



**National
Trust**

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Greater Cambridge Shared Planning
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Dear Sir/Madam

Draft North East Cambridge Area Action Plan

I refer to the recently published Draft North East Cambridge Action Plan (NECAAP) which is currently the subject of a consultation exercise.

The National Trust has significant land holdings in the locality of the North East Cambridge Area and has therefore considered the potential impact on that land from the proposals within the draft NECAAP. The Trust owns Anglesey Abbey (a Grade I Listed Building set within a Grade II* Registered Park and Garden and an estate which extends to over 46ha) and approximately 800ha of land at Wicken Fen, a National Nature Reserve and designated SSSI and an internationally designated Special Area for Conservation and Ramsar site. Beyond its own landholdings, the Trust has an interest in the extensive area of land in the corridor between the River Cam and the B1102 stretching from the A14 in the south to Wicken village in the north. This land is recognised as the “Wicken Fen 100 Year Vision Area” and the Trust, working with partners and landowners, has a long-term ambition to see this 5,300ha area managed for nature conservation with improved public access for recreation, community engagement and learning.

The plans for the site at North East Cambridge (NEC) are radical and ambitious, involving the proposed development of a whole new “city district” which will accommodate at least 8,000 new homes and deliver 20,000 new jobs within the 182 hectare site. This will be achieved

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mainly through redevelopment of the areas to the east of Milton Road (principally for housing) and the intensification of existing employment sites in the Science/Business Park area to the west of Milton Road. The site will also deliver 3 primary schools, retail floorspace, 10 hectares of public open space and safeguard a site for a secondary school.

The NEC site has the benefit of proximity to Cambridge city centre and to public transport hubs (Cambridge North Rail Station; Guided Busway route) and strategic cycle routes and is well-located in terms of linkages to jobs, services and recreation. The indicative layout shows a hierarchy of streets that would limit vehicle movements (other than buses) within the residential areas and improve cycle/walking links with neighbouring areas, the city centre and the public right of way network beyond the site, particularly to the north and east. In the redeveloped areas there would be a vertical mix of land uses; a high proportion of affordable housing; energy/water efficiency designed into buildings and an expectation of 10% net gain in biodiversity throughout. Overall, the site scores very well against many indicators of sustainability: it's a brownfield site; it's well-located with good connectivity; it's outside the Green Belt; it's large enough to deliver a whole new community and provide both homes and jobs.

In general terms, the National Trust would support the principles which guide this approach to the redevelopment of the site. Nevertheless, the Trust has serious concerns about the scale and intensity of development proposed for the NEC site and the consequences that this will have for the ongoing management of National Trust land, including the safeguarding of internationally designated sites within that land. The National Trust also has doubts about the deliverability of the modal shift that underpins the density of residential development that the Area Action Plan seeks to achieve. These concerns are set out in detail below.

Residential density and deficiency in publicly accessible open space

The intensity of residential development is radical and a distinct departure from existing residential neighbourhoods in the locality. Densities within the proposed development range from 75 dwellings/hectare to 385 dwellings/hectare with the vast bulk expected to exceed 225 dwellings/hectare. To achieve such high densities tall buildings (up to 13 storeys in the core of the District) are proposed across much of the land east of Milton Road.

In addition to the high density of the residential development, there is very little of the NEC site that would not be developed land. There are only two significant areas of public open space proposed (totalling around 10 hectares) the largest of which is a "linear park" sited between high density blocks. The shape and context of a linear urban park clearly limits its range of use as it offers less potential for formal recreation (e.g. football pitches) or informal kickabout/dog walking. It is also not clear how much of this undeveloped space would need to be set aside to meet the need for Sustainable Urban Drainage (i.e. swales and lagoons to address flood risk). The 10 hectares would be expected to meet the needs of a population of around 18,000 people yet the public open space standards of the adopted Cambridge City Local Plan would expect a new population of this size to be provided with around 70 hectares in a mix of formal, informal, play and allotment space. Even the Open Space Topic Paper which forms part of the evidence base for the Draft NECAAP estimates that around 66ha of

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public open space will be required to serve the residential community within NEC. This means that the residential development would be provided with barely 15% of the open space provision that would be expected for a community of this size.

A new community of the size proposed for NEC, served by so little useable open space will inevitably generate greater recreational pressure upon publicly accessible open space in the areas beyond the city fringe. The planned improvements to linkages to the existing public rights of way network could only add to that impact. The areas of open space that would be most affected are the Milton Country Park and the National Trust land at Wicken Fen. These are areas that will already be expected to experience increased recreational pressure arising from the recently approved developments at Waterbeach. This increased recreational pressure would have consequences in terms of the ongoing maintenance and management of National Trust land and could even pose a threat to the condition of the Wicken Fen Ramsar/Fenland SAC. In fact, prompted by the proposals for Waterbeach, the National Trust commissioned a visitor survey to establish the range/profile of its visitor "catchment" to Wicken Fen; how this might change as a consequence of the proposed expansion of Waterbeach; and the threat that additional visitor numbers would pose to the Trust's endeavours to protect vulnerable habitats within the Wicken Fen Nature Reserve (designated SSSI, Special Area of Conservation and Ramsar Site) as well as safeguarding the quality of the recreational experience that Wicken Fen and the Vision Area offer to visiting members of the public. I have included a copy of the Footprint Ecology Report with this letter for information.

The Footprint Ecology Report is a robust piece of research which shows the extensive size of the catchment for visits to Wicken Fen and the high proportion of repeat visits made by local residents, many of whom are accessing the site via the Public Rights of Way network. The proposed development at NEC would add a significant population to the local area and, without adequate provision for recreation within the site, the inevitable consequence is increased pressure on sites like Wicken Fen.

It is of note that the draft Habitat Regulations Assessment (HRA) that accompanies the Draft NECAAP is very clear about the threat of increased recreational demand at Wicken Fen arising from the proposed development and it also makes reference to the Footprint Ecology Visitor Survey results. The relevant extract from the HRA states:

5.30 Wicken Fen Ramsar and a component part of Fenland SAC are located 10km to the north-east of North East Cambridge boundary and is subject to high levels of recreation every year. The National Trust records over 65,000 visitors to at their visitor centre with more people using the access network in the Wicken Fen Vision Area each year. Following a recent visitor study of the Wicken Fen Vision Area, visitors to the European sites comprised of first-time visitors travelling a greater distance in the wider area and visitors from the local area who visit the site two to three times a month.

5.31 Key activities undertaken by visitors to the European site included dog walking and walking. Other activities recorded at lower levels included cycling, bird/wildlife watching and photography. These activities have the potential to adversely affect qualifying habitats of the

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Ramsar site and SAC, which are fragile and susceptible to damage and disturbance to vegetation from trampling and illegal activities, such as bonfires and vandalism to contamination from litter and dog fouling and disturbance of livestock from dogs, which prevents the successful management of habitats being grazed.

5.32 Although, the Information Sheet on Ramsar Wetlands for Wicken Fen Ramsar and the Standard Data From and Natural England Site Improvement Plan for Fenland SAC do not highlight recreation as a key threat, due to the high levels of visitors to this site there is potential for impacts to the qualifying feature of the Ramsar site from recreational pressure to occur. Given the NECAAP will result in the provision of an additional 8,500 dwellings within the 20km ZOI for these sites, there is potential for AEol (Adverse Effect on Integrity) to occur alone and in-combination with the Greater Cambridgeshire Local Plan and other surrounding local authorities without any mitigation measures.

5.33 The Ramsar site and overlapping SAC are well managed by the National Trust. Existing management measures are expected to provide some level of mitigation for increased recreational pressure to the sites. These measures include controlling access to the site by requiring permits before entry, zoning remote areas away from the central hub to protect habitats from damage and disturbance and engaging with visitors at their visitor centre. However, it is recommended that discussions are undertaken with the National Trust to determine exact measures that will be required to mitigate for impacts to Wicken Fen Ramsar and Fenland SAC. This will be undertaken alongside the development of the NECAAP and will be outlined at a later iteration of this report.

Unfortunately, the draft HRA makes the assumption that the delivery of sufficient recreation space within the development will help to mitigate the impact of the increased recreational pressure arising from the new development. However, as outlined above, the proposed development falls far short of the public open space provision required by the adopted Cambridge City Council Local Plan and falls even further short of the green space provision recommended by Natural England in their response to consultation on the earlier Issues and Options report on the NECAAP. The Natural England recommendation, as advocated by the Suitable Alternative Green Space (SANGS) Guidance, is for 8ha/1000 population. This would equate to a provision of over 140 hectares of green space in the NEC site.

The draft HRA recommends that the green space provision advocated by Natural England is implemented within the development “to ensure that increased demand for recreation is focussed away from Wicken Fen Ramsar and Fenland SAC”. This clear recommendation within the HRA has not been reflected in the draft policies of the NECAAP that concern provision for public open space. In fact, despite stating that there is an “expectation that all open space requirements will be met on site”, Policy 8 allows for under-provision of strategic open space where the development site is too small, or provision can be made off-site through way-finding or increasing capacity at neighbouring areas of public open space such as Milton Country Park. Surely, the Action Area Plan is the appropriate place to identify the required area of open space rather than to encourage a piecemeal approach that will fail to deliver the scale and range of space required.

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This failure to secure adequate recreation space within the NEC site raises serious concerns for the National Trust's ability to prevent a consequent detriment to the integrity of designated European Sites for which it has responsibility. In addition, no approach has been made by the Greater Cambridge Partnership to the National Trust to "determine exact measures that will be required to mitigate for impacts to Wicken Fen Ramsar and Fenland SAC" as recommended by the HRA. This dialogue should ideally be developed with the organisational leads of the Cambridge Nature Network (Cambridge Past Present and Future and the Wildlife Trust) and should explore further research into the scale and impact of the increase in recreational pressure at sites beyond Cambridge (building on the Footprint Ecology work) and the scope for alternative off-site provision of green space to serve the new community.

Assumptions about the level of car use

The allocation of land use within the Draft NECAAP relies on a very optimistic assumption of the level of car use by residents of the new community. The car parking standard that would apply is a **maximum** of 0.5 spaces per dwelling, most of which would be accommodated in "car barns" (multi-storey car parks). Certainly, the prospects of achieving high levels of cycling and walking are better on a site at the edge of Cambridge than elsewhere in the country. However, there doesn't appear to be any evidence to show that such a low level of car parking provision has been achieved in other similar scale developments within the UK or Europe and, if this low level of provision proves over-optimistic, the consequences for the quality of the residential environment could be dire. There have certainly been cases elsewhere in East Anglia where a lack of sufficient provision for car parking (due to ambitious maximum parking standards) resulted in unwelcome on street parking that obstructed public transport routes and access for emergency vehicles and compromised safe pedestrian movement. The high-density nature of the proposed development leaves little scope to address the problems that might emerge if the shift turns out to be from petrol car to electric vehicle, particularly for families.

Potential impact on water quantity and quality at designated sites

The draft HRA highlights the potential impact of the development upon water quantity and water quality at European designated sites in the locality. The HRA confirms that in the absence of a Water Cycle Study it cannot be concluded that there will not be adverse effects on the integrity of the Wicken Fen Ramsar/Fenland SAC. It is understood that a Water Cycle Study has been prepared in connection with the Greater Cambridge Local Plan and that this takes into account the development proposed in the Draft NECAAP. Beyond the requirement for a Water Cycle Study to determine whether measures can be secured that would ensure that adverse effect are avoided, the HRA recommends a commitment to a Water Recycling Centre that can cope with the additional demand (for sewage treatment and waste water capacity) that will arise from the development. The Trust is aware that the development of NEC is predicated on the relocation of the Milton WWTP, however, the new site for the WWTP has not yet been settled and the proposals will be subject to the Development Consent Order process. In advance of this decision, the Trust would hope for an assurance that whichever site is chosen for the new WWTP, it will be designed to meet the increased demand in a manner that avoids any adverse effects on the integrity of the Wicken Fen Ramsar/Fenland SAC in relation to water quantity and quality.

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In conclusion, the draft NECAAP envisages an extremely ambitious intensity of development for a site at the edge of Cambridge's urban area. The strategic vision for the site is:

an inclusive, walkable, low-carbon new city district with a lively mix of homes, workplaces, services and social spaces, fully integrated with surrounding neighbourhoods.

Curiously the strategic vision makes no reference to the recreational needs of the new community and the serious deficiency in green space provision causes the National Trust to raise objection to the intensity of residential development that the Draft NECAAP aims to deliver. Judged against the standards of the adopted Cambridge City Local Plan, the proposed residential development within NEC would be provided with barely 15% of the quantum of public open space expected for a community of 18,000. The dramatic deficiency in the scale and range of open space provision will generate increased recreational pressure at neighbouring publicly accessible green spaces, including the Trust's Nature Reserve at Wicken Fen. Without adequate mitigation this increased recreational pressure has the clear potential to cause harm to the integrity of the Wicken Fen Ramsar/Fenland SAC. These concerns have been highlighted in representations at the Issues and Options stage and through the HRA process but have not been properly addressed in the Area Action Plan. This failing, compounded by a very optimistic assumption about the level of car use, would deliver a less than satisfactory living environment for the new community and potential harm to sensitive environments beyond the site. The National Trust considers that these matters need further review and research (following dialogue with the organisational leads for Cambridge Nature Network) into the scale and impact of the increase in recreational pressure at sites beyond Cambridge and the scope for alternative off-site provision of green space to serve the new community.

Yours faithfully

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