

FEN DITTON PARISH COUNCIL

Greater Cambridge Shared Planning,
PO Box 700, Cambridge,
CB1 OJH.

09 October 2020

Dear Sirs,

FDPC Consultation Response to NECAAP Consultation 2020

Thank you for the opportunity to submit today our response to the above consultation. In summary, Fen Ditton Parish Council (FDPC) strongly OBJECTS to the North East Cambridge Area Action Plan proposals as put forward in the current consultation. Our principal concerns are:

- The visual intrusion as seen from Ditton Meadows, Fen Ditton Conservation Area and other locations due to the proposed building heights and massing;
- increased congestion and traffic in Fen Ditton;
- major incursion into the Green Belt to relocate the sewage works;
- provisions for biodiversity and green space;
- a major addition to the population of Cambridge with attendant infrastructure needs;
- timing of this consultation and the lack of relevant, up to date evidence to justify the proposals; and
- missed opportunities to avoid degrading the environment of Cambridge and its surrounding villages and countryside.

The above points are discussed in full in Appendix 1. These objections are additional to those submitted in the letter to you dated 4th October from Parish Councils adjacent to the NECAAP area and others in South Cambridgeshire District.

We would welcome the opportunity to receive a response to the points we raise and look forward to hearing from you.

Yours faithfully,

c/c Sarah Smart;
Parish Clerk
Fen Ditton Parish Council
email: clerk@fenditton-pc.org.uk

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c/c Lucy Frazer MP
Daniel Zeichner MP
Mayor James Palmer
Councillor Anna Bradman, Cambridgeshire County Council
Councillor Claire Daunton, SCDC
Councillor Graham Cone, SCDC
Councillor John Williams, SCDC
Councillor Ian Manning, Cambridge City Council

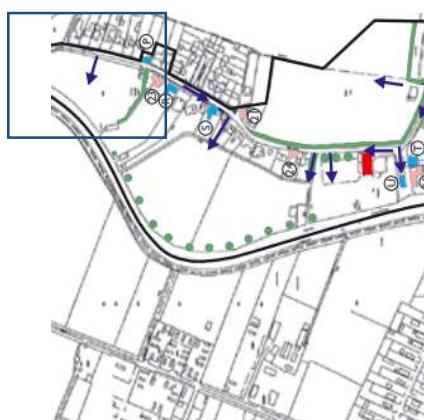
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APPENDIX 1 – DETAILED OBJECTIONS TO NECAAP PROPOSALS

1) VISUAL INTRUSION

- a) We welcome the recognition given to the importance of Fen Ditton and its Conservation Area and of Ditton Meadows and Stourbridge Common as the water meadows forming the green, River Cam Corridor. This is reflected in your choice of VP1, VP2 and VP3 in these areas. However, we suggest there are other publicly accessible viewpoints that must also be considered.

- o The adopted Fen Ditton conservation area appraisal Section 8.9 states “Vistas of the river can be glimpsed from the northern end of the Green End and from the western end of High Street whilst views of the open countryside can be seen behind many properties throughout the village”. The boxed area below is the view point shown in the appraisal which looks from Green End over the Osier Holt, a field held by the Townlands Trust, towards the NECAAP area.



- o A second suggested viewpoint is from Footpath 85/2, as referenced on the County’s “My Cambridgeshire” website, approx. grid ref TL477603. This site is a few 10s of m upstream of the gateway dividing the larger portion of Ditton Meadows from the smaller portion containing the boathouse. The viewpoint is well used by recreational walkers all year round and especially during events such as regattas and Bumps races on the river. There is an excellent view upstream and downstream and across the river as shown in the photo below. The hotel building at Cambridge North is visible in the photo and there is a very clear view across the NECAAP area which is currently devoid of other tall buildings. From site photos, the hotel comprises a Ground Floor with five upper stories and a service block above the roofline. Planning applications show a height of 27.09 m to a roofline. The hotel building is even more visible from the towpath on the north bank as shown in the insert photo.

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- A third viewpoint is on an informal path cutting across Ditton Meadows to the railway bridge at TL 475601. This is just north of a footbridge across a ditch and some trees.



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- In the wider area, there are some outstanding views of Cambridge City and its setting from the higher ground around the A14/A11 junction and from the area of the A604 and Little Trees Hill - Gog Magogs. These viewpoints offer wonderful panoramas of the Cambridge skyline, especially in evening light.
- b) The assessment of lighting and visual intrusion should take into account the reduced screen provided by vegetation in winter and spring between leaf fall and bud burst as well as the possibility that trees on privately owned land might be cleared as has happened next to the railway bridge and very recently near the city/county boundary.
- c) We are concerned about the level of impact from operational lighting given the height of the buildings. We request that the baseline light levels and nuisance glare are assessed.
- d) The Supporting Technical Document [SPD] - Landscape Character and Visual Impact -Appraisal: Development Scenarios provides a number of references to applicable planning policies and requirements including:
 - Para 3.6 – “Paragraph 170 of Section 15 advises that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, as well as recognising the intrinsic character and beauty of the countryside.”
 - Para 3.7 – “Paragraph 180 advises that planning polices and decisions should limit the impact of light pollution from artificial light on local amenity.”
 - Para 3.23 – “The [South Cambridgeshire District Council (SCDC)] SPD promotes a 'Landscape Scheme' which is stated to assist in achieving the following objectives related to this LVA: '
 - Promote Landscape Character;
 - Promote 'A Sense of Place';
 - To reduce the visual impact of development;
 - To provide opportunities for recreation,’”
 - Para 3.31 on Cambridge City planning – “The overall aims of Appendix F are to:
 - Maintain the character and quality of the Cambridge skyline;
 - Ensure that tall buildings which break the established skyline are well considered and appropriate to their context;
 - Support only new buildings which are appropriate to their context and contribute positively to both near and distant views. “
- e) The Appraisal Summary also concludes that only the Low option would result in Minor or Negligible overall effects on four viewpoints although there would be with Moderate overall effects on Viewpoint 3 (Harcamlow Way, River Cam) and Viewpoint 6 (Mere Way, Public Right of Way). Furthermore, only the Low option would result in Minor or Negligible overall effects on landscape character of all areas appraised.
- f) We contend that the Station Hotel is already visually intrusive and, understanding that the nearby office block has approval to be higher, we would expect the Hotel to remain higher than new buildings in Phases 3 and 4 of the Cambridge North

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Project in the NECAAP area and these to screen buildings in Phase 2 and others to the west in NECAAP.

- g) We therefore object strongly to the fact that the proposed building heights shown in Figure 21 of the Draft NECAAP exceed those shown on the Low option on Figure 5.3 of the Appraisal report which themselves are borderline or unacceptable according to planning policies such as those described above. It is unacceptable that buildings almost twice the height of those in the Low option have been included in the Draft NECAAP despite the conclusions of the Landscape Appraisal. We note that the justification for the proposals is presented as stemming from the ambition for growth in commercial space, jobs and dwellings. to create 20,000 new jobs.

2) TRAFFIC AND TRANSPORT

- a) We welcome the objective described in NECAAP that a modal shift in travel to work to or from the area will avoid increasing road congestion. It is proposed instead to increase the use of sustainable modes.
- o The proposal under NECAAP is to ration car spaces to only 0.5 per residence noting this requires provision of a large number of extra Park and Ride spaces outside the NECAAP area.
 - o The table below gives a comparison of the estimated baseline, the self-reported travel to work in TP+ area and the ambition for NECAAP.

Source	Type	Mode						
		Walk	Cycle	Bus	Train	Car Driver	Car Psgr	Other
Fig 13 (%)	Estimate based on 2011	6	15	2.4	1.5	71	3.2	1.2
TP+ 2017 (%)	Survey	5.8	21.7	4.0	3.7	52.7	2.7	1.0
Distance 2017 (miles)	Survey	3	4	13.2	37	24	36	23
Fig 58-est (%)	Aspiration	12	28	12	4	24	3	14

- o There is a big discrepancy between the projections from 2011 Census data and the 2017 survey. Even so, it is clearly a big change to achieve 24% car use in NECAAP whether starting from 71% or 52.7%.
- o The recent survey data may be skewed by several factors:
 - The Chisholm Trail bridge is now expected to open in late 2020 and was predicted to increase cycling and walking to Cambridge North and the NECAAP area;
 - The 2018 survey may have been affected by the massive problems with train timetables in mid 2018. 2019 data are not published;
 - The number of trains stopping at Cambridge North has been broadly increasing since the station opened. A new service pattern is expected in 2020 as 8 car (longer) trains are introduced that can stop

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- at Waterbeach and Littleport and are expected to reduce overcrowding;
- Employers are thought to be improving travel from Cambridge North to places of work in the NECAAP area; and
 - Park and Ride charging policy has changed.
- There is no discussion in NECAAP of out-commuting to other places including London although the number of residents who work in the NECAAP area must reduce for each one who commutes elsewhere.
 - 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 whether or not this is considered a success in travel terms or even if it could be improved on. Since Cambridge County Council holds survey data similar to the TP+ surveys, we urge the Cambridge City Council and SCDC, the sponsors of NECAAP, to request the County seeks permission from relevant businesses to anonymise and pool their data so a clearer picture emerges of how and from where staff in businesses in the Cambridge station area actually travel to work.
 - We object that NECAAP does not present recent evidence (apart from TP+) to support the aspiration to increase use of non-car travel or Park and Ride or indeed address the changes in home working patterns, employment and economic growth that are occurring in 2020.
 - We object that the aspiration in NECAAP assumes that residents will be able to walk or cycle to work. This depends on them being young and active, but people don't stay that way. Communities are made of people of different ages and abilities. Family sizes change. These factors often increase the reliance on cars.
 - Leisure, shopping and sport often involve some travel and occasional car use increases the desirability of car ownership and the need for parking.
 - The 2011 basis for NECAAP will soon be superseded by the 2021 census. We suggest the NECAAP proposals should show if or how this data could be used within the programme to verify the travel predictions.
 - Future patterns of travel will change as other projects come to fruition. Although Cambridge Autonomous Metro (CAM) will tend to reduce numbers of car trips, improvements to the A10 will increase them.
 - We also object that NECAAP does not provide any evidence from anywhere else that the aspiration for modal shift can be achieved. It appears "Predict and Provide" is being substituted with an experiment in 'Ration and Predict'.
- b) The amount of congestion that could occur if the aspiration for modal shift is not achieved is dependent on the numbers of journeys involved. Therefore, a lower increase in the planned number of jobs and residences would reduce the negative consequences of the risk of failing to meet the aspiration.
 - c) The documents state on page 57 that "Currently, there are estimated to be about 12,000 jobs within the study area and no dwellings, so the above scenarios represent an increase in jobs of between 6,200 and 15,000 and an increase in dwellings of between 5,500 and 9,200". This implies the NECAAP studies have investigated a

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traffic impacts for an additional working population of only 15,000 not 20,000 as stated elsewhere.

- d) As presented, the negative consequences for traffic are set against an objective for traffic on Milton Road. FDPC objects to this single objective since we consider that traffic will increase on the B1047 Horningsea Road and Ditton Lane and probably High Ditch Road. We also think it likely that our streets will be increasingly used as informal parking areas by commuters going to the NECAAP area. This issue of traffic in Fen Ditton should be addressed by the NECAAP.

3) THE SEWAGE WORKS AND RELOCATION IN THE GREEN BELT

- a) We have objected strongly to the CWWTPR proposal to relocate Anglian Water's (AW's) sewage works from Milton to Honey Hill and to the methodology that led to one of three sites in the Green Belt being proposed for consultation. Our letter of objection of 11th September and Joint Parishes objection of 14th September are attached.
- b) CWWTPR asserted that the need for relocation was implicit in the NECAAP. However, the current proposal does not provide any further information as to how alternatives were rejected. We highlight below several aspects that should be included in a reasoned transparent justification of the move or its alternatives. These cover public support, odour issues, use of buffer belt as areas to support biodiversity, land holdings and affordability.
- c) There has been widespread support amongst residents and interviewees for the sewage works to remain where it is. We suggest that AW is asked to clarify as soon as possible how much support there was for this firstly in the answers given to their specific consultation question and secondly in other responses. The answers should be sought prior to the entire consultation reporting being completed if that is going to delay the NECAAP.
- d) AW's policy of 400m separation for dwellings and 150m for commercial space is critical to the rationale given for relocation and to the site selection process. There is however no sign that this policy has been tested against modern best practice.
- o The NEECAP odour report in the Document Library shows the spread of the odour contours under present (or possibly 2013) conditions. The report also highlights how certain process areas within the site are the primary sources.
 - o At present there are offices on Cowley Road within the 150m buffer zone around the site. If these don't have problems then 150m is too conservative.
 - o Thames Water's Deephams Works has one set of dwellings within 50m of the site boundary to the north and another 200m to the west. A recently completed upgrade project (approved by the then Mayor of London, Boris Johnson) has led to "...achieving a 99% reduction in odour emissions". Thames Water's website reports success in reducing odour issues in nearby residences. The NECAAP should include some evaluation of this and, possibly, some other rehabilitated works in UK.

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DEEPHAMS SEWAGE WORKS UPGRADE

EXTRACT FROM APPLICATION

The Greater London Authority's August 2014 Planning Report on this Project describe a proposal to redevelop the existing 35 ha Deephams Sewage Treatment Works in Enfield to provide a new works with higher capacity to serve 989,000 population equivalents and treating sewage to a higher standard.

The Report states in Sections 46 and 47 - Air quality and odour:

“46 The proposals include the provision to cover and treat several parts of the new works, notably the inlet works, primary settlement tanks and various other elements of the process.

47 As odour is one of the most contentious and unpleasant aspect of a sewage treatment works, the reduction in odour is welcomed and supported. The applicant’s planning statement section 8.6 states that the total European Odour Units/second will be reduced by 85%, whilst the sustainability statement section 4.5 states that the number of properties most affected by odour will be reduced by 99%. These measures are welcomed and a method of monitoring the odour improvements, connected to a mechanism to rectify any shortcoming should be secured by condition.”

DEEPHAMS SEWAGE TREATMENT WORKS - Planning Drawing and Google Map View



What is notable from the above is that there appear to be residences close by both prior to and after the redevelopment.

The Report’s section on Sustainable Energy include which states:

“Para 36 The applicant has identified that the proposed Lee Valley district heating network is within the vicinity of the development and is proposing to design the system on site to allow connection to the wider network either for heat import or export:

- Import - heat could be imported from the network to top up the onsite Combined Heat and Power (CHP) generation during winter peak heat demand, as an alternative to the current approach which involves the use of solid fuel boilers.

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- Export - while biogas and heat generation on site currently does not exceed onsite demand, biogas generation may increase going forward with the integration of a Thermal Hydrolysis Plant (THP). Should this materialise, excess heat (especially in summer) may potentially be exported to the Lee Valley heat network.

Para 37 The applicant has stated the intention to include the facility for high temperature heat offtake as part of the CHP system upgrade and this is welcome.”

As a testament to its success, the project won the prestigious ‘Greatest Contribution to London’ trophy at the ICE London Civil Engineering Awards 2019.

- e) Conceptually, a smaller footprint works on the existing site could be surrounded by a green shelter belt between it and nearby commercial premises with dwellings still further away. If safeguarding zones other than AW’s defaults are used, the potential advantages would include:
 - Ability to provide more homes than AW’s original policy would suggest;
 - Provision of areas of vegetation to meet the target for net gain in biodiversity;
 - Avoidance of the need to develop a new site on the Green Belt, noting that the current biodiversity baseline excludes the area of Green Belt taken up by a relocated new works
 - Incorporation of links for a possible sustainable energy solution for nearby residences and commercial premises;
 - Reduced embedded carbon, especially if some existing infrastructure can be incorporated in the new works;
 - Reduced planning periods and programme time thus bringing forward the delivery of some NECAAP residential or commercial development;
 - Reduced capital cost thus freeing up some of the HIF funds for use elsewhere in Cambridgeshire or the UK;
- f) The other consequence of such an approach is that there would be a resulting reduction in the area available for new dwellings and commercial space. However, a 22 ha site (<15% of the NECAAP) for a sewage works with a, say, 100m wide tree and green belt buffer zone on two sides would take up around 30-35 ha in all from the 182 ha of the NECAAP.
- g) The land holdings issue arises because CWWTPR papers lump the AW owned area with that owned by the City of Cambridge and say that up to 5600 homes could be built after ‘unblocking’. Allocation of a, say, 100m strip of commercial space outside the postulated biodiversity zone would take around 12 ha more. It would be important to find out if replacement residential area could be found with the land holdings of others in the NECAAP area.
- h) The affordability issue arises since the CWWTPR and NECAAP documents state that the HIF grant is only available to relocate the sewage works. We could not find out whether the possibility of a smaller HIF grant had been investigated or could be negotiated. Given the events of the last 12 months, we would expect local councils and national Government would be open to the idea of new negotiations leading to a reduced grant to Cambridge, especially if it speeded up delivery of new homes.

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4) BIODIVERSITY AND GREEN SPACES

- a) We welcome the objective described in NECAAP to increase biodiversity and provide adequate connected green space for environmental and amenity purposes. However, we object to the proposed NECAAP because:
- the metric for biodiversity is taken to be areas of different habitat with less emphasis on quality or the species present. Field surveys would be required to remedy this. These might also might also address the anecdotal information that the current sewage works has a rich and dense avifauna at certain times of the year.
 - The area of greenfield site required for a relocated sewage works is not taken into account although, as stated above, retaining it on the present site would avoid this concern.
 - The small areas of green space being proposed within NECAAP area would not make up for the loss of a large part of Cambridge's Green Belt.
 - It is unclear if or how Chesterton Fen would be acquired in order to allow the net gain target to be achieved.
 - The proposed ratios of green space to dwellings or population will be low compared to most areas of Cambridge and more like an inner-city area in a large conurbation. In his Radio 4's Rethinking: Cities, Mayor James Palmer made the point – “because of Covid, people want to spend their living time in areas where there's plenty of open space and fresh air”.

5) POPULATION INCREASE AND INFRASTRUCTURE

- a) 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 densities of 200 to 400 dwellings/ha are planned.
- b) The proposed increase in homes will not decrease the pressure on housing in Cambridge but appears to be intended, at best, to merely go part of the way to keeping pace with the proposed increase in jobs.
- c) The affordability of housing in Cambridge is likely to remain an issue compared to the cost of living elsewhere nearby. The report of the Cambridgeshire and Peterborough Independent Economic Review (2018) highlighted the rapid rise in house prices in the years before 2017. However, the most recent publication of the same source of data is Bulletin 45 which is published as a supplement to the Cambridge area Strategic Housing Market Assessment. Figure 15 from this bulletin (see below) suggests that lower quartile prices in Cambridge have remained static since then although still higher than other local districts. In contrast, prices in the less expensive districts have continued to rise slowly. The NECAAP makes provision for social and affordable housing but does not examine how the differences between SCDC and the City might be dealt with nor the issues of whether some workers might prefer to live in less expensive dwellings outside the City and travel into Cambridge nor whether community building may be hindered

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by a high turnover of inward migrants to Cambridge who subsequently leave the NECAAP area when their circumstances change.



Source: Bulletin 45

- d) Conversely, the affordability of housing compared to London and desirability of living in Cambridge has attracted people who out-commute. As it is so close to Cambridge North station there is a risk that NECAAP as presented is just giving up Cambridge Green Belt to provide homes for London commuters. Some out commuting is useful but large numbers would undermine the rationale for NECAAP's linking of numbers of new homes and jobs.
- e) The NECAAP contains several references to Build to Rent that should be clarified including:
 - o P154 states - "...it is also recognised that Build to Rent Schemes deliver fewer than 40% affordable homes, and that this shortfall needs to be made up for by other schemes coming forward in North East Cambridge". There is no explanation who or how this would be decided;
 - o P155 states - "d) ensure all units are self-contained"; it is unclear what this means; and
 - o P160 states - "Build to Rent schemes can deliver homes at a faster rate than conventional market housing". Should such a statement be justified or at least qualified by comparing the times taken?
- f) The high rate of population growth aimed for in NECAAP will produce correspondingly extra demands on utility infrastructure.
 - o Telecoms and sewerage should not be problematic
 - o Stormwater flooding is addressed in NECAAP
 - o Energy supply is unlikely to be based on natural gas and so the extra demand on the electrical grid could be considerable. This could be reduced if heating and cooling loads are balanced. The possibility of a district scheme incorporating ground storage and also retention of the sewage works as a heat source/sink should be investigated.

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- water supply in a water stressed catchment is another problem although the industry has a solid approach to "predict and provide" as a response to future demands placed on it by plans for economic growth in the Cambridge area leading to increase population.
 - i. Increases in licensed abstraction in the headwaters of the River Cam are most unlikely and may be reduced in response to climate change. The result will be a need in summer for greater imports of drinking water from storage or imports from elsewhere. At present, groundwater can be brought in from Thetford but the amounts are controlled.
 - ii. Extra imports of potable water lead to extra return flow of treated effluent in the River Cam which is of great value to low flows in late summer. There is therefore a need to make sure that the return flow is not moved way downstream and that the quality is suitable under all conditions including summer storms which give rise to particular problems of water quality.
 - iii. Bulk storage in a new reservoir or inter basin transfers are another component of the supply system and that is why some effluent from Cambridge in the Cam can be transferred from Denver Sluice at the tidal limit into the River Stour to the area of Colchester. Another transfer allows water from the Trent to be transferred to East Anglia but probably cannot assist supplies to Cambridge at the moment.
 - iv. All of these measures to maintain the supply, distribution and treatment systems come with a financial, energy and carbon footprint cost. Reducing per capita demand and leakage therefore come to the fore. It may be that reusing potable water as grey water in a development such as West Cambridge is worthwhile since it reduces net demand but it too has a financial and carbon cost which should be accounted for.

6) TIMING OF NECAAP

- a) The events of 2020 are affecting economic growth, the availability of labour, 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 to have 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 Cambridgeshire District Council's own staff have expressed the desire for more flexible working arrangements to continue in future.
- b) The Government is proposing to allow change of use for redundant commercial buildings and other measures to rapidly increase residential space. This will affect the rationale for the number of new dwellings in the NECAAP area.

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- c) The data used to justify NECAAP and even the HIF grant are no longer applicable. The 2021 census will provide a much clearer baseline.
- d) The delivery of some proposed NECAAP residential or commercial development cannot take place until the sewage works is relocated. There are planning periods built into the programme for this but there are also risks that have not been presented.
- e) A reduced scale of development would lead to reduced capital cost thus freeing up some of the HIF funds for use elsewhere in Cambridgeshire or the UK.
- f) We have not been able to discover the number of homes now proposed for NEECAP within the LDP or April 2020 Housing Trajectory Report other than around 500 included by the City for “Cowley Road”. This may mean that the sponsors have a high degree of flexibility to choose a more appropriate number of homes than 8000 in NECAAP.
- g) Aligning NECAAP with the LDP timetable would provide extra time to evaluate the impact of the events of 2020 and reconsider the improvements that could be achieved by scaling back the ambition.

7) MISSED OPPORTUNITY

- a) The NECAAP document reports that Great Kneighton, Accordia and Eddington developments have won awards. These are relatively low height and low density compared to NECAAP. However, development around Cambridge Station has been widely criticised raising the question whether development around Cambridge North will be any different.
- b) The proposals to improve existing bus and rail services with expansion including a new station at Cambridge South, and reopening the Wisbech line and the East West Rail link will promote new development along transport corridors to Cambridge. This is likely to reduce inequality across the county.
- c) The proposal in NECAAP to create a high rise densely populated urban district is a missed opportunity to avoid degrading the environment of Cambridge and its surrounding villages and countryside. The fact that the NECAAP itself proposes increased urbanisation above that described in the supporting technical studies is a major concern.
- d) There is scope to develop North East Cambridge at a scale and density that is more sympathetic to the area and avoids moving the sewage works into the Green Belt. A number of damaging issues and inconsistencies in the NECAAP have been identified in this consultation response and some suggestions to overcome them put forward. NECAAP should be revised to arrive at a more satisfactory and sustainable plan taking into account the major changes that are occurring in the economy. If the resulting potential for economic and housing growth falls short of the emerging need, solutions should be sought within the local development plans rather than simply over-development through the NECAAP.