

# North East Cambridge Area Action Plan

## Proposed Submission Duty to Cooperate Statement of Common Ground



**GREATER CAMBRIDGE**  
SHARED PLANNING

DRAFT

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## Contents

North East Cambridge Area Action Plan .....	1
Proposed Submission Duty to Cooperate Statement of Common Ground.....	1
Appendix 1: Proposed table of signatures.....	11
Appendix 2: North East Cambridge Area Action Plan - Relocation of Cowley Road Bus Depot Statement of Common Ground - AGREED OFFICER DRAFT: SUBJECT TO FORMAL SIGN OFF .....	12
Appendix 3: North East Cambridge Area Action Plan - Retention/Relocation of Waste Transfer Station and Aggregates Railheads Statement of Common Ground.....	19

# 1. Introduction

A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for strategic cross-boundary matters. It documents where effective co-operation is and is not happening throughout the plan-making process and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. It is also part of the evidence required for local planning authorities to demonstrate that they have complied with the duty to cooperate.

This Duty to Cooperate Statement of Common Ground supports the Proposed Submission North East Cambridge Area Action Plan. It documents the outcomes of co-operation to date in preparing the local plan in order to inform and shape a positively prepared and justified strategy. In doing so, it addresses and takes account of the requirements set out in the National Planning Policy Framework<sup>1</sup> and Planning Practice Guidance<sup>2</sup>. It has also had regard to relevant advice produced by the Planning Advisory Service<sup>3</sup>.

As a Proposed Submission Statement of Common Ground, this document sets out what Cambridge City Council and South Cambridgeshire District Council (the Councils) consider to be points of common and uncommon ground for relevant strategic cross-boundary matters. The Statement will be updated ahead of submission to the Secretary of State, in the light of relevant stakeholders' representations to the Proposed Submission North East Cambridge Area Action Plan. See section 7 Timetable for Agreement, Review and Update for more details.

## Relationship with other documents

The following two documents are closely related to this Statement of Common Ground and should be read alongside it:

- The North East Cambridge Area Action Plan Proposed Submission Duty to Cooperate Compliance Statement, which sets out the process completed to date as part of the ongoing cooperation with relevant bodies regarding strategic cross-boundary matters
- The North East Cambridge Area Action Plan Statement of Consultation, which records the formal consultation process completed to date and how

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<sup>1</sup> In particular paragraphs 24 – 27.

<sup>2</sup> PPG Plan-Making - Maintaining effective cooperation.

<sup>3</sup> PAS Statement of Common Ground Advice and Template, January 2019.

consultation responses have informed the Proposed Submission Area Action Plan.

## 2. Parties Involved

Given the distance of North East Cambridge from the outer boundary of South Cambridgeshire, the Councils consider that the duty to cooperate bodies with most interest in North East Cambridge are those with an interest in matters crossing the boundary between Cambridge and South Cambridgeshire (i.e. Cambridgeshire County Council, Cambridgeshire & Peterborough Combined Authority, and the prescribed duty to cooperate bodies). For more detail see the North East Cambridge Area Action Plan Proposed Submission Duty to Cooperate Compliance Statement section 2.2.

## 3. Signatories

Drawing on the section above, we propose that the central signatories should be (see section 7 for Timetable for Agreement, Review and Update) the two planning authorities within Greater Cambridge, namely Cambridge City Council and South Cambridgeshire District Council. In addition we also propose that the following authorities and prescribed bodies which are identified in the Duty to Cooperate Statement of Compliance as having an interest in a specific strategic cross-boundary matter or matters of substance should be signatories to relevant sections of the Statement of Common Ground. This includes:

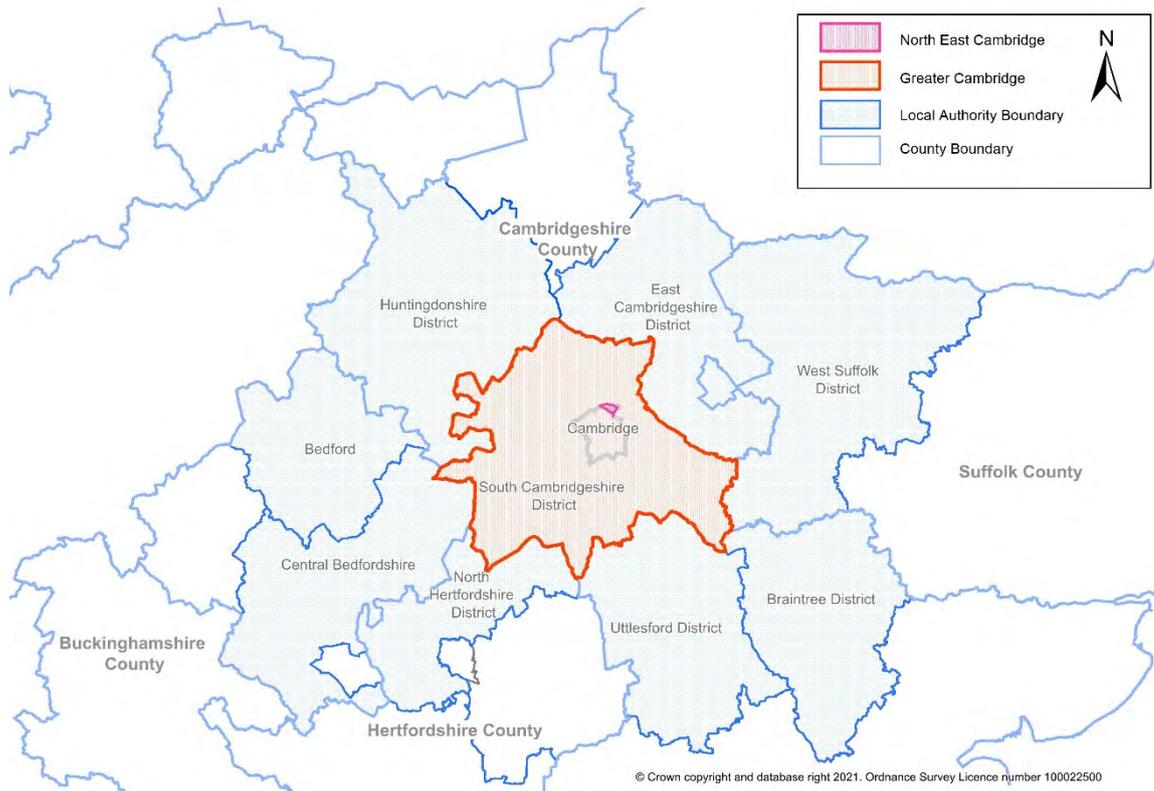
- Cambridgeshire County Council
- Cambridgeshire and Peterborough Combined Authority
- National Highways
- Environment Agency
- Natural England
- Historic England
- Cambridge and Peterborough NHS Trust
- Cambridgeshire and Peterborough Clinical Commissioning Group

A template table for future signatures is set out at Appendix 1.

## 4. Strategic Geography

This Statement of Common Ground addresses strategic cross-boundary matters relating to the North East Cambridge geography, as shown in Figure 1.

**Figure 1:** Strategic Geography for the North East Cambridge Statement of Common Ground



Cambridge City Council and South Cambridgeshire District Council are working together to create the North East Cambridge Area Action Plan. This builds on the Cambridge Northern Fringe East strategic site allocation in both councils' 2018 local plans and is now proposed to cover a wider area including Cambridge Science Park and other sites.

The North East Cambridge area includes 182 hectares of brownfield land at the north eastern edge of Cambridge urban area. The area crosses the administrative boundary of Cambridge City Council and South Cambridgeshire District Council. The Area Action Plan area does not adjoin any other districts; the closest district is East Cambridgeshire, with the closest settlement being around five miles away.

## 5. Strategic Matters

This section explores topics that are considered to be strategic cross-boundary matters relevant to North East Cambridge at this stage in the plan-making process. Wider strategic matters have been addressed via duty to cooperate engagement supporting the Greater Cambridge Local Plan.

Given the relatively small area addressed by the Area Action Plan and its location – surrounded entirely by South Cambridgeshire and Cambridge – the Councils consider that the strategic cross-boundary matters relevant to the North East Cambridge are:

- Strategy: pattern and scale of growth, including housing and employment (insofar as this impacts on other matters as below)
- Transport, in relation to:
  - Impacts of the development on the transport network
  - Relationship with transport infrastructure projects
  - Cowley Road bus depot
- Strategic heritage impacts
- Wildlife habitats, open space and green infrastructure
- Water, including supply, quality, and wastewater
- Energy, in relation to electricity provision
- Social, health and community infrastructure, in relation to
  - Health infrastructure
  - Education infrastructure
- Minerals and waste, in relation to
  - North East Cambridge Aggregates Railheads
  - The Veolia Waste Transfer Station at Cowley Road Industrial Estate

The Duty to Cooperate Compliance Statement provides for each matter details of the relevant bodies, the joint evidence, engagement and the current position. For the purposes of this draft Statement of Common Ground only the current position is recorded, together with any areas where agreement has not been reached to date or where there are other outstanding issues.

## **5.1 Strategy: pattern and scale of growth, including housing need and employment**

### **Current position**

- a. Through bilateral meetings relating to the emerging Greater Cambridge Local Plan the Councils asked neighbouring authorities whether they considered there to be any substantive strategic cross-boundary matters arising from the content of the North East Cambridge Area Action Plan. No neighbouring authorities or prescribed bodies have identified any substantive cross boundary matters in relation to strategy.

## Conclusion

Drawing on the above, the Councils consider that there are no areas of disagreement on this strategic matter.

## 5.2 Transport

### Current position

- a. In relation to the overall transport impacts of development at North East Cambridge, the Proposed Submission policies include the trip budget approach referred to above, with the aim of ensuring that vehicle trip generation levels do not exceed the current level, to mitigate all development impact on the highway network. The approach is supported by the North East Cambridge High Level Transport Strategy which is agreed with relevant partners, and the Councils consider that this forms an agreed position with the relevant duty to cooperate bodies.
- b. In relation to Cowley Road Bus Depot located within North East Cambridge, the Statement of Common Ground regarding the Depot (see Appendix 2) supports the retention of the Depot within North East Cambridge until around 2031, and states that the parties agree to work collaboratively to address the assessment of bus needs, supporting strategies and delivery plans, to facilitate delivery of the NEC AAP, including the timely relocation of the Cowley Road Depot. The current version of this Statement of Common Ground is an agreed officer draft: subject to formal sign off; the Councils consider that this forms an agreed position with the relevant duty to cooperate bodies.
- c. In relation to engagement with transport infrastructure proposals, the Proposed Submission Area Action Plan includes in particular Policy 19: Safeguarding for Public Transport, which will support provision of proposed transport infrastructure at North East Cambridge. The policy approach is supported by the relevant duty to cooperate bodies; this forms an agreed position with the relevant duty to cooperate bodies.

## Conclusion

Drawing on the above, the Councils consider that there are no areas of disagreement on this strategic matter.

## 5.3 Heritage

### Current position

- a. The Proposed Submission Area Action Plan Spatial Framework follows the Heritage Impact Assessment's recommendation that development at North East Cambridge should not exceed certain heights in certain locations. The evidence and policy approach is broadly supported by Historic England, and therefore the Councils consider that there is common ground on this strategic matter. The Councils and Historic England have also agreed to participate in further, regular discussions on future planned growth and the historic environment from early 2022 which will inform the emerging Greater Cambridge Local Plan and its specific site allocations.

### Conclusion

Drawing on the above, the Councils consider that there are no areas of disagreement on this strategic matter.

## 5.4 Wildlife habitats, open space and green infrastructure

### Current position

- a. Regarding open space provision, the Proposed Submission Plan meets open space provision standards for informal open space on-site such that there is now no need for additional off-site informal open space provision. Notwithstanding, the Plan requires new and enhanced connections with the countryside beyond North East Cambridge that will also enhance accessibility to the wider countryside network. The Councils consider that this forms a position of common ground with Natural England.
- b. Regarding the impact of development at North East Cambridge on designated biodiversity sites of European importance, the Proposed Submission policies will support no adverse effect on their integrity. The Councils consider that this forms a position of common ground with Natural England.

### Conclusion

Drawing on the above, the Councils consider that there are no areas of disagreement on this strategic matter.

## 5.5 Water, including supply, quality, wastewater and flood risk

### Current position

- a. The Councils continue to engage with the relevant bodies responsible for water supply planning, including Water Resources East, the Water Companies and the Environment Agency, as well as with neighbouring authorities, about the potential impact of growth on water abstraction and supply. A stakeholder group is working to identify interim solutions and to oversee longer term solutions, including the Water Resources East Water Management Plan.

Ahead of longer-term solutions being found, the Proposed Submission Plan's approach, of requiring all development to demonstrate that there is sufficient water supply available to meet the demands generated by the development without causing unacceptable environmental harm, is considered to provide sufficient safeguards with respect to the potential impact of development at North East Cambridge.

Also, in the context that the Area Action Plan will be paused to await the outcome of the Waste Water Treatment Plan DCO process, it is expected that the Water Management Plan being identified by Water Resource East (WRE) and due to be completed by 2023 will be prior to the Proposed Submission consultation of the NECAAP being carried out, likely to be in early 2024. This is therefore also ahead of the subsequent submission and examination stage of the Area Action Plan, and as such will provide the necessary evidence to meet the policy requirement.

The Councils consider that this is a robust position able to form a position of common ground with the Environment Agency and Natural England.

### Conclusion

Drawing on the above, the Councils consider that there are no anticipated areas of disagreement on this strategic matter.

## 5.6 Energy

### Current position

- a. The Proposed Submission Plan's inclusion of a requirement for the expansion of Milton Primary Sub-Station to support energy supply to North East Cambridge means that this cross-boundary matter has been fully addressed.

## Conclusion

Drawing on the above, the Councils consider that there are no areas of disagreement on this strategic matter.

## 5.7 Social, health and community infrastructure

### Current position

- a. In relation to education, the Proposed Submission Plan includes an identified requirement for two but potentially up to three primary schools, and draws on views from the local education authority that the existing local secondary school provision in the surrounding area of North East Cambridge is also suitable in supporting the needs of both the new and existing community. The Councils consider that this forms a position of common ground with Cambridgeshire County Council as the Education Authority.
  
- b. In relation to health infrastructure, the Proposed Submission Plan includes an identified requirement for a health hub. The Councils consider that this forms a position of common ground with the Cambridgeshire and Peterborough NHS Trust, the Cambridgeshire and Peterborough Clinical Commissioning Group and Cambridgeshire & Peterborough Health & Wellbeing Board.

## Conclusion

Drawing on the above, the Councils consider that there are no areas of disagreement on this strategic matter.

## 6. Minerals and waste

### Current position

- a. The Proposed Submission Area Action Plan reflects the common ground between the Councils and Cambridgeshire County Council regarding the aggregates railheads and waste transfer station located within the Area Action Plan boundary that are safeguarded in the Cambridgeshire and Peterborough Minerals and Waste Plan 2021, as set out in full in the Retention/Relocation of Waste Transfer Station and Aggregates Railheads Statement of Common Ground,(see Appendix 3).

## Conclusion

Drawing on the above, the Councils consider that there are no areas of disagreement on this strategic matter.

## **7. Governance Arrangements**

For the Greater Cambridge authorities, sign-off of the final Statement of Common ground will include member engagement, including consultation with lead members on behalf of the two councils.

It is anticipated that the other signatories to the statement will identify the relevant person to sign the document as they see fit, whether this involves political or senior officer approval.

## **8. Timetable for Agreement, Review and Update**

The Greater Cambridge authorities have worked with relevant parties to address identified strategic matters on an ongoing basis. This Statement will be updated at later stages as follows

- Following receipt of comments regarding the Proposed Submission Area Action Plan, we anticipate seeking signatures to a final Statement of Common Ground, confirming the formal position of relevant signatories for submission to the independent examiner as an Examination document
- Beyond the point of submission, if required the Statement could be further updated should further agreement be necessary through the examination process

## Appendix 1: Proposed table of signatures

Organisation	Role of signatory	Signature	Relevant sections of document
Cambridge City Council	TBC	-	All
South Cambridgeshire District Council	TBC	-	All
Cambridgeshire County Council	TBC	-	5.2a-c, 5.7a, 5.8a
Cambridgeshire and Peterborough Combined Authority	TBC	-	5.2a-c
National Highways	TBC	-	5.2a
Historic England	TBC	-	5.3a
Natural England	TBC	-	5.4a, 5.5a
Environment Agency	TBC	-	5.4a
Cambridgeshire and Peterborough NHS Trust	TBC	-	5.7b
Cambridgeshire and Peterborough Clinical Commissioning Group	TBC	-	5.7b
Cambridgeshire & Peterborough Health & Wellbeing Board	TBC	-	5.7b

# **Appendix 2: North East Cambridge Area Action Plan - Relocation of Cowley Road Bus Depot Statement of Common Ground - AGREED OFFICER DRAFT: SUBJECT TO FORMAL SIGN OFF**

## **1. Purpose**

This Statement of Common Ground sets out how the Parties will work together, and through what appropriate mechanisms, to facilitate the future relocation of the existing Bus Depot in Cowley Road as part of demonstrating the deliverability of the North East Cambridge AAP proposals. Parties to the Statement are:

- Cambridge City Council (the City Council) - local planning authority for the joint AAP
- South Cambridgeshire District Council (the District Council) – local planning authority for the joint AAP
- Cambridgeshire and Peterborough Combined Authority (the CPCA) - the transport authority
- Cambridgeshire County Council (the County Council) – the highway authority
- Greater Cambridge Partnership (the GCP) – the local delivery body for a City Deal with central Government.

For the AAP to ultimately be found ‘sound’ the local planning authorities must be able to demonstrate that there is a reasonable prospect of delivery of the AAP proposals to the timescales envisaged and therefore to the relocation of the Bus Depot at an appropriate time consistent with the phasing of development at NEC. This statement aims to provide appropriate evidence of deliverability commensurate with the stage in the development and plan making process.

## **2. Background**

South Cambridgeshire District Council and Cambridge City Council, the local planning authorities, are jointly preparing an Area Action Plan (AAP) for the North East Cambridge, which will form part of the statutory development plan.

The area proposed to be covered by the AAP is shown in Annex 1. It includes the east of Milton Road – the area bounded by the A14, the railway and extending south

to the Nuffield Road industrial area - and the west of Milton Road, including the Cambridge Science Park (CSP) and the Cambridge Regional College (CRC).

The area east of Milton Road is one of the last remaining significant brownfield sites in Greater Cambridge, extending to almost a square kilometre. The local councils have long recognised the merits of this location as an opportunity to regenerate this part of the city and to support the continued economic success of the local economy, but also the significant constraint that the existing Anglian Water Waste Water Treatment Plant (WWTP) presents and the viability challenges in terms of relocation.

Policy 15 of the Cambridge Local Plan 2018, and Policy SS/4 of the South Cambridgeshire Local Plan 2018, allocate the area for high quality mixed-use development, primarily for employment as well as a range of supporting uses, commercial, retail, leisure and residential uses (subject to acceptable environmental conditions). The local plans do not specify the amount of development, site capacities, or timescales for development, deferring such matters to the preparation of the joint AAP. This is because the planning of the area is affected by uncertainty over the future of the WWTP, which covers a significant part of the area and is a significant constraint on development of adjoining land.

Since the local plans were adopted, the City Council and Anglian Water, as landowners of the WWTP and surrounding land, have sought to secure funding through the Housing Infrastructure Fund (HIF), to assist with the relocation of the WWTP off site. This has been supported by the CPCA and the bid was successful. Waste provision is the responsibility of the County Council as Minerals and Waste Authority, however, the WWTP relocation project is being taken forward, led by Anglian Water, under the Development Consent Order process.

## **North East Cambridge (NEC) Area Action Plan (AAP) Pre-Submission Draft**

To recognise the opportunity created by the relocation of the WWTP for regeneration of this brownfield site in a highly accessible urban location, the councils are preparing a joint Area Action Plan to guide the type, mix and location of development that delivers on a shared future vision of the place and ensures a comprehensive and coordinated approach.

The Pre-Submission Draft (Reg 19) of the NEC AAP is predicated on the relocation of the Waste Water Treatment Plant (WWTP) having taken place. The relocation provides the opportunity for the creation of a new urban quarter to Cambridge which can make a significant contribution to the future housing and employment needs of

Greater Cambridge. The AAP promotes future structural change in the layout and land use of parts of the area to optimise development potential, mitigate constraints, and for place-making purposes. This includes proposals for new strategic walking and cycling connections; the residential use of Nuffield Industrial Estate; the consolidation of and intensification of industrial use around the aggregate railhead (which is remaining in situ for the foreseeable future); and the relocation of incompatible uses in order to deliver the vision for the area.

## The Bus Depot at Cowley Road Industrial Estate

The existing operator of the Bus Depot, Stagecoach, was engaged early in the plan-making process, through attendance of an NEC landowner forum. They advised:

- The Cowley Road Depot is already at its operational capacity with approximately 130 buses operating out of this depot;
- They are renting additional space from the City Council on adjacent land to the north, which is not ideal;
- They operate a second depot at Willow Road, near Fenstanton, out of which another 70 buses run into the city;
- They note that the Willow Road depot is also at capacity;
- To meet the future bus demand needs for Cambridgeshire, they anticipate a doubling of the existing bus fleet as a minimum;
- Electrification of the bus fleet will likely have space requirements within the depots reducing capacity further;
- New bus depot capacity will be required;
- They acknowledge the potential incompatibility of their existing depot operations at Cowley Road with the future AAP vision; and
- Stagecoach have indicated they would support relocation of the depot to a larger site or sites in support of the area's growth and the transport strategy, subject to a suitable site being found upon which to relocate them, having regard to diversion miles etc.

From a plan-making perspective, the local planning authorities note that the Bus Depot site at Cowley Road is a strategic transport use serving Greater Cambridge and is therefore to be treated as a 'ring-fenced use' providing a status similar to that of a safeguarded use. However, through preparation of the AAP, including area master planning and evidence gathering, it has been concluded that the Bus Depot use is not compatible with the proposed future vision and development of the NEC area for reasons set out later in this statement, but it is recognised that any

alternative site would need to provide good access to Cambridge in order to provide effective and efficient public transport to serve the area.

## **Transport Policy for Bus Provision in Greater Cambridge**

The CPCA adopted its statutory Local Transport Plan in 2020 which identified that supporting growth of jobs and homes in this successful area presents a unique challenge for Greater Cambridge. It said “there is a clear need for an ambitious approach to significantly increase transport capacity to support additional trips from new residents, while tackling congestion on the highway network and creating more attractive, less car-focused places to live and work”.

The CPCA is preparing a ‘refresh’ of the 2020 Local Transport Plan, to be rebadged as a Local Transport and Connectivity Plan which is currently under preparation. It will look at the longer term proposals for bus provision in the Combined Authority area, including Greater Cambridge and will provide an updated framework for a new Bus Strategy.

Bus market reform is one of the CPCA’s key priorities. Following the publication of the National Bus Strategy (Bus Back Better) in March 2021, the government is making grant funding available to areas that commit to produce a Bus Service Improvement Plan (BSIP) by October 2021. Working with members of the local Bus Operators’ Forum, the Highway Authorities and the GCP, the CPCA is currently developing a Cambridgeshire and Peterborough BSIP. The plan will describe the improvements the Transport Authority (CPCA), bus operators and other partners intend to make from April 2022. At the same time, the CPCA is assembling evidence to evaluate franchising and enhanced partnership options for the future delivery of bus services in the area.

The BSIP and the Franchising Assessment will form part of the CPCA Bus Strategy which also includes a bid to Government for Zebra funding for an initial 30 electric buses and supporting infrastructure, to be provided at the Cowley Road Depot site and needs to remain in place until at least 2031 in order to provide value for money.

## **3. Agreed Position of all signatories**

- To deliver growth levels in the current local plans, there is a need triple the number of people using bus services and therefore the bus network needs to double in size/scale (*source: Zebra bid*).

- To ensure that this growth does not exacerbate existing air pollution issues and leave a long-term legacy of high carbon emissions from public transport, these buses must be zero emission. Moving the bus fleet to zero emission is a central plank of delivering growth in Greater Cambridge and maintaining its international success (*source Zebra bid*).
- The North East Cambridge Area Action Plan Transport Evidence Base report by Mott MacDonald recommends that any future development growth in the NEC AAP area should be delivered without any significant increase in development-related highway trips above existing levels so that highway impacts can be minimised. The reasons for this include the current lack of spare highway network capacity in and around the area at peak times, the limited opportunities to increase this in future, the additional pressure to be placed by other developments such as the new town north of Waterbeach and the lack of wider policy support for this. The consultants state that remaining within this 'trip budget' will require the relatively unconstrained existing car mode-share level to be significantly reduced in future.
- Adding more vehicular movements into the area will be unacceptable in terms of road capacity, as well as air quality and placemaking. To achieve this, the Area Action Plan will encourage the use of sustainable travel modes, as well as limiting car use and parking significantly. The signatories to this Statement want to promote sustainable public transport and active modes as part of their focus on addressing climate change.
- The ambition to at least double the size of the bus network in the area and for the network to be low carbon, the limitation of vehicle movements on NEC and the incompatibility of the bus depot use with residential and other sensitive uses will require the relocation of the Cowley Road Bus Depot.
- The delivery assumptions for the NEC area are that the core part of the site will not be available to come forward and deliver new homes until 2031/32 onwards, following relocation of the Waste Water Treatment Plant, that is being taken forward by Anglian Water under a separate Development Control Order process. Whilst the AAP does not include any policy constraint on the start date for any development, so long as all policy tests are met, on the basis of the anticipated delivery programme for the NEC area, there is not envisaged to be any planning policy constraint to the bus depot remaining on site until 2031. Prior to this date, it is envisaged that residential development could potentially take place around the Cambridge North Station area.

- The CPCA's business case for Zebra funding includes the installation of 16 x 150kWh double charging points (or equivalent) at the Cowley Road Bus Depot to support the operation of 30 new double-decker electric buses.
- The installation of the new charging points and the retention of the Cowley Road depot use to 2031 will not inhibit the delivery of early phased NEC development with potential that residential development could take place around the Cambridge North Station area prior to that date. As such, the depot will have at least nine more years of uninterrupted operation (*source: Zebra bid*).
- This timing will ensure the optimal use of the proposed charging infrastructure, which would have been required even without a movement of depot, to upgrade the charging infrastructure that has reached the end of its life cycle after 8 years (*source: Zebra bid*).
- The CPCA is very supportive of the NEC AAP and proposed regeneration of this sustainable brownfield site, as evidenced by its successful submission of the HIF bid to relocate the WWTP.
- To enable the implementation of the NEC AAP, in the longer term, a new depot site location will be established outside the AAP area with direct participation and input from the signatories and also the bus operator. Together they will work proactively to identify an appropriate alternative site or sites to provide for longer term bus needs in a timely way that provides confidence to the AAP process that the AAP proposals are sound and capable of being deliverable at the time envisaged.
- The Greater Cambridge Partnership is developing a City Access project that proposes significant public transport enhancements across Greater Cambridge, providing enhanced bus connectivity to the city centre, hospital and biomedical campus, Science Park and other destinations across the area. It will support fast and reliable onward bus connections from the radial public transport schemes currently in development by the GCP, supported by up to £500 million of Government funding.
- Given the 10 year horizon before the relocation of the Bus Depot needs to take place, and the significant amount of transport planning still to be undertaken that will clarify the bus needs of Greater Cambridge and the future lay-over facilities that will be required for an enhanced fleet, there is not yet a specific delivery plan or alternative site in place for planning and delivering the Cowley Road Bus Depot relocation. The new LTCP and Bus Strategy processes, alongside the GCP's City Access project, will start to map out the

proposals for bus provision in Greater Cambridge and the GCP schemes will help develop those further.

## **4. Duty to Cooperate**

On the basis of the above, the parties agree to work collaboratively through the assessment of bus needs, supporting strategies and delivery plans, to facilitate delivery of the NEC AAP, including the timely relocation of the Cowley Road Depot.

# **Appendix 3: North East Cambridge Area Action Plan - Retention/Relocation of Waste Transfer Station and Aggregates Railheads Statement of Common Ground**

## **1. Purpose**

This Statement of Common Ground sets out how the Parties will work together, and through what appropriate mechanisms, to facilitate the future retention/relocation of the Waste Transfer Station and the Aggregates Railheads, either within the North East Cambridge AAP area or elsewhere, in recognition of their protection in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 (adopted July 2021) and in order to enable delivery of the AAP proposals. It also addresses the third protected minerals and waste site in the Minerals and Waste Local Plan, the Waste Water Treatment Works and its relationship to the AAP. Parties to the Statement are:

- Cambridge City Council (the City Council) - local planning authority for the joint AAP
- South Cambridgeshire District Council (the District Council) – local planning authority for the joint AAP
- Cambridgeshire County Council (the County Council) – the mineral and waste planning authority

For the AAP to ultimately be found ‘sound’ the local planning authorities must be able to demonstrate that there is a reasonable prospect of delivery of the AAP proposals to the timescales envisaged. This statement aims to provide appropriate evidence of deliverability commensurate with the stage in the development and plan making process.

## **2. Background**

South Cambridgeshire District Council and Cambridge City Council, the local planning authorities, are jointly preparing an Area Action Plan (AAP) for the North East Cambridge, which will form part of the statutory development plan.

The area proposed to be covered by the AAP is shown in Annex 1. It includes the east of Milton Road – the area bounded by the A14, the railway and extending south to the Nuffield Road industrial area - and the west of Milton Road, including the Cambridge Science Park (CSP) and the Cambridge Regional College (CRC).

The area east of Milton Road is one of the last remaining significant brownfield sites in Greater Cambridge, extending to almost a square kilometre. The local councils have long recognised the merits of this location as an opportunity to regenerate this part of the city and to support the continued economic success of the local economy, but also the significant constraint that the existing Anglian Water Waste Water Treatment Plant (WWTP) presents and the viability challenges in terms of relocation.

Policy 15 of the Cambridge Local Plan 2018, and Policy SS/4 of the South Cambridgeshire Local Plan 2018, allocate the area for high quality mixed-use development, primarily for employment as well as a range of supporting uses, commercial, retail, leisure and residential uses (subject to acceptable environmental conditions). The local plans do not specify the amount of development, site capacities, or timescales for development, deferring such matters to the preparation of the joint AAP. This is because the planning of the area is affected by uncertainty over the future of the WWTP, which covers a significant part of the area and is a significant constraint on development of adjoining land.

Since the local plans were adopted, the City Council and Anglian Water, as landowners of the WWTP and surrounding land, have sought to secure funding through the Housing Infrastructure Fund (HIF), to assist with the relocation of the WWTP off site. This has been supported by the CPCA and the bid was successful. The County Council, as the mineral and waste planning authority, is responsible for forward planning for waste management development and has in the Cambridgeshire and Peterborough Minerals and Waste Local Plan adopted the policies and criteria against which proposals for waste development will be assessed. Policy 11 deals with new or improved water recycling centres (WWTPs). The County Council is usually responsible for determining applications for waste management development. However, the WWTP relocation project is a Nationally Significant Infrastructure Project (NSIP), led by Anglian Water who will therefore submit a Development Consent Order (DCO) application to the Planning Inspectorate (PINS).

## **North East Cambridge (NEC) Area Action Plan (AAP) Pre-Submission Draft**

To recognise the opportunity created by the relocation of the WWTP for regeneration of this brownfield site in a highly accessible urban location, the councils are preparing a joint Area Action Plan to guide the type, mix and location of development that delivers on a shared future vision of the place and ensures a comprehensive and coordinated approach.

The relocation provides the opportunity for the creation of a new urban quarter to Cambridge which can make a significant contribution to the future housing and employment needs of Greater Cambridge. The AAP promotes future structural change in the layout and land use of parts of the area to optimise development potential, mitigate constraints, and for place-making purposes to create a sustainable community. This includes proposals for new strategic walking and cycling connections; the residential use of Nuffield Industrial Estate; the consolidation of and intensification of industrial use around the Aggregates Railheads (which is remaining in situ for the foreseeable future - see below); and the relocation of incompatible uses in order to deliver the vision for the area.

## **Waste Water Treatment Works in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036**

The Pre-Submission Draft (Reg 19) of the NEC AAP is predicated on the relocation of the Waste Water Treatment Plant (WWTP) having taken place. The WWTP is protected in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036. The relocation is being taken forward by Anglian Water under a separate Development Consent Order process, which will consider the merits of the proposal. Only if and when the DCO is approved will the AAP be taken forward for its later formal stages.

## **Waste Transfer Station at Cowley Road Industrial Estate**

Veolia Environmental Services (ES) Ltd (Veolia) operate a Waste Transfer Station (WTS) and vehicle depot from Cowley Road within the North East Cambridge boundary. The site is on the corner of the Cowley Road Industrial Estate with good access to Milton Road and the A14. It is owned by Cambridge City Council and leased by Veolia ES (UK) Limited.

Veolia provide a service collecting waste from commercial customers in and around Cambridge. This principally involves refuse collection vehicles (RCVs) bringing dry recyclable waste materials to the site and tipping it into designated bays inside the waste transfer building, except glass which is tipped into an external bay. The waste materials are stored on site for a short period of time before being loaded onto larger vehicles for onward transport to other waste management facilities for recycling or recovery. The site is effectively a 'drop-off point' that enables commercial waste generated in and around Cambridge to be managed higher up the waste hierarchy. The depot allows the RCVs to be parked overnight and repaired in the workshop.

To protect the amenity of surrounding occupiers and highway safety, conditions attached to planning approval C/5000/19/CW for the Waste Transfer Station require the following:

- The retention and maintenance of a specified acoustic barrier for the duration of the development.
- No waste materials other than glass to be deposited or stored outside the specified WTS building. Glass to only be deposited and stored within the storage bays.
- The permitted hours of operation are (except glass): Monday: 05:00 to 00:00 (midnight); Tuesday to Friday: Unrestricted; Saturday: 00:00 to 23:00 and Sunday: 07:00 to 23:00. The permitted hours of operation for the receipt, unloading, loading and despatch of glass are: Mondays to Fridays each day (except bank or public holidays) 07:00 to 18:00.
- No more than 75,000 tonnes of waste to be accepted at the site within any calendar year.
- The free-field equivalent continuous noise level, measured as a LAeq1hr, (dBA Equivalent Continuous Sound Level, 1 hour) from operations carried out at the site shall not exceed 60dB when measured at the boundary of the site.

The site is identified as a protected Waste Management Area (WMA) in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036.

## **Waste Management Areas in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036**

Waste Management Areas are specific sites identified for waste management facilities and consist of both existing operational sites, and committed sites (i.e. those with planning permission but which are not yet operational) that make a significant contribution to managing any waste stream.

Policy 10 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 states that within a WMA, new non-waste management development will not be permitted other than:

- (a) proposals which are compatible for that specific site as identified in the non-Mineral and Waste Plans that make up the Development Plan for the area; or
- (b) proposals which demonstrate clear wider regeneration benefits which outweigh the harm of discontinued operation of the site as a WMA, together with a demonstration to the Waste Planning Authority as to how the existing (or recent) waste stream managed at the site will be (or already is being) accommodated elsewhere.

The current Veolia site is surrounded by a Consultation Area (CA). This is a buffer that seeks to ensure that the WMA is protected from development that would prejudice operations within the area for which the buffer is identified, or to protect development that would be adversely affected by such operations. The buffer is within and around (250m) of the WMA. Where new waste management facilities of

significance are approved, the policy principle of a CA around such a facility is deemed to automatically apply.

Policy 16 in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 states that the Waste Planning Authority must be consulted on any planning applications within Waste Consultation Areas except for householder applications (minor development works relating to existing property) and advertisements. Development within a CA will only be permitted where it is demonstrated that the development will:

(c) not prejudice the existing or future use of the area for which the CA has been designated; and

(d) not result in unacceptable amenity issues or adverse impacts to human health for the occupiers or users of such new development, due to the ongoing or future use of the area for which the CA has been designated.

When considering proposals for non-mineral and non-waste management development within a CA, then the agent of change principle will be applied to ensure that the operation of the protected infrastructure is not in any way prejudiced. Any costs for mitigating impacts on or from the existing minerals and/or waste-related uses will be required to be met by the developer. It is for the developer to demonstrate that any mitigation proposed as part of the new development is practicable, and the continued use of existing sites will not be prejudiced.

Policy 4 in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 guides future waste management development to the most appropriate locations. Site specific allocations to meet identified needs are not made but instead a locational criteria based assessment is outlined. The policy directs most waste management facilities to main settlements, these being the areas which generate the greater proportion of waste arising, as well as having the better infrastructure (e.g. main highways) to accommodate proposals.

Policy 4 recognises that there may be instances where waste management sites or facilities that already exist outside main settlements may be appropriate for temporary recycling opportunities, alternative or additional waste management facilities within the planning permission boundary of existing permanent waste sites.

The Minerals and Waste Local Plan also states that Cambridgeshire County and Peterborough City Councils also believe it is appropriate to identify existing and allocated employment land as a suitable location for many types of future waste management development, recognising that waste management development is now often located in buildings and can be indistinguishable from other industrial uses

which operate alongside it. They also recognise the benefits of co-location of waste management facilities, subject to compliance with policy.

However, it states, there is no guarantee waste management facilities will come forward on employment land because of viability or other locationally specific reasons, or due to a lack of available land. Accordingly, other locations could be considered, via the criteria based policy.

## **North East Cambridge Aggregates Railheads**

The Cambridge North East Aggregates Railheads is located to the west of the north end of Cowley Road Industrial Estate.

Aggregates, primarily hard rock are imported to the site by rail and occasionally sand is exported by rail. Operations involve the unloading and loading of railway wagons and the storage of aggregates for sale and distribution into the local market place. Storage bays of different aggregates are provided close to the site access for smaller collections. A welfare cabin is also provided for site staff.

The Cambridge North East Aggregates Railheads at North East Cambridge is of strategic importance to Greater Cambridge's economy providing an important source of building materials for the wider area. Hard rock is an essential component of the construction industry but is not part of the geology of East Anglia. It therefore needs to be imported to the region over relatively long distances, typically from the East Midlands. The movement of minerals over long distances by rail is both economic and more sustainable than by road.

The Railheads area is designated as a Transport Infrastructure Area in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036.

## **Transport Infrastructure Areas in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036**

Policy 15 in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 states that development which would result in the loss of or reduced capacity of Transport Infrastructure Areas will not be permitted unless it can be demonstrated that either:

(a) the loss or reduced capacity will have no impact on the ability of minerals or waste to be transported by sustainable means, both now and for accommodating future planned growth; or

(b) alternative, suitable and sufficient capacity is to be developed elsewhere (and in which case the authorities are likely to require it to be implemented before the loss or reduced capacity has occurred).

Policy 15 also states that new relevant transport infrastructure capacity (such as wharves, railheads, conveyor, pipeline and other forms of sustainable transport), whether on TIAs or elsewhere, including the improvement or extension to existing sites, will be supported in principle, particularly where it is required to meet wider growth proposals identified in a Development Plan.

As with the Waste Transfer Station, the Aggregates Railheads is surrounded by a 250m Consultation Area so the provisions of Policy 16 also apply in this area.

### **Future of Minerals and Waste safeguarded sites in the North East Cambridge AAP**

From a plan-making perspective, the local planning authorities recognise that both the Waste Transfer Station site at Cowley Road and the Aggregates Railheads are safeguarded uses in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036. However, through preparation of the AAP, including area master planning and evidence gathering, it has been concluded that due to their location and environmental pollutants the current configuration of the sites is not compatible with the proposed future vision and development of the NEC area as a high density mixed use community, particularly in the case of the Waste Transfer Site.

The Waste Transfer Station is located in an area identified in the Spatial Framework for a District Centre (see Annex 2) to serve the new development. There will also be residential development within and around the District Centre that would fall within the buffer zone for sensitive uses that would be adversely affected by the Waste Transfer Station operations. As such the relocation is necessary to enable delivery of the proposed Spatial Framework for the AAP.

There are currently no confirmed alternative locations outside of the Area Action Plan area to which these uses could be suitably relocated in line with Policies 4 and 15 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 (as described above). As such, the potential for both uses to be accommodated within the development proposals of the Area Action Plan is proposed to be maintained in order to demonstrate the AAP is deliverable.

### **Proposed Location for Aggregates Railheads during plan period**

The Aggregates Railheads is of strategic importance and provides the potential to minimise the movement of construction materials and waste by road. Unless and until a suitable alternative off-site option with a railhead can be identified, the proposed approach is to retain the Aggregates Railheads in its current position and to surround it with a buffer of industrial (B2 and B8) uses.

### **Proposed Location for Waste Transfer Station during plan period**

There is a recognition that the current protected Waste Transfer Station operation needs to remain close to its market in or near to Cambridge. There is the opportunity to undertake site searches to determine a suitable long-term location for the operation. The councils will continue to work with the Mineral and Waste Planning Authority and partners to identify potential suitable sites outside the NEC AAP.

However, in the meantime, and in the event that no suitable site is identified, an alternative preferably interim location has been identified within the NECAAP area where the operation can move to during the AAP period, and beyond if necessary, to maintain the waste activities whilst freeing up the current site of the Waste Transfer Station for redevelopment.

A broad area, adjacent to the Aggregates Railheads and within the industrial buffer for the Railheads, within which the Waste Transfer Station could be relocated is represented in Annex 4.

Policy 26 in the NEC Area Action Plan has been revised to reflect this position (See the Proposed Submission draft policy in Annex 3).

## **3. Agreed Position of all signatories**

### **Aggregates Railheads:**

- The Aggregates Railheads at North East Cambridge is an important asset to the Greater Cambridge area and provides the potential to minimise the movement of construction materials and waste by road.
- There is a long-term ambition to relocate the Aggregates Railheads from North East Cambridge to support the wider growth proposals in the NEC AAP. This will be subject to finding an acceptable alternative site in line with Policy

15 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036.

- In the absence of an alternative site, the operation of the Aggregates Railheads at North East Cambridge will continue in situ with the creation of a buffer zone of intensified industrial uses (B2 and B8) around the site to mitigate its impacts on nearby sensitive uses.
- Proposals for residential uses adjacent to the Aggregates Railheads will not be acceptable as it is unlikely that satisfactory design mitigation can be achieved to protect residential amenity alongside the operational requirements of the Railheads.
- Developments should ensure that design and siting of development provides an appropriate mitigation buffer around the Aggregates Railheads and relocated Waste Transfer Station to create satisfactory levels of amenity for adjacent uses and spaces.
- The Councils and the Mineral and Waste Planning Authority will work with relevant landowners when the opportunity arises in securing a suitable off-site relocation for the aggregates operation in line with Policy 15 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036.
- Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 will continue to apply to new development in the Consultation Area around the Aggregates Railheads.
- Policy 26 of the NECAAP requires that all development proposals, including residential, within the Consultation Area of the Aggregates Railheads must apply the Agent of Change principle, and will need to demonstrate that: the proposal will not prejudice the existing use of the facility; not result in unacceptable amenity issues or adverse impacts to human health for the occupiers or users of the proposed development due to the ongoing operation of the facility; that any mitigation measures proposed either as part of the new development or in relation to the existing operation or its site are practicable; all costs can be met by the developer of the development proposal.

### **Waste Transfer Station:**

- The current location of the safeguarded Waste Transfer Station is incompatible with the proposed future vision and development of the NEC area as a high density mixed use community.

- The wider regeneration benefits from the redevelopment of North East Cambridge outweigh the harm of discontinued operation of the site as a Waste Management Area, so long as an appropriate alternative site can be identified and provided in a timely manner, thereby ensuring no net-loss of capacity, given the protected nature of the site in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036.
- Subject to the identification of a suitable alternative site in line with Policy 10 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036, the Waste Transfer Station should preferably be relocated off-site.
- In the absence of a suitable alternative off-site location, preferably as an interim site, the Waste Transfer Station operation will be relocated to a site adjacent to the Aggregates Railheads and within the new industrial buffer on Cowley Road Industrial Estate.
- Relocation of the Waste Transfer Station would need to be undertaken in collaboration with the Mineral and Waste Planning Authority and the Waste Transfer Station operator and is a pre-requisite to future sensitive development coming forward on surrounding plots.
- Relocation will be secured through planning contributions from new residential developments within 250 metres of the boundary of the existing Waste Transfer Station site as identified in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036.
- The Councils and the Mineral and Waste Planning Authority will work with relevant landowners and the Waste Transfer Station operator when the opportunity arises in securing a suitable off-site relocation for the waste transfer operation in line with Policy 4 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036.
- Policy 16 of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 will continue to apply to any new site for the Waste Transfer Station either on-site or off-site.
- Policy 26 of the NECAAP requires that all development proposals, including residential, within the Consultation Area of the relocated Waste Transfer Station must apply the Agent of Change principle, and will need to demonstrate that: the proposal will not prejudice the existing use of the facility; not result in unacceptable amenity issues or adverse impacts to human health for the occupiers or users of the proposed development due to the ongoing operation of the facility; that any mitigation measures proposed either as part

of the new development or in relation to the existing operation or its site are practicable; all costs can be met by the developer of the development proposal.

### **Access to Aggregates Railheads and Waste Transfer Station:**

- Both the Waste Transfer Station and Aggregates Railheads generate HGV movements. Appropriate road specification and development design between the access from these sites to the wider strategic road network is required to ensure the amenity of future occupants of residential and other sensitive development and to minimise conflict between land uses.

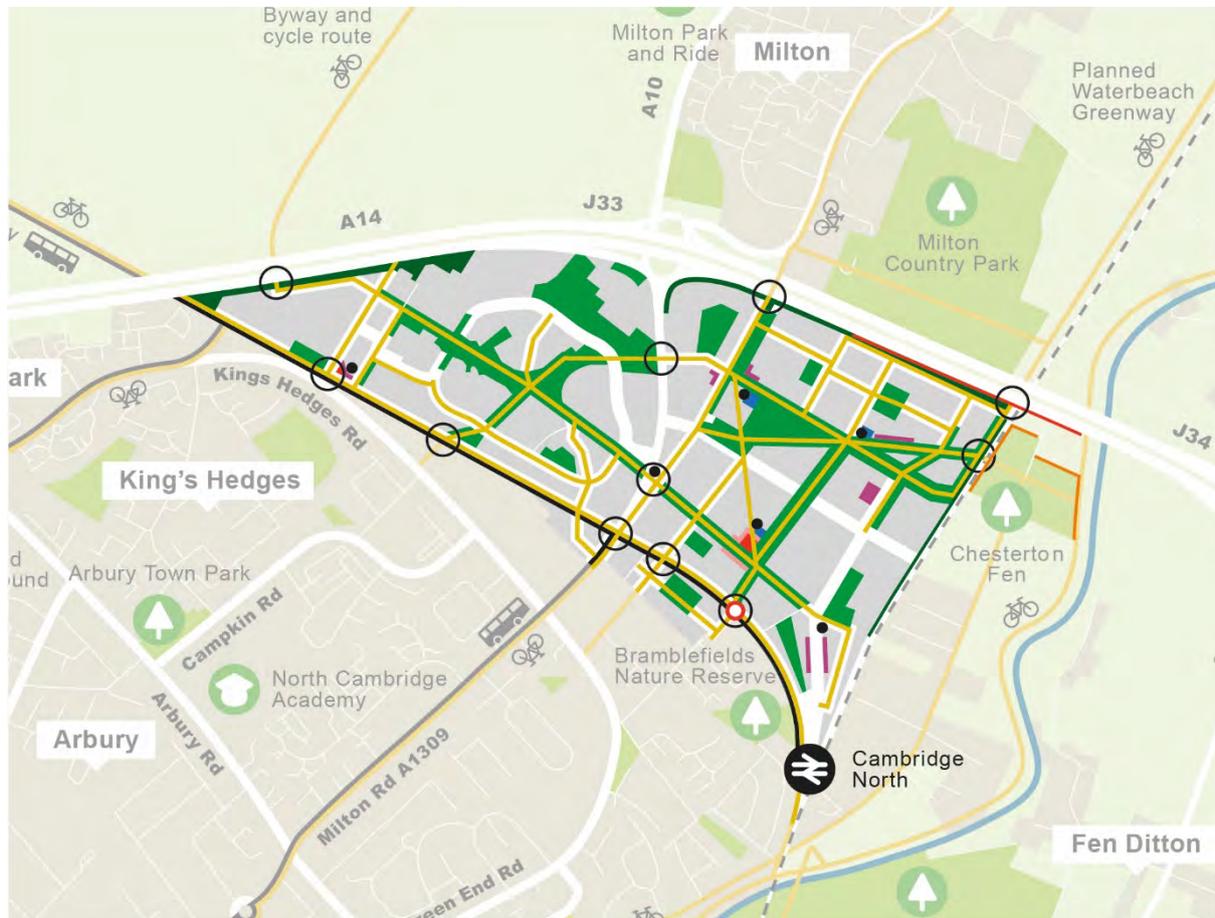
## **4. Duty to Cooperate**

On the basis of the above, the parties agree to work collaboratively through supporting strategies and delivery plans, to facilitate delivery of the NEC AAP, including the timely relocation of the Waste Transfer Station.

## Annex 1: NEC AAP area



## Annex 2: NEC Area Action Plan Pre-Submission Draft Spatial Framework (illustrative)



### KEY

- Superblock layout – refer to land use plan for required use mix
- Retained and enhanced landscape buffer
- Green space network
- Key hard landscaped public spaces

- Primary School
- Broad area for relocated Waste Transfer Station
- District Centre
- Local Centre
- Strategic routes for non-motorised users

- A14 noise barrier
- New landscape buffer
- New and improved crossings to overcome barriers to movement
- Proposed new guided busway stop
- Local landmark building

## Annex 3: Policy 26: North East Cambridge Area Action Plan Pre-Submission Version

### Policy:

Unless and until a suitable off-site alternative for replacement railheads can be identified, the continued operation of the Aggregates Railheads at North East Cambridge are supported due to their essential infrastructure role serving Greater Cambridge and consistent with the safeguarding policy in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036.

The Waste Transfer Station will need to be relocated as a pre-requisite to future sensitive development coming forward on surrounding plots and to enable the delivery of the district centre, but must be re-provided consistent with the safeguarding policy contained in the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 and in collaboration with the Mineral and Waste Planning Authority. Relocation is preferably off-site or alternatively, and preferably as an interim site, adjacent to the Aggregates Railheads within the Cowley Road Industrial Estate. This will be secured through planning contributions from new development within 250 metres of the boundary of existing Waste Transfer Station site.

In accordance with Policy 12b: Industry, Storage and Distribution, industrial, storage and distribution uses are to be intensified around the existing Aggregates Railheads and the relocated Waste Transfer Station (if retained on site) to act as a buffer to more sensitive uses, as shown in the land use plan (Figure 11). All development proposals, including residential, within the Consultation Area of either facility must apply the Agent of Change principle, and will need to demonstrate that: the proposal will not prejudice the existing use of the facility; not result in unacceptable amenity issues or adverse impacts to human health for the occupiers or users of the proposed development due to the ongoing operation of the facility; that any mitigation measures proposed either as part of the new development or in relation to the existing operation or its site are practicable; all costs can be met by the developer of the development proposal.

Residential and commercial development of the Aggregates Railheads site will only be acceptable if the current operation, and the relocated Waste Transfer Station are relocated off-site, subject to meeting the requirements of the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 (or future equivalent) or removing the safeguarding policy related to this site.

## Supporting text:

Why we are doing this

Relevant Objectives: 3

The Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 (adopted 2021) and Policies Maps (adopted 2021) safeguards both the Aggregates Railheads at Chesterton Sidings and the Waste Transfer Station on Cowley Road. The safeguarding policies include requirements on all new development proposals within a Consultation Area (circa 250m from the boundary of the existing facility) to ensure such proposals do not prejudice the existing operation.

There are currently no suitable alternative locations identified outside of the Area Action Plan area to which these uses could be suitably relocated. As such, both uses must be accommodated within the development proposals of the Area Action Plan. In order to protect future residential amenity and other sensitive uses, the Area Action Plan provides for the provision of intensified General Industrial (B2) and Storage and Distribution (B8) uses around these operations, providing a buffer. All new development proposals within the Consultation Area of the respective facilities must demonstrate that they can achieve satisfactory design mitigation, either at source (i.e. improvements to the environmental performance of the facility) or to the development (i.e. in terms of acceptable environmental standards). All costs of required mitigation will need to be met in full by the developer of the new development proposal.

There has been a long-term ambition to relocate the Aggregates Railheads from North East Cambridge. Whilst this policy and Area Action Plan Spatial Framework do not seek to relocate this use off-site, it also sets a clear preference for residential development to be delivered on the site should the site become available for development during the plan period. Any future development in this area would need to protect residential amenity in accordance with Policy 25: Environmental Protection.

The Cambridge Waste Water Treatment Plant is also a safeguarded use within the Minerals and Waste Local Plan. However, the adoption of the Area Action Plan is predicated on it being possible, through a separate planning process, to relocate this facility to another site and freeing up the land for comprehensive redevelopment and it is not a proposal of the Area Action Plan.

## Annex 4: Broad location for interim Waste Transfer Station (draft plan\*)



\* The plan is currently with designers to provide a more polished version.