

ECDC RESPONSE TO AMENDED HIGHFLYER FARM PLANNING APPLICATION

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GENERAL – SCOPE OF RESPONSE

1.0 INTRODUCTION

1.1 The following appraisal of and response to the outline application reference 11/01077/ESO (amended in April 2013) follows extensive work with the applicants and internal discussions within the Council, having also received external expert advice. It does so in a positive light and includes recommendations, where appropriate, to overcome identified issues. For simplicity, recommendations are clearly identified at the end of each section.

1.2 For continuity, the Council has instructed “Land Use Consultants” to undertake a review of the ES addendum in response to previous comments. Officers do not anticipate any significant new issues but the consultants’ comments will be forwarded as soon as they have been received.

1.3 As you are aware the Council is in the process of appointing a consultant to advise on viability matters to take forward the S106 measures and therefore these issues are not covered directly in the attached comments but, where relevant, mitigation measures are identified.

2.0 THE PLANNING APPLICATION & THE EMERGING NORTH ELY SPD

2.1 Following the completion of the JSMP in July 2013, work has now begun on adapting this to a North Ely Supplementary Planning Document (SPD). This process has been agreed with the landowners and their agents. The SPD is due to be considered by the District Council’s Development and Planning Committee in September 2013 as a draft for endorsement by the Members, and for public consultation purposes. .

2.2 The importance of this is crucial as the application will be assessed against the draft SPD. In the meantime the application has been reviewed against the JSMP and draft Local Plan, as the most up to date documents available.

PLANNING APPLICATION CONTENT – KEY ISSUES

3.0 SITE CAPACITY & CHARACTER AREA VARIATION

3.1 Officers have reviewed amendments to the Parameter Plans, Development Specification, ES Addendum and Design and Access Statement some of which respond positively to previous comments. However, officers remain unconvinced that the character areas shown in the ES Addendum together with the character described in the DAS are likely to transpire. Officers are of the view that if the 800 homes target is to be achieved here, the net density will actually be significantly higher than the densities indicated and implied in the various images in the Design and Access statement. This will in effect make the whole area all 'urban village' in character and, therefore, is unlikely to deliver the character areas shown in the JSMP and ES Addendum.

3.2 If the net site area is accepted as 19 Ha and the average net density is 35dph as implied, then the capacity is 665 homes if none can be put in the local centre. If 50 dwellings, as it was recently indicated by Atkins, are planned in the centre (and this has not been discussed previously) then this still leaves a shortfall from the 800. Officers calculate the net residential area to be in the order of 16-17ha (excluding the Green Streets and Local Centre) which would mean even higher densities than estimated above.

3.3 The application should demonstrate what is actually being proposed, and how this will lead to the delivery of high quality development and the character areas sought via the JSMP. Officers are of the view that these issues may, to some extent, be overcome through the measures outlined below.

3.4 The Council needs to be satisfied **at this current outline stage** that there are workable design solutions which will bring about the high quality development and character areas described in the JSMP. In order to satisfy officers on this point, a density parameter plan is required that shows the character areas and densities described in the ES Addendum.

Action: Modification to Parameter Plan 5 and the Development Specification to include densities shown in the JSMP and ES Addendum. There needs to be a Parameter Plan that shows density bands that reflect the character types, and it must include a specific average density. It will need to set out what the density ranges are for the different character types following checking of capacities in a Parameter Plan: Up to 40dph for urban village, 30-35dph for suburbia, and up to 30dph for green living, i.e. an average of around 30-35dph. (Note – the green living density levels indicated in the JSMP are higher than those set out in the NEDF and will need to be reviewed by the District Council for the SPD). This should be also reflected in the Character Types shown in the DAS addendum.

4.0 CHARACTER AREAS - LAYOUT, DESIGN & DENSITIES

4.1 The problem of “tighter” than anticipated density compounds another worry (also expressed by Members), namely the issue of proposed rear parking courts and large hard surfaced areas which have to be avoided. Examples from the many settlements visited (see East Cambs Guide “Designing for Exemplary Development” on the Council website for good and bad examples) have clearly demonstrated the negative impact of such solutions both visually, by creating large “holes” amidst houses, but also practically and in terms of security with cars being at long distances from their respective houses and not overseen by owners. On the contrary, other examples managed to combine attractive green spaces, streets, pavements, cycleways and on-street parking “close to home”, dedicating areas to the rear for more private, garden and open space use.

Action: Removal of rear courtyard parking and more efficient block design. Design approaches suggested below (on-plot parking and avoiding rear car parks) may help in “space-saving” and maximising land use but it has to be demonstrated how.

4.2 Generally, even at the higher densities, there should only be exceptional reasons why courtyard “group” parking should be considered. Dedicated parking should be accommodated behind the building line, with on street parking restricted to visitor spaces and integrated carefully. Clear fronts and backs to houses should be identified and the area of hard surfaces minimised. This should be a key principle of the design vision for the development. Parking courts are confusing because people arrive at the rear and they also expose rear gardens, whereas ideally rear gardens ought to back on to each other to provide greater privacy and security. The main place where rear parking courts may be unavoidable is where there are apartment buildings and on those homes fronting Highflyer Avenue if cars were having to back out from on-plot parking spaces, for safety reasons. The parking arrangements in the D and A statement also look optimistic and seem to underprovide parking which compounds this problem.

Action: Amend Parameter Plans and DAS to introduce/describe sensitive and discreet vehicular access and movement into the Green Streets and their “Green Heart”, which would “merge” with their green nature and character and not challenge or compromise it.

4.3 The principle of the “Green Streets” connecting to the southern “Green Heart” and the Country Park is to be welcomed, “Ely-like” and attractive, and in particular the connection via the widening axis (the main “green finger”) to the Park is a key functional and potentially very attractive “Path” and gateway to the Country Park. However, these Green Streets need also to include, carefully and discreetly, some provision for local highway movement and vehicular access to serve the houses and buildings on them, via appropriately surfaced narrow lanes which must be incorporated as sensitively as possible, without negatively affecting their green character. This will allow for vehicular access to the front of the dwellings rather than courtyard provision to the rear while maintaining the fundamental linear “park” character of them.

4.4 The nature of the green streets should be described in Design Principles in the development specifications and parameter plans. Essentially the principle should recognise the importance of

providing open space which is highly accessible, at the doorstep to dwellings. It should provide for a range of activities including any play and amenity in an informal open space in an efficient way. Whilst incorporating highway movement, this concept follows the format of 'home zones' in a way which is fully integrated with its urban form, private space and landscape treatment. Further discussion with County Highways will be required regarding the adoption strategy for the development including this concept of the green streets with vehicular access.

4.4 The Green Streets should also be specifically marked as and included as part of the **Strategic Green Infrastructure Network** wherever reference to this is made in all documents and specifications accompanying the planning application. Green Street 1 (Parameter Plan 2) and Green Street 5 are fundamental to the green character and movement and will help define the hierarchy of the place. Officers are of the view that they are defining parts of the network leading to the Park and also given the logic of lining up on the view of the Cathedral more should be made of them in the DAS, so their key importance is even more evident.

4.5 In respect to the Green Edges of the settlement, the current Parameter Plans are inadequate. As discussed below these **"edges"** – and there are many – are most important in **"defining"** the kind of place this will be and, obviously, are the most "public" and visible and they will form what people will experience both from the distance and close-up and are for that reason crucial in their appearance and character. ***This is also a Design Principle that must be embodied in the outline planning application and permission.***

Action: Parameter Plan 3 (where now dotted as "Area where a Landmark Feature will be Appropriate") **and Development Specification need to be amended. The whole length of the Park Edge, both straight lined edges north and south of the long "Main Footpath/Cycleway Link"** (marked blue on Parameter Plan 1), **the already dotted small open space to the north, the circular built edge around the Green Heart and either side of the wide Green Streets should be similarly marked and cross-referenced in the Development Specification as follows:**

"Defining "Character Edges" providing enclosure with varied architecture and townscape, varied heights, (which will need to exceed 3 stories in places), massing, gaps/open spaces, creating visually rich, intricate serial visions of quality silhouettes and attractive public views, landmarks with recognisable features and roofscapes, through the use of quality architecture, materials, heights, shapes and detailing, including locally-inspired and innovative 21st Century buildings".

4.6 Green Streets 2 & 4 are less directional green infrastructure routes than the Major Green Street (1 and 5) but also with a green character. These offer a good opportunity to include sustainable drainage channels as a landscape feature in them as experienced in Upton.

We agree with the application's interpretation that the southern east/west Green Street 3 adjacent to Longchamp Drive is more of a **'Green Edge'** similar to the north/south footpath/cycleway from High Barns to Highflyer Hall and should be marked as such, and be given special treatment in the D and A statement with houses fronting onto a 'soft' access road

that still gives front access whilst maintaining a relaxed green edge with a swale and space for large trees (see proposals for edges-treatment below).

Action: Green Streets 1 & 5 should be described as Major Green Streets and excluded from the net residential area. Parameter Plan 2 to specifically exclude these and the Green Heart from residential land. Their width to reflect their status as principal green routes. Design Principles to reflect their multifunctional nature including street access to front doors, informal play space and SUDS where appropriate.

Action: Green Streets 2 & 4 should be described as Minor Green Streets incorporating SUDS. Green Street 4 should specifically allow for future integration into adjacent land, should that land be redeveloped.

Action: Green Street 3 (as described under para 3.15) should be described as a “Green Street Edge”.

Action: Amend Parameter Plans, Development Specification (in accordance with accompanying amendments para 3.42) and DAS to introduce sensitive and discreet vehicular access and parking into the Green Edges and review Parking Principles to avoid rear parking courtyards (unless in exceptional circumstances).

4.7 A major objective for North Ely is that it becomes a “*unique*”, *locally distinctive*, exemplary urban extension worthy of the uniqueness and attractiveness of the historic City of Ely itself with which it must relate (mainly via the green infrastructure) but also look to the future and employ innovative and exceptional quality of quality new design and townscape. The application is too sketchy and its content uncertain at this stage, not least due to understandable economic considerations and need for the applicants to maintain flexibility. The Council will therefore condition any forthcoming planning permission to be subject to a site-wide (coordinated with the adjacent landowner’s plans) design code/detailed masterplan following approval of which, detailed reserved matters (individual buildings and physical design, landscaping details etc) will then be considered. When actual development, following the key agreement of an appropriate S106 and other obligations, is more ripe to come forward, prospective developers will have to work alongside the Council (as they have done to this milestone point we are about to reach) to ensure that the more detailed design of the site wastes no effort to achieve these high design quality expectations. These, for the reasons outlined above, cannot be judged now, at this outline state, hence the need for further robust, ambitious and detailed design input and control prior to reserved matters to do justice to the hard task of achieving a good extension for the unique Cathedral City of Ely.

Action: ECDC to propose design coding/detailed masterplanning condition to be attached to planning permission for clearer urban design concepts and more detailed spatial development prior to approving Reserved Matters.

4.8 Information provided in the Development Specification regarding self build provision is very limited. The District Council have made clear that it will be looking for inclusion of this type of

development in the proposals, subject to evidence of demand, and the draft Local Plan sets out a policy for a minimum of 5% of housing to be self build in North Ely.

Action: Amend Development Specification to indicate proportion of self build housing proposed.

5.0 TRANSPORT / MOVEMENT / ACCESS

5.1 The issue of transport and transport infrastructure and its impact are undercutting through the entire North Ely extension development, vision and concept, linking it onto the city of Ely and the surrounding highway network. Transport, perhaps best of all issues, exemplifies the interdependence and interrelationship of its parts and the fact that sections of it cannot and should not be considered in isolation. The ongoing workshops and further TIAs and impact work which, as we know, are still taking place as this response is written, bear witness to this fact. A session to further address these issues with the County will take place on 1st August 2013.

Action: Further information is required working collaboratively with the adjacent landowner to assess the transport impact in response to the County Highway Authority's comments.

5.2 It is hoped that this ongoing work will address the issue of interdependence of the three North Ely land parcels and their combined impact in order that a proper assessment of mitigation and traffic volumes can be reached at. It is essential that North Ely is planned and delivered **as a whole** without one part prejudicing and making it harder to deliver another. It is a complete and balanced vision, varying in use, density and character and will only be "successful" and exemplary if delivered in its totality. A great deal of work has gone into this from all sides which must not be sacrificed in the interest of short-termism and haste with great leaps of progress having been made over the past year.

5.3 We firmly agree with and support the County Council's response confirming a **holding objection to this planning application which we also raise**, as the Highway Authority responsible for the area, due to incomplete and partial analysis yet available, which perhaps best exemplifies the issue; their response is self-explanatory and states:

"...the Highway Authority maintains its holding objection (i.e. already raised when application was first submitted) to the omission of a transport strategy for the whole North Ely site which should identify the transport impact of the development and the mitigation measures required for off-site highway improvements, public transport and cycling.

As noted above, this site forms part of the wider North Ely development, and a transport strategy for the whole site detailing off-site highway works including the A10 and Lynn Road interface is required, together with strategic public walking, cycling and public transport proposals which have not yet come forward. A joint strategy is required to provide and critically analyse the wider context within which this site sits, identify where there are cumulative impacts for Ely North as a whole, what wider mitigation measures are required, and an appropriate basis for any contributions from all development proposals within Ely North for these wider measures.

This would also, crucially, be required to be used to examine if the proposed transport measures outlined for this site are appropriate and fit in to the overall plan for North Ely.

CCC officers therefore require both sets of developers to work together on this to address these key omissions and point to the solutions to enable the impact of this element of the site and mitigation measures, to be fully and comprehensively considered as part of these wider proposals.”

5.4 The Highway Authority also adds that: - “... in order to understand if the mitigation measures required by the proposed development are appropriate, further information is required:

- *Further evidence for the A10/A142 Witchford Road junction to ensure the queues in the base year are representative, and therefore there is confidence that the future year scenario is reflective of the operation of the junction. Once further evidence is presented, a view on the impact of the development on the junction can be taken. **Any mitigation measures developed for this junction, and others off-site, should be developed within a wider transport strategy framework for North Ely.***
- *Additional information on the proposed east west cycle route through the site and if any crossings of Lynn Road will be provided including how these might link to wider Ely North proposals*
- *Provide information whether the two links to Larkfield Close and Summerhayes can be provided by the developer as they have control over the land.*
- *Further evidence on the viability of the bus service over the proposed pump priming period is required to ensure appropriate contributions are secured as part of the S106 and to ensure the long term viability of these services; further work on how the proposed bus service would integrate with wider proposals for Ely North as they come forward should also be undertaken*

5.5 The transport issues exemplify the problem of considering the application prior to the SPD.

Action: Following progress of the work on transport appropriate conditions and S106 obligations will be formed to ensure a satisfactory strategic transportation approach is delivered for North Ely as it links to this development parcel of it.

Action: Parameter Plan 1. The potential footpath/cycleway access points to Davison Road have been omitted as well as the access point westwards from Green Street 4. These should be replaced as possible future connections potentially via Morton Close. Need to adjust Green Streets as detailed above, and make them more explicitly a formal part of the green infrastructure.

Action: Parameter Plan 2. The Major Green Streets should be shown in white at their likely width to avoid confusion (although the dotted lines showing the 40m wide corridors should remain).

6.0 THE AVENUE

6.1 “**The Avenue**”, the treed spine road through the development is obviously terribly important in both its strategic and detailed design, which needs to be varied for both townscape character and functional/traffic reasons. In fact, in this planning application it is largely an “**edge**” to the development, anticipating a latter phase. If this happens it will remain an “edge”, like the park and other green edges, thus requiring a particular design and streetscape approach that is both able to do this (stand alone with some presence), as well as “marry” with an opposite side proposed in future when that is built.

There is therefore the question of how that edge can appropriately “stand alone”, one-sided, facing open space in the eventuality that the other side takes a very long time to, or indeed, does not, materialise in built form and a condition requiring detailed design to show how this area would be adequately treated will be attached.

6.2 Given the outline stage we are at, it has not really yet been thought through what sort of road Highflyer Avenue should be. E.g. should cyclists be segregated or on carriageway? Will bus lay-bys be provided? What is the design speed and likely ultimate traffic volume? What will the necessary and optimum width of it be? These are all issues which will have to be reserved also at the design coding level and clear proposals put forward following detailed examination of appropriate and best options.

6.3 “The Avenue” is so important that appropriate Design Principles specifically relating to The Avenue must be included at this outline planning application stage before further proposals are considered. The following are design principles which must be sought:

- The Avenue will be a green, tree-lined streets, characterised by a section comprising road, parking, tree lined verge, footway/cycleway, soft boundary treatment, front garden and home.
- The trees and formal planting to highway in addition to the verges will help to create distinct character along the primary route into the development and assist wayfinding; planting and trees will also help to encourage wildlife.
- The verges will help to create low level enclosure and privacy to the more generous areas of footpath/cycleway and define the curtilage of surrounding residential properties.
- Changes to surface treatment will be explored through use of block paving to roads to emphasise the transitions through character areas and provide traffic calming and aid legibility.

Action: Parameter Plan 3 is amended (or another new Parameter Plan added) so that the sides of the whole length, (both sides where development is proposed either side) of “The Avenue”, and “The Avenue” (the street) itself, are marked and annotated on that Parameter Plan and cross-referenced in the Development Specification to amend its Design Principle as:

“Main spine road whose detailing, width (rather than specifying it at this stage) and treatment will be reserved and conditioned to be of exemplary quality in townscape and traffic management terms, including segregated cycleways, “Treed Edges”, providing enclosure and attractive public serial vision through varied architecture and townscape, heights (which will need to exceed 3 stories in places), landmarks and roofscapes with recognisable features, massing and gaps/open spaces, created through the use of careful traffic management, quality architecture, materials, heights, shapes and detailing, including locally-inspired and innovative 21st Century buildings”.

Action: Development Specification (para 3.26) is amended to say the detailed design of The Avenue will allow for segregated cycling access throughout.

7.0 EMPLOYMENT

7.1 ***Successfully providing and realising employment generation (a key objective of the Vision for North Ely) is a real challenge.*** The implications of the recommendations of the SQW Employment Strategy (at paras 4.24 – 4.28), particularly regarding homeworking as a key theme for the North Ely developments need to be taken on board. ***This is a very important issue that needs more embracing in the vision for the Highflyer Farm development application.*** At the moment there isn't much of a vision in this aspect in the D and A Statement other than for a fairly standard suburban housing development, with some mention of ‘flexible dwellings’ but with no ***commitment to a minimum provision.*** The vision for this neighbourhood needs to be strongly focussed on homeworking as recommended by SQW, and this should be backed up by the following requirements in any outline permission:

- A minimum percentage (50%) of the market houses in each phase to be designed with a home office that is separate from the living accommodation (and not just assuming that, say a bedroom, will do). As it is reasonable to assume that it will be difficult to make this a requirement for the affordable housing, and that it may also be unrealistic to require this for the market apartments, this condition would ensure that around 20-30% of the overall housing will be designed for homeworking, which reflects the current ECDC experience from evidence in the SQW report (see pages 13-15). The form that this could take could, for instance, be a separate ground floor home/office as in the ‘black houses’ at Newhall in Harlow, or as a room above the mews garage as at Accordia, but other formats should be developed at the reserved matters stage.
- The ‘flexible dwellings’ idea is a good one which ECDC has supported, but needs to be carried through with more conviction. Firstly there needs to be a minimum figure rather

than the maximum figure currently used ('up to five' which can mean none!). There should be at least five and say up to ten in each of The Green and Highflyer Place, and some in or close to the Local Centre. Also there should be **a commitment to marketing** these units as live/work units with the option of A1, A2, B1 or residential use included in the permission so there is no bureaucratic impediment to them being used as live/work from the start.

- The 'business space' in the local centre needs more development to understand how it will operate and integrate with other land uses in the local centre, and how it will be delivered. This will be best achieved through the commissioning of a local centre study (see section 8)
- High speed broadband needs to be installed throughout the North Ely development to assist in meeting the employment targets and Council corporate objectives. This is an issue that has not yet been covered in any detail and will need to be further discussed and negotiated and dealt with by condition.

Action: Amend Development Specification to propose 20-30% home working design for all housing (see evidence in SQW report) and aim to comply with the key job creation requirements for North Ely, which will be incorporated in the Local Plan and SPD.

Action: Indicate in Development Specification 'other guiding principles' section the approach which will be taken towards the provision of infrastructure including adequate ducting to support high speed broadband to all premises in the development. Action: Amend Parameter Plan 3 to show active frontages related to employment/retail uses around The Green Heart with a minimum of 5 flexible units.

8.0 THE LOCAL CENTRE

8.1 The importance of ***input of effort to ensure the Local Centre successfully develops as the heart for the whole of North Ely*** cannot be overestimated. It is perhaps here more than anywhere else on the site that the challenge and opportunity to create a truly attractive and unique public centre, commensurate with Ely's distinctive quality is offered, and that opportunity must not be missed. Much work was put in via teamwork in attempting to develop an urban design concept for the centre but this work was not completed. The concept included in the JSMP is a first step towards a more co-ordinated approach to the local centre which is welcomed, but a better spatial solution will be needed.

8.2 All issues regarding the design and "unification" of the Local Centre with its "other half" will have to be reserved by condition and addressed in detail. The dissection of the centre by Lynn Road leaving part of it in separate ownership and the question of how Lynn Road itself (which is within this red site application line) is best treated to become a different "*place of quality*" and not just a through road, part and parcel of the pedestrian-friendly, safe and attractive centre. This obviously needs more design and transport thought as does the employment opportunity here and the "marriage" of this scheme with whatever will be proposed opposite.

8.3 Officers are of the view that further concept design testing of the Local Centre will be required at future stages to secure a better spatial outcome than is currently indicatively proposed and this will be secured via planning conditions. Officers are concerned to avoid piecemeal plots built to operator standards with a poor relationship with the public realm.

8.4 Officers wish to see the design principles in the development specification for the Local Centre strengthened. We consider all of the following principles must all be addressed in its design:

Local Centre (current bullets 3 & 4 in the Devt Spec are deleted)

- The Local Centre is placed at the intersection of two key routes: The Avenue which leads to the A10 and Lynn Road which runs into the centre of Ely.
- The centre will comprise distinct functional spaces including a public square as a meeting point, and a softer landscaped approach west of Lynn Rd. The key public spaces should be connected by direct, attractive pedestrian and cycle routes and road crossings as required.
- Future design codes will test options for a unified approach to achieve a Local Centre that shares characteristics of traditional Fen High Streets.
- The public square shape and length will take advantage of the sun and allow outdoor activity and seating.
- West of Lynn Road will take on a different character, providing a softer, planting dominated space.
- The provision of retail, employment and community facilities are clustered around these key spaces providing an attractive place to live, work and socialise.
- Shared surface treatment around the main public spaces slowing down traffic speeds and reinforcing pedestrian priority.
- Focus activity and active frontages along main routes.
- The retail, employment and community facilities will act as 'anchor points' with good visual connections of their main entrances from across the public spaces.
- The building heights will be scaled accordingly to provide a sense of enclosure and protection creating attractive environments around the two distinctive spaces. Buildings will be a minimum of two storeys to avoid single storey standalone buildings that do not contribute to the overall sense of enclosure.
- Existing trees that are good, healthy specimens should be retained where possible and more provided.
- Expansive surface car parking provision should be avoided, and instead parking areas broken up to be discreetly distributed within the Local Centre.

8.5 The principle of residential use as part of the mix in the centre is in principle encouraged. However, we need to know where and how that will be provided.

8.6 The issue of community facility remains under question as to its management and location, and further discussion is required on this. Discussions with local community groups have

indicated a preference for location of the community facility in the local centre, where it will be accessible alongside other facilities, whilst the faith site is retained at The Green.

8.7 Following internal discussions the Council would like to see the YOP for teenagers located in the Local Centre rather than in the Country Park, as a more urban facility. This would enable the Country Park TOP and JOP to be a more natural adventure play space.

Action: Conditions will be attached requiring a Local Centre Study, in collaboration with the adjacent landowner and the Council, to demonstrate the planning and working of its functions, contents, nature and pedestrian-friendly, place-making quality, exemplary public space and townscape design. A mirror condition will be applied to the adjacent site.

Action: Following review of the net residential area, amendments are needed to the Development Specification to include a specific land use budget for the Local Centre including a meaningful minimum level of residential provision. The exact amount to be determined following review of capacity and design issues.

Action: Amend the Design Principles for the local centre in the Development Specification to secure a well designed, suitably enclosed, integrated and active local centre, incorporating all the design principles as set out in para 8.4 above.

Action: Centre design to be masterplanned via design coding prior to Reserved Matters.

9.0 THE COUNTRY PARK

9.1 The Country Park is a major Ely-wide facility and both its design and management will require a great deal more thought subsequently, both in planning conditions and the S106. Parking provided for it has to be also sensitively and carefully thought through. There are ongoing discussions regarding these management and park character issues and further more detailed proposals will develop. It has been envisaged that the southern part of the park would be likely to be more practically and “formally” laid out as visitors would be more frequent being closer to the urban area with a more natural feel developing moving north.

9.2 ***Both the County and the Council have concerns about the absence of a site-wide North Ely SUDS Strategy and this must be developed.*** Liaison with the Environment Agency and Drainage Boards already underway will have to be ongoing to ensure their needs are coordinated and early planning avoids undesirable future “forced” solutions. Sustainable drainage in particular ***must*** be done in a way that it will create interesting landscape corridors (“canals” with bridges) with “dual”, effectively, SUDS and open space use, with attractive bridges and linkages wherever possible as seen elsewhere (Upton).

9.3 In townscape terms the linkage of the settlement with the open park and countryside is crucial in its design, in both silhouette and detail. ***It is where the city meets the countryside***, a key opportunity to develop a sensitive and intricate interface; considerable skill and effort must

be employed to achieve this. Long and closer views will be important of that edge set in magnificent landscape and the most must be made on views from the edge buildings themselves to enjoy the beautiful peaceful Fens. The same applies to the parts of the built forms bordering the wide Green Streets and the Green Heart as well as those along The Avenue. It is very important that these edges are attractive and not monotonous providing intricate silhouettes and skylines and quality housing, with gaps and attractive landscaping and small open spaces between buildings in appropriate places and that a commitment to this **Design Concept** is made at this outline stage.

9.4 Clarification is needed on the green finger of land north of The Avenue and whether this is part of the overall public open space calculation. Will it be available for public access from the outset of the development or is it restricted? It would be desirable for this to be available for public use. A similar consideration applies to the areas of SUDS/agricultural space.

Action: The Council will apply appropriate conditions requiring developers to work collaboratively with the Council to produce a Concept and Delivery Strategy for the whole of the Country Park prior to reserved matters stages. (Mirror condition to be applied to adjoining applications.)

Action: ECDC will apply appropriate conditions regarding the development of a landscape design concept for the entire Country Park including measures to address its delivery and ongoing management via S106 and its relationship to its built edge treatment.

Action: Clarification required on public access to the ‘green finger’ area and SUDS/agricultural space.

Action: Provision of scaled drawings of the Open Space/Country Park to enable the Council to measure the provision of public open space.

10.0 ADDITIONAL POINTS TABLE

**Church Commissioners Application Highflyer Farm – ECDC Response
Additional Points 30/7/13**

Issue	What the concern is	What needs to be changed	Planning condition or amendment to application material
Parameter Plans			
PP 1 Movement			

Framework			
	No reference to bridle ways	Confirmation of bridle way routes on the Parameter Plan	Amendment
	Pedestrian/cycleway link to Heaton Close (by the Water Tower) as only important east/west link.	Need confirmation that this link is deliverable and to be included.	Amendment
	No indication of traffic calming on either The Green or Highflyer Place	Show indicative traffic calming on parameter plan	Amendment
	No indication of construction traffic routes		Condition
	No indication of a safe route to the first primary school (west of Lynn Rd)	Reference in Dev Spec	Condition/Amendment
	Will there be car and emergency access to the allotments plus parking?	Confirmation that access routes and parking will be provided.	Design Coding
	Pedestrian link from Highflyer Avenue across to the long finger of land running north from the primary school site.	Would wish to secure public access to this valuable area of green space plus pedestrian linkages.	Discussion/Amendment
	Lack of certainty about sustainable transport routes within the site and linkages beyond the site.	A Sustainable Transport Strategy including a sustainable cycle network.	Condition
PP 2 Land Use Framework			
	Proposals for place of worship site – appears very linear. Will it function effectively?	Confirmation about actual site, suitability for car parking etc. The EDCD preferred approach is for the developers to retain the site for a place of worship plus car parking but to have a community hall/community centre provided separately, at	Conditions re place of worship site if no proposals come forward within an agreed period of time??

		the local centre. S106 funds to be allocated towards the community hall only (see comments on community hall below)	
PP 3 Urban Design Framework			
	Restriction under point 4 on PP is too restrictive and potentially harmful	Review principle and wording in PP point 4 to make building heights being more flexible.	Amendment
PP 4 GI Plan			
	Need to check open space against ECDC standards.	Please provide a scaled (autocad) version showing the public open space (ie usable space in accordance with ECDC policies)	
	Use of local centre grassed/pitch area	The preferred ECDC approach is for the grass pitch located next to the primary school to be available as an informal kick about area, rather than a formal pitch – adjacent to the YOP/JOP/TOP Play area.	Discussion/Amendment
	Need for a clearer explanation on how the site will meet the ECDC outdoor sports standards.	The Downham Road off site solution is still to be developed and its delivery in not guaranteed. It relies on the purchase of land etc.	Amendment
	Need for advance planting.	Show advance planting areas as appropriate along with indicative timetable	Amendment
	No reference to cemetery proposals despite requirement in NEDF and capacity issues in Ely.	Provide proposals for cemetery provision – either on site or off site	Amendment
Development Specification			
Application Parameters			

Community Hall/"Community Hub"	Confirmation of the Councils preferred approach of a new community facility of at least 1000sqm (GIS) to meet the needs of the whole N Ely population and to be located in the Lynn Road Local Centre	Need for discussions/agreement on an appropriate site, possibly near to or as part of the local centre. This would require car parking. ECDC producing a paper on Community Facilities.	Discussion/Amendment to Dev Spec.
Primary School	Cambs County Council is not in a position to agree to community access to the school. That will be up to the school promoter, still to be appointed.	School facilities cannot be included in any community or public provision. Indicate alternative if school cannot accommodate.	Amendment to Dev Spec.
	Will the MUGA at the school have floodlights?	Confirmation required as would have impact.	
Play Space	Limited information about the proposals for the design and delivery of children's play space. How will the facilities meet the expectations of the new community, how will local people be involved?	Requirement for a Play Strategy for the site	Condition
	Location of play areas (see points above re YOP moved to local centre)	Amend PP 4 and Development Specification.	Amendment
Sport	No reference to Indoor sport provision	Include reference to new leisure centre in Dev Spec	Amendment
	Need for a clearer explanation on how the site will meet the ECDC outdoor sports standards.	The Downham Road off site solution is still to be developed and its delivery in not guaranteed. It relies on the purchase of land, extension and improvement to changing facilities, improved car parking etc. The Dev Spec need	Section 106 Contribution

		to indicate how a financial contribution can be identified to cover these costs.	
	Will the MUGA be available to the public? or is it a school playground?	Clarification in Dev Spec.	Amendment
Public Art	No information about how local landmarks might be developed or designed linked to public art work.	Requirement for a Public Art Strategy for the site	Condition
Local Centre			
	Need for greater clarity on how businesses will be encouraged.		S106
	What does an outdoor meeting space involve? Is it a performance space/seating area/grassed area or hard landscaped?	Design principles in Dev Spec	Amendment
Other Guiding Principles			
Self Build	No reference to self build- what %?	Statement with minimum percentage of self build across site in Dev Spec..	Amendment
Flexible Dwellings			
	Need for a stronger vision regarding flexible dwellings as a key theme for the development. A commitment to a minimum percentage (50%?) of market homes in each phase to be for home working (with an office space)	A statement in the Development specification and a clearer vision outlined in the D and A.	Amendment
	Flexible dwellings idea is a good one but needs to be carried through with more conviction. How will they be marketed?(A1,A2,B1	See above	Amendment

	or residential)		
Open Space			
	Concern that planting and habitats cannot be established early and the new community will not have the benefit for many years to come.	Proposals for advance planting as referred to in the NEDF.	Amendment
	What are the proposals for management of the open space and SUD's?		Amendment
SUD's and water			
	No reference to the Water Cycle Strategy	Need to confirm that the quantum of foul drainage for this development has been accounted for in full.	Amendment
	Concern about the condition of the existing Clayway Catchwater (IDB)	A commitment to significant maintenance works before any surface water from the proposed site is discharged into it. Agreements will also be required for the future maintenance of the catchwater as part of the overall SUD's maintenance.	Condition
Parking	Information not clear on parking proposals	A clear statement on how much parking is being provided per dwelling. Also information on cycle parking proposals.	Design Coding
Design and Access Statement			
Page 35	Need to update map to show ALDI and Sainsburys.		
Page 83	Housing typologies are uninspiring eg apartment typology dominated by car parking at rear, reference to mews		

	parking courts is a concern. The garden terrace should be replaced by linked semi-detached typology with parking tucked in between the pairs of semis		
Page 86	Confusing layout of local centre re fronts and backs.		
Pages 99 and 101	Layout illustrates parking problems and of concern.		
Page 103	The JSMP has this block as “green living” which suggests low density housing. What is shown is much higher density.		
Page 116	Need a commitment to making enhancements to the ecologically valuable hedgerow along Clayway Drove.		
Page 117 10.5	Needs a formal commitment to a design review with the Cambs Quality Design Panel or similar at Design codes/reserved matters stage.		
Page 118	Need to provide management proposals for all public spaces.		
Page 120	Need for reference to bin stores and refuse collection especially for parking courts.		
Page 125	Bus operators have highlighted the importance of building bus stops into the road provision ie pull ins for busses and space to pull off.		

	How will sustainable transport be promoted?		
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