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4th October 2020

Re: North East Cambridge Area Action Plan Consultation

CPRE Cambridge and Peterborough Branch Objects to and adds the following comments to the Greater Cambridge Partnership's (GCP) proposals for the Cambridge North East Area contained in the current Action Plan.

1. Anglian Water concur that there is no operational need to move the Milton Waste Water Treatment (WWT) plant from the current site. The current installation has been upgraded to serve the City's needs until 2050 and is currently operating at approximately half capacity.
2. It has been demonstrated that a modern WWT plant using new technology could be built on the current Anglian Water site. This would prevent the AAP boundary spilling into the Cambridge Green Belt and onto prime agricultural land. The timing of the AAP consultation appears to be premature until the outcome of the consultation and any planning application relating to the relocation of the Milton WWT plant into the Green Belt, upon which these proposals are dependent, is known. CPRE would be very concerned indeed if the outcome of the WWT plant study is either being assumed or pre-determined.
3. CPRE has concerns regarding the density per hectare of 235 dwellings in certain areas of the development which requires twelve storey high tower blocks. These would be out of keeping with the City and South Cambridgeshire landscape in which the proposed settlement will be sited. It is also important to keep the sense of place of Cambridge City as well as the identity of the necklace of villages characteristic of the South Cambridgeshire District Council Area.
4. CPRE would like to remind the GCP that Cambridge is nationally a very special place. The Cambridge Green Belt, unlike other nationally designated Green Belts, was specifically designated in order to preserve the historic character of the City as well to protect it from generating urban sprawl into the surrounding gentle countryside. This objective was expressed in the Green Belt Local Plan by the phrase *"To preserve the special character of Cambridge and its setting"*. This being an addition to the more usual objectives also contained in the Green Belt Local Plan of:
 - "To control the urban expansion of Cambridge;
 - To allow for the development of communities in accordance with Structure Plan policies;
 - To prevent the further coalescence of settlements;
 - To enhance the visual quality of the area;
 - To balance the provision of suitable recreational and leisure facilities against the needs of agriculture".

5. CPRE is aware that, due to COVID19, working and living patterns have changed. We suggest to GCP that this new situation should be taken into account as a significant factor when developing this Plan. It is now a requirement of many people when seeking new homes that they provide space to work from home and gardens to enjoy which contradicts the current plans in the draft AAP. We recommend that GCP consider the following studies:

Felstead, A and Reuschke, D (2020) 'Homeworking in the UK: before and during the 2020 lockdown', WISERD Report, Cardiff: Wales Institute of Social and Economic Research. Available for download from: <https://wiserd.ac.uk/publications/homeworking-uk-and-during-2020-lockdown>

Business Times <https://www.businesstimes.com.sg/real-estate/london-office-property-market-likely-to-see-structural-changes>

Royal Institute of Chartered Surveyors <https://www.rics.org/globalassets/rics-website/media/knowledge/research/market-surveys/uk-commercial-property-market-survey---q1-2020.pdf>

Royal Institute of Chartered Surveyors <https://www.rics.org/globalassets/rics-website/media/market-surveys/gcpm/rics-uk-commercial-property-market-survey---q2-2020.pdf>

These clearly indicate a trend towards home-working and the potential for existing commercial buildings in town and city centres to become available for conversion for residential use.

6. There is a distinct lack of green space within the settlement as planned. This applies particularly to dwellers in the proposed tower blocks. It has become widely known that connecting with green space and nature is important for mental health and physical wellbeing. CPRE are also concerned that Milton Country Park is the suggested green space. This is outside of the development and to the north of the A14. Milton Country Park already experiences heavy footfall from existing residents. South Cambridgeshire District Council have recently provided funding to ensure that the Country Park continues to provide this vital green lung. However, if footfall becomes too heavy, its primary purpose will be damaged as will the wildlife and bio-diversity it contains.
7. CPRE note that car parking spaces of 0.5 per dwelling have been allocated. This assumes that each household will in the main use sustainable transport and that the majority of residents will live and work within the proposed settlement. It is unclear how the GCP will "police" how many motor vehicles per household there will be. It is also unclear how the less mobile members of the community will have access to parking close to their homes.
8. The number of commercial buildings including office space proposed within the AAP should be questioned due to the current changes in working patterns following COVID 19. CPRE consider that it is unlikely the GCP can guarantee that all residents who wish to will be able to live and work within the proposed development.
9. CPRE has concerns regarding the potential impact that the density and scale of the AAP will have on existing communities particularly Milton, Chesterton, Milton Road and Kings Hedges. CPRE are also concerned by the impact on existing roads and other essential services. How will the development be created to design out crime and to create an integrated community particularly with the proposed housing mix and lack of affordability for local people?
10. CPRE are aware that the Greater Cambridge area is currently in water stress and enquire as to how supply will be made available to the settlement without creating further harm to the already depleted chalk streams and the river Cam. CPRE consider it irresponsible to rely on the legal obligation of local water companies to supply in a situation of known water stress and when one of those companies, Anglian Water, has recently been heavily criticised and fined for poor environmental performance and causing

pollution. What mitigations will be put in place to protect and enhance the River Cam corridor due to the impact that an increased footfall may have. How will biodiversity be enhanced and increased.

11. CPRE seek clarity as to how the GCP will mitigate the impact of climate change, especially flooding due to global temperature rise and consequent sea level rise. Studies now predict that land from the Wash to Cambridge will likely experience regular from floods by 2050: <https://www.climatecentral.org/>

In Summary

- CPRE reiterate that the existing Wate Water Treatment plant should remain on the existing site.
- CPRE considers that this consultation is premature given that there has as yet been no public decision about the future of the WWT.
- CPRE considers that the height and the density of the proposed development is out of context with the character of the City of Cambridge and South Cambridgeshire District.
- Because of its apparent dependence upon the move of the Waste Water Treatment plan this plan will lead to a further reduction in the already limited Cambridge Green Belt, which was designed to protect the character of the City. CPRE is totally opposed to such incursions which have now reached a totally unacceptable level.
- The Greater Cambridge Partnership through this development has the opportunity to take a holistic approach in creating a sustainable community that suits the needs of residents and businesses in the light of the changes in lifestyle and working practices due to COVID19. If the AAP proceeds, CPRE hopes that truly affordable, social-rented homes will be available for local people, not homes branded as 'affordable' by the current government definition.
- More green space for leisure and mental wellbeing should be integrated into the development whilst increasing biodiversity. The reliance on Milton Country Park to mitigate the lack of green space on the site is not a practicable solution.
- Sustainable travel and car parking space allocation needs to be evidence based whilst factoring in the requirements of the less mobile in the new community. Travel plans should be factored in for commuters to and from the settlement.
- The impact on existing communities, infrastructure and essential services require further study and mitigations to ensure truly sustainable living and that the development does not irreparably damage the River Cam corridor and environment.
- CPRE believe that water stress and the risk of flooding due to climate change and their mitigation, in association with carbon emission reduction, must be seriously considered before any application for planning permission is made.

Yours sincerely,

Jane Williams

On behalf of CPRE Cambridgeshire and Peterborough Branch.