

**NEC AAP Reg 18 Consultation Draft  
Core Site response October 2020**

**APPENDIX ONE: DETAILED COMMENTS ON POLICIES AND TEXT**

Section	Comments
1.1 Our Vision for NE Cambridge	Strong vision which aligns closely with the emerging promises and values for the Core Site .
1.2 Connected and integrated	What is the intention of the drawings? How prescriptive? General concerns over framework drawings (see main reps). Do not support showing Diagonal on Strategic Framework drawings - even only as a strategic route for pedestrians and cyclists.
1.3 Social and cultural	Is the right question asked? How could people be expected to 'know' or answer?
1.4 Homes and workplaces	As 1.3.
1.5 Social & Cultural Facilities	As 1.3 – can't just ask 'are these the right facilities' without considering other constraints including capital & revenue funding. Concern about allocation of school in/adjacent to Cowley Road centre – we can't commit to this as yet. Concern about allocation of all schools on Core Site. What about other landowners?
1.6 Building Heights & Density	As 1.3 – see comments at 5.4 below.
1.7 Open Spaces	'Cowley Triangle' very prescriptive when we don't even know if we can locate greenspace there – due to existing & proposed infrastructure and we'd like to restore some Victorian buildings in that location. But in general proposals for green infrastructure and linkages across and beyond NEC are welcomed (eg linear park on First Drain and connecting with the greenway).
1.9 Discouraging car use	Net neutrality over time – as confirmed by County Council officers. This is not suggested in current draft version.
<b>Section 2: Context &amp; Objectives</b>	
2.1 Context	Positive section and good use of infographic and diagrams.
2.2 Strategic Objectives	Good balanced set of objectives – but often difficult to disagree with at this level. Are developers to be required to demonstrate how they are achieving them when applications come forward?
<b>Section 3: A Spatial Framework for North East Cambridge</b>	
3. A spatial framework for North East Cambridge	Key spatial framework diagram (oddly) buried on page 39. General concerns over diagrams. Especially the Diagonal, greenspace especially the 'Triangle'; locating retail + quantum and community facilities, when in reality they may end up in slightly different locations. Page 40 – 'housing-led' designation for CNFE, what does this mean? We are developing a mixed use city district.
Policy 1: A comprehensive approach at North East Cambridge	Upfront should be a clear policy support for the relocation of the Waste Water Treatment Plant. Otherwise good and strong policy but enshrines spatial framework drawings in policy - with all their inherent weaknesses. 'Jobs' not floorspace target.

**Section 4: Climate change,  
biodiversity and water**

Policy 2: Designing for the climate emergency

Focused on individual buildings – needs a site-wide approach eg on masterplanning for climate change; on transport and neighbourhood hubs. Plus infrastructure? Also add something on post-occupancy evaluation?  
Unfortunate lag in evidence base (Greater Cambridge Net Zero study).  
Policy focused on here & now – how is it to be future-proofed?  
a - Construction Standards: Good aspirations – welcome construction certification requirements such as BREEAM Excellent/ Outstanding. Also support the need for a site wide community sustainability framework.  
However there are limitations to the use of particular frameworks. Passivhaus is better for operational carbon reduction and there are concerns over use of BREEAM communities. Other tools are more flexible – given timescales involved this is essential.  
b - Adaptation to climate change: All flat roofs must contain an element of green roof provision (p51) – Is this the right approach? What about if it's used as a communal / private terrace? What about solar panels? Should prescribe standards and allow developers flexibility in achieving them according to the site and building rather than arbitrarily dictating eg green/brown roofs.  
Fully support the move to undertake CIBSE TM52 and 59 analysis in order to inform design and ensure comfort is addressed. Modelling alone is not enough but requires adjustments to designs to be undertaken.  
c - Carbon Reduction: Aspiration is good and pleased that further work will be done. Is there a recognised form of 'Assured Performance Certification'? What about a prohibition on use of fossil fuels on site?  
d - Water – see policy 4 below.  
e - Site Construction Waste. Good to see this addressed but opportunity has been missed to set a holistic benchmark target for construction waste. What about infrastructure waste?

Policy 4a: Water efficiency

We want to achieve the 110lpppd target and go further but there must be a level playing field in NEC and across Greater Cambridge in general. Rainwater harvesting and greywater provisions need to be planned in now so that they can be built into the masterplanning. Feasibility work underway but AAP must reflect demands of potential landtake and loss of developable area.  
More consideration needs to be given to external demands eg irrigation. And encourage use of water recovery systems on site.

Policy 4c e): Flood risk and sustainable drainage

Reference to Strategic Flood Risk Assessment questioned – Strategic FRA very different to an FRA supporting a planning application. The Strategic FRA would be at plan level and produced on behalf of GCSPS.

Policy 5 Biodiversity and Net Gain

Policy supported but long-term habitat management needs to be put in place.

## Section 5: Design and built

### Character

Policy 6b: Design of mixed use buildings

c) Ensure that the form, architectural design and layout clearly articulate the intended uses within a development – Given how we expect uses to start blending especially post-Covid (What happens to retail? Where do we work?), this may not be as clear. In addition the document specifically talks about flexible forms of use and this is not in line with ‘clearly articulating the intended use.’

e) Active ground floor uses. Agree in principle but this is at odds with the low cap on non-residential use on the Core Site and viability of ground floor uses.

Page 79. “The Council will lead on the production of a site wide design code for the North East Cambridge area that will require input from the various landowners and their design teams.” Our understanding was the design code will be led by us and will apply to the Core Site only and not that there will be an overarching design code for the whole AAP led by the council. Many measures set out in the draft AAP are in actual fact more appropriate for a design code.

Policy 7: Legible streets and spaces

While the style and character of the diagram is great – appealing and visually friendly – the level of detail and prescription on street design and dimensions are yet again very prescriptive and appear very fixed. This level of detail is normally expected in a design code not in an AAP Framework diagram. If this diagram and annotation are for illustrative purposes we would welcome it but it is vital that this is stated somewhere clearly and well visible.

Also it is important to note that not all primary streets will look and be designed the same, equally for secondary and tertiary streets. Widths need to respond to the height and scale of the building as well as their function in the hierarchy.

At present, all seem to require frontage-to-frontage distances of 21m, which would make all streets feel the same regardless of hierarchy. Moreover within the current approach to the Core Site masterplan design only Cowley Road is set to meet a 21m distance, whilst even some primary streets within the scheme would not do this in order to create streets that are pedestrian priority rather than vehicular.

Figure 18, page 85: 3m wide terrace gardens in front of ground floor homes – This is very prescriptive and detailed and may well not be appropriate for all typologies on secondary streets.

Policy 8: Open spaces for recreation and sport

Green spaces are overly prescribed – even to the level of naming them. We simply don’t know if the ‘Cowley Triangle’ can be provided here because of constraints work yet to be undertaken and its shape is defined by a route (Diagonal) that is inconsistent with our draft masterplan.

Page 98 – figures should be a minimum on green space – we think we can provide more.

Policy 9: Density, heights, scale and massing

Continued concerns about provisions with regard to density, heights, scale and massing. The prescriptive format of the diagrams is not underpinned by density studies and risks creating obstacles in the delivery of a compliant scheme.

Ongoing concerns over incompatibility of block structure shown with our emerging masterplan.

Page 105 - A quick analysis by Urbed of the residential densities set out in the draft suggests a maximum capacity using the AAP figures of 12,167 units (see Appendix 4). The approach should be reconfigured as ‘heat maps’, less definitive and

	<p>feature minimum densities to be achieved. This is one demonstration of our concerns over the diagrams and how they might be read in a 'binary' rather than more nuanced way.</p> <p>Height restriction of six storeys adjacent to A14 – may be overly restrictive and should be reviewed in line with emerging acoustic strategy in due course.</p>
Policy 10b: District Centre	Concerns over quantum and location of High Street (Cowley Road vs Diagonal)
Policy 10e: Cowley Road Neighbourhood Centre	<p>Retail uses: 3,000m<sup>2</sup>– This is very specific, should state a range with a higher maximum. We do not yet know if this is the right amount of retail here, further work and studies are needed before this is, eg on connectivity and movement.</p> <p>Schools: Need further work to establish proposed location of schools and relationship to proposed neighbourhood centres. Disagree with safeguarding for secondary school which is not supported by the evidence base.</p> <p>Milton Road Crossing: The AAP is very specific about a bridge across Milton Road but the need for a bridge has not yet been established, an at-grade option is still being considered.</p>
<b>Section 5: Jobs, homes and services</b>	
Policy 12a: Business	'An element of new business floorspace' ( <b>see comment on UCO changes below table</b> ) insufficient. We are looking for 77,400m <sup>2</sup> in our emerging masterplan. We are developing a mixed use city district not a housing estate next to a business park.
Policy 12b: Industry, storage and distribution	Welcome proposals for 10% 'affordable' industrial floorspace and small 'last mile' delivery & distribution hubs.
Policy 13a: Housing	<p>Welcome provision for specialist housing; 60% of affordable tenure being social/affordable rent.</p> <p>Shortfall of affordable housing from BTR shouldn't fall upon other developments including Core Site to address.</p>
Policy 13c: Build to rent.	<p>Welcome distribution of BTR across developments.</p> <p>However, BTR cap is too low across NEC – need to recognise appealing to an international / global audience that want to rent.</p> <p>Proposals on breaks in tenancies – unsure if commercially acceptable to BTR operators.</p>
Policy 13e: Custom build	Notwithstanding the challenge of providing custom build at scale, greater than 2% of 'custom finish' should be achievable, particularly as the industry innovates over time. A higher aspiration would be welcomed. Policy support for group custom build (ie cohousing) would be welcomed.
Policy 14: Social, cultural and community infrastructure	<p>Welcome broad range of community infrastructure proposed, particularly visual &amp; performing arts hub (though the evidence base is perhaps a little weak) and community garden. Also the co-location of facilities and services which would help to provide additional gravity to the Cowley Road centre.</p> <p>However, some of this (eg swimming facilities) could be costly and burden shouldn't fall disproportionately on the Core Site.</p> <p>Question whether all schools should be located on Core Site and the health facilities. Insufficient evidence requiring safeguarding of land for secondary school.</p>

	Cultural placemaking strategy is useful.
Policy 15: Shops and local services	How will Use Classes Order changes impact on provisions (Class E contains B1 + A Classes)? The maximum size of 150m <sup>2</sup> and restriction on merging of units are too onerous – need some flexibility to account for changing retail trends over the years.
<b>Section 7: Connectivity</b>	
Policy 16: Sustainable Connectivity	Support the policy objectives, the measures to reduce car-based travel, the wider connections including green space. However the concept of net neutrality will not be possible either 1) for the Core Site alone (because of very low levels of existing traffic) or 2) in the short term across NEC. This has been recognised by officers of Cambridgeshire County Council. The draft AAP needs to acknowledge this and not introduce dependencies on the Core Site in relation to other users reducing their volume of parking or trips.
Policy 17: Connecting to the wider network	i) Milton Road crossing: Form of crossing as yet undetermined. Adjoining landowners, whose land would be required for construction of a bridge, are known not to favour such a crossing and delivery could therefore prove protracted. The policy should not predetermine the nature of the crossing here.
Policy 19: Safeguarding for CAM	Whilst the transformative nature of a CAM system is recognised and the policy supported, the current proposed area lacks definition. At Examination, an Inspector will need to be convinced that there is a reasonable prospect of the scheme being delivered and the area to be safeguarded will require clearer justification and definition.
Policy 22: Managing motorised vehicles	The policy states that development will not be permitted if vehicles exceed the trip budget, however the budget has been proposed for the entire area as a whole and therefore it is unclear as to how the trip budget for the individual sites will be apportioned. Final version of the Transport Addendum evidence base has yet to be made available. With very little parking currently available on the Core Site, objective a) of this policy cannot be applied to it; b) is supported and we aim to go further than the number of parking spaces allocated in the draft AAP. The current policy is wholly unrealistic in expectations as to the potential for reduction of existing parking and the complex pattern of long-term leases in place on the Science Park in particular.
<b>Section 8: Development process</b>	
Policy 23: Comprehensive and co-ordinated development	Policy generally supported but note comments on infrastructure delivery plan and ensuring all NEC developments contribute proportionately under policy 27 below.
Policy 24a: Land assembly	Support the use of CPO to prevent piecemeal or inappropriate development coming forward. Although it can't neatly be encapsulated in policy wording, the 'threat value' of CPO should not be underestimated and the process as a result truncated where possible.
Policy 24b: Relocation	Support policy and in particular the sequential approach to relocation. This policy should also refer to the high levels of growth to be enabled by the relocation of the Waste Water Treatment Plant in the first instance.

Policy 25: Land contamination	<p>The policy refers to both ‘contaminated land’ and ‘land contamination’. It has been assumed that the latter term is intended throughout rather than former which has a distinct and specific statutory significance for land designation under EPA Part IIA.</p> <p>g) It is unclear why these particular land uses are singled out - residential with private gardens are a more sensitive end use (in respect to land contamination) and it would be a primary role of the Phase 2 and dependent assessments to determine the suitability of any land for a particular end use.</p>
Policy 26: Aggregates & waste sites	<p>Despite the protected nature of the sites, policy aspirations for their relocation in the longer-term could be more fully set out. In particular we would like to see early relocation of the Veolia waste facility which is not hampered by the need for railway access and sidings.</p>
Policy 27: Planning contributions	<p>We accept the need to contribute to NEC-wide infrastructure as well as to provide that necessary to support development of the Core Site. However, the late production of the Infrastructure Delivery Plan, coupled with the associated viability work, has a number of significant implications. It means that assertions as to the level of development (and hence scale, density and building heights) required across NEC to support the infrastructure development and place making cannot be tested. Also there is a risk of early developments not being sufficiently caught – either due to existing (modest) capacity or by failure to have an appropriate infrastructure tariff or similar in place.</p> <p>Aspirations for early funding of strategic infrastructure but this must be cashflowed by public sector (eg use of PWLB funding).</p>
Policy 28: Meanwhile uses	<p>Support this policy including use of existing buildings which would otherwise remain empty.</p>
Policy 29: Employment & training	<p>Support the policy. Targeted focus on construction upskilling would be useful as there no agreed targets for skills training is in place.</p>
Policy 30: Digital infrastructure and open innovation	<p>Policy supported – particularly the application of technology in the public realm, data collection and management and ‘future mobility’ including assisting sustainable travel choices in the round.</p>

See section on Development quanta and trajectories on following pages.

## **Section 8.9: Development Quanta and Trajectories**

The draft AAP proposes non-residential floorspace figures quanta that are significantly below those which we have been adopting for the purposes of our emerging masterplanning.

The trajectory across each five year period is set out in Table Two below and comparisons against the total quanta currently allocated in Table Three. These relate to the old Uses Class Order categories for ease of reference to the figures in the draft AAP.

This is a key issue for the Core Site representation – we require much greater non-residential floorspace than currently projected in the AAP which inhibits quality place making and viability of the development as a whole including restricting our ability to fund infrastructure and other essential community benefits.

**This consultation being undertaken in light of ‘old’ Use Classes Order. But with move of B1 to E class how will it be handled in future? In principle this could be significant and welcome as it would allow flexibility across ‘town centre’ type uses office / retail / services.**

**Table Two: Indicative floorspace figures for the purposes of Core Site masterplanning**

Land Use		April 2020 - March 2025		April 2025 - March 2030		April 2030 - March 2035		April 2035 – March 2040		Totals	
		sqm	Units	sqm	Units	sqm	Units	sqm	Units	sqm	Units
<b>A1-5</b>	Shops, Financial and professional services, Food & drink, drinking establishments, ot food takeaways	1250		5893		3325		1208		11676	
<b>B1 (inc. B1a, B1b, B1c)</b>	Business	10449		23762		27686		9290		71187	
<b>B2</b>	General Industry (temp + perm)	2490		1858		0		0		4348	
<b>B8</b>	Storage or distribution (temp + perm)	929		929		0		0		1858	
<b>C1</b>	Hotels	0		11788		0	-	0		11788	
<b>C2</b>	Residential institutions			0		0		0		0	
<b>C3</b>	Dwelling houses	0	137	0	2100	0	2100	0	1258		5595
<b>C4</b>	Houses in multiple occupation	0		0		0		0		0	
<b>D1</b>	Non-residential institutions	1640		4701		3437		465		10243	
<b>D2</b>	Assembly and leisure	884		0		465		0		1348	
<b>Other</b>	Sui generis (e.g. student/shared living)		0	9290	289	9290	289			19159	
<b>Other</b>	Parking/Transport Hubs	3612		8630		14941		2601		29784	
<b>Total</b>		21253	137	66852	2389	59144	2389	13564	1258		



The above figures have been calculated from masterplan drawings and are indicative only – the level of precision should not be inferred. ‘Old’ Use Classes Order refers.

**Table Three: Comparison between land use allocations, draft AAP and Core Site masterplanning**

Some figures are rounded in the table below from the figures in Table Two above. ‘Old’ Use Classes Order refers.

Land Use	Draft AAP (Figure 47)	NEC Proposed	Net Difference
Residential	5,500 (units)	5,600 (units)	-100
Employment*	23,500 (sqm)	77,400 (sqm)	-53,900 (sqm)
Retail**	3,700 (sqm)	11,700 (sqm)	-8,000 (sqm)
Community and Culture***	5,700 (sqm)	42,000 (sqm)	-36,300 (sqm)

\*B1-B8

\*\*A1-A5

\*\*\*C1, C2, D1, D2 and Sui Generis

**We would welcome continued engagement with the AAP team on these issues.**

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October 2020**