

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: <a href="#">Stephen P Tomkins</a>	Agent's name: (if applicable)
Name of organisation: <a href="#">Cam Valley Forum</a> (if applicable)	Name of Agent's organisation: (if applicable)
Address: 	Agent's Address:
Postcode: 	Postcode:
Email (optional): 	Email (optional):
Telephone (optional): 	Telephone (optional):

Signature:	Date:
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  [Yes](#)

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

<b>Document details:</b>	
Which document are you commenting on? (please tick)	<input type="checkbox"/> Draft North East Cambridge Area Action Plan
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	<b>Principally QUESTIONS 1, 2, 6, 7, and 10</b>
Is your comment (tick one):	<input type="checkbox"/> Support <input 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.

#### Why Cam Valley Forum are commenting on the North East Cambridge Area Action Plan

The Cam Valley Forum is a voluntary group, established in 2001. We are an association of local individuals with diverse environmental, recreational, academic and business interests, concerned directly or indirectly with the River Cam. Our interests embrace not only the main river within the city, its 'beating heart' and one of the most intensively-used stretches of water in Europe, but also the smaller watercourses that convey water through the fields and villages, local towns and Cambridge suburbs.

Our mission is to be the voice for the River Cam, defending its health and wellbeing for its wildlife, environment and everyone that enjoys it, and safeguarding its historical and cultural importance. In this role, the Cam Valley Forum speaks for the very large number of local people who value its heritage, beauty and recreational value. Last year, our *River Cam Manifesto* revealed widespread support for our now diminished Chalk-stream fed river.

This year our recent report '*Let it Flow!*' - addresses the fact that the River Cam is no longer the river it once was. This is the driest part of Britain and potentially the fastest growing in human population! Those two facts are now on a collision course. The way in which we currently demand so much water for so many things - our own personal domestic supply, our recreation, our food production and our lowland and wetland wildlife - needs much more careful planning. Moreover, we cannot rely on past ways alone for solving our own selfish water needs.

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What follows are our responses, with our insights and interests, to your listed concerns, **1, 2, 6, 7, and 10.**

### **1. The Vision:**

Broadly, we do recognise the need to provide more low cost housing for the city, this is a crying need; but the density, scale, social, environmental and infrastructural deficiencies of this plan are grossly inappropriate and frankly demeaning of Cambridge City as we have known it and as it might be.

Even the location of this plan is deeply worrying. The Anglian Water Milton Sewage works has spare capacity now and could be improved further without a move to any of the proposed smaller sites in the green belt. All we hear from our communities and observe from the local press is that this scale of development really has not been thought through sufficiently and appears to be driven by a myopic central government focus on the South East and an unwanted local growth agenda. It appears largely driven by business interests, and with scant regard to environmental factors and, centrally, to human wellbeing.

If, however, after all sensitive and pragmatic considerations are taken on board and what is proposed still gets the go-ahead we would like you to consider a re-focus on the following concerns of the Cam Valley Forum.

### **2. Walking and Cycling Connections.**

With respect to walking and cycling, access should be provided to adequate open space. Milton Country Park will be possibly accessible, by bridge or tunnel under the motorway, but it is already heavily used, without an influx from 8000 extra new homes. Much of Cambridge has accessible green space for local residents. There is nothing here that is comparable in terms of easy urban access.

At present there is a riverside path from Chesterton to Baits Bite Lock. It is used by walkers, dog-walkers, anglers, cyclists, rowing interests etc., and is already at times very congested and hazardous. Added pressure from the new residents on this route will therefore need to be carefully managed. A substantial buffer area between new buildings and the river needs to be protected for nature and informal recreational use. Where possible, opportunities to segregate walkers and cyclists within and around the development should be seized.

### **6. Heights and densities.**

Whether you are housed in them, or whether they are on the skyline it is not in any way desirable to have ten storey buildings around the periphery of Cambridge. The initial Landscape Study claimed that tall buildings would be invisible from the towpath hidden behind hedges and trees. But the views of the Cam in its own floodplain, from Stourbridge Common and Ditton Meadows matter greatly to us. They will not be graced at all by what is proposed here. Stourbridge Common is an historical site of significance. Stourbridge fair held annually on Stourbridge Common was, at its peak, the largest fair in the whole of Europe.

## **7. Public Open spaces.**

Widely viewed as the best current example of progressive, environmentally sound social housing, the Goldsmith Street development in Norwich, has a density of 83 households per hectare. For Brookgate and the Sewage Works 225 to 385 households per hectare are envisaged. It is already offensive to many current residents of the Cambridge area that access to open space is currently inversely correlated with personal wealth. The poor in Cambridge City have least access to nature and open spaces. This will be the more so here with this development. Large cities in the UK typically average an area of green space at one fifth (20%) the total area. It is typically greater in Cambridge City at present. What is proposed here is 10%. If this happens we ought be ashamed. If this development must happen then Chesterton Fen should be protected and managed as a 'Nature Park', a green lung accessible by a purpose built, railway bridge. There would then be an opportunity for wetland re-creation and a genuine benefit to present biodiversity losses.

## **10. Climate Crisis.**

A year ago we rang alarm bells for the health of the River Cam and, in our support, the Cambridge City Council declared an environmental crisis - with, in part, our depleted Chalk groundwater and our diminished river flows in mind. We are concerned not only about pressure on currently unsustainable water use and infrastructure but also about climate change. These effects are real and need to be reflected in wiser choices.

### **(a) Water: water use targets.**

The North East Cambridge Area plan envisages water consumption of 110 litres per person per day. The city currently uses about 140 litres per person per day and is asking for economy. At present it seems likely that the Government will implement only a national standard of water economy on North East Cambridge Area building regulations. The Cambridgeshire regional water stress, that we have highlighted (which is to large extent acknowledged now by the Environment Agency), is still not regarded as sufficiently important by central Government. Cambridge University, to its credit, designed and built the Eddington development with an 80 litres per person per day target. This however had extensive grey water and rainfall capture/recycling built in. The same standard needs to be adopted in the North East Cambridge Plan.

The local plan should require the new development to be 'water neutral'. Hence, any additional demand for water should first be minimised - through innovations such as those used at Eddington - and then further offset by water efficiency programmes in existing local social housing, schools, hospitals and other public buildings

We know that all water companies are obliged to supply to demand and that even by pursuing water neutrality, they will still have to find the water for this development. The task is likely to fall to the Cambridge Water Company whose supply area it is. They take their water almost exclusively from the Chalk. The Cam Valley Forum are asking that the company should be required instead to meet any new demand through water transfers from non Chalk-aquifer sources.. As there is an intercompany pipe supply network this is surely a possibility.

## **(b) Global warming**

Greater Cambridge Partnership need to do some longer term planning for climate change. Two immediate hazards are on the time horizon now.

Firstly, climate change includes longer and hotter summers which exacerbate soil moisture deficits and will undoubtedly make aquifer recharge harder - possibly even with the cessation of abstraction. The needed aquifer recharge is not occurring in a large fraction of current winters.

Secondly, and no longer trivially, over recent decades the forecasts of when sea level rise will have its impact are accelerating. This is due very largely to thermal expansion as well as glacial melt. Massive earthworks may be needed to defend our lowlands and fenlands, which pale into insignificance beside the necessary infrastructural changes to water supply. In the most recent interglacial periods the sea has been up to just north of Cambridge more than once. The North East Cambridge Area site is at most 10 metres above sea level (OD) and some is lower, the Cam as it exits Cambridge is 5 metres above OD. Should such a building project be undertaken at all here? Zero carbon infrastructure is needed now in the UK and very soon globally and even then it will take many decades for our anthropogenic greenhouse gas reversal to impact on ocean warming. If the EA are already planning for a planned retreat and North Sea ingress, how will Cambridge be impacted?

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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