

For office use only
Agent number:
Representor number:
Representation number:



Draft North East Cambridge Area Action Plan Consultation 2020

Response Form

How to use this form

If you are able to, please comment online at www.greatercambridgeplanning.org/nec. You can comment on part or all of the Draft Area Action Plan online, and your response can be analysed more quickly and efficiently if you do so.

If you wish to comment using this form, please note we will transcribe all your responses into our online consultation system, and they will be published as part of our consultation feedback.

There are three parts to this form. Please fill in the form electronically or in black ink.

All comments must be received by **5pm on Monday 5 October 2020**. Thank you for taking the time to respond to this consultation.

Part A – Your details

- We ask for your name and postal address because the Councils must comply with national regulations for plan-making. We also ask for contact details but it is optional for you to give these. Please be aware that if you do not provide contact details and 'opt-in' to future notifications, we will not be able to notify you of the future stages of the North East Cambridge Area Action Plan.
- Your name will be published alongside your representations on our website, but your email address, address and phone numbers will not.

Part B - Response to the ten big questions

- This section asks you to answer ten important questions about the Area Action Plan. You can answer some or all.
- Each question has a multiple choice answer and the opportunity to add further comments.

Part C – Comments on specific policies and supporting documents

- You can comment on specific policies in the draft Area Action Plan, and on the draft Sustainability Appraisal, draft Habitats Regulations Assessment and draft Policies Map.
- Please copy this part of the form as many times as you require. You should complete a separate response for each policy or supporting document you wish to comment on.




If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or nec@greatercambridgeplanning.org


Part A – Your Details

Please note that we cannot formally register your comments without your name and postal address, because the Councils must comply with national regulations for plan-making.

We also ask for contact details but it is optional for you to give these.

If you do not provide contact details and 'opt-in', we will not be able to notify you of the future stages of the North East Cambridge Area Action Plan.

Name:	Matthew Asplin	Agent's name: (if applicable)
Name of organisation: (if applicable)	N/A	Name of Agent's organisation: (if applicable)
Address:		Agent's Address:
Postcode:		Postcode:
Email (optional):		Email (optional):
Telephone (optional):	-	Telephone (optional):

Signature:		Date:	27 th September 2020
If you are submitting the form electronically, no signature is required.			

Data Protection

We will treat your data in accordance with our [Privacy Notice](#). Information will be used by South Cambridgeshire District Council and Cambridge City Council solely in relation to the North East Cambridge Area Action Plan. Please note that all responses will be available for public inspection and cannot be treated as confidential. Comments, including your name, are published on our website, but we do not publish your address or contact details. **By submitting this response form you are agreeing to these conditions.**

The Councils are not allowed to automatically notify you of future consultations unless you 'opt-in'. Do you wish to be kept informed about future planning consultations run by the Greater Cambridge Planning Service on behalf of Cambridge City Council and South Cambridgeshire District Council?

Please tick: **Yes** No

Part B – Response to the ten big questions

1. What do you think about our vision for North East Cambridge?

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

Further comments:

The draft plan document is very well presented with some pleasing infographics that set out a professional view of the vision for North East Cambridge. However, beneath the polished cover there appears to be a number of concerns that are at risk of being glossed over:

Integrated Planning: The current draft plan proposed hinges on relocation of the Water Treatment Plant to a likely Green Belt location in contravention of Green Belt policies, at a considerable cost and with a corresponding impact on the time to delivery of housing. Given the post Covid 19 economic crisis and the fact that there is no operational need to relocate the plant, this casts into question whether the spend is appropriate and the legitimacy of the current draft plan. This is compounded further by the fact that considerable sums were invested in the current water treatment plant in 2014 / 2015 to future proof the operational capability.

Use of a Development Consent Order to relocate the Treatment Works under a Nationally Significant Infrastructure Project could potentially be misleading as it implies the move is required to maintain national infrastructure, which is not the case, but prevents the overall programme from being viewed in a holistic integrated manner.

Recent responses to the Call for Sites under the Greater Cambridge Local Plan provided 656 sites, well in excess of that needed for development. Although these sites have yet to be determined from a planning perspective, this output should also be considered in relation to the North East Area Plan in terms of cost, optimum delivery of housing needs and time to delivery.

A ‘Once in a Generation Opportunity’:

Cambridge is expanding and driving demand for both residential and commercial development on the outskirts of the city. The current proposed locations for the Water Treatment Works are being driven primarily by cost and are therefore proposed to be at nearby Green Belt locations, which is just moving the issues with odour and noise to other local communities and creating the same problem for the next generation, when the plant needs to be relocated again.

The Treatment works should therefore either remain at its current location or be considered on a long term integrated planning basis as opposed to being divested to a third party company in isolation.

Risk / Feasibility:

Neither the Draft Area Action Plan, nor the proposed Waste Water Treatment Plant relocation appears to be underpinned with a suitable level of investigation or feasibility study to gain surety of either proposal. This represents a risk to delivery of both plans.

2. Are we creating the right walking and cycling connections to the surrounding areas?

- Yes, completely
- x **Mostly yes**
- Neutral
- Mostly not
- Not at all

Further comments:

Peripheral connections should also be considered, especially those that use existing river crossings, such as the footpath from the B1047 to Baits Bite Lock. This is used by many in the summer but is virtually impassable and dangerous to cyclists in the winter. Only the initial footpath at the B1047 end would require attention and the remainder of the connections are already built up. This would provide ready cycle access to NEC for those East of the River Cam, without having to venture to Waterbeach or Chesterton to cross the river and follows the principle of minimising car travel.

3. Are the new 'centres' in the right place and do they include the right mix of activity?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

4. Do we have the right balance between new jobs and new homes?

- Yes, completely
- Mostly yes
- x **Neutral**
- Mostly not

Not at all

Further comments:

The Draft plan recognises the need to monitor the Covid 19 situation, but would have to question if the balance is current at time of issue given the change in working practices and the gravitation of demand away from high density residential development close to employment.

5. Are we are planning for the right community facilities?

Yes, completely

Mostly yes

x **Neutral**

Mostly not

Not at all

Further comments:

Although a secondary school has been considered via reservation of space, this would benefit from further clarification. It is difficult to see how a secondary school would not be required unless the plan in the near term is to travel to outlying communities, which would seem to contravene key design principles.

The plan would also benefit from an infographic clarifying the design criteria in terms of target market / anticipated generation profile. This would also help in assessing the sufficiency of other community facilities and the potential for achieving and retaining the sense of community.

6. Do you think that our approach to distributing building heights and densities is appropriate for the location?

Yes, completely

Mostly yes

Neutral

Mostly not

x **Not at all**

Further comments:

The densities appear to be very high compared to other developments in Cambridge / other large Towns & Cities and not in keeping with the surroundings. Recent examples of high density housing, at a very much lower level, such as Orchard Park have not been particularly successful in retaining a sense of community.

7. Are we planning for the right mix of public open spaces?

- Yes, completely
- Mostly yes
- Neutral
- x **Mostly not**
- Not at all

Further comments:

The current proposal which includes relocation of the Water Treatment Works will have a significant detrimental impact on open spaces in general.

8. Are we doing enough to improve biodiversity in and around North East Cambridge?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- x **Not at all**

Further comments:

No, to the contrary, reviewing the North East Cambridge (NEC) area in isolation and disassociating relocation of the Water treatment works does not provide a true reflection of the impact on biodiversity.

The three relocation sites currently proposed by Anglian Water are all Green Belt locations. It is most unlikely that the provisions around NEC will make up for the impact on the Green Belt and corresponding biodiversity resulting from the relocation.

Anglia Water is on record as stating that provision of infrastructure should not be governed by Green Belt Policies. Furthermore, the key governing consideration in the relocation would currently appear to be cost, not suitability or biodiversity.

If the NEC development is to be considered on a truly integrated basis, then it should consider all impacts and be viewed holistically, including relocation of the Water Treatment Plant, acknowledging that a significant element of the 182 hectares being badged as Brownfield development, will be at the expense of the Green Belt.

9. Are we doing enough to discourage car travel into this area?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not
- Not at all

Further comments:

10. Are we maximising the role that development at North East Cambridge has to play in responding to the climate crisis?

- Yes, completely
- Mostly yes
- Neutral
- Mostly not**
- Not at all

Further comments:

The Draft Plan in itself seeks to mitigate the climate crisis through ensuring general design principles are efficient.

However, conversely, the Draft Plan currently proposed, seeks to relocate a major water treatment works currently sited on contaminated land, which has no operational need to relocate.

Embarking on a substantial construction / relocation, that is not without risk on many levels, to a greenbelt location, would not seem to be maximising the role in responding to the climate crisis.

The feasibility studies now concluded and referenced on p32 of the plan, as set out in the 2018 Adopted Local Plans do not appear to have been published.

There doesn't currently appear to be a comprehensive evaluation of the combined impact, including the relocation activity as such this cannot be considered to be maximising the role the North East Area Action Plan has to play in responding to the climate crisis.

Part C – Comments on specific policies and supporting documents

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	2.1.6 Planning context p32 para 3
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space. Please copy this page for each policy or part of the document you are responding to.</p>
<p>The Minerals and Waste plan 2011 currently safeguards the existing water treatment works site. As noted on page 32 the Cambridge City and South Cambridgeshire Adopted 2018 Local Plans both state that:</p> <p><i>‘a new treatment works facility either elsewhere or on the current site would be assessed’.</i></p> <p>This approach and review options were also reflected in the 2014 and 2019 Issues and Options consultations.</p> <p>However, para 32 advises that the feasibility studies are now complete and relocation off-site is the option moving forward, yet no evaluation, or the basis for this decision, appears to have been published, addressing the options for a smaller more cost effective, expedient development, retaining the Water Treatment Works in its current location.</p> <p>The draft plan acknowledges that the Cambridge Waste Water Treatment Plant, is an essential piece of infrastructure that serves Cambridge and surrounding areas, but the draft plan is currently in contravention of the adopted Local Plans and Minerals and Waste Plan.</p>

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	Policy 1 – A comprehensive approach
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.</p> <p>Please copy this page for each policy or part of the document you are responding to.</p>
<p>Policy 1 seeks to approve proposals that contribute to delivery of the Action Plan’s vision ‘<i>without delay, subject to a full assessment of the particular impacts of the proposals and securing appropriate mitigation measures where necessary</i>’</p> <p>No provision appears to exist for the existing published policies within the 2018 Adopted Local Plans or the 2011 Adopted Mineral and Waste Plan.</p> <p>The Draft Plan appears selective and fails to adopt a comprehensive approach to the development.</p> <p>The Draft Plan stops short at the North East Area and seeks to disassociate relocation of the Waste Water Treatment Plant and in doing so doesn’t represent a comprehensive approach.</p>

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	Policy 3 – Energy and Associated Infrastructure
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space. Please copy this page for each policy or part of the document you are responding to.</p>
<p>Page 58/59</p> <p>Earlier consultation submissions do not appear to have been fully taken into account.</p> <p>The draft plan seeks to evaluate the development on an integrated basis in other areas, but is disassociating the relocation of the Treatment Plant within this policy and the draft plan in general and therefore fails to provide a holistic integrated approach to the proposed development.</p>

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	Policy 23 – Comprehensive and co-ordinated development
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space. Please copy this page for each policy or part of the document you are responding to.</p>
<p>The issues raised in earlier consultations, including those on page 228, such as those raised by the Environment Agency, do not appear to have been addressed.</p> <p>By disassociating the proposal to relocate the Treatment works, this does not appear to represent comprehensive and co-ordinated development.</p> <p>The draft plan should provide a holistic integrated view of the proposed development.</p>

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	Policy 25 – Environmental Protection
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:

Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space.

Please copy this page for each policy or part of the document you are responding to.

The policy advises that

Prior to commencement of development a comprehensive site wide Contaminated Land Phase 1 – Desk Top Study / Preliminary Risk Assessment of the entire area shall be undertaken and completed.

This is a source of concern as the draft plan recognises the potential for contamination of the current waste water treatment site. This would indicate that no phase 1 Desk top study or risk analysis has been completed thus far, let alone an in depth risk assessment. Should this not be a pre-cursor, without which budgets and financial forecasts could well be flawed and potentially impact viability and/or affordable housing content?

Despite acknowledgment within the plan of the potential for contamination, at the same time it is proposed to relocate the current waste water treatment works to a green belt location, one of which is sited over a High Vulnerability Principle Aquifer (source Anglian Water Stage-3-Fine-Screening-Appendix-F-Contaminated-Land-Appraisal).

Page 32 advises that the feasibility studies relating to relocation of the treatment works are now complete and relocation off-site is the option moving forward. This would have to question the depth and therefore integrity of the evaluation.

Part C – Comments on specific policies and supporting documents

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	Policy 25 – Environmental Protection
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

Comments:
<p>Please provide your response to the policy of part of the document you are commenting on. This box will automatically enlarge if you need more space. Please copy this page for each policy or part of the document you are responding to.</p>
<p>Policy 25 outlines the concerns regarding environmental impacts such as noise, odour and other operational impacts and how these can be mitigated during development.</p> <p>By discharging responsibility for relocation of the treatment plant to a commercial organisation for which cost will be a primary driver, it is likely that this will result in a revised location that will remain close to the existing waste water connections and just move these environmental impacts to a green belt location and alternative nearby communities on the city edge.</p> <p>Furthermore, this is likely to then define the planning future for the preferred location. Again, this might be a 'means to an end' for the Draft Action Plan, but does not appear to be an integrated planning solution for the future.</p>

Completed response forms must be received **by 5pm on Monday 5 October 2020**. These can be sent to us either by:

Email: nec@greatercambridgeplanning.org or post, to:

Greater Cambridge Shared Planning
 Cambridge City Council
 PO Box 700
 Cambridge CB1 0JH