

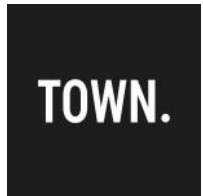


NORTH EAST CAMBRIDGE AREA ACTION PLAN

REGULATION 18 CONSULTATION

COMMENTS BY THE CORE SITE TEAM

OCTOBER 2020



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1 INTRODUCTION: PURPOSE OF THIS DOCUMENT

This document sets out representations to the Regulation 18 draft version of the North East Cambridge Area Action Plan (NEC AAP); for the consultation undertaken July - October 2020. It has been prepared by U+I plc with TOWN, the master developers for the “Core Site” appointed by the landowners, Cambridge 4 LLP and Cambridge City Council. As such, it should not be interpreted as representing the views of landowners; or of Anglian Water Services (AWS) in discharge of its functions as a statutory water undertaker nor indeed of the obligations of the City Council as Local Planning Authority.

The Core Site is currently home to the Cambridge North Waste Water Treatment Plant (WWTP) with ancillary facilities owned by AWS; together with a golf driving range and service depot belonging to the City Council. The intention of both landowners is for comprehensive redevelopment of the Core Site to a residential led mixed-use city district, once the existing land uses have ceased and/or been relocated.

Funding of £227m has been approved from Homes England’s Housing Infrastructure Fund (HIF) to relocate and decommission the existing WWTP. This is contingent upon the provision of 5,600 homes on the Core Site. The Area Action Plan, together with the emerging Greater Cambridge Local Plan, will provide the framework for the delivery of the new district and hence discharge the obligations related to the funding.

These representations set out a number of key issues from the perspective of the Core Site team (i.e. U+I plc with TOWN and appointed consultants). The representations are as set out below.

Format of these representations

Following a summary of the representations in Section 2, in Section 3 we set out general comments about the style and format of the document – as well as commending the efforts at consultation and engagement by the AAP team during the ongoing global pandemic.

Section 4 addresses the Vision; Context and Strategic Objectives of the draft AAP.

In Section 5, we set out a critique of the spatial framework drawings – an issue of significant ongoing concern for us.

Section 6 details the key issues and concerns identified by the Core Site team arising from the draft policies in the AAP.

Section 7 commences with some remarks on the potential impact of the Government’s proposals for the overhaul of the planning system and the implications for the planning and delivery of development at NEC and the Core Site in particular. We then set out some concluding comments.

In Appendix One, we provide a table of detailed comments on the draft AAP, and its policies in particular. Appendices Two – Five set out further evidence as noted in the main text of these representations.

2 SUMMARY REMARKS

U+I plc and TOWN welcome the publication of the consultation draft AAP. There is much to be commended about it, the Vision and strategic objectives are strong and it is a visually attractive document.

However, the draft AAP raises a number of significant issues for us as Master Developers seeking to deliver the Core Site, which will be integral to the success of North East Cambridge as a whole:

- The strategic case for the growth set out in the AAP is not strongly made. Of concern is the risk of the consequences for the spatial pattern of growth across Greater Cambridge without the growth at NEC. We consider that at least one large scale, greenfield settlement would be required in a location inevitably less sustainable than NEC;
- Although the Vision and Strategic Objectives are in line with our own and the wording of many policies supported, we have particular concern about the spatial framework drawings and the level of prescription that they suggest which we feel inappropriate for this stage in the masterplanning and design process;
- The focus of the document errs too much on design and too little on ensuring the fundamental elements of deliverable policy are in place – in particular in relation to transport and infrastructure funding;
- On transport, we see the need for strong leadership from both County and District Councils, working with all developers in the production and delivery of a new Transport Strategy comprised of 'carrot and stick' measures to ensure the achievement of the radical modal shift necessary; and
- On infrastructure, we are concerned that the infrastructure delivery plan is insufficiently resolved; equally that the mechanisms to capture appropriate proportional contributions from all developers at NEC, including any seeking to secure an early planning permission, have not been progressed.

We look forward to working collaboratively on these issues with the other developers, under the strong leadership of the local authorities, in order that the £220m+ of public funding earmarked for the relocation of the Waste Water Treatment Plant can unlock the £5bn+ growth at NEC.

3 COMMENTS ON THE STYLE AND FORMAT OF THE DOCUMENT.

We welcome this important stage in the evolution of the AAP and much of the document itself. The visual material is well presented and helps to convey a message about the nature of development which is expected to be delivered at NEC. Diagrams and infographics break up the text and are generally very helpful.

However, our serious concerns about the spatial framework drawings remain (see section 5 below) – although unusually for a document such as this, the first key diagram is not displayed until page 38.

Whilst efforts have clearly been made to make the document accessible to a wide audience, at nearly 300 pages it is very lengthy and overly prescriptive in a number of respects (as will be set out in these representations). We think that generally the document should be shorter and more focused around matters that the AAP should cover. Specifically:

- Since the AAP is currently being promoted in advance of the Greater Cambridge Local Plan (GCLP), this means that it is looking to lead policy in a number of respects (e.g. on sustainability). The planned pause in the AAP process will enable the local plan to ‘catch up’ and some of these wider policy themes should then be removed to the ‘higher’ plan – unless specific and more stringent controls on issues such as water usage and sustainable construction can be demonstrated to be necessary at NEC. In principle we think this is unlikely to apply;
- There is a range of design criteria set out in the current draft AAP which we consider to be overly prescriptive and more appropriate for area-wide design guidance, as set out in Section 6 below; and
- The readability of the document could be greatly improved by removing a good deal of the text below the draft policies and inserting it into a table in an appendix. The sections titled Evidence supporting this policy; Monitoring indicators; and Policy links to the adopted Local Plans could all be put into such a table – noting that the latter will also need to include emerging GCLP policy.

Consultation and engagement process

During the course of 2019, the AAP team hosted a series of design workshops. We valued these workshops and participated fully in them. However, we don’t feel that the design evolution as it was at the end of those workshops was carried wholly into the current draft.

Nonetheless, the efforts of the GC Shared Planning Services Team in respect of its consultation and engagement activities are to be commended, particularly as it took place during the Covid-19 pandemic. It can be challenging to engage with local communities on local plan and strategic policy documents and the use of YouTube videos and webinars will hopefully lead to a wider public participation into the document than is often the case.

4 VISION, CONTEXT AND STRATEGIC OBJECTIVES.

The Vision for NEC

The scale of the opportunity at NEC is truly generational – both in terms of how often such opportunities arise and in the length of time it will take to deliver. The vision set out in the draft AAP is strong and accords well with the emerging ‘promises’ and values’ for the Core Site, which are summarised as follows:

*CNFE will be **rooted in Cambridge**, an integral piece of this unique city, learning from its past and looking to its future. It will be a place where people know their neighbours and put down roots.*

*It will be **shaped by many**, involving local people and organisations as it is planned, being built by a wide range of delivery partners and involving future residents in its management once it’s complete. CNFE will be open to all: its resources will be available to everyone, its homes will offer a place to start and a place to stay and it will place the needs of children and more vulnerable people at its heart. CNFE will make it easy for people to **live within their environmental means**, using innovative technologies to reduce the impacts of construction, responding to the climate emergency and encouraging more sustainable lifestyles.*

*CNFE will be **integrated with nature**, incorporating greenery, enabling people to experience nature at first hand, and looking to the natural world to help solve challenges. And it will be a place for **street life**, offering spaces for play, exercise and landscape, places to work, shop and have fun, and enabling walking, cycling and low-carbon modes of movement.*

We aspire to create a new, world-class city district for Cambridge based on the concept of the 15-minute neighbourhood, where all principal services and facilities can be accessed within a 15-minute walk or cycle ride from home. We support the setting of ambitious targets on sustainability and climate change – although the reality of standards today may mean that there is a need to increase those targets over time.

Context and strategic objectives

In our view, more could be made of the strategic context for the AAP and the City’s unique locational advantages. The draft makes little of the regional case for growth at NEC, including the positioning on the Oxford – Milton Keynes – Cambridge Arc, a national growth priority and focus for infrastructure funding and support.

The opportunity to capitalise on the city’s strengths in research and development and to appeal to an international market and population are barely referenced. Growth in housing and jobs at NEC must be in tandem to avoid increasing commuting flows further.

The emerging GCLP will be dependent on NEC to deliver 8,000 homes. This level of development enabled by the AAP could not be delivered elsewhere within the city and so without NEC the local authorities would have to consider at least one new settlement, certainly greenfield and potentially within the Green Belt, in order to provide growth of the levels envisaged for NEC.

A freestanding new settlement in the open countryside which took the place of the growth at NEC would inevitably be less sustainable; would require more land take; have lower public transport opportunities; have greater environmental and climate change impact and be less well positioned on the journey to net zero carbon. That alternative would be a significantly worse option than the growth proposed for NEC.

Hence, the opportunity to capitalise on the £227m of public (HIF) funding allocated for the relocation of the WWTP must be seized and in order to do that:

- The AAP needs to be better placed within the wider framework of the GCLP and the interdependencies recognised;
- The consequences of the failure to deliver the growth of NEC (as outlined above) need to be accepted across the spectrum of public and private sectors; and
- It is essential that there is a strong public sector lead to facilitate development at NEC, across a range of sectors most notably including transport and infrastructure planning and delivery.

The strategic objectives in the draft AAP are well balanced and positively phrased. However, it is often difficult to disagree with generic statements expressed at this level. It may be helpful for developers to be required to demonstrate how they are addressing the strategic objectives, as planning applications come forward.

5 THE SPATIAL FRAMEWORK DRAWINGS.

We remain concerned generally about the level of prescription inferred by the spatial framework drawings, particularly as they are so clearly referenced in policy and hence integral to the delivery of the AAP. Early on in the process of developing the document, it was suggested by the AAP team that the adopted AAP for Canada Water would be a good model for the visual approach to be used for NEC. See Appendix Two for an example. This example key diagram shows key parameters, connectivity across the area and with surrounding areas. The Core Site team consider this appropriate for an AAP, produced at a stage when detailed masterplanning, and infrastructure planning and assessment have yet to be undertaken and are expected to be carried out over several years.

As one would expect from a long-term delivery process (as at NEC), the Canada Water AAP has been subject to change since its initial adoption in 2012. It was updated in 2015 following the Daily Mail's decision to vacate its printworks and is currently subject to further detailed masterplanning by British Land. The AAP was able to facilitate these changes over time as it struck the right balance between prescription and flexibility.

This is markedly different from what is shown in the current NEC AAP drawings, which go far beyond this level of prescription and are much closer to detailed masterplan drawings.

We are concerned that a masterplan / outline planning application that did not show strict accord with the AAP framework drawings – and specifically in respect of the superblocks that these show – would run the risk of being refused. Therefore, should infrastructure or other valid considerations not allow the exact block layout to be achievable in practice, then it would be impossible to demonstrate that such a plan complied with policy. This may have other consequences, such as the level of development required may not be demonstrably achievable, leading to questions of soundness.

Our preference would be for all of the spatial framework drawings to be less prescriptive, focused on indicating parameters and connections across the NEC and with surrounding communities and areas. The drawings should appear less 'binary' and more nuanced as appropriate for this level of policy framework and given that the AAP should provide an overarching context for more detailed masterplanning. Approaches in the style of 'heat maps' could be incorporated to further address these concerns, with the edges of zones blurred and arrows to indicate key relationships.

A fallback option, although significantly less preferable, would be to include some additional text at the beginning of the document on the following lines:

All sites to be developed under this AAP will be subject to comprehensive masterplanning including physical infrastructure and other constraints studies. As such, the detailed block structure and other parameters shown on the spatial framework drawings should not be regarded as absolutely fixed but will be interpreted through these ongoing processes including engagement with the planning service in pre-application discussions. The purpose of the spatial framework drawings is to indicate key parameters as well as the relationship between the different parts of North East Cambridge and with the surrounding areas.

Our principal concerns about the spatial framework drawings are detailed below:

Block Layout

It is not considered necessary for the spatial frameworks to show such a detailed and rigid super-block layout. We suggest simply showing the primary connections at this stage and leaving flexibility in the detailed block layout. As suggested above, until comprehensive infrastructure planning and masterplanning work has been undertaken, we simply do not know if we will be able to achieve this block layout, nor indeed whether it is the optimal layout in the context of a more detailed masterplan.

Examples of the detailed infrastructure work yet to be undertaken include assessment of legacy Anglian Water infrastructure to remain on site; detailed assessment of ground conditions; a study regarding the potential undergrounding of the Over Head Electric Lines (OHEL); and the detailed arrangements regarding the A14 noise attenuation measures. Much of this work will not be complete for two years or more.

The diagonal route

This has been subject to some discussion between our teams. The draft spatial framework drawings include a long diagonal route connecting the link from Milton and Cambridge Science Park, to the proposed high street and towards Cambridge North Station. Unfortunately this was introduced by the AAP team after the 2019 AAP design workshops –it was not proposed or explored during these workshops and did not feature in the generally north-south block structure that emerged from them.

Whilst we recognise that it will be important for there to be a high-quality strategic link between Milton and Cambridge North station (which is the rationale put forward by the AAP team for this route), we feel there should be flexibility in the exact orientation of the route which needs building up from connectivity and movement studies. One solution for the AAP would be for the plan to show the two points between which a route should be established, allowing some flexibility between these. Or it might incorporate an arrow that indicates the broad direction of a route, similar to others as shown on the drawing at section 1.2, page 14. Or else it could simply be picked up in policy wording.

This is important in that there is no evidence at present that this route is deliverable in its proposed location – and as above this will depend on detailed work on ground condition and infrastructure design. Therefore a rigid designation of the exact route carries the same risks as described above – a masterplan that deviates from it in the future (even for good reason) may run the risk of refusal, or the AAP may carry risk of being unsound.

Allowing flexibility in the route would also allow the detailed masterplanning process – to be undertaken over the coming 3+ years – to optimise the route in relation to other key considerations, for example by positioning it in a way that it will strengthen footfall through the district centre and high street. As shown we have concern that it may dilute that footfall instead. This is addressed in Section 6 below.

Open spaces

We are concerned about the inclusion of the large triangular greenspace –named as ‘Cowley Triangle’ which seems premature, ahead of a long design and masterplanning process which has not yet commenced. This is in the area likely to require some utilities infrastructure for the undergrounding of the OHEL and therefore we cannot guarantee that it could all be open or green space and we would face further conflict with the spatial framework drawings.

We are committed to the provision of a network of multifunctional and high-quality green and blue infrastructure which connects across NEC and critically with surrounding areas such as Milton Country Park, Chesterton Fen and the wider countryside beyond. This remains one of our core design principles underpinning the masterplan. But until detailed masterplanning has been carried out, we can't be confident of the exact location and shape of large open spaces – this should be determined through more detailed study and evidence-based design which focuses on the overall green/blue infrastructure strategy rather than isolated proposals such as this Triangle.

As with the issues identified above, the specific nature of the plan in this regard carries the risk that if it cannot be delivered as shown, any plan will fail to demonstrate compliance. It also lacks any evidence that this is the optimal location, shape and size of green space since this work has understandably not yet been carried out.

Our view is that it is right for the drawings to show strategic green infrastructure corridors, where there is a greater level of certainty that it will be delivered in that manner such as the N-S primary green corridor and the E-W secondary green corridor. Policy wording could then support the strategic infrastructure requirement by reinforcing the intention to provide high quality multifunctional space in preference to standard local plan requirements, and that individual planning applications will be expected to provide green/blue infrastructure strategies to demonstrate how open space and recreation have been integral to the masterplanning processes.

The approach set out on Figure 20 is questionable. We understand why the AAP is trying to display comparable green spaces in the City. However, it's making a very specific promise that is premature and more suited for later in the process. As suggested in the detailed response to policy 8 below, we believe we can provide more strategic green space than indicated – with the exact quantum to be defined through the masterplanning process yet to come.

The provision of specific new strategic green space appears to be reserved for the Core Site and should be allocated across NEC.

Social and cultural facilities

The drawings are prescriptive in the number and locations of schools to be provided at NEC. Given that these should be planned and delivered in line with provision planning in surrounding communities at the time of masterplanning, the policy wording could indicate that three primary schools are likely to be required across NEC with detailed location to be determined as the sites come forward.

Since around 30% of homes at NEC are to be provided off the Core Site, it would seem proportionate (and indeed efficient land use distribution) for one of the schools to be provided elsewhere and we would like to understand whether this has been tested and why it has been ruled out at this stage if so.

The need for a secondary school is not supported by the evidence base and the safeguarding should be removed from the drawings and policy. The text could instead refer to the need for the situation to be kept under review during the plan period.

District centre

The District Centre is currently identified by a node on the spatial framework drawings. This is in contrast to other elements clearly delineated on the super-block layout. In our view, it would

be more appropriate for a wider zone to indicate the extent of the potential District Centre – across the Core site and surrounding land ownerships - or better still to remove the current super-block layout and retain the existing ‘node’ approach.

We have a number of issues with the frontages marked as active. Specifically:

- The definition of the superblock approach means that if the layout changes, we can't conform with the frontages as shown;
- High street uses currently extend up the diagonal, thereby diluting footfall, in advance of connectivity and movement studies (see response to policy 10b below); and
- The extent of retail and/or mixed use frontage on the high street appears very limited. Without active ground floor uses it won't be a 'high street.'

We also question what is meant by 'green high street'. We are keen to introduce trees and landscape features into the area but currently it seems not to be presented as a high street at all.

Approach on densities, heights, scale and massing

We support much of the work that underpins this aspect of the AAP, but have serious concerns about the way that it has been translated into the specific framework diagrams.

For instance, Figure 23 sets out 'residential densities considered suitable for North East Cambridge.' Using the analysis reproduced at Appendix Three, these densities indicate a maximum capacity for the Core Site using the AAP figures of 12,167 units. This is more than twice the number of homes required to be provided to support the HIF funding.

Furthermore, measures such as dwellings per hectare only tell part of the story. It also needs to be related to development typologies. There could be a vast range of built floorspace possible depending on the proposed mix – e.g. 5,000 large units or 12,000 smaller ones having the same amount of built floorspace.

In our view, the approach should be reconfigured as 'heat maps', less definitive and feature a range of potential densities within each zone – just as for the approach on heights set out on figure 21, which proposes a range within each zone. A similar approach on densities would be appropriate and consistent.

It would then be for detailed LVIA's and masterplans to pick up these parameters and propose their definition for each site through the usual pre-application and EIA processes.

Further discussion on the approach to these key design parameters is set out in Section 6 below, in relation to policy 9.

Setting stark limits or locations (even seemingly the right ones) based on the proposed superblock structure is not only overly prescriptive but would raise significant soundness and planning risk for the AAP if that exact structure cannot be delivered for any reason. For example, if the superblock structure were to evolve, even in a minor way, through evidence-based detailed design, or for reason of ground conditions or infrastructure or similar, then it would be impossible for such an evolved plan to demonstrate compliance with the current AAP plans.

There is a risk that unless these issues are addressed, the levels of development proposed for the Core Site, and potentially other parts of NEC, cannot be accommodated. This is not just a risk to the Core Site (including the £227m of HIF predicated on the provision of 5,600 homes) but also to the soundness of the AAP and its contribution to delivery of a significant proportion of growth across the Greater Cambridge Local Plan area.

It should be noted that all of these concerns were raised following the joint design workshops undertaken in autumn 2019, as set out in the note submitted by URBED at the time, now attached as Appendix Four. It is disappointing that none of these comments appear to have been addressed in the diagrams set out in the draft AAP.

6 KEY ISSUES ARISING FROM THE DRAFT AAP.

Policy 1: Support for the relocation of the WWTP

The relocation and decommissioning of the Waste Water Treatment Plant is an essential prerequisite to the delivery of the levels of growth envisaged in the AAP. It is therefore curious that there is little reference in the AAP to the major relocation project nor to the processes which will support it – including the application for a Development Consent Order through the Nationally Significant Infrastructure Projects process.

We therefore recommend that the following wording changes are made to Policy 1:

*The Councils will work to secure the comprehensive regeneration of North East Cambridge during the plan period, in particular the creation of a new high quality mixed-use city district, providing at least 8,000 new homes, 20,000 new jobs, and new physical, social and environmental infrastructure that meets the needs of new and existing residents and workers, as well as delivering tangible benefits for surrounding communities. In order to achieve this, the Councils will work in collaboration with the County Council, Greater Cambridge Partnership, other strategic partners **including Anglian Water**, and landowners to:*

*a) Secure and deliver the interventions and infrastructure needed to deliver the vision and objectives for the area including: the required modal shift in accordance with the North East Cambridge Transport Study; district-wide networks and services; **relocation of Cambridge Wastewater Treatment Plan (which is required for the proposed spatial strategy) and potentially existing business uses** and land assembly; environmental, amenity, and community health and wellbeing standards; a network of functional and multi-use open spaces; and innovative approaches to community facilities provision...*

Policy 4a: Water efficiency

The aims in relation to water consumption and reduction in per capita usage are supported. As the Core Site will provide around 70% of the new homes at NEC, any requirements to safeguard land for secondary (grey or other) water networks may impact disproportionately upon us if that land is required to be within the Core Site.

Therefore the practicality of reducing to 80lpppd is as yet undetermined. The AAP Team is aware of the strand of technical activity being advanced in conjunction with Cambridge Water and Anglian Water (in discharge of its statutory functions) and we will continue to play a full part in that workstream.

Policy 6b: Design of mixed-use buildings

The supporting text to this policy indicates that “The Council will lead on the production of a site wide design code for the North East Cambridge area that will require input from the various landowners and their design teams.” However, some of the measures already included in the draft AAP are more appropriate to a design code (for example, see comments on policy 7 below).

We welcome the AAP’s aspirations to lift design quality across the NEC. However, it is important to strike the right balance between level of detail and enabling developers to follow their own evidence-based approach.

Design coding is an important part of the planning and delivery process. An effective design code will go beyond pure land-use considerations to consider the management of physical or transport infrastructure as well as public realm and green spaces. As such, it is most appropriate for the master developer's team to produce a design code.

The production of a design code is a requirement of the Master Development Agreement between U+I and the landowners – reflecting the fact that it is integral to the delivery process. We envisage that this design code for the Core Site will be submitted for approval as part of the outline planning application and then used by plot and parcel developers in producing their own schemes.

We recognise that there might be concern about the quality of design on some sites, or the desire to consistently apply the same standards across NEC. We therefore think that it would be appropriate for a design guide for NEC to be produced by GC Shared Planning Services. This would form a bridge between the prescriptive parameters set out in the eventual AAP and a larger volume of advice and guidance which aren't necessary to formally prescribe.

Some parts of the existing draft AAP could then be stripped out for inclusion in the design guide. This would help to reduce the length and accessibility of the AAP. Examples include the material related to street design. Additional material on alternative approaches, precedence from elsewhere and the design process itself could then be included.

The NEC design guide would then be used by developer teams in masterplanning their own sites.

Policy 7: Legible streets and spaces

The style and character of the diagrams in this section (figures 16-18) are great – appealing and visually friendly. However the level of detail and dimensions are yet again excessively prescriptive and seemingly fixed. This level of detail is normally expected in a Design Code, not in an AAP policy and framework diagram, which has understandably not been subject to a full masterplanning and design process. If this diagram and annotation were for illustrative purposes we would welcome it but for the reasons already set out in Section 5 above, not in the current format.

It is important to note that not all primary streets will look and be designed the same, equally for secondary and tertiary streets. Widths need to respond to the height and scale of the building as well as their function in the hierarchy. At present, all seem to require frontage-to-frontage distances of 21m, which would make all streets feel the same regardless of hierarchy. Moreover within our emerging approach to the Core Site masterplan design only Cowley Road is set to meet a 21m distance, while primary streets within the scheme may not do this in order to create streets that are pedestrian priority rather than vehicular.

It's not clear how the 21m distance has been derived (other than adding the component parts) – it should be evidenced.

Whilst we don't have any particular issues with the policy wording itself, we would propose that the diagrams should not be referred to in the policy and reserved for the suggested NEC design guide. In such a subsidiary document there would be greater opportunity to present cross-sections, broken down into the component elements with an explanation of how they all contribute to the achievement of the desired quality of streetscape with priority to pedestrians and cyclists.

Policy 8: Open space for recreation and sport

Although detailed masterplanning has yet to be undertaken, we do feel that we will be able to provide more than the amount of space identified in Figure 20. There will be a network of high-quality, multifunctional spaces within the Core Site. Of critical importance is the need for green spaces to be connected for pedestrians, cyclists and biodiversity alike.

As stated above, we do not know if the 'Cowley Triangle' can be provided here because of constraints work yet to be undertaken. Its current shape is defined by a route (Diagonal) that is inconsistent with our draft masterplan. Any naming of green infrastructure features should be reserved for the landowners much later in the development process.

Policy 9: Density, heights, scale and massing

As set out in Section 5 above, we have continued concerns about the provisions with regard to density, heights, scale and massing – and how they are portrayed on the diagrams in particular. The prescriptive format of the diagrams has not been underpinned by density studies and risks creating obstacles in the delivery of a compliant scheme.

As set out in Section 5 above, the current approach on density suggests a maximum capacity of over 12,000 units, based on the calculation of floorspace. The current approach should be revised, giving a density range and related to the typology or housing mix. The revised diagrams should present this, as previously set out, in a much more nuanced way such as the use of heat maps and blurring the distinction between zones.

Although we are broadly supportive in the approach related to heights, the proposed height restriction of six storeys adjacent to A14 may be overly restrictive and should be reviewed in line with emerging acoustic strategy in due course.

Policy 10b: District Centre

We are concerned about the extent and quantum of uses proposed for the District Centre. The image on the front cover of these representations has been produced to portray the vibrancy and mixed-use approach we intend to bring forward at the District Centre / High Street. We are developing a residential led mixed-use city district - categorically not a housing estate next to a series of business parks.

Whilst we accept that some restriction of development capacity is necessary in an AAP, the ongoing transport strategy work should assist in proving that additional provision can be made from the current low ceilings for non-residential uses. The assumptions that we are using in the emerging Core Site masterplanning are set out in Table Two, Appendix One.

Currently the AAP appears to be restricting mixed uses because it doesn't consider a mixed-use solution to be viable. We suggest that flexibility over quantum would allow a market solution to determine the right level. It is not conceivable that any significant impact on the city centre's retail activity could arise from competition introduced at NEC.

A principal concern of the Core Site team related to the identification of the Diagonal as a link on the spatial framework drawings is to ensure that the non-residential floorspace is not diluted and dissipated across two corridors. It would be much better in both market and urban design terms to focus the commercial uses along the principal high street corridor with any subsidiary link providing strategic pedestrian and cycle movements as well as green infrastructure functions. This need not be in the form of a direct diagonal but could be

provided by ensuring a permeable network through the development. It will be defined as a result of connectivity and movement studies at an appropriate stage of the masterplanning process.

Policy 12a: New Business space

The current wording suggests that 'an element of new business floorspace' will be provided, primarily around the Centres. This is totally inadequate to support our aspiration of developing a new residential-led mixed-use city district. As shown in Table Two, Appendix One, our current masterplanning assumption is for in excess of 75,000 sqm of employment floorspace. Whilst it is understood that the transport strategy provides a constraint on development, the AAP should set out clearly the potential for developers to increase the quanta of floorspace allocated provided that the transport strategy can accommodate such provisions.

The AAP will need to be updated to bring it into line with the recent revisions to the Use Classes Order. The rolling of class B1c into the new Use Class E reflects the Government's desire for more flexibility across uses appropriate to town centre and wider residential areas. Such flexibility could be targeted around the District and other centres at NEC in particular in order to allow for uses to change organically over time.

Policy 15: Shops and local services

This policy, along with many others, will also require updating to reflect the revisions to the Use Classes Order. One approach could be to identify 'retail' (old A1-A3) as the intended use in the core retail area with restrictions on some other Class E uses to be imposed through planning conditions.

Retail floorspace is likely to benefit from a split between convenience and comparison modes – though the exact proportions may be better addressed at the development management stage to counter the ongoing turbulence in the retail sector.

The limit on floorspace of 150m² on single units is overly restrictive. We suggest allowing individual shops to be up to 350m² gross to allow for long term flexibility (either on first opening or through later combination). As well as allowing for future proofing in changing retail trends over time, this would ensure better sustainability and help the achievement of neutrality of traffic generation.

Policy 16: Sustainable connectivity

Success of this policy (together with policy 22) will be fundamental to the delivery of the levels of growth proposed for NEC, and by extension the return on investment of the £227m of HIF funding to relocate the WWTP and unlock the growth.

We support the policy objectives including measures to reduce car-based travel as well the wider connections set out, such as the use of green corridors. The promotion of walkable neighbourhoods and healthy towns are welcomed by the Core Site.

However the concept of net neutrality will not be possible either 1) for the Core Site alone (because of very low levels of existing traffic) or 2) in the short term across NEC. The supporting text to this policy suggests that 'introduction of additional vehicular traffic is unacceptable in terms of highway capacity'.

The draft AAP needs to acknowledge that some increase of traffic in the short term is inevitable. This is the recent stated position of Cambridgeshire County Council officers and this pragmatism, albeit with the goal of transport neutrality in the longer term, is welcomed.

The alternative would be to introduce dependencies on the Core Site in relation to other users reducing their volume of parking or trips. We question whether the AAP could be found sound in such circumstances.

Policy 22: Managing motorised vehicles

This policy states that development will not be permitted if vehicles exceed the trip budget, however the budget has been proposed for the entire area as a whole and therefore it is unclear as to how the trip budget for the individual sites will be apportioned. Unfortunately, the final version of the Transport Addendum evidence base has yet to be made available.

With very little parking currently available on the Core Site, objective a) of this policy cannot be applied to it; although b) is supported and we aim to go further in restricting the number of parking spaces allocated in the draft AAP.

In our view, the application of this policy raises the greatest risk of the AAP being found unsound with all the consequent implications for local authorities and developers alike – the whole spatial strategy for Greater Cambridge rests, in effect, on the successful implementation of this policy.

However, the current policy is wholly unrealistic in expectation as to the potential for reduction of existing parking and the complex pattern of long-term leases in place on the Science Park in particular; where a s.106 agreement signed within the last 12 months only commits to the reduction of parking spaces to the current number over the course of 10 years. Given this fact, and the limited levers to implement further restrictions, we have concerns over the test of soundness at Examination.

In the view of the Core Site team, the trip budget approach requires the full commitment of public and private sector stakeholders including all the landowners and the local authorities. Specifically it requires the ownership and lead of the local authority partners. Cambridgeshire County Council have a critical role to play. The formation of a full-time, time-limited project team, drawn from across the local authorities (and their advisers) with input from the developer teams, would be a significant demonstration of such commitment.

Clearly this team would require resourcing – but as has been pointed out earlier, failure of this policy risks not only the £227m of HIF funding but the £5bn of growth it will unlock. Against such considerations even £1m of spend would demonstrate an excellent return on investment.

This approach requires a fresh and robust Transport Strategy for North East Cambridge, based on a model which is comprehensive, updated and more dynamic than the current approach. These steps need to be taken quickly to demonstrate certainty that the growth can be delivered to the inter-related HIF, DCO and AAP processes. Even a small delay could risk all three processes as they are so heavily interdependent.

All developers would then be required to conform to this Strategy including the use of the model to produce their own Transport Assessments as schemes come forward. The Strategy would need both carrots and sticks in implementation, including punitive financial measures, to achieve the overall goals. Some difficult choices may need to be made as part of the

process – but undoubtedly those choices would be made worse without the delivery of growth at NEC.

As a demonstration of our commitment to both 'soft' and 'hard' measures to constrain traffic generation on the Core Site our transport advisers, have mapped out the range of potential alternative measures that we could apply. This is set out in Appendix 5 attached.

The Core Site team will play a full part in assisting the development of such an approach with an appropriate revised policy basis in order to provide the necessary robust evidence base for the AAP at Examination.

Policy 23: Comprehensive & co-ordinated development

This policy is welcomed. Regeneration at the scale proposed for NEC does indeed require a comprehensive and co-ordinated development across all the sites. In the eventuality that applications come forward before the adoption of the AAP it is the opinion of the Core Site team that the development should contribute proportionately to NEC wide infrastructure (whether through a specific site-wide tariff or other mechanism) as if the mechanisms were already in place.

Furthermore, actions by individual developers seeking to reserve a certain amount of spare infrastructure capacity would weaken the NEC wide approach and mitigate against the level playing field that the AAP is attempting to generate.

Given the lack of adopted local plan policy support for non-commercial uses (specifically residential) and the existence of the odour zone, it is difficult to see how comprehensive mixed-use development could be brought forward prior to the AAP being well advanced.

In these circumstances, we feel that any application that came forward in advance of the AAP would risk falling foul of the tests of prematurity as set out in the revised NPPF, February 2019. Paragraph 50 states that “...the local planning authority will need to indicate clearly how granting permission for the development concerned would prejudice the outcome of the plan-making process.” We feel that, by weakening the NEC-wide approach, pre-emptive actions by individual developers could meet this test.

Policy 24b: Relocation

This policy refers to the re-location of existing business uses and the need to provide a re-location strategy. It is welcomed, however it does not specifically refer to the relocation of Cambridge Wastewater Treatment Plant which forms an integral part of the AAP.

It is therefore proposed that Policy 24b is amended as follows:

*“The relocation of Cambridge Wastewater Treatment Plant is required by the Councils as it forms an integral part of the spatial strategy for the North East Cambridge AAP. The Councils will support the relocation of existing **business** floorspace and uses that are incompatible with the delivery of the spatial strategy and/or the optimisation of development.”*

Policy 27: Planning contributions

The social, community, physical and green/blue infrastructure required to support development at the scale proposed for NEC will be considerable. The Core Site team accepts

the need to contribute proportionately to NEC wide infrastructure, moreover it is our view that there will be some economies of scale to be gained from providing it at this level.

It is therefore regrettable that the production of an Infrastructure Delivery Plan, coupled with the associated viability work, has been delayed. This has a number of significant implications. It means that assertions by developers as to the scale of development required across NEC (and hence density and building heights as well) to support this infrastructure burden and provide for adequate place making cannot be tested.

Also, as set out in the response to policy 26, there is a risk of developments coming forward in advance of the adoption of the AAP and not being required to make proportionate contributions – either due to existing infrastructure capacity or by failure to have an appropriate infrastructure tariff or similar mechanism in place. We consider that all developers should contribute proportionately and equitably for the increased infrastructure requirements arising from development across NEC as a whole.

The Core Site will play a full and active role in the development and delivery of any common infrastructure funding mechanism for NEC.

We note the aspirations for early funding of strategic infrastructure at NEC and would support this where possible and supported by good place making principles. However any such initiatives must be cashflowed by public sector (for example use of Public Works Loan Board funding). It would further represent good leadership by the local authorities and determination to deliver the quality and quantity of development desired at NEC.

7 CONCLUDING COMMENTS

Implications of the Government's White Paper: Planning for the Future

During the period of consultation on the draft AAP, the Government has launched its consultation on wide-ranging revisions to the planning system in England, Planning for the Future.

Government changes presaged in the White Paper would see NEC as a 'growth area' for which Permission in Principle would automatically be granted for development. Rather than implying that the AAP would have to include significant additional amounts of detail, it could conversely imply less detail than currently – otherwise it would require numerous outline planning applications to deal with modifications from the unnecessary level of detail in the parameters of the spatial framework drawings.

Should the changes proposed in the White Paper be brought forward, we would produce a detailed design code for NEC with the input of the Shared Planning Service – this would obviate the need for a planning application at the PiP stage.

Concluding remarks

The scale of growth proposed for NEC is both exciting and challenging. It can only be realised through co-ordinated support by all the landowners and developers, with a strong lead by the District and County Councils.

U+I plc and TOWN welcome the publication of the consultation draft AAP. There is much to be commended about it, the Vision and strategic objectives are strong and it is a visually attractive document. However, we do have some concerns as set out in these representations.

We will play a full part in the planning and delivery of the growth proposals for NEC and look forward to continuing discussions with the Shared Planning Service through the established Landowner Forum as well as bilaterally. We will happily expand on any of the points raised in these representations, including those in Table One at Appendix One or otherwise referenced.

U+I / TOWN

October 2020

APPENDICES

The following appendices are provided separately:

APPENDIX ONE: DETAILED COMMENTS ON THE DRAFT AAP (IN TABLE FORM)

APPENDIX TWO: EXTRACT FROM THE ADOPTED CANADA WATER AREA ACTION PLAN (FRAMEWORK DRAWING)

APPENDIX THREE: DENSITY ASSESSMENT USING MAXIMUM THRESHOLDS INDICATED IN THE DRAFT AAP

APPENDIX FOUR: NOTE BY URBED ON NEC AAP DRAFT STRATEGIC FRAMEWORK PLAN, NOVEMBER 2019

APPENDIX FIVE: COMMENTARY ON POTENTIAL TRANSPORT INTERVENTIONS, CORE SITE, PRODUCED BY PELL FRISCHMANN, SUMMER 2020.