

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](http://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](mailto: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:	Agent's name: (if applicable)	Alison Wright
Name of organisation: (if applicable)	Brookgate Land Limited	Name of Agent's organisation: (if applicable) Bidwells LLP
Address:	C/O Agent	Agent's Address: Bidwell House, Trumpington Road, Cambridge
Postcode:		Postcode: CB2 9LD
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Telephone (optional):		Telephone (optional): [REDACTED]

Signature:	Date:	05.10.2020
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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:

Brookgate supports the proposed vision. The AAP area is the largest brownfield site in Cambridge and is extremely well served by existing public transport. It therefore has the potential to transform into a high-quality gateway to the city and act as a catalyst for the regeneration of the wider area.

The White Paper “ Planning for the Future” sets out a proposed new approach to plan making. North East Cambridge would sit within the Growth Area definition.

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

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

Further comments:

Refer to comments under Policy 16, 17, 18, 19, 20 and 21

**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:

Refer to comments under Policy 10d and 10e.

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

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

Further comments:

Refer to comments under Policy 12a, 12b 13a, 13b, 13c and 13d

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

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

Further comments:

Refer to comments under Policy 14

**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
- Not at all

Further comments:

Refer to comments under Policy 9

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

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

Further comments:

Refer to comments under Policy 8

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

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

Further comments:

Refer to comments under Policy 5

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

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

### Further comments:

In order to create a walkable, cyclable and sustainable neighbourhood which does not increase pressure on the road network around the area, development is proposed to be subject to strict trip budgets which will limit the number of vehicle trips allowed to and from each site, and reduced levels of car parking. Draft Policy 22 : Managing motorised vehicles sets out the trip budget principles and quotas, and the ratio of parking spaces that will be permitted for new development.

Brookgate is comfortable future phases of Cambridge North can be brought forward in accordance with the external car and parking budgets set out in Draft Policy 22 and the Transport Evidence Base AAP Report (September 2019). CB1 around Cambridge Station provides a strong local example of low parking office and residential development and evidence from CB1 indicates low car parking can work.

The Site has good public transport connectivity, the CGB, frequent local buses (the Citi 2) and Park and Rides services, a mainline railway station and good cycle and pedestrian connectivity to Cambridge City Centre and the cycle network in general. The Site can therefore support a low car parking strategy due to the abundance of other non-car mode options available. There are also significant opportunities to further enhance non-car modes of transport and to increase the number of 'internal trips'. As such, there are significant opportunities to build a community where people can live and work, commuting by foot or bike or public transport within the NEC AAP area and surrounding urban area.

Furthermore, there are emerging strategic schemes, such as the CAM which will provide a high frequency metro services between the Site and surrounding employment hubs and high-tech clusters of Greater Cambridge.

With respect to the potential Maths School at Cambridge North, the school will have a Green Travel Plan and will look to minimise car to school transport and maximise encouragement of sustainable forms of transport.

**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:

Refer to comments under Policy 2, 3, 4a, 4b and 4c

## Part C – Comments on specific policies and supporting documents

<b>Document details:</b>	
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)	<b>Policy 1, Figure 10, Figure 11</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input 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.

Brookgate broadly support the aims of Policy 1, the Spatial Framework and Land Use Plan. However, as referred to under Section 1 of these representations, the supporting diagrams as currently drafted are too precise. They should instead be clearly marked as indicative.

Both the Spatial Framework and Land Use Plan also need to recognise the potential for an educational facility within the Cambridge North site, a 16-19 offer in the form of specialist Maths School. This is capable of coming forwards separately to the proposed primary school sites and the potential safeguarded land for a secondary school.

It also needs to be recognised that the adopted plans of South Cambridgeshire District Council and Cambridge City Council make it clear that planning applications are capable of being submitted and granted planning permission in advance of the AAP being adopted (South Cambridgeshire Local Plan Policy SS/4 and Cambridge City Local Plan Policy 15). Under both policies, the Cambridge North Site is allocated for high quality mixed-use development, primarily for employment uses such as B1, B2 and B8, as well as a range of supporting commercial, retail, leisure and residential uses (subject to acceptable environmental conditions).



The approach in the recently adopted local plan in respect of early submissions should not be watered down through the AAP process, indeed, through the AAP process the opportunity to bring Brookgate land forward early should be explicitly acknowledged as beneficial to the regeneration of the area, creating a sense of place and arrival around the new Station and evidencing in commercial terms how the low parking ratios might work.

<b>Document details:</b>	
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)	<b>Policy 16</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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>Brookgate support the basis of Policy 16. There is a need for area wide non-car interventions to cater for these trips and ensure sites can come forward in accordance with AAP car trip/parking budgets.</p> <p>Creating new and improved walking and cycling connectivity to the NEC is essential in creating a development that is not reliant on the car as the primary means of transport. These measures are welcomed. There appears to be an over emphasis on new walking and cycling routes and not enough consideration of improving existing walking and cycling infrastructure in the area.</p> <p>In particular:</p> <ul style="list-style-type: none"> <li>• Improving existing links to Milton P&amp;R site to Milton Village and the NEC by improving the existing footbridge over the A10 to allow cycle access. Improvement to cycle and walking routes on Milton High Street and connectively to Jane Coston Bridge and the NEC.</li> <li>• A greater emphasis on the existing very well used walking and cycling route to the south of the site via Moss Bank and the River Cam. This is by far the most direct and safe 'off road' route for pedestrians and cyclist from Cambridge City Centre to the whole of the NEC. And will only become more popular when the Chisholm Trail is opened allowing high quality 'off road' access to the east and south of Cambridge.</li> </ul>

In terms of new cycle links we note that there are no proposals to provide better permeability between the NEC and East Chesterton between the existing Nuffield Road / CGB footway / cycleway link to the north and Moss Bank to the south. This creates an impenetrable barrier along the south western side of the NEC in excess of 600m.

Brookgate consider this to be a missed opportunity and maintains the current barriers between the NEC and established residential areas. We strongly suggest that a footway / cycleway link is provided through the Bramblefields area (not just wayfinding to the site which would be a very long walk and impractical for most people).

This will not only provide better connectivity between the established residential areas of East Chesterton and the NEC but will also provide easy access to residents and workers on the NEC to enjoy the established areas of public open space at Bramblefields.

This is a similar approach to the proposals to provide a link from the north of the NEC to Milton Country Park. Clearly any footways and/or cycleway through Bramblefields would need to be design sympathetically within the established parkland, as would be the case for the proposed links to Milton Country Park. We would suggest that a route adjacent to the southern boundary of the allotments (minimising any impact on the established wildlife area) linking in with the established network of path through Bramblefields is included in the NEC proposals.

<b>Document details:</b>	
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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 17, Figure 37</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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 possible interventions shown on Figure 37 and identified in Policy 17 are broadly similar to those in Table 55 of Transport Evidence Base AAP Report (September 2019).</p> <p>Brookgate support the proposed internal and external interventions identified in Policy 17 which will help sites come forward in accordance with the aspirations of the AAP and within the trip/parking budgets. The emphasis must be the promotion of non-car and active modes of travel and delivering a highly connected, and accessible development by walking, cycling and public transport.</p> <p>However, blanket financial contributions by developers towards an overall package of interventions may not be appropriate given the geography of the AAP study area, the range of interventions proposed and the delay associated with implementing any charging schedule or equivalent. The current AAP developers forum and emerging transport assessment process will assist developers in understanding the value of interventions for their sites. This will help inform which interventions developers should target for funding</p>

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 18</b>
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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>This policy sets out the standards and quantities of cycle parking that new development must provide. It states that cycle parking should be provided in excess of the minimum standards set out in Appendix L of the adopted Cambridge Local Plan (2018) and at least 5-10% of cycle parking provision should be designed to accommodate non-standard cycles and should consider appropriate provision for electric charging points.</p> <p>Brookgate support the application of the minimum cycle parking standards from the Cambridge Local Plan across the AAP area.</p> <p>Cycle parking provision will be very important in encouraging sustainable transport and to assist in delivering on low car use development. Brookgate consider that cycle parking provision above 'minimum standards' may be necessary (depending on demand) and will need to be evidenced as part of the overall transport strategy and assessment work for each development site.</p> <p>Opportunities for shared cycle parking between deference land uses is welcomed and supported. The efficient use of cycle parking will be key to responding to the future demands for cycling in the NEC.</p> <p>Cycle parking numbers and type will be provided for future phases of Cambridge North in accordance with these standards and detailed within specific transport assessments.</p>

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 19, Figure 38</b>
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.

Policy 19 ensures that land is safeguarded for the CAM and other public transport hubs.

The north portal for the central core section of the CAM is likely to be located within the North East Cambridge AAP boundary. An area of land in close proximity of Cambridge North station (shown on Figure 38) is proposed to be safeguarded for the operation of the CAM, including land for the portal/tunnel entrance as well as for construction and maintenance.

The indicative area safeguarded for CAM portal construction includes the existing station turning circle, bus stops and cycle parking. It also includes land to the west of the guided busway associated with utilities/drainage for the consented office and hotel development at Cambridge North and the next phases of development.

It is acknowledged that the proposed safeguarding land for CAM is indicative at this stage, However, as it is currently shown in figure 38, the shaded area is wholly Network Rail owned land including Network Rail's station lease area and operational railway land. Any proposed safeguarding of the land would need to be agreed with Network Rail and further engagement with Network Rail is required on this matter as and when it progresses.

Brookgate understand the aspirations of the Combined Authority to provide a new rapid transport system of Cambridge. However, they are concerned over the lack of information on this important issue and the extensive area of land that is considered necessary to be 'safeguarded'.

There is no information within the document on the justification for the extent of the area proposed to be 'safeguarded' or its intended use, as tunnel portals or station concourse or construction compounds etc. Brookgate would expect that an evidenced based approach would be driving this exercise and that the area indicated on the plan would be based on the requirements to deliver the CAM scheme.

Providing a 'safeguarding' area without any detail of what the area is to be used for or indeed why it is required is very unhelpful and will lead to uncertainties during the masterplanning of the area around the station, and significantly affect the ability of the landowners in this area to effectively plan this very important area, to enhance the existing transport interchange (a key requirement of NEC AAP policy) and necessary to achieve further support and enhance sustainable transport modes in the area.

The land should not be safeguarded in any planning document unless it is clear that CAM Metro is deliverable and funded, any formal designation of land prior to this would be premature. In this context Brookgate would therefore welcome discussions with all stakeholders to understand the extent and scope of land potentially safeguarded in the context of existing/future development in this area. The AAP will be subject to external scrutiny and it is clear from the North Essex Examination that the presiding Inspector will scrutinise the deliverability of the CAM metro.

<b>Document details:</b>	
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)	<b>Policy 20</b>
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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 20 sets out where the Councils expect delivery hubs to be located and what they should provide. A delivery hub has been identified within Cambridge Science Park Local Centre, as set out in Policy 10c. An additional hub could be located close to Milton Road where it can be accessed directly from the primary street to reduce vehicle movements within the Area Action Plan area.</p> <p>Brookgate would support the policy for smaller scale servicing, where appropriate.</p>



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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 21, Figure 40</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input 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.

Policy 21 describes the primary and secondary street network, and how these streets should be designed to lower vehicle speeds, and with excellent provision for walking and cycling to ensure these remain the travel mode of choice. It also sets out how space efficient car parking should be provided in 'car barns' so that residents and workers who need to occasionally use cars, can access private or shared cars.

The Policy states that NEC should be designed to manage vehicle movements in accordance with the street hierarchy shown in Figure 40 and the design principles described in Policy 7 and shown in Figures 16, 17 and 18. This shows a realignment of the current primary access route along the east-west section of Cowley Road to Cambridge North Station further north so as to avoid HGV, bus and other vehicle movements through the proposed District Centre.

Chesterton Partnership support priority being given to non-car movements and a permeable layout being provided for walking and cycling throughout the AAP area. However, any realignment of Cowley Road would likely impact on future development aspirations across a number of sites.

Early engagement will therefore be needed with Cambridgeshire County Council to understand possible alignment and impact on development mix and interaction with highway and interaction with highway, railway uses activities and operations. Careful planning and phasing of the proposed new road layout and network, particularly proposals for Cowley Road, is needed to ensure all access requirements across the site are met at the required times

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 10d, Figure 24</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

<b>Comments:</b>
<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 10d sets out more detailed policy guidance for the Station Approach Local Centre, including acceptable land uses, indicative development capacity, phasing and development and design requirements.</p> <p>The extent of the land parcel for the Station Approach Local Centre is not clear from Figure 24 but Brookgate broadly support the proposed land uses and indicative development capacities set out in Policy 10d, with the exception of the 100m<sup>2</sup> for community and cultural uses.</p> <p>The next phase at Cambridge North is proposing to include for a Specialist Maths School of 200 pupils (opening with 100 initially). The Government has committed to having a 16-19 maths school in every region, 11 in total. The Department for Education (DfE), through the Learning Alliance, has identified the Cambridge North site as an ideal location for this, due to regional accessibility and wider economy and skills concentration.</p> <p>The inclusion of a Maths School is compatible and complimentary to the other uses being brought forward in the wider allocation and will not affect the ability to bring forward wider residential and commercial development.</p> <p>LocatED is an Arms-Length Body to the Department for Education. It is responsible for buying and developing sites in England to help deliver much needed new school places for thousands of children. It was commissioned to identify and acquire a site within Cambridge to facilitate the school, of c.2,450 sq m.</p>

An extensive site search was undertaken originally in 2017 and a follow up search in 2018/20 which demonstrated the challenges of land availability and suitability. In 2020, further to this review search (which identified 16 sites), a shortlist of four sites was drawn up. A high level discussion was then held in March 2020 between LocatED's Jacqueline Nixon and the Assistant Director of Planning at GCP (Sharon Brown) to discuss the four shortlisted sites. The Cambridge North site was then chosen as the most suitable.

The site is the most sustainably located of all of the sites appraised as part of the site search. This is due to its proximity to Cambridge North Station and busway interchange. Maths Schools are expected to have regional accessibility and therefore this is an optimum location for accessibility and sustainability

Policy 10d therefore needs to recognise the potential to accommodate a Specialist Maths School within the Local Centre of circa 2,450 sq. m.

Brookgate, in dialogue and agreement with Network Rail, also support the requirement for the existing station car park to be re-provided in a more efficient multi-storey car barn as part of a mixed-use higher density development proposal. This will be included in a future phase of Cambridge North and will involve dialogue with Network Rail, the Train Operating Company (TOC) and Cambridgeshire County Council as appropriate throughout the design and planning process.

Policy 10d states that development proposals should consider taking the First Public Drain overflow out of its culvert which extends into 'the Knuckle' (the area around the bend in Cowley Road) and flows through to Chesterton Fen.

5.15 The FPD overflow is culverted where it crosses the Cambridge North site. The FPD has already been diverted (and retained in a culvert) as part of the Cambridge North Station project. Brookgate do not consider it appropriate to carry out further works on this drainage asset. The culverted section of the FPD through the Cambridge North site is quite deep and any proposals to 'open up' a section of the drain would be difficult to achieve without steep sided slopes and would inevitably lead to H&S and maintenance issues in perpetuity. Brookgate is supportive of introducing 'soft' SUDS across the whole of the NEC site and to provide visual 'clues' to how surface water is managed through the introduction of swales, water bodies and rain gardens. However as discussed above given the practical issues with the existing FPD diversion we do not consider it appropriate to 'open up' this section of the drain.

Policy 10d states that a new public open space (Station Place) along Station Approach should be provided to create an informal space which offers opportunities for people to dwell and interact. Brookgate are broadly supportive of this although the exact siting and quantum of space will need to be determined as part of the future design and planning process.

The Policy also states that the development and design requirements for the Station Approach Local Centre includes safeguarding land to accommodate the CAM (including interim construction site) adjacent to Cambridge North Station to facilitate a transport hub. Brookgate would welcome discussions with all stakeholders to understand the extent and scope of land safeguarded in the context of existing/future development in this area.

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 10e</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

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<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>The supporting text to Policy 10e states that ‘Beyond the District Centre, a new pedestrian and cycling bridge will connect over Milton Road to Cambridge Science Park’.</p> <p>Brookgate do not support the concept of a bridge over the Milton Road corridor, and are surprised that it is categorically stated in the draft. Brookgate’s transport consultants have consistently made the case (as have other NEC landowners) during the workshops on the NEC AAP that improvements to the ‘at grade’ pedestrian and cycle crossings both at the Science Park entrance and the CGB junction be looked at in more detail before any decision of a bridge is taken forward. Brookgate had thought that this had been agreed by all parties.</p> <p>The fundamental targets of the Greater Cambridge Partnership (GCP) is to reduce vehicle movements into the city centre of Cambridge by up to 20%. This clear policy target should be seen in the context of highway intervention proposed on the Milton Road corridor. Reduced ‘through traffic’ on Milton Road provides the opportunity to give improved priority to pedestrian and cycle movements (a key policy of the draft NEC) and to ‘humanise’ the Milton Rod corridor.</p> <p>A grade separated bridge is an outdated 1960s concept and would create an inhospitable vehicle dominated spaces at ground level with people ‘inconvenienced’ on detours over bridges, ramps etc. The proposed bridge on Milton Road is at a location where pedestrians and cyclists need to access the bridge from the north, south, east and west. How can a bridge facilitate all these movements with ramps in excess of 100m long?</p>

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 12a</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

<b>Comments:</b>
<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 Policy states that applications which create new employment floorspace and promote increased jobs and job densities in the Area Action Plan area will be supported where they are consistent with the other policies of the Area Action Plan and adopted Local Development Plan.</p> <p>Overall, up to 234,500 sqm of additional B1 floorspace is proposed in the NEC AAP area.</p> <p>The Policy states that ‘proposals that exceed these figures will need to be justified in terms of the impact on the trip budget and Area Action Plan wide infrastructure and where the character, role and function of an area will not be compromised’</p> <p>Brookgate support the aims of Policy 12a in terms of creating new employment floorspace and promoting increased jobs and job densities in the AAP area. However, mix and quantum of new employment floorspace should be informed by both market conditions and successful place-making. Bespoke solutions to maximise economic and employment benefits should therefore be secured as part of individual applications rather than through a generic and inflexible policy approach.</p>

Indeed, initial assessment and design work together with its location adjoining an existing transport hub has indicated that the Chesterton Sidings is capable of accommodating greater than 36,500 m<sup>2</sup> of additional B1 floorspace whilst having no adverse impact on the trip budget or compromising the character, role and function of the area.

It should also be noted that as of 1 September 2020, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 amend the Town and Country Planning (Use Classes) Order 1987. Classes A, B1 and D1 applicable to retail, office and non-residential institutions are removed and a new Class E 'commercial' use has been introduced in their place.

The Chesterton Sidings site (Land at Cambridge North) is capable of providing significant additional capacity of commercial, Class E, floorspace than that identified in Policy 12a to support the growing office and R&D market, with associated increase in job creation.

There is a lack of Grade A office space in Cambridge. For the R&D and business services sector, the location decisional drivers are access and ability to recruit the right skill sets. Land at Cambridge North provides this, but the lack of available space and lack of development pipeline puts that resilience at risk and could undermine the growth of the R&D sector. Developing land at Cambridge North can help address the demand and supply imbalance for quality office stock by bringing forward Grade A space in close proximity to an existing transport hub.

A flexible and positive approach to employment growth should also be adopted in the NEC AAP and considered in light of the CPIER and the target of doubling the regional economic growth (GVA) of Greater Cambridge over the next 25 years. This requires the area going beyond what it has achieved in the past (to double an economy over twenty-five years requires an average annual growth rate of 2.81%. Historically, since 1998, the local economy has only grown at around 2.5%). Achieving this requires employment growth and more importantly productivity growth, as we are already at comparatively high levels of employment.

The Science and Technology sector is the engine of the Cambridge Phenomenon that has driven the economy and it will remain an important part of the local economy and job market. Alongside, it is important to have all types of commercial space to provide for a wide range of job opportunities and to serve Greater Cambridge at close quarters to not overly rely on long-distance travel to service the area with goods and services. Further prime office floorspace in high quality developments is also needed to consolidate and expand the world class facilities which have recently put CB1 on the international property investment map.

The CPIER states that locations with high levels of public transport access, such as Land at Cambridge North, should be identified for businesses with high employment densities. This would include sites within walking distance of train stations, travel hubs and along transport corridors.

*“by ensuring good quality public transport is in place before development, the number of those new residents who will use the transport is maximised. This is also likely to be the best way to stretch some of the high-value businesses based within and around Cambridge out into wider Cambridgeshire and Peterborough. These companies will not want to be distant from the city, but these clusters could ‘grow’ out along the transportation links, providing connection to other market towns.”*

Taller prime office buildings should be located close to Cambridge North station in order to focus development at transport hubs; keeping the city compact, but supporting the demand for high quality office space.



<b>Document details:</b>	
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)	<b>Policy 12b</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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 12b states that development should ensure there is no net loss of B2 (general industrial) and B8 (storage or distribution) floorspace in North East Cambridge. It continues in stating that the redevelopment of existing premises and the provision of new industrial floorspace should consolidate current activities and promote a mix of uses that includes light industrial, offices, storage and distribution.</p> <p>The Policy identifies the following development areas in respect of the Chesterton Sidings site:</p> <ul style="list-style-type: none"> <li>• 4,800 sqm of B2 (General Industrial) (min. floorspace)</li> <li>• 4,000 sqm of B8 (Storage and Distribution) (min. floorspace)</li> </ul> <p>Brookgate are broadly supportive of the aims of Policy 12b in terms of no net loss of B2 and B8 floorspace in North East Cambridge, subject to ongoing market conditions. However, as referred to under Policy 12a, the quantum and distribution of employment floorspace across the NEC site should be informed by both market conditions and successful place-making and bespoke solutions to maximise economic and employment benefits should be secured as part of individual applications rather than through a generic and inflexible policy approach.</p>

<b>Document details:</b>	
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)	<b>Policy 13a</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

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<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>The AAP makes provision for at least 8,000 net dwellings.</p> <p>The Policy states that residential units in addition to the table above will need to be considered alongside the other policies of the Area Action Plan and adopted local development plan.</p> <p>Brookgate are broadly supportive of Policy 13a and that the housing provision figures are regarded as a minimum. It is important to take a flexible and positive approach and be clear that the AAP does not impose a ceiling on the amount of housing development that may come forward.</p> <p>As referred to above, there is a target of doubling the regional economic growth (GVA) of Greater Cambridge over the next 25 years. In order to deliver this 'step change' in economic performance, there is clearly a need to provide for a high level of housing to take account of the pressing and worsening affordability issue and to support the aspiration to grow the Greater Cambridge economy and double the GVA across the Greater Cambridgeshire and Peterborough area.</p> <p>The Chesterton Sidings site (Land at Cambridge North) has the potential to continue the successful transformation of this part of the city and address a specific need for more housing to serve the private rented sector, thus making a significant contribution to meeting housing needs within Greater Cambridge in a manner that would diversify housing choices within the market.</p>

<b>Document details:</b>	
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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 13b</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

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<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 13b states that the AAP requires 40% of new homes to be delivered as affordable housing.</p> <p>Subject to viability testing, the 40% requirement is supported in terms of being applied to the NEC AAP as a whole. The very heavy infrastructure costs and brownfield nature of the land with associated remediation costs must however be recognised and viability is of key importance.</p> <p>The Policy also recognises that Build to Rent Schemes deliver fewer than 40% affordable homes, and that this shortfall needs to be made up for by other schemes coming forward in North East Cambridge. This fundamentally misunderstands the contribution BTR makes to housing supply in Cambridge and the LPA must take a more nuanced approach to housing tenures.</p>

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 13c</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

<b>Comments:</b>
<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 13c states that Build to Rent (BtR) should be provided in a balanced way across North East Cambridge without being the dominant typology of homes in any location to ensure that specific areas contain mixed housing types and tenures. To achieve this, it is proposed that no more than 10% of the total housing across the Area Action Plan should be Build to Rent, i.e a maximum of 800 homes across North East Cambridge. This approach is fundamentally flawed. The 10% cap is an arbitrary number and is not supported by evidence.</p> <p>Brookgate support the aims of Policy 13c and the recognition that BtR developments can play an important role in providing overall housing choice within North East Cambridge. However, the restriction on the quantum of BtR units and that they should not be a dominant typology in any location is not supported.</p> <p>The AAP instead needs to remain flexible in order to be able to respond to change and take a positive approach to housing development.</p> <p>BtR housing responds to a particular local housing need and provides a means of widening housing choice for tenants, particularly those who may be renting long term, and also to deliver much needed housing within a faster timescale.</p>

Contrary to popular opinion, the private rented sector is not dominated by all-student households, which account for only 7.5% of private rented households, as most students live in dedicated communal establishments. Rather, the Cambridge private rented sector is quite unique with a population profile characterised by young adults and many are in professional or other senior occupations, despite the young age profile.

These young professional households make-up a considerable proportion of the population and are people who often do not meet the criteria for social rented housing but cannot afford to buy their own home. The private rented sector can provide such accommodation.

The redevelopment of Land at Cambridge North offers an opportunity to provide a significant amount of rented accommodation in a highly sustainable location, making the best possible use of a brownfield site that is already allocated for residential development.

The Homes for Londoners Affordable Housing and Viability SPG (2017) confirms the significant benefits that BtR developments can secure in terms of their particular contribution to increasing housing supply, as outlined below:

- attract investment into housing market that otherwise would not be there, particularly since Build to Rent is attractive to institutional investors seeking long-term, inflation-tracking returns;
- accelerate delivery on individual sites as they are less prone to 'absorption constraints' that affect the build-out rates for market sale properties;
- more easily deliver across the housing market cycle as they are less impacted by house price downturns;
- provide a more consistent and at-scale demand for off-site manufacture;
- offer longer-term tenancies and more certainty over long-term availability;
- ensure a commitment to, and investment in, place making through single ownership; and
- provide better management standards and higher quality homes than other parts of the private rented sector.

Of particular relevance here is the reference to development at scale. In order to be attractive to investors and in turn ensure the development is commercially viable, BtR needs to be of sufficient scale and size. This critical mass is also important not just in terms of the nature of BtR but also in terms of management. Therefore, pepper potting as proposed in the Draft NEC AAP is the wrong approach. The approach others are taking, such as the Greater London Authority, demonstrates a greater understanding of the economics of BtR. More research needs to be undertaken by the Councils to inform the NEC AAP and to recognise the contribution that BtR can make in this location.

The Cambridge North site is the optimal location for BtR within the NEC AAP site given its proximity to the Cambridge North station and transport interchange. This is a prime requirement for BtR operators.

<b>Document details:</b>	
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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 13d</b>
Is your comment (tick one):	<input checked="" type="checkbox"/> Support <input type="checkbox"/> Neutral <input type="checkbox"/> Object

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<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 13d states that developments including affordable private rent as part of their affordable housing allocation should demonstrate how these homes will be targeted to meet local worker need. Development proposals for purpose built Private Rented Sector homes such as Build to Rent, which are offered to employers within and adjacent to North East Cambridge on a block-lease basis, will be supported.</p> <p>Land at Cambridge North has the potential to provide key worker accommodation to support the concentration of healthcare services in and around Cambridge.</p>

<b>Document details:</b>	
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)	<b>Policy 14</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

<b>Comments:</b>
<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 proposed on-site education provision has been informed by an Education Topic Paper prepared by the education authority for the area. The Topic Paper indicates that presently, development at North East Cambridge is not projected to generate sufficient numbers of pupils to warrant the need for a secondary school on-site. Nevertheless, for the proper and long term planning of the area, the Councils consider a cautious approach should be taken and have safeguarded land for a secondary school if it is needed. This is located within Cowley Road Neighbourhood Centre alongside a primary school. Local secondary school provision is to be kept under review throughout the Plan period to determine whether a secondary school at North East Cambridge is required and when it will need to be delivered. Based on the housing trajectory for the Area Action Plan, it is anticipated that if it is required, then it is likely to be delivered towards the end of the Plan period.</p> <p>Land at Cambridge North is proposing to include for a Specialist Maths School. The Government has committed to having a 16-19 maths school in every region, 11 in total. The Department for Education (DfE), through the Learning Alliance, has identified the Cambridge North site as an ideal location for this, due to regional accessibility and wider economy and skills concentration.</p>

Policy 14 as currently drafted only provides policy support where there is recognised 'local needs'. This is overly restrictive and does not align with the objectives of the NPPF which is to take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (paragraph 94).

It is therefore requested that Policy 14 includes the following wording;  
*“State funded education infrastructure which is capable of meeting wider regional needs will also be supported where this is deliverable and sustainable.”*



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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)	<b>Policy 9, Figure 21</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input type="checkbox"/> Neutral <input checked="" type="checkbox"/> Object

<b>Comments:</b>
<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 9 sets out expected building heights and densities across the area and how the scale and massing (shape) of buildings should consider its impact on the skyline.</p> <p>To understand the potential impact of development, the Councils have undertaken a Landscape Character and Visual Impact Appraisal to inform Policy 9 but are also commissioning a Heritage Impact and Townscape Assessment to inform a wider Townscape Strategy for North East Cambridge.</p> <p><i>Policy 9 states that 'development densities and building heights should not exceed those identified on Figure 21 and Figure 23. Densities and intensification of appropriate uses will increase around highly accessible parts of the Area Action Plan area taking into account wider development sensitives, and activity clusters such as the District Centre and Cambridge North Station.'</i></p> <p>Brookgate object to Policy 9 in that the Policy is overly restrictive in stating that building heights 'should not exceed' those identified on Figure 21. 4-5 or 5-6 typical building height in an area around an existing station and public transport interchange is particularly low. Figure 21 also fails to take account of the building heights of the consented hotel and office adjacent to the station (both 7 storeys). Both of these detailed applications demonstrated through detailed technical evidence the acceptability of 7 storeys in this location.</p>

Furthermore, the maximum heights proposed in Figure 21 are assuming a residential storey height as opposed to an office typical level and do not appear to allow sufficient additional ground floor height for active frontage and alternative uses. It should also be noted that office storey heights have recently increased to be in line with developing national space standards and therefore they may be a small increase when comparing to existing precedents.

Setting overly restrictive maximum height limits in certain locations and without the proper consideration of the wider planning potential of development sites and wider implications of not maximising those opportunities (by displacing development to other locations that may not be best placed to accommodate it) is a risk to the current approach set out in the NEC AAP. Such a displacement effect presents a lost opportunity in key urban areas of high demand for new accommodation, whether that is for living, working, leisure or other requirements in the built environment.

With particular reference to Cambridge North, the Site is bounded by the railway line to the east, the A14 to the north, the Cambridge Science Park to the west and the suburban Chesterton to the south. The City Centre is some 3.5km from the site. This physical context presents an opportunity to investigate heights and densities which might not be supported in other locations in Cambridge: taller buildings would have no impact on any existing residential properties with regard to sunlight and daylight but could;

- Make optimal and efficient use of the capacity of the site and release significant development pressure from the historic core of the City;
- Optimise the effectiveness of substantial investment in public transport infrastructure and mobility corridors in terms of improved and more sustainable mobility choices and enhanced opportunities and choices in access to housing, jobs, community and social infrastructure;
- Create an opportunity to define the north east corner of the City with striking buildings visible from the A14;
- Support the additional uses and amenities that will make this a self-supporting district; and
- Assist in reinforcing and contributing to a sense of place, such as indicating the main centres of activity, important street junctions, public spaces and transport interchanges. In this manner increased building height is a key factor in assisting modern placemaking and improving the overall quality of our urban environments.

The NPPF confirms, at paragraph 118, that planning policies should “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs” and “promote and support the development of under-utilised land and buildings”. The NPPF continues, at paragraph 112, in advising that planning policies should support development that makes efficient use of land, taking into account, inter alia, the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it.

The NEC AAP is the largest brownfield site in Cambridge and is served by excellent public transport infrastructure. It therefore presents a significant opportunity to transform into a high-quality gateway to the city and act as a catalyst for the regeneration of the wider area. Opportunities for densification of existing urban areas in locations well served by public transport should therefore be maximised wherever possible.

The tax payer, through the construction of the Station and the relocation of the water treatment works, will contribute over £300M towards the regeneration of the area. It is therefore imperative that a proper return is achieved on this massive investment in the area and if the Mayor's CAM comes to fruition, further tax payers monies will be secured.

A high density development would represent efficient use of land in a sustainable location and create the opportunity for people to live close to where they work. A higher density of people also helps to form a critical mass and sense of place to support the range of ancillary retail uses, services and facilities that would come forward alongside the residential and employment accommodation.

The need for densification in urban parts of Cambridge and adjoining transport hubs is also supported by the Cambridge and Peterborough Independent Economic Review (CPIER), published in September 2018. One of the key recommendations from the review, at 2.3, is to consider some densification, particularly in Cambridge, away from the historic centre, and more on the edges, as and where new development sites comes forward. The CPIER report specifically states that the east side of Cambridge offers significant scope for housing and commercial development:

*“Such development would have the advantage of being close to the principal centres of employment and the existing rail infrastructure whilst also opening up opportunities for new transport links to connect the main centres of employment more effectively. Most significantly, it includes land which has previously been safeguarded for development and is within the boundaries of the existing urban area so would proving opportunities in line with the existing spatial strategy.”*

<b>Document details:</b>	
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)	<b>Policy 8, Figure 19</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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 8 sets out how the AAP area is proposed to create a functional and beautiful open space network, including improving existing open spaces and making the most of assets such as the First Public Drain. Regard is proposed to be had to the Cambridge City local standards of provision of all relevant types of open space (see Cambridge Local Plan 2018, Appendix I or any future replacement) and the Councils' open space and sports strategies, where applicable.</p> <p>Policy 8 states '<i>for development proposals requiring the provision of strategic open space, this must secure in the first instance the siting and amount of strategic open space shown in Figure 19</i>'.</p> <p>The expectation is that all open space requirements will be met on-site. However, Policy 8 states that any underprovision in the total amount of strategic open space required of a development, beyond that provided as per Figure 19, can be met through new or enhanced offsite provision, including:</p> <ul style="list-style-type: none"> <li>● Bramblefields Local Nature Reserve (way-finding)</li> <li>● Milton Country Park (increasing capacity and way-finding)</li> <li>● Chesterton Fen (way-finding and accessibility to River Cam including pedestrian and cycle bridge crossing over railway)</li> </ul> <p>The potential locations for off-site provision are broadly supported but this should not preclude alternative off-site locations coming forward.</p>

For non-strategic open space requirements, where there are deficiencies in certain types of open space provision in the area surrounding a proposed development, the Councils will seek to prioritise those open spaces deficient in the area.

The regard to the Cambridge City Council standards is broadly supported but applying the standards uniformly across the NEC AAP area fails to recognise the very different character and functionality of public open space around a major transport interchange and its hinterland. There are numerous examples of successful urban schemes where public open space has been limited in terms of quantum but is of high quality. Small intimate spaces often create the most successful urban experiences.

The emerging Cambridge North proposals accommodate an area of public open space broadly in the location of 'Station Place'. However, it should be stated that Figure 19 is indicative only and development proposals should instead be informed by successful place making with solutions to open space and public realm secured as part of individual applications rather than through a strict policy approach.

The proposals for the next phases at Cambridge North offer a series of public open spaces, creating a green network that would include:

- The existing public realm at Cambridge North Station and extension of the tree avenue along Cowley Road;
- A central triangular park of informal open space, south of Cowley Road;
- A green hub at the 'knuckle';
- A spine of linear green spaces, north of Cowley Road; and
- Secondary pocket parks, green walking routes, areas of natural and equipped children's play spaces, and private communal garden and rooftop amenity spaces.

These spaces will form a comprehensive, high quality landscape, that integrates with the proposed new residences, shops, cafes and offices. Cambridge North proposals to the north of Cowley Road, still in the early stages of design, will ensure that new green spaces form a coherent and legible network with other AAP proposed spaces and wider existing spaces such as Milton Park. Green infrastructure proposals would comprise a balanced mix of planting, tree infrastructure, amenity lawn, biodiverse rooftop planting, and hard materials in order to complement and assimilate the building structures into the site and local context; the use of high quality hard materials; a range of street furniture with multiple seating areas; vibrant planting mixes; and trees of varying levels of maturity, including specimens at key junctions.

In regards to qualitative elements of Policy 8, in addition to the high standards of quality, the green spaces will generally reach standards for low maintenance, water efficiency use and climate resilience, through careful selection of materials and plant species and through well-considered maintenance specifications. The green spaces will be publicly accessible and appealing throughout the year, with some exceptions within the residence courtyards and rooftops.

In terms of the reference to the 'retained and enhanced landscape buffer to infrastructure', shown on Figure 19, and the provision within Policy 8 to protect this area for the purpose of environmental amenity and landscaping, again it should be acknowledged that Figure 19 is indicative only and bespoke solutions are capable of being delivered under individual applications.

Furthermore, it is assumed that this 'buffer' includes the area between the bus road through the Cambridge North site and the station. We support the principles here of, 'no development' on this section of land however the emerging proposals for management of surface water on the Cambridge North site include some SUDS (swales) within this area. We consider that these proposals are appropriate for this area of the site and would suggest that the use of SUDS measures be included in the list of supported 'ancillary development' in these areas.

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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 5</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

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<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 5 sets out how new development will achieve biodiversity net gain and measurably improve the biodiversity network across the wider area. It states that development proposals will be required to deliver a minimum of 10% net gain in biodiversity value and shall follow the mitigation hierarchy.</p> <p>Where on-site provision is not feasible, greenspace and biodiversity enhancement will need to be provided in alternative ways and/or accommodated off-site. The Councils are proposing a sequential approach to mitigating adverse impacts on biodiversity resources. This is proposed to be achieved on-site in the first instance and then in areas adjacent to North East Cambridge, such as Milton Country Park and Chesterton Fen, before considering wider mitigation measures across the city and further afield.</p> <p>As referred to under question 7 in respect of Policy 8, the potential locations for off-site provision are broadly supported but this should not preclude alternative off-site locations coming forward.</p> <p>Brookgate broadly support Policy 5. They acknowledge that the existing local policy framework supports the 10% biodiversity net gain requirement even though the legislative framework is not yet in place. The proposals for the next phases at Cambridge North will be able to meet or exceed this target and follow the mitigation hierarchy. Furthermore, green corridors will be designed into the Site to contribute to the creation of a coherent on-site and off-site, high quality ecological network, particularly along the rail corridor N/S axis. The existing vegetation along the guided busway, the northern boundary of the Site and the narrow corridor along the</p>

railway fencing are the key features that the Cambridge North proposals will work with.

On-site mitigation should however be reflective of the baseline ecological conditions. For example, at Cambridge North where the railway sidings context has created habitat that is unusual within the AAP area, mitigating for open mosaic habitat (OMH) is required and this necessitates mainly brown roof planting mixed with a small proportion of green roof.

Brookgate acknowledge the sequential approach to mitigation set out in Policy 5, with off-site measures to form part of the mitigation strategy and the aspiration to agree improvement projects with the Councils which could include enhancements to Milton Country Park and/or Chesterton Fen. Given the habitats present within the Cambridge North Site, full on-site mitigation is not practicable. However, it is expected that the AAP developments as a whole may require the identification of other additional/alternative sites both within the wider local area, and then other sites elsewhere within Greater Cambridge.

Brookgate recognise the importance of improving the natural environment and Land at Cambridge North has the potential to provide areas of high quality public realm which recognises the very different character and functionality of public open space around a major transport interchange and its hinterland.

The proposed residential and commercial quarters at Land at Cambridge North can deliver a successful urban scheme where, despite public open space being limited in terms of quantum can still deliver spaces of high quality, providing green spaces to relax and socialise. Indeed, small intimate spaces often create the most successful urban experiences. New areas of green infrastructure also provide opportunities to mitigate against climate change, through creating resilient new habitats. Strategic off-site opportunities also offer the opportunity to significantly increase biodiversity other than providing site specific biodiversity improvements.



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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 2</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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>This policy sets out the range of measures that are proposed to be an integral part of the design of new development proposals, in order to ensure that new development responds to the climate emergency. These measures are to ensure that development in North East Cambridge addresses the twin challenges of climate change mitigation and adaptation, in a way that enhances the environmental and social sustainability of the development.</p> <p>Brookgate broadly support Policy 2. However, climate change policy and good practice is changing quickly, and the Plan will need to build in suitable flexibility to accommodate these changes within the lifetime of the plan. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes.</p> <p>Allowing for changing technologies and approaches should also help with viability as technology and approaches improve and are more widely adopted, thereby reducing costs. Escalating targets and policies may be able to accommodate these changes, while providing clarity to developers on the costs of development over time.</p> <p>Policy 2, part (b), states that development must be climate-proofed to a range of climate risks, including flood risk, overheating and water availability. Specific guidance is then given on how to minimise the risk of overheating and that overheating analysis must be undertaken to include consideration of future climate scenarios using 2050 Prometheus weather data. However this data is based on UKCP09 data rather than UKCP18 climate change projections which are the most recent data.</p>

Policy 2, part (b) also states that all flat roofs must contain an element of green roof provision. This section of the Policy needs to be more flexible to allow on-site mitigation to be reflective of the baseline ecological conditions. For example, at Cambridge North where the railway sidings context has created habitat that is unusual within the AAP area, mitigating for open mosaic habitat (OMH) is required. The Cambridge North proposals will include a mix of green and brown roof planting but with the majority being brown roof because this is closer to the OMH habitat lost. These brown roofs or a combination of brown and green roof planting will form part of the overall mitigation strategy. Ecologically biodiverse brown roof planting mixed with a small proportion of green roof is more appropriate for the Cambridge North Site given the OMH baseline and this is the strategy that the Councils have approved previously for the consented office and hotel developments.

<b>Document details:</b>	
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)	<b>Policy 3</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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 3 states that an Area Action Plan wide approach to energy and associated infrastructure should be investigated and, where feasible and viable, implemented. The Shared Planning Service has commissioned the development of an Energy and Infrastructure Study and Energy Masterplan for NEC. This will consider the energy options and associated infrastructure requirements needed to support the energy demands of the development and the transition to net zero carbon, giving consideration to energy use in buildings, battery storage and that required for transportation. It will also give consideration to the development of local energy communities and local collaboration and options for community ownership of decentralised energy opportunities that may arise from the energy masterplan.</p> <p>At this stage of the Plan, the site wide energy and infrastructure study and energy masterplan has not been prepared.</p> <p>Whilst Brookgate do not oppose the approach set out in Policy 3 in principle, throughout the NEC AAP workshops, Brookgate has made it clear that they have already sourced their power and other such requirements both on and off site in respect of the Chesterton Sidings site.</p>

<b>Document details:</b>	
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)	<b>Policy 4a, 4b and 4c</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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>Policies 4a, b and c set standards and expectations for development across all water related issues.</p> <p>Brookgate broadly support these policies from a climate change resilience and in-combination climate change impacts perspective. However, Policy 4c needs to be aligned with Environment Agency guidance on climate change allowance: (<a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a>).</p>

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

This Policy states that planning applications for major development within the North East Area Action Plan area will be supported subject to a number of criteria. This includes, inter alia, demonstrating the development will make an appropriate and proportionate contribution to site wide infrastructure and be supported by a comprehensive masterplan that accords with the overarching AAP Spatial Framework and other AAP policies, including, where appropriate:

- i. The ability to connect and contribute to Area Action Plan-wide utilities and communications grids; and
- ii. The setting aside of land for strategic and site-specific infrastructure provision.

Representations in respect of the setting aside of land for CAM are provided in response to Question 2 and Policy 19.

It also needs to be recognised that the adopted plans of South Cambridgeshire District Council and Cambridge City Council make it clear that planning applications are capable of being submitted and granted planning permission in advance of the AAP being adopted (South Cambridgeshire Local Plan Policy SS/4 and Cambridge City Local Plan Policy 15).

The approach in the recently adopted local plan in respect of early submissions should not be watered down through the AAP process, indeed, through the AAP process the opportunity to bring forward Land at Cambridge North early should be explicitly acknowledged as beneficial to the regeneration of the area, creating a sense of place and arrival around the new Station and evidencing in commercial terms how the low parking ratios might work.

<b>Document details:</b>	
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)	<b>Policy 25</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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>The Arup Odour Report concluded that overall the range of evidence available from all the various reported modelling studies, as well as the Arup study, indicate that odour levels on the proposed development site would be below the levels generally considered to have a low risk of adverse odour impacts. The report was based on a further, more detailed odour analysis of the potential for odours at the development site at Cambridge North in response to the Odournet report. Anglian Water collaborated with Arup in terms of inputting into the report and agreed with the methodology adopted within the report.</p> <p>The conclusions of the Arup Odour Report are as follows:  <i>“A qualitative Source Pathway Receptor assessment concludes that the proposed development site would have a Low to Moderate risk of adverse odour impacts. This is because the development site is more than 400-800m from the more odorous parts of CWRC meaning odours which allows for dispersion and hence dilution of the odours released.</i></p> <p><i>Overall the range of evidence available from all the various reported modelling studies and this study indicate that odour levels on the proposed development site would be below the levels generally considered to have a low risk of adverse odour impacts. The only exception is the Odournet study which appears to have made some very pessimistic assumptions and the results can only be replicated by nearly doubling the measured odour emission rates on site.</i></p> <p><i>The evidence from modelling studies is further supported by the evidence form the Source, Pathway, Receptor qualitative approach and the sensory assessments. Odour complaints are received at a frequency of once a year (and some are</i></p>

*received in areas where all studies would suggest that there is a risk of adverse odour impacts) and the evidence from sniff testing is consistent with the modelling studies undertaken by Arup, Anglian Water and CERC”*

A number of reports have been commissioned on the potential for odour in connection with the CWRC, all of which have reached consistent findings as the Arup Odour Report detailed above, with the exception of the Odournet Report which has far higher readings.

The evidence from these reports collectively is clear and this allows the LPA to confidently take informed decisions.

<b>Document details:</b>	
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Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Policy 26, Figure 42</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input checked="" type="checkbox"/> Neutral <input type="checkbox"/> Object

<b>Comments:</b>
<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>It is proposed that the Cambridge North East Aggregates Railheads at North East Cambridge continues to be safeguarded within the NEC AAP. These are located in the Chesterton Sidings Site and the extent of the safeguarded area is shown in Figure 42 of the AAP (see below).</p> <p>However, Policy 26 does support residential and commercial development of the aggregates railheads site if the current operation is relocated off-site, subject to meeting the requirements of the Minerals and Waste Local Plan (or future equivalent), or if the Minerals and Waste Local Plan (or future equivalent) removes the safeguarding policy related to the site.</p> <p>Brookgate, as part of their Chesterton Partnership meetings (comprising Brookgate, Network Rail and DB Cargo UK), are in regular liaison with DB Cargo UK and their tenant Tarmac regarding the future potential relocation of the railheads. These discussions have confirmed that there is in principle support for their relocation.</p> <p>In terms of Figure 42 and associated text, the following should be noted;</p> <ul style="list-style-type: none"> <li>• The haul road leading to the aggregates and freight lines is not consistent with other diagrams/figures within the AAP i.e. other figures do not include the haul road and possibly assume the aggregates and freight site are relocated;</li> <li>• The narrow white/non colour strip between the aggregates and freight tracks should also be part of the Aggregates Railheads site, and shaded brown;</li> <li>• The plan does not show the full extent of the aggregates railheads , including land on Cowley Road;</li> </ul>



- The AAP shows mixed and confusing details in relation to the aggregates railheads. It should therefore clearly demonstrate a situation which includes the retention of the aggregates railheads

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](mailto:nec@greatercambridgeplanning.org) or post, to:

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