### NORTH EAST CAMBRIDGE AREA ACTION PLAN -ISSUES AND OPTIONS 2 CONSULTATION CAMBRIDGESHIRE COUNTY COUNCIL CONSULTATION RESPONSE

The comments in this response are those of Cambridgeshire County Council Officers and are subject to the comment and endorsement by the Council's Economy and Environment Committee.

## **General Comments**

## **Minerals and Waste**

#### Waste Management

1.1 Figure 2.2 is a map depicting the sites and polices in relation to the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and the Cambridgeshire and Peterborough Site Specific Proposals Document (2012). The 'area of search' (for waste recycling and recovery, potential uses include recycling centre, inert waste recycling, and waste management technologies, W1F), should incorporate the waste water recycling centre, however it appears that this has been obscured by the shading showing the existing waste water recycling centre site.

# Transport

1.2 As you are aware, the County Council Transport Strategy and Funding team is working closely with SCDC and the City Council to provide further transport evidence to support the development of the AAP. This work is taking forward the recommendations from the Ely to Cambridge Transport Study (ECTS) and one of its key elements is the development of a highway trip budget which will help to understand what transport impact a range of development mixes and levels in the area might have on the surrounding highway network. It is following the principles set out in the ECTS that there needs to be a suitable mix of residential, employment and ancillary uses which minimises the amount of external highway trip generation through a high level of internalisation. This work hasn't yet concluded therefore it is considered premature to give too much commentary on some of the questions around development types and mixes at this time.

# 2 Question Responses

Question 2: Is the proposed boundary the most appropriate one for the AAP?

2.1 The proposal to include both the Cambridge Northern Fringe East (CNFE) and Cambridge Science Park is welcomed. The highway network in the vicinity of both sites already operates at capacity at peak times of the day and in order for the intensification of either or both sites to be acceptable in transport terms, the way in which people travel to, from and within the sites will need to be significantly different in the future. Now that Cambridge North station and the Guided Busway have been delivered, along with the prospect of the area being connected to the CAM network it is essential that these key

pieces of infrastructure are used to their maximum potential and the area considered holistically. The proposed boundary is therefore supported.

Question 6: Do you agree with the overarching objectives? If not, what might you change?

2.2 The objectives for the North East Cambridge area to continue to meet the strategic needs of the city, and explicitly by enabling the continued use of the mineral railheads is supported. It should be recognised that this will have implications for the uses which can be located near to the railheads, and only development which will not be prejudicial to the ongoing operation of the railheads should be located in the associated Transport Safeguarding Area designed by the adopted Cambridgeshire and Peterborough Minerals and Waste Plan (see also the response to Question 7).

Question 7: Do you support the overall approach shown in the Indicative Concept Plan? Do you have any comments or suggestions to make?

- 2.3 The eastern part of North East Cambridge AAP area (i.e. the area east of Milton Road referred to as CNFE) has two railheads which are critical to the supply of mineral which cannot be found locally, in particular crushed rock. It is vital that these railheads continue to operate in order to ensure a steady supply of mineral to support the development planned in Greater Cambridge and beyond. These facilities are currently safeguarded under the adopted Cambridgeshire and Peterborough Minerals and Waste Plan (Policies CS23 and SSPT2C), and will continue to be safeguarded under the new Minerals and Waste Local Plan. Safeguarding seeks to ensure that only development which is compatible with the railheads will take place in the safeguarded area; and that new development will not be permitted where it may give rise to activities which could prejudice the ongoing operation of the these facilities. This situation should be explicitly recognised in the AAP, and future proposals must have regard to the provisions of the adopted safeguarding policy.
- 2.4 In this context it is noted that a considerable area of land which has 'Opportunity for Residential and Mixed Use' (shown on Figure 5.1: Concept Plan) is adjoining the aggregate railheads and which falls within the railheads designated Transport Safeguarding Area. Residential development (including hotel development) immediately adjacent to the railheads would not be appropriate, as this could prove to be prejudicial to the operation of the railheads. The Concept Plan should therefore be revised to remove residential use from the immediate proximity of the railheads. If residential development is within the Transport Safeguarding Area, but not adjacent to the railheads such development must demonstrate that it would not be prejudicial to the ongoing operation of the aggregate railheads. Similarly it appears that mixed use development will be residential led development and therefore this must also be compatible with the railhead uses, and not be located in a position where it could be prejudicial to the ongoing operations of the railheads. Consideration of this matter should include the wider implications of the ongoing operation of the railheads for potential new neighbouring development, including the impact of any HCV movements, dust and noise emissions.

- 2.5 Please note that the railheads have been reconfigured since the adopted Transport Safeguarding Area was designated. However, this has been taken into account and the emerging Minerals and Waste Local Plan (Further Draft Plan 2019), which is due to published for public consultation in 2019, has a revised Safeguarding Area proposed.
- 2.6 The overall approach with regard to movement through the site is broadly supported, accepting that this is an early indicative concept plan and that the detailed work on making the two sites work in transport terms has yet to be undertaken. The indication of specific green links connecting these two sites is welcomed. Last mile links will be particularly important within the area, especially for connecting Cambridge North Station to the more westerly parts of the AAP area. It will also be important to be mindful of how the Greater Cambridge Partnership's thinking evolves on their Waterbeach to Science Park public transport link and to ensure that this is reflected and included in the AAP.
- 2.7 Any education facilities on site would be best located in, or close to, the District Centre.

Question 8: Do you agree that outside of the existing business areas, the eastern part of North East Cambridge AAP area (i.e. the area east of Milton Road) should provide a higher density mixed use residential led area with intensified employment, relocation of existing industrial uses and other supporting uses?

2.8 Yes. The Ely to Cambridge Transport Study recommended that in order to redevelop and intensify the use of this important area of brownfield land, a more varied development mix would be needed which included residential as well as employment land uses as well as other ancillary land uses such as education, retail and leisure. We are pleased to be assisting colleagues at both SCDC and the City Council to help come to a clearer understanding of what this development might look like. This work hasn't yet concluded but it is clear that the mix will need to ensure that as many trips as possible are catered for within the sites themselves, that the number of jobs and homes will need to be broadly balanced and be of such a nature that the trips are smoothed across the day rather than resulting in a tidal movement of people in and out the site during peak hours.

Question 9 and 10

Question 9: Should Nuffield Road Industrial Estate be redeveloped for residential mixed use development?

Question 10: Do you agree that opportunities should be explored to intensify and diversify existing business areas? If so, with what sort of uses?

2.9 The Transport Strategy and Funding team at the County Council is working closely with SCDC and the City Council to provide further transport evidence to support the development of the AAP. This work is taking forward the recommendations from the Ely to Cambridge Transport Study (ECTS) and

one of its key elements is the development of a highway trip budget which will help to understand what transport impact a range of development mixes and levels in the area might have on the surrounding highway network. It is following the principles set out in the ECTS that there needs to be a suitable mix of residential, employment and ancillary uses which minimises the amount of external highway trip generation through a high level of internalisation. This work hasn't yet concluded therefore it is considered premature to give too much commentary on development types and mixes at this time.

Question 11: Are there any particular land uses that should be accommodated in the North East Cambridge area?

- 2.10 Whilst it is not possible without further detail of the number of residential units and housing mix to determine the education need, it is envisaged there will be a need for at least primary school and early years provision on site.
- 2.11 As you are aware, the Transport Strategy and Funding team at the County Council is working closely with SCDC and the City Council to provide further transport evidence to support the development of the AAP. This work is taking forward the recommendations from the Ely to Cambridge Transport Study (ECTS) and one of its key elements is the development of a highway trip budget which will help to understand what transport impact a range of development mixes and levels in the area might have on the surrounding highway network. It is following the principles set out in the ECTS that there needs to be a suitable mix of residential, employment and ancillary uses which minimises the amount of external highway trip generation through a high level of internalisation. This work hasn't yet concluded therefore it is considered premature to give too much commentary around development types and mixes at this time.

Question 13: Should the AAP require developments in the North East Cambridge area to apply Healthy Towns principles?

- 2.12 The County Council supports the AAP requiring developments in the North East Cambridge area to apply Healthy Town principles.
- 2.13 The principles of Healthy Towns are compatible with the types of travel modes that this area will need to develop in order for it to be acceptable in transport terms. For the aspirational levels of development to be possible in transport terms, car mode share will need to be even lower than those being pursued at CB1 or on the Cambridge Biomedical Campus and akin to those more typically seen in central London. For this to be achieved, a far higher proportion of daily trips will need to be made on foot or by bike, with the health benefits that these modes can realise.

Question 16: Should the AAP include any or a combination of the options below to improve pedestrian and cycling connectivity through the site and to the surrounding area?

A – A strong east-west axis to unite Cambridge North Station with Cambridge Science Park across Milton Road. This pedestrian and cycle corridor would be integrated into the wider green infrastructure network to create a pleasant and enjoyable route for people to travel through and around the site. The route could also allow other sustainable forms of transport to connect across Milton Road.

B – Improve north-south movement between the Cowley Road part of the site and Nuffield Road. Through the redevelopment of the Nuffield Road area of the NEC, it will be important that new and existing residents have convenient and safe pedestrian and cycle access to the services and facilities that will be provided as part of the wider North East Cambridge area proposals.

C – Upgrade connections to Milton Country Park by both foot and cycle. This would include improving access to the Jane Coston Bridge over the A14, the Waterbeach Greenway project including a new access under the A14 (see Transport Chapter), as well as the existing underpass along the river towpath.

D – Provide another Cambridge Guided Bus stop to serve a new District Centre located to the east side of Milton Road.

E - Increasing ease of movement across the sites by opening up opportunities to walk and cycle through areas where this is currently difficult, for example Cambridge business park and the Cambridge Science Park improving access to the Kings Hedges and East Chesterton areas as well as the city beyond.

2.14 Pedestrian and cycling connectivity both within and external to the AAP area will be critical to the success of this development and will be one of the determinants to what level of development can be accommodated. We are pleased to be working with colleagues at SCDC and the City Council to help provide further transport evidence to support the AAP and we will be considering all of these possibilities in the very near future. Therefore, at this stage no options should be ruled out and indeed we may wish to see further connections included as the work continues.

Question 17: Should we explore delivery of a cycling and pedestrian bridge over the railway line to link into the River Cam towpath?

2.15 As already mentioned, we are pleased to be working with colleagues at SCDC and the City Council to help provide further transport evidence to support the AAP and we will be considering a range of possibilities in the very near future. Therefore, at this stage no options should be ruled out and indeed we may wish to see further connections included as the work continues.

Question 18: Which of the following options would best improve connectivity across Milton Road between Cambridge North Station and Cambridge Science Park?

A - One or more new 'green bridges' for pedestrians and cycles could be provided over Milton Road. The bridges could form part of the proposed green

infrastructure strategy for the NEC, creating a substantial green/ecological link(s) over the road.

B - Subject to viability and feasibility testing, Milton Road could be 'cut-in' or tunnelled below ground in order to create a pedestrian and cycle friendly environment at street level. This option would allow for significant improvements to the street which would be more pleasurable for people to walk and cycle through.

C - Milton Road could be significantly altered to rebalance the road in a way that reduces the dominance of the road, including rationalising (reducing) the number of junctions between the Guided Busway and the A14 as well as prioritising walking, cycling and public transport users.

D - Connectivity across Milton Road could be improved through other measures. We would welcome any other suggestions that would improve the east-west connectivity through the site.

E – Other ways of improving connections (please specify)

2.16 Last mile links will be vital to the integration within the AAP area and therefore it will be important to ensure that the final solution provides for these linkages without impacting the operation of this important radial route. However, given the potential scale of development and the level of ambition on the travel characteristics across the AAP area, the solution really needs to be exemplary. Whilst no option should be ruled out at this stage, segregation of bus, pedestrian and cycle and any future transit solutions across Milton Road is the ideal, and would allow for better streetscape and urban realm.

Question 20: Do you agree with proposals to include low levels of parking as part of creating a sustainable new city district focusing on non-car transport?

2.17 Yes. Parking policy is directly linked to the number of trips that a development generates and puts onto the external highway network. Given the constraints on the highway network surrounding and running through the AAP area, this is fundamental to making the development acceptable in transport terms.

Question 21a: In order to minimise the number of private motor vehicles using Milton Road, should Cambridge Science Park as well as other existing employment areas in this area have a reduction in car parking provision from current levels?

2.18 Yes. Evidence shows that car-driver mode share at Cambridge Science Park is currently around 49%. At Cambridge Biomedical Campus, where there are far fewer parking spaces per square metre of floorspace, the comparable mode share is 31%. The new CB1 development near Cambridge Station pushes this even further and is aiming to achieve a car driver mode share of 11%. Furthermore, evidence also suggests that parking spaces are currently underutilised on the site therefore there is no incentive for people not to drive to and from the site at the moment. Consideration will need to be given as to

how parking is controlled on streets adjacent to the AAP area to ensure that people do not simply park off site and walk in.

21b: Should this be extended to introduce the idea of a reduction with a more equitable distribution of car parking across both parts of the AAP area?

2.19 Both sites within the AAP area should be looking to reduce their availability of parking.

Question 22: Should the AAP require innovative measures to address management of servicing and deliveries, such as consolidated deliveries and delivery/collection hubs?

2.20 Yes. Any innovative measures that could help to reduce the demand on the highway network in this area should be encouraged.

Question 23: Should development within North East Cambridge use car barns for the storage of vehicles?

2.21 The issue for this site is not car ownership per se, it is the use of cars and the time of day at which they are used. Car barns should not be used as an excuse to increase the level of parking on the site; however if the parking that is permitted is located in such a way that makes foot, bike or public transport the easier mode of transport to use, then this approach should be welcomed. It could also help to reduce the visual dominance of cars in the development.

Question 25: As set out in this chapter there are a range of public transport, cycling and walking schemes planned which will improve access to the North East Cambridge area. What other measures should be explored to improve access to this area?

2.22 The transport evidence work is exploring what other measures could contribute to making the area more accessible by non-car modes.

Question 26: Do you agree that the AAP should be seeking a very low share of journeys to be made by car compared to other more sustainable means like walking and cycling and public transport to and from, and within the area?

2.23 Yes. Work done to date has indicated that if traditional car mode shares were to be applied to this area, the level of development that would be acceptable in transport terms would be very low due to existing capacity issues and congestion on the surrounding highway network. In order for the aspirational levels of development to be achieved, there needs to be a step change in the car mode share for the area to levels that are more akin to those seen in central London.

Question 27: Do you have any comments on the highway 'trip budget' approach, and how we can reduce the need for people to travel to and within the area by car?

2.24 A highway 'trip budget' approach rather than the traditional approach of allowing unconstrained vehicular trips to and from the site is considered a

practical way to try and deliver the aspirational levels of development on this site through forcing the development to focus on achieving a low car mode share and by optimising the mix and level of development such that external trip generation is minimised.

Question 28: Do you agree that car parking associated with new developments should be low, and we should take the opportunity to reduce car parking in existing developments (alongside the other measures to improve access by means other than the car)?

2.25 Yes. Please see response to questions 20 and 21.

Question 29: Do you agree that we should require high levels of cycle parking from new developments?

2.26 Yes. In order for the development to be acceptable in transport terms a significant proportion of trips will need to be undertaken by bike and the connectivity of the site will be critical in this respect. This connectivity will need to be complemented by high levels of cycle parking to make trips as easy as seamless as possible.

Question 30: Should we look at innovative solutions to high volume cycle storage both within private development as well as in public areas?

2.27 Yes.

Question 31: What additional factors should we also be considering to encourage cycling use (e.g. requiring new office buildings to include secure cycle parking, shower facilities and lockers)?

2.28 Any measures that make it easier to undertake trips on bike are to be welcomed and if these measures can be secured through the planning process then this should be done.

Question 32: How do we design and plan for a place that makes the best use of current technologies and is also future proofed to respond to changing technologies over time?

2.29 The transport evidence that is currently in progress will be considering how current technologies can be used. The conclusions can then be considered for the draft AAP.

Question 33: What sort of innovative measures could be used to improve links between the Cambridge North Station and destinations like the Science Park?

2.30 Part of the brief for the transport evidence work included consideration of how smart technology can be harnessed to provide innovative transport solutions within the plan area in particular - but not exclusively - between the area east of Milton Road, Cambridge North Station and Cambridge Science Park. Once this work has concluded, any identified measures can be considered for inclusion in the draft AAP

Questions 34 -39 covering issues relating to types of employment space, approach to industrial uses, and housing mix, please note paragraph 2.33 below. Specific responses to individual questions follow.

2.31 As you are aware, the County Council Transport Strategy and Funding team is working closely with SCDC and the City Council to provide further transport evidence to support the development of the AAP. This work is taking forward the recommendations from the Ely to Cambridge Transport Study (ECTS) and one of its key elements is the development of a highway trip budget which will help to understand what transport impact a range of development mixes and levels in the area might have on the surrounding highway network. It is following the principles set out in the ECTS that there needs to be a suitable mix of residential, employment and ancillary uses which minimises the amount of external highway trip generation through a high level of internalisation. This work hasn't yet concluded therefore it is considered premature to give too much commentary on these questions around development types and mixes at this time.

#### Questions 36

Question 36: Which of the following approaches should the AAP take to existing industrial uses in the North East Cambridge area?

A - Seek to relocate industrial uses away from the North East Cambridge area?

B - Seek innovative approaches to supporting uses on site as part of a mixed use City District?

2.32 There are a number of industrial uses in the CNFE, which play an important role in supporting the wider economy and local area, including existing waste management uses. It is noted that the concept plan shows an industrial development area adjacent to the northern boundary of the CNFE, and thus it may be possible to relocate current general industrial uses, including waste management uses, within the CNFE site. It is vital that such uses are not displaced from the local area, and if they are to be relocated from the CNFE then there should be a clear strategy / site for them to be located on in the future. Requiring industrial development just to relocate without such a strategy in place will mean that they may just be lost, especially as there are few general industrial sites in the local area. This would result, for example, in waste management capacity being lost, when such facilities contribute significantly to delivering sustainable development by dealing with waste arising in Cambridge and the wider surrounding area.

Question 38: Should the AAP require a mix of dwelling sizes and in particular, some family sized housing?

2.33 From an education planning perspective the more detail about proposals for housing mix / tenure which can be secured at this stage the easier it becomes to establish and plan for the level of education provision. A policy context will help inform viability for the site.

Question 55: Do you agree with the range of considerations that the AAP will need to have regard to in planning for new retail and town centre provision on the North East Cambridge area? Are there other important factors we should be considering?

2.34 Retail and leisure uses will be necessary to keep as many trips as possible internal to the plan area. However, these ancillary uses must only serve the jobs and homes within the area and should not be of a scale that they become a destination in their own right as this would then create additional undesirable external trip generation.

Question 57: What community facilities are particularly needed in the North East Cambridge area?

2.35 As per our response to Question 10, there will be a need to accommodate primary school and early years provision on site.

Question 63: Do you support the approach to sustainable design and construction standards suggested for the AAP?

2.36 Please note the CCC policy for new schools is BREEAM 'very good'.

Question 71: Should the AAP include a relocation strategy in preference to leaving this to the market to resolve?

2.37 See response to question 36 above.

Question 72: Do you agree with an approach of devising a section 106 regime specifically for the North East Cambridge area? If not, what alternative approach should we consider?

2.38 Yes, very supportive of the approach set out. The Council will expect that any development that comes forward will mitigate its impacts and contribute towards these measures through direct provision and/or developer contributions (Section 106 and/or Community Infrastructure Levy). S106 is preferable to CIL for this type of development as it allows timely delivery of the key infrastructure.

Question 75: Do you agree with the proposal to require land assembly where it can be demonstrated that this is necessary for delivering the agreed masterplan for the North East Cambridge area and/or the proper planning of development?

2.39 See response to Question 36 above.

Question 78: Do you agree with the Councils' proposed approach to dealing with planning applications made ahead of the AAP reaching a more formal stage of preparation?

2.40 The proposed approach is supported. It is particularly important in transport terms the North East Cambridge area is considered as a whole. Proposals will also need to have regard to the need not to prejudice safeguarded mineral and waste management facilities, including the railheads, in the east of the proposed AAP area.