

PD11977/CB/RM

email: [REDACTED]

Planning Policy Team
Cambridge City Council
PO Box 700
Cambridge
CB1 0JH

05 October 2020

Dear Sir / Madam,

**NORTH EAST CAMBRIDGE AREA ACTION PLAN
REGULATION 18 CONSULTATION (2020)**

On behalf of The Crown Estate, the freehold owners of Cambridge Business Park, we submit representations to the Regulation 18 Consultation of the North East Cambridge Area Action Plan (AAP).

The Crown Estate supports the principle of the regeneration and redevelopment of land covered by the draft AAP for high quality mixed use sustainable development.

The Crown Estate is a long term investor/developer and is keen to work with Cambridge City Council, South Cambridge District Council, adjoining landowners and developers and other stakeholders in relation to North East Cambridge. The Crown Estate is taking an active role in the AAP process and is an active participant in stakeholder engagement.

The Crown Estate notes that the adopted Area Action Plan will be a development plan document that will form part of the statutory development plan for both Cambridge City Council and South Cambridgeshire District Council. It is acknowledged that following the Regulation 18 consultation the draft policies will be refined in response to the comments received and emerging evidence studies that the Councils are undertaking. The next version of the Area Action Plan will then be published for a further round of public consultation in which The Crown Estate welcomes the opportunity to become actively involved.

The Crown Estate and Cambridge Business Park

The Crown Estate is the freehold owner of Cambridge Business Park (Site J on Page 30 of the Draft AAP). The Site totals approximately 9.5 hectares and currently comprises 12 two and three storey buildings with a total floorspace of more than 30,000 sqm. It provides a high quality flexible office and R&D space in an attractive landscape setting.

The Business Park was developed in phases from the 1980's and is home to companies including Qualcomm, BBC and Redgate Software.

The main access to the Business Park is from Milton Road (A1134) with a pedestrian access to Cambridge North Station via a controlled gate. It provides circa 1,200 car parking spaces and over 500 cycle spaces.

The Business Park is located between Cambridge North Station (approximately 250m to the east), Cambridge Science Park to the west of Milton Road and the Anglian Water Treatment Works. The northern boundary of the Business Park comprises Cycle Network with Cowley Road beyond. The southern boundary is the Cambridge Guided Bus way.

Master Planning of Cambridge Business Park

The Crown Estate recognises that Cambridge Business Park occupies a strategic location within the draft AAP area and therefore has a key role to play in delivering the spatial framework and objectives of the AAP. The five strategic objectives of the AAP which seek to guide redevelopment in the area are shared by the Crown Estate as set out below;

- To ensure development addresses both the climate and biodiversity emergencies, and leads the way to reach net zero carbon;
- To create a sense of place that will be a lively, mixed-use area which fosters community wellbeing and encourages collaboration.
- To integrate with surrounding communities – to be physically connected, and socially cohesive.
- To optimise the delivery of new homes, a full range of jobs and provision of local amenities.
- To create a healthy district where wellbeing, recreation and community safety are built into how it is designed.
- To be planned around walking, cycling and public transport as a key way to address climate change

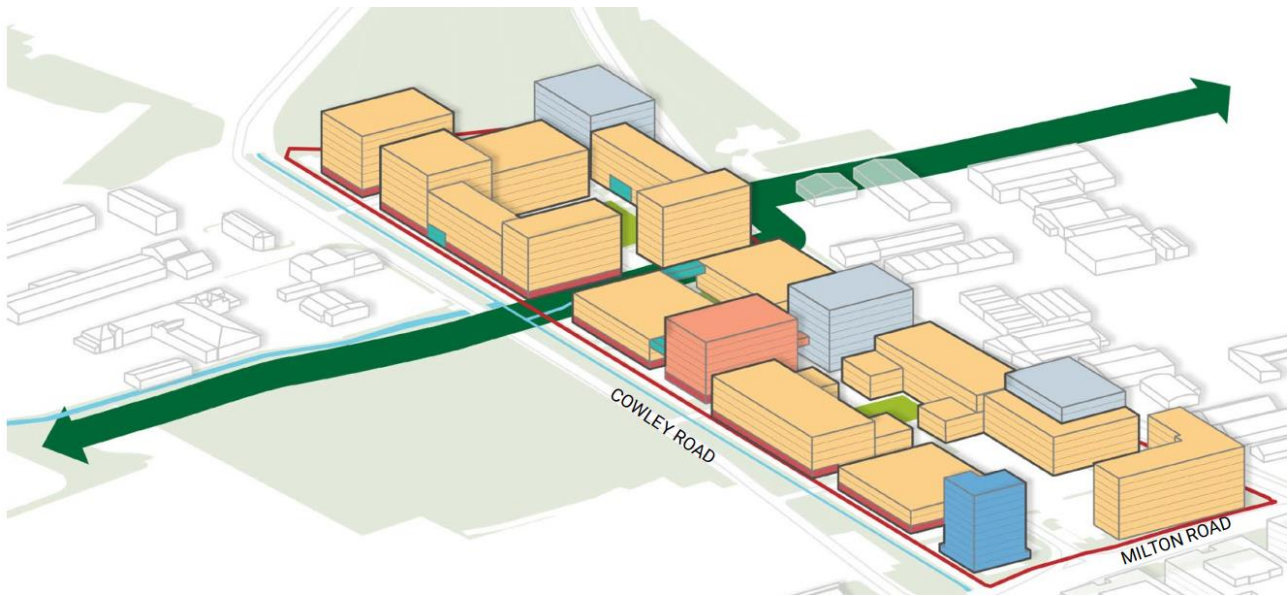
The Crown Estate has appointed a multi-disciplinary team to consider the potential of the Site within the context of the evolving AAP objectives and having regard to the aspirations of the other landowners, developers and stakeholders in the AAP area. The on-going activities includes developing an over-arching development framework or masterplan which is being prepared by masterplan architects Studio Egret West (SEW), and a Phase 1 office based development to the Milton Road frontage of the Site designed by Barr Gazetas in accordance with the masterplan. The latter is subject to a current pre-application process with Cambridge City Council.

The wider consultancy team includes:

- TTP Consultancy-providing transport consultancy
- CBRE-providing commercial real estate advice
- Watermans-providing environmental and sustainability consultancy

The master planning undertaken by SEW and the Phase 1 building proposed by Bar Gazetas has regard to the objectives and broad design parameters evolving through the AAP process, including the potential scale and heights of buildings on the Site.

Based on a variety of building heights across the Site, but typically 6-8 with a maximum of 10 storeys (see draft Policy 9 and Figure 21-see below), SEW consider that there is potential to deliver the range of uses proposed for the Site in the AAP and potentially net additional B1 offices compared with the draft AAP. We have included below an initial scale, height and massing exercise based on a full scale redevelopment of the Site which could deliver up to 180,000 sqm of new development. This exercise follow the approaches scoped as part of the landowner's forum process with the Council's and other stakeholders.



Therefore, based on the master planning work undertaken to date and having regards to the stage that the AAP has reached, The Crown Estate consider that the AAP should fully reflect the development potential of the Site and therefore propose that the relevant policies, figures and trajectories include for additional development. Given the Site's prevailing B1 office use and the proposed wider distribution of uses across the AAP area, these representations are made on the basis that the additional development capacity of the Site is reflected in an increase in B1 offices.

Scope of Representations

These representations to the Regulation 18 Draft AAP are made on the following basis:

- General comments;
- Comments on the 10 main overarching questions raised by the Councils; and
- Policy and Site Allocation specific.

Absence of comment or representations on specific issues should not be taken to be “default” support and The Crown Estate reserves its position to make further comments as appropriate and specifically as and when further/additional evidence base documents and studies are completed and made available.

General Comments

We would make the following general comments which we would invite the Council's to give due consideration to in their evolution of the AAP.

The Council's will be aware of the Governments White Paper “Planning for the Future” and it's propositions with regard to spatial planning, a stream-lined development plans system, proposals to replace the current Community Infrastructure Levy and S106 mechanism with a new Infrastructure Levy, changes to Standardised Housing Need requirements, etc. Potentially, these proposed changes will have material implications for content, scope and delivery of the AAP.

Amendments were introduced to the Use Classes Order on 1st September 2020. These draw together the majority of the previous employment generating uses compatible with a residential area into a new Class E and also created new F1 and F2 Classes which would be relevant to the planning of the AAP area. The Government's objective for Class E was to consolidate the commercial use classes to allow for greater flexibility and efficiency to allow for a wider range of uses to take place without the need for prior approval of local authorities. This includes the previous Class B1 uses and many of the uses commonly found in Centres (i.e. Use Class A1, A2 and A3 and some leisure and community uses). At the headline level, these changes will have implications for how the Councils have described the distribution of uses across the AAP area. In addition, we would respectfully suggest it would have implications for how the Councils approach the definition of uses, specifically within the proposed centres.

We note that the supporting documents for the AAP is "work in progress". This includes, inter alia, in relation to Heritage Impact and Townscape Assessments, the approach to an AAP wide energy solution, etc. It is acknowledged that the APP process will not be concluded before this evidence basis is concluded in full.

In principle, The Crown Estate supports a regime to apportion the infrastructure and other costs to deliver development in the AAP area. This will need to have regard to the existing ("base") position of the individual sites within the AAP area, the relationship between proposed development and infrastructure requirements, etc. We would suggest that the more effective approach would be one that is straightforward and transparent so that there is a clear apportionment of "cost" associated with development which can be factored into assessments at the outset.

Various landowners and developers within the AAP area are at different stages of formulating proposals for their sites and potentially bringing forward development. This includes The Crown Estate who are engaged with the Council in a pre-application process for a new development fronting Milton Road. Given the need for a comprehensive approach to the planning of the AAP area as a whole and an equitable approach to the funding and delivery of infrastructure, etc it is important that the AAP (alongside other provisions available to the Councils) ensures that a "first past the post" position does not arise.

Finally, we highlight the potential overlap between the AAP programme and timescales/trajectories set out in the Draft AAP. For example, the Local Development Scheme indicates potential adoption of the AAP in 2025 and that this will be dependent upon, inter alia, the Anglia water Treatment Works DCO, an Independent Examination into the AAP and the position of the Greater Cambridge Local Plan. Set against this, the draft AAP includes development trajectories for the period 2020-2025. We would suggest this either requires a direct acknowledgement of development in the AAP area running ahead of the AAP adoption or the trajectories should be pushed out. On the basis that the development of some sites within the AAP and the uses proposed thereon would not, in our opinion, be fundamentally dependent upon the relocation of the Water Treatments Works, the final adoption of the AAP, or can otherwise come forward within the development plan framework set by the existing Cambridge plans, this would suggest the former.

Comments on 10 Overarching Questions

The Crown Estate notes the 10 overarching questions for the Regulation 18 consultation, and sets out comments below on each question.

1. The Vision for North East Cambridge

The Crown Estate supports the Councils vision for North East Cambridge to be *'an inclusive, walkable, low-carbon new city district with a lively mix of homes, workplaces, services and social spaces, fully integrated with*

surrounding neighbourhoods' which aligns with The Crown Estate's key development principles. In addition, The Crown Estate sets a number of sustainability aspirations which support the overarching vision for North East Cambridge and will be applied across future development across its Site. These include:

- Improving Social Value: Social value is increased where a great place brings people together, creates a community, and addresses the specific needs of the local context. The Crown Estate looks to ensure that the design of future buildings, and their relationship with the public realm support the creation of an economically inclusive, diverse and cohesive communities.
- Improving Human Value: Human value is increased where quality and longevity of life is improved, and happiness is increased. The Crown Estate will seek to provide an environment across the Site that protects peoples' health, both indoors and outdoors; support and encourage an active lifestyle; and enhance wellbeing by creating places that support health, happiness, and prosperity.
- Improving Natural Value: Natural value is increased by achieving positive gain through the protection of existing quality and where new complimentary resources are introduced. Future development at the Site will seek to protect and enhance the existing biodiversity. The materials used in future development will be carefully considered so that they prioritise the use of reused and recycled products over raw materials. The embodied carbon impact of various construction options will be assessed for each building to inform decision making particularly on the structure, sub-structure and building envelope.
- Improving Physical Value: Physical value is increased where buildings and infrastructure respond to the local context, are designed for longevity, and allow people to navigate easily on foot and by bike. Cambridge Business Park occupies a strategic location with the AAP area and The Crown Estate will seek to provide a high quality urban space which improves physical value and aligns with the hierarchy of spaces across the area. Furthermore, smart technology and sustainable design will ensure that the development across the Site will be future-proofed and climate adaptable.
- Improving Economic Value: Economic value is increased where the development supports an equitable distribution of the economic benefits during construction, in-use, and supports a positive economic legacy.

2. Connected and Integrated (see also Policy 17)

The AAP sets out to improve accessibility across the AAP area, and includes new and improved pedestrian and cycle networks which help to link North East Cambridge with nearby villages, the City Centre and surrounding area. Of particular relevance to the Site are the new crossings points proposed over the guided busway, the new crossing on Milton Road (see below) and the improved junction for pedestrian and cycle movement at Milton Road.

The Crown Estate's vision for Cambridge Business Park is to plan new development around walking, cycling and public transport as a key way to address climate change. In principle, The Crown Estate therefore supports the proposals to improve pedestrian and cycle connections within the AAP area but further work is required in relation to potential pedestrian and cycle connections over Milton Road with the draft AAP highlighting a preference for a bridge in the vicinity of Cowley Road / Science Park Entrance and an underpass further north in the vicinity of the Innovation Centre access, with an at grade crossing to the south by the existing Guided Bus junction.

It is acknowledged that the bridge and underpass would have the least impact on motorised traffic running along Milton Road. However, a bridge in particular with a relatively long transition to obtain the necessary clearance over the road would have a relatively significant impact on accessibility to adjacent properties. Although an at-grade crossing could affect through vehicular movements along Milton Road, evidence from the DfT data suggests

that these movements have been reducing over time, and by all accounts there is the potential for there to be more pedestrian and cyclists across Milton Road than motor vehicles along the corridor and as such pedestrians and cyclists should have priority.

Construction costs associated with the bridge and underpass would also be relatively high when compared to at-grade crossings, with apportionment of costs along with benefits being further considerations that need to be taken into account. We are of the opinion that whereas delivery of the wider AAP is important, crossings over Milton Road are more likely to be key for connections between the Science Park and Cambridge North Station. Furthermore, the proposed at-grade crossing in the vicinity of the Guided Busway is likely to be the most direct route to / from Cambridge and large parts of the AAP once the frontage along the Guided Busway is opened up. Promoting at-grade crossings in all three locations could reduce costs which would increase delivery potential along with releasing funding for other uses with an anticipated relatively limited impact on the capacity of the Milton Road corridor.

In terms of external connectivity, the Draft AAP and supporting documents refer to additional bus services and train carriages in the short to medium term, with the creation of the Cambridge Autonomous Metro (CAM) in the medium to longer term. However, whereas additional bus services and train carriages would provide additional capacity, usage will depend on the frequency along with the origin / destination of any services. Whilst the creation of the CAM with links to St. Neots, Huntingdon and Waterbeach to the north of Cambridge along with destinations to the south is supported in principle, is likely to be subject to significant funding and land constraints making delivery challenging.

In conclusion, we respectfully suggest that additional work needs to be undertaken to address the connectivity and integration objective for the AAP area. Not least, this goes to the heart of the development capacity debate which is determined by a “no additional vehicle movements” objective.

3. Social and Cultural Hubs (See also Policy 10)

In principle, The Crown Estate supports the location of the four proposed centres within the AAP area which seek to create active, lively focal points for new and existing residents and workers. The location of the proposed District Centre, situated centrally to the AAP and along the north east boundary of the Site, is supported. This is particularly important for the District Centre which is proposed to straddle The Crown Estate and adjoining ownership so as to create a double sided “High Street”. This will require a joined up approach to its delivery and it is proposed that the relevant policy (see below) explicitly allows for this.

Notwithstanding, The Crown Estate considers that emerging policies for the social and cultural hubs should include a degree of flexibility in terms of uses, scale and detailed location in order to reflect phasing of development and the changing economic and social context.

Furthermore, The Crown Estate would suggest further consideration is given to the cost of delivering the social and cultural hubs, as seen with the apportionment cost mechanism for the site wide infrastructure. Given the social and cultural hubs will serve the AAP as a whole, it may be appropriate that the costs (or a proportion thereof) of delivering such centres should not fall solely on the landowners/developers of the sites where the centres are located.

4. Homes and Workplaces

The Crown Estate notes the proposed mix of uses within the AAP area including the provision of 8,000 new homes and 20,000 new jobs. The Crown Estate supports the principle of an integrated mix of uses across the AAP area, however suggests the AAP considers a degree of flexibility should be applied with how this is distributed.

5. Social and Cultural Facilities

The Crown Estate notes the proposed mix of social and cultural community facilities within North East Cambridge including the provision of health facilities, a library, cultural facilities, schools and a community centre. It is acknowledged that such facilities will be required to ensure pressure is not placed on existing resources arising from the increase of residents and workers in the area.

The Crown Estate supports the provision of community facilities within the area. However it is considered that a degree of flexibility is required in the delivery of facilities in terms of phasing, location, and associated costs.

6. Distribution and Location of Building Heights and Density

The draft AAP discusses the sustainability of North East Cambridge as a place to build having regard to its brownfield land, good public transport, walking and cycling links. The Crown Estate supports the AAP's aspiration to build a critical mass of new homes and workspace in the area, and considers the approach to the distribution of height and density across the AAP broadly appropriate (see comments on Figure 21 and Policy 9 below).

7. Open Spaces

In line with The Crown Estate's objectives for Cambridge Business Park, the proposed public open spaces are supported to help create a healthy City district where wellbeing, recreation and community safety are built into how it is designed.

The proposed Green High Street along Cowley Road and the Linear Park stretching from Milton Country Park to Nuffield Road, including where it passes through the Site, are supported in principle.

Notwithstanding, The Crown Estate considers the need to for the AAP to provide additional details on specifically where the open spaces will be located and how they will be funded particularly in terms of the potential impact on development density, etc. It should be acknowledged that such open spaces will serve the needs of the wider North East Cambridge area, and therefore the costs of delivering such social infrastructure should not fall solely on the land owners to which the spaces are located.

8. Biodiversity

The Crown Estate supports the AAP's strategy to improve biodiversity within and around North East Cambridge. Specifically, the initiatives of protecting Cowley Road Hedgerow and encouraging green and brown roofs on buildings are supported and align with The Crown Estate's own biodiversity goals. The Crown Estate's commitment is to create a habitat of value to wildlife by incorporating pollinators friendly species or for foraging, with all green spaces looking to achieve two or more functions. The Crown Estate will look to achieve a minimum of 15% of development area to be valuable net gain green space.

9. Discouraging Car Use (see also Policy 22)

The draft AAP sets out the objective to encourage sustainable, active travel and discourage all non-essential vehicle traffic and an over-riding no additional vehicle movement objective. This objective is proposed to be achieved through a number of options, including, giving priority to pedestrian and cyclists, ensuring all streets are designed to keep speed limits below 20mph, limiting parking spaces to a maximum of 0.5 spaces per home, and ensuring no additional vehicle movements on Milton Road.

The Crown Estate supports the strategy of the AAP to discourage car use into the area, however further work is required in relation to the details and in particular the modelling which forms the basis of the approach. We note that there has been much discussion regarding the most appropriate source of this additional information, including a suggestion that the landowners collectively undertaken an exercise. It is The Crown Estate's view that the transport issues, particularly the objective that there be no additional vehicle movements, are central to the AAP approach that presenting a comprehensive agreed set of base data and parameters against which, inter alia, development capacities can be assessed should be led by the Councils and comprise part of a sound evidence base for the AAP.

The AAP area is relatively well connected by public transport with bus services running along Milton Road, the Guided Busway running along the southern boundary and the recently opened Cambridge North Station. However, it is recognised that Milton Road carries relatively high volumes of traffic and acts as a barrier to east-west pedestrian and cycle movements, albeit data from the DfT website suggests that traffic volumes a short distance to the south are lowest now (based on a 2016 count), with the highest recorded count of over 15,500 recorded in 2006. Notwithstanding this, the AAP sets targets of 3,900 two-way movements for the weekday AM Peak Hour and 3,000 two-way movements for the weekday PM Peak Hour for the AAP area. The flows have been based on a LINSIG model using traffic data from 2017 prior to the opening of the Cambridge North Station, and since this time there has been a mode shift away from the car at the Cambridge Business Park. We therefore have some concerns that the adopted targets have been based on a simplistic approach and that more detailed traffic counts and modelling need to be undertaken particularly given it forms the foundation for the principle approach to the AAP- i.e. no additional vehicle movements.

Setting aside potential concerns regarding the base data, measures to discourage car use include increasing the capacity of the Park & Ride site to the north of the A14 along with parking “barns” with the aim of reducing car parking within the AAP area itself and associated traffic generation. Overall, capacity for a maximum of 6,500 cars is proposed within the Car Barns across the AAP area for employment uses with 4,800 spaces accessed from Milton Road and 1,700 spaces accessed from Kings Hedges Road. The Crown Estate is supportive of reducing car parking subject to details on the distribution of spaces, with neither the Draft AAP nor the Transport Evidence Base stipulating how spaces will be allocated. Furthermore, with existing and consented parking provision on the Science Park alone being greater than the overall proposed provision, there is concern that adhering to the proposed level could affect delivery of the wider AAP. Consideration could be given to allocating parking based on site area or on the current CCC aspirations rather than developer aspirations which would remove the potential for developers to be “allocated” more parking with higher density aspirations. It is unclear if the aspirations to increase the capacity of the Milton Road Park & Ride is seeking to remove vehicular movements from the wider highway network or just from the Milton Road corridor, as although it would achieve the latter, it

would not necessarily remove many movements from the A14 / Milton Road interchange which is identified in the Draft AAP as a traffic hotspot and will be of interest to Highways England.

10. Climate Change

The Crown Estate notes and supports the AAP's objective for development to respond to climate change. These objectives align with The Crown Estate's own sustainability aspirations towards future buildings and where possible a net zero carbon performance by locking energy efficiency into the design of building form and envelope to minimise energy demand, utilising the most efficient building services systems, making the most of on-site renewable energy, and investing in additional, validated offsets to ensure zero carbon is achievable.

Detailed Comments

Below we set out comments on specific policies, figures or other issues within the draft AAP:

Figure 11 (Proposed Land Uses)-the Site is identified for "business space (B1), and housing with part of the District Centre proposed to north east corner. The Crown Estate support these uses in principle but consider that there should be scope for further associated and ancillary uses as may be required.

Policy 1 and 23 (Comprehensive and Coordinated Development)-these need to be read together. Whilst The Crown Estate supports a comprehensive approach to the development of the Site, given the timescale of the AAP area and the different development programmes across the area (e.g. as a consequence of existing lease commitments, the relocation of the Water Treatment Works etc), the policies should explicitly allow for development to come forward on a site by site basis provided that the objectives for the AAP are not prejudiced. Whilst Policy 23 appears to allow for this, it is not sufficiently clear, including for example in relation to what is intended by a "comprehensive master plan". Policy 23 should be amended accordingly.

Policy 3 (Energy and Associated Infrastructure)-The Crown Estate considers Policy 3 is too broad brush and open ended and is not sufficiently robust to comprise a policy at this stage. We consider that Policy 3 should either be deleted or re-worded.

Policy 4c (Flood Risk and Sustainable Drainage)-The Crown Estate supports the objectives of this policy but would welcome further information on how this approach would allow for the development of individual sites particularly in advance of the relocation of the Water Treatment Works.

Figure 21 and Policy 9 (Building Heights)-The Crown Estate supports the indicative distribution of heights across the AAP as shown on Figure 21 and agrees in principle that the appropriate location for taller buildings is within the centre of the AAP area. The heights of 6 to 8 storeys typically across the Site with a maximum of 10 are noted. However, we consider that Policy 9 should not be "prescriptive" in setting maximum heights and instead allow for a criteria based approach against which specific proposals would be considered.

Policy 10 (Centres)-The Crown Estate supports the proposed hierarchy of centres including the proposed District Centre on part of the Site. However, The Crown Estate would welcome a further discussion on how the floorspace and uses may be distributed across the two ownerships and how development may be phased.

Figure 29-The Crown Estate supports the range of uses identified for the site (i.e. offices, residential and retail/commercial uses for the District Centre). Notwithstanding, it is noted that wider uses often associated with large scale development, such as hotels, are not specifically mentioned. Therefore, The Crown Estate proposes that such uses are included and that the Site would make an appropriate location for such uses in principle, perhaps as part of the District Centre. In addition, based on initial master planning in the context of evolving AAP potential development parameters (particularly in relation to height and density of development on the Site), The Crown Estate considers that the Site could potentially support a greater scale of uses. Specifically, The Crown Estate considers that there is scope to increase the B1 floorspace by a net additional 88,000 sqm (i.e. + 20,000 sqm) subject to the comments above in relation to Figure 11 and Policy 10 (i.e. the scope for the net addition of up to 88,000sqm of additional B1 floorspace, 500 homes and 1,500sqm retail as part of the District Centre).

Policy 12a (Business)-The Crown Estate supports this policy in principle but would suggest that a viability test (not just “feasibility”) is introduced in relation to, inter alia, the affordable rental space and an acknowledgement that some development may come forward on a tenant specific basis with particular operational requirements which may not fully align with Policy 12a aspirations. In addition, The Crown Estate proposes that hotel and other uses which commonly support large scale mixed use developments are included.

Policy 14 (Social, Community and Cultural Infrastructure)- It is suggested that cross reference is made to the infrastructure delivery policies to ensure a proportionate contribution to facilities across the AAP area as a whole.

Policy 17 (Connecting to the wider network)- See comments above.

Policy 22 (Managing motorised vehicles)-This policy goes to the heart of the approach to development across the AAP area and adopts a vehicle trip budget approach. Whilst The Crown Estate supports the principle of discouraging vehicle movements (inc single car use), as set out above, we consider that the basis for this approach is not robust. Therefore, until further evidence is presented, The Crown Estate does not support Policy 22.

Policy 27 (Planning Contributions)- Policy 27 is the policy basis for the Councils approach to ensuring that infrastructure across the AAP is delivered in a timely manner. The Crown Estate supports the principle of this approach but considers that further work needs to be progressed to understand the scope and scale of the infrastructure requirements and the mechanism for its delivery. Furthermore, it is fundamental that it is applied on a fair and proportionate basis having regard to, inter alia, the existing prevailing position of individual sites.

Trajectories-The Crown Estate acknowledge that these are based on broad brush estimates of phasing over the AAP period. However, we would re-iterate that the date ranges may need to be reconsidered in the context of the Local Development Scheme etc. In addition, The Crown Estate proposes that the B1 office content is increased by 20,000 sqm as above.

Closing

The Crown Estate and its team look forward to continuing to work with the Councils and other stakeholders and to be kept informed of the AAP process.

Please contact Hayley Turley, Senior Asset Manager, The Crown Estate (Hayley.turley@thecrownestate.co.uk) or myself on 0207 866 8607 or 07984 458485 should you require any further information at this stage.



Yours faithfully,



Montagu Evans LLP

Encs.

