

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:	Mr David Ousby	Agent's name: (if applicable)	
Name of organisation:	South Cambridgeshire District Council (Commercial Development and Investment Team)	Name of Agent's organisation: (if applicable)	Carter Jonas LLP
Address:	C/o Agent	Agent's Address:	One Station Square, Cambridge
Postcode:	C/o Agent	Postcode:	CB1 2GA
Email (optional):	C/o Agent	Email (optional):	
Telephone (optional):	C/o Agent	Telephone (optional):	N/a

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  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:

### 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: See supporting comments

### 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: See supporting comments

**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: See supporting comments

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

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

Further comments:

**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: See supporting comments

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

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

Further comments:

**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:

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

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

Further comments:

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

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

Further comments:

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

Document details:	
Which document are you commenting on? (please tick)	<input checked="" type="checkbox"/> Draft North East Cambridge Area Action Plan <input type="checkbox"/> Draft Sustainability Appraisal <input type="checkbox"/> Draft Habitats Regulation Assessment <input type="checkbox"/> Draft Policies Map
Policy or section of supporting document that you are commenting on (Please state and be as precise as possible)	Various questions / policies
Is your comment (tick one):	<input checked="" type="checkbox"/> Broadly 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.

#### Introduction

These representations relate to the site currently occupied by Buildings 270 and 296 on the Cambridge Science Park ('CSP'). A Site Plan, showing the boundaries outlined in red, accompanies this submission (Annex 1) ('the Site'). South Cambridgeshire District Council ('the Landowner') own the freeholds of the two buildings on the Site.

Building 270 is 2/3-storeys in height, built in the 1980s, and currently vacant, having been formerly occupied by WorldPay, who have since moved into a new office building on an adjoining site. It is envisaged that Building 270 will be refurbished and then offered for let on a short/medium term basis in 2021.

Building 296 is 2-storeys in height, built in the early 00's, and is currently occupied, with the earliest opportunity for vacant possession in 2027.

Building 270, in addition to the Johnson Matthey building to the east, formed part of a hybrid planning application (S/0630/15/FL) that was approved in March 2016 for the provision of a new 4-storey building and a new decked car park (detailed consent), both of which have been built, and occupied by WorldPay – and two new replacement buildings (for Building 270 and the Johnson Matthey building) of four-storeys each (outline consent).

Planning permission was given for 17,219m<sup>2</sup> GIA across the three buildings, 497no. car parking spaces, and 602no. cycle spaces.



The plan period for the North East Cambridge Area Action Plan (NEC AAP), is expected to cover the next 20 years, and it is likely that the Landowner will wish to consider redevelopment of Buildings 270 and 296 during the first half of that plan period. The purpose of these representations is therefore to seek suitable development parameters for future redevelopment, particularly in terms of scale/height, density, and parking, in order to provide developer confidence for any future planning application process.

The planning consent provides a baseline that indicates 4-storey redevelopment is acceptable in this location, but given the wider strategic aims of the NEC AAP particularly in seeking to reduce the significant levels of existing car parking, optimising development opportunities for economic and social benefits, and maximising connectivity across the AAP area, it is considered that the Site might offer the opportunity for increasing the quantum of floorspace further.

The Landowner broadly supports the vision, spatial framework (Annex 2) and strategic policies of the NEC AAP, but seeks the following clarifications from the Greater Cambridge Shared Planning Services ('GCSP') team / changes to draft Policy:

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

CSP was founded on the basis of establishing strategic structural landscaping for the Park as a whole, coupled with landscaping for each plot, low rise / low density buildings (in terms of plot ratio) of typically 1 – 3 storeys, and generous levels of car parking for each building. Since the introduction of the Busway and Cambridge North Station, there has been a trend in the redevelopment of older building stock, with taller buildings (typically 4-storeys), lower car parking levels (due to improved pedestrian, cycle and public transport accessibility), and significantly lower on-plot landscaping (on the basis that occupiers will have access to the established strategic structural landscaping nearby).

The whole of the NEC AAP area will be within a 10-minute cycle ride or a 30 minute walk from Cambridge North station and Busway. The street network will enable a seamless transfer from public transport to walking and cycling, ensuring that those who commute into the area don't need to drive to work. The NEC AAP includes new and improved crossings across Milton Road, the A14, the Busway and other major routes, linking surrounding neighbourhoods with the new ones that will be forming.

The NEC AAP will lead to a positive step-change in how older building stock is optimised in redevelopment; significantly enhanced connectivity will enable plots to offer lower levels of on-site car parking (but higher cycle parking) and, along with taller height parameters (between 4 – 6 storeys), it will create opportunities for higher density / finer urban grain in the area. The higher density will be supported by the legacy of established strategic structural landscaping around CSP.

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

We support the proposal for the creation of new centres, to provide walkable access to new services and facilities for existing and newly redeveloped businesses on the CSP. One of the current issues with the CSP is that people use it during core hours of work e.g. 0800 – 1800, Monday to Friday. However, during the evening and at weekends CSP has extremely low levels of use. People tend to travel in and leave work by car (mostly), often all at the same time – which in itself leads to the very high levels of peak-hour congestion on to Milton Road.

Furthermore, many businesses have their own café/canteen, meaning that staff remain within their building for lunch. As such, there is very little integration between the various businesses on

the CSP. The centres will therefore help foster greater activity and vibrancy around the CSP (for instance, new places to eat and drink might extend the time people stay on CSP, going to a café after work to socialise with co-workers), and will encourage workers to be more physically active (for instance, by leaving the office and walking to a sandwich shop for lunch), helping to promote healthier lifestyles for people working on CSP.

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

We broadly support the proposed use of CSP for business-led development (see Annex 3). We would query the 72,250m<sup>2</sup> of business space, shops and local services that is indicated in the plan for CSP. This figure appears to have been derived from Appendix A of the *'Typologies Study and Development Capacity Assessment January 2020'*.

The Site falls within zone 'KK' of that document (Annex 4), which states a parcel size of 2.14ha (gross) but has not been considered for any form of redevelopment on the basis that it is deemed to be unavailable: *'Single land ownership. Discussion with landowner confirms that there are no plots within this development parcel which will be available for redevelopment during the Plan period due to existing leaseholder agreements'*. For the reasons set out in the earlier introduction, this is incorrect. Both buildings are likely to be available within the first half of the Plan Period. **We therefore would request that GCSP reconsiders its assessment of potential for Buildings 270 and 296, which together could feasibly have redevelopment potential for 10,000 – 12,000m<sup>2</sup> (subject to assessment, modelling and design). Given that the existing buildings currently offer approximately 5,500m<sup>2</sup> GIA, it is considered that redevelopment could provide an increase of 4,500 – 6,500m<sup>2</sup> GIA.**

We think it might also be useful for the table to refer to the recent consent (S/0630/15/FL) that was achieved on part of site KK (excluding Building 296), which would provide some context to what has previously been considered in terms of quantum, layout, density and scale.

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

We would like to query why the plan takes a more cautious approach to heights than is recommended in the *'Landscape Character and Visual Impact Appraisal January 2020'* ('LCVIA'). For the area in which Buildings 270 and 296 are positioned, the LCVIA recommends 'up to 6 storeys – 18m' (Annex 5) and we think the plan in question 6 might follow this approach and simply state 'up to 6 storeys' rather than 'typically 4 – 5 storeys, maximum 6 storeys' (Annex 6). This would then step-down to 4 storeys on the Site's edge near the A14, as recommended. This change in reference would make it clear what the general upper height parameter should be (rather than the current format which implies that only in special and limited circumstances will 6 storeys be deemed acceptable), thereby creating a positively-worded policy that will help optimise economic development across the CSP.

#### Policy 7: Legible streets and spaces

We would question the relevance of this policy to CSP, particularly the references to Figures 16-18, which are seemingly more applicable to the Anglian Water / Cambridge City Council / Chesterton Sidings areas. There is a long-established estate and street layout in the CSP, and individual planning applications (such as one for Buildings 270 and 296) are unlikely to be able to have much influence on estate and street hierarchy changes. Could GCSP please clarify?

#### Policy 9: Density, heights, scale and massing

The statement in the policy *'Development densities and building heights should not exceed those identified on Figure 21 and Figure 23'* does not provide sufficient flexibility for a detailed planning

application process – there might be exceptional circumstances that support a taller building beyond the heights specified, and policy should be written in a more positive manner i.e. simply inserting '*unless exceptional circumstances can be demonstrated*'.

We would like to query why the plan takes a more cautious approach to heights than is recommended in the '*Landscape Character and Visual Impact Appraisal January 2020*' ('LCVIA'). For the area in which Buildings 270 and 296 are positioned, the LCVIA recommends 'up to 6 storeys – 18m' and we think the plan in question 6 might follow this approach and simply state 'up to 6 storeys' rather than 'typically 4 – 5 storeys, maximum 6 storeys'. This would then step-down to 4 storeys on the Site's edge near the A14, as recommended. This change in reference would make it clear what the general upper height parameter should be (rather than the current format which implies that only in special and limited circumstances will 6 storeys be deemed acceptable), thereby creating a positively-worded policy that will help optimise economic development across the CSP.

#### Policy 12a: Business

We would query the 70,000m<sup>2</sup> of new business space for CSP, as indicated in Figures 29 and 30 (which is also slightly different to the figure given in Question 4. The figure appears to have been derived from Appendix A of the '*Typologies Study and Development Capacity Assessment January 2020*'.

The Site falls within zone 'KK' of that document, which states a parcel size of 2.14ha (gross) but has not been considered for any form of redevelopment on the basis that it is deemed to be unavailable: '*Single land ownership. Discussion with landowner confirms that there are no plots within this development parcel which will be available for redevelopment during the Plan period due to existing leaseholder agreements*'. For the reasons set out in the earlier introduction, this is incorrect. Both buildings are likely to be available within the first half of the Plan Period. **We therefore would request that GCSP reconsiders its assessment of potential for Buildings 270 and 296, which together could feasibly have redevelopment potential for 10,000 – 12,000m<sup>2</sup> (subject to assessment, modelling and design). Given that the existing buildings currently offer approximately 5,500m<sup>2</sup> GIA, it is considered that redevelopment could provide an increase of 4,500 – 6,500m<sup>2</sup> GIA.**

It is noted that the policy seeks to make provision for additional development beyond the 70,000m<sup>2</sup> figure, to ensure any such development is justified in terms of trip budget and AAP wide infrastructure, but it is deemed sensible (and appropriate in Soundness terms) to ensure the quantum of B1 development in the CSP reflects the most up-to-date information available (and that the trip budget / AAP wide infrastructure cost is calibrated correctly).

We think it might also be useful for the table to refer to the recent consent (S/0630/15/FL) that was achieved on part of site KK (excluding Building 296), which would provide some context to what has previously been considered in terms of quantum, layout, density and scale.

#### Policy 15: Shops and local services

The inclusion of additional shops and local services, including a Local Centre for CSP, is supported, but seek clarification from GCSP on the proposed location of the Local Centre (it appears to be in the location of where Xaar are). Could you clarify that the landowner/developer is supportive of a local centre in this location – the buildings here are not particularly old, and the landowner may not have any intention to redevelop. This could affect delivery of the local centre. It would seem more appropriate to provide a zone of where the local centre might sensibly be

placed, and then leave it to respective landowners who, when and how the uses are brought forward.

#### Policy 21: Street hierarchy

We wish to clarify the diagram in Figure 40 – this includes a proposed car barn in the location of the Site (Annex 7). It is assumed that this relates to the decked car park that was provided in application (S/0630/15/FL), which provides car parking for Building 270 and the new WorldPay building. **Please can GCSP confirm this is a correct assumption, and that the intention is not to provide another car barn on the Site i.e. building 270 or 296.** This car park is not in the ownership of the Landowner, so we won't make any comment in that respect, but there is an agreement to use spaces in the decked car park for the occupants of building 270 (albeit that it's currently vacant).

#### Policy 23: Comprehensive and Coordinated Development

Policy 23 seeks to ensure a comprehensive and coordinated approach to development and regeneration at North East Cambridge, which is broadly supported. The policy appears to be written more for some of the larger landowners, such as Anglian Water/Cambridge City Council, Brookgate/Network Rail, The Crown Estate and Trinity College. Where individual plots become available, such as in the case of the Landowner/Site, it will be more difficult to show how it complies in the context of part **b)** of the policy (wider masterplanning). Consideration should be given to this in the policy.

#### Policy 28: Meanwhile uses

The grant of temporary consent for 'meanwhile' uses within North East Cambridge is broadly supported. The 'meanwhile' uses could temporarily add to the range of facilities within the area, and could reuse empty or underused land and buildings.

#### Policy 29: Employment and Training

The employment, skills and training initiatives associated with development within North East Cambridge are supported.

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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PO Box 700  
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