

Greater Cambridge Shared Planning,
PO Box 700, Cambridge,
CB1 0JH.

October 2020

Dear Sirs,

Parish Councils' Joint Response to NECAAP Consultation 2020 - DRAFT

We, the undersigned wish to record that we strongly object to the North East Cambridge Area Action Plan proposals as put forward in the current consultation. The plan includes a major incursion into the Green Belt to relocate the sewage works and a major addition to the population with attendant infrastructure needs. The consequences are likely to be increased congestion, continued or exacerbated inequality (Cambridge having one of the worst records in UK cities) and unavoidable degradation of the environment of north-east Cambridge.

The proposed increase in jobs and homes will not decrease the pressure on housing in Cambridge but appears to be intended, at best, to merely keep pace with the increase in jobs.

The proposal appears to add around 15-20,000 people, ie. 12 to 17 % of Cambridge's total population, into a development area of less than 5% of the city. Due to the provision of commercial space, it appears that ~~very high densities of 200 to 400 dwellings/ha~~ are planned. The resulting building heights are incompatible with the historic city of Cambridge and the fenland landscape. We support the idea of building heights of 4 to 6 storeys generally. The case for a few taller buildings to break up the massing effect should be examined.

The increase in commercial space and consequent jobs reflects a desire, translated into a commitment, made by local government in earlier years. This is presented as not being open to challenge under NECAAP, implying that national and local government would have to agree a different set of targets possibly in relation to the next local development plan (LDP).

The events of 2020 are affecting economic growth, working practices and living arrangements. Lower economic growth will reduce the minimum housing provision in the LDP as required by Government. Increased working from home will reduce the requirement for office space and daily commuting but may result in a desire for more space in homes, to avoid living in dense urban areas or to live further away. ~~These are not abstract concepts; we understand that South Cambs District Council's (SCDC's) own staff have expressed the desire for more flexible working arrangements to continue.~~

The Government is proposing to allow change of use for redundant commercial buildings and other measures to rapidly increase residential space. This will affect NECAAP.

The proposed relocation of the sewage works should be re-examined. We draw attention to Anglian Water's proposed buffer zones for residential and commercial premises. There are offices closer than 150 m to the existing works. Thames Water's Deephams works has residences much closer than 400 m and the recent upgrade (approved by the then Mayor of London, Boris Johnson) has led to "...achieving a 99% reduction in odour emissions".

The biggest step towards achieving a more sustainable development would be to scale back NECAAP and use more of the existing infrastructure especially the sewage works. The case for a district heating/cooling system including the sewage works (as at Deephams) should be examined. The energy plan proposed for NECAAP does include solar panels for power generation but these conflict with spaces also being developed as Green Roofs. The sustainability assessment should include a discussion of organic population growth and inward migration.

The NECAAP proposal has several optimistic assertions that are not backed up by evidence, especially from the Cambridge sub-region. These include: residents will choose to work near their dwellings; that personal car use and ownership will diminish due to rationing of provision instead of 'predict and provide'; that biodiversity will increase and that adequate green space will be provided. The 2017 and 2018 pattern of commuting to work in the NECAAP area shows little use of public transport. Although awards have been given to Accordia, Great Kneighton, Eddington and the Central Mosque, there is no discussion of travel to work patterns, car ownership or out-commuting to other places including London. The higher rise buildings and density of CB1 and the area east of the railway station may be more comparable to NECAAP but the proposals are silent as to if this is considered a success or even if it could be improved on. If the problem is lack of an evidence base, the 2021 census should provide a much clearer picture of living, working and travelling patterns. Comparisons should be made with successful and unsuccessful developments elsewhere in UK or Europe.

We object to the premise that biodiversity will increase if areas of suitable habitat are included. Actual baseline surveys of biodiversity are needed throughout the NECAAP area and Chesterton Fen if that is going to be acquired to meet the targeted increase.

The institutional framework for NECAAP should be examined. We consider that Milton PC and the future residents are the main stakeholders of the SCDC portion of the site and should be consulted accordingly.

In conclusion, despite the current momentum and previous investment, we urge you to reconsider NECAAP ~~and align it with the LDP timetable~~ and use the extra time to evaluate the impact of the events of 2020 and reconsider the improvements that could be achieved by scaling back the ambition. This will allow lower building heights, densities of dwellings and the often voiced desire to see a modernised sewage works on the existing site. In addition, we urge you to negotiate with the Government about targets for housing and employment growth especially if the quantum of the HIF grant can be scaled back to allow investment elsewhere in the UK.

Yours faithfully

Parish Council Chairs:

Histon/Impington, Milton, Landbeach, Waterbeach, Horningsea, Fen Ditton, Teversham