STATION FIELDS

Axis Land Partnership Limited Representation to the Greater Cambridge Local Plan 'First Proposals' (Regulation 18: Preferred Options 2021).

December 2021



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Version: 1 Version date: 08122021 Comment Draft/Report

This document has been prepared and checked in accordance with ISO 9001:2015



Introduction

These representations are submitted by LDA Design on behalf of Axis Land Partnerships ('Axis') in response to the Greater Cambridge Local Plan 'First Proposals' (Regulation 18: Preferred Options 2021).

Axis are promoting land at Station Fields (also known as Land north-west of A10 Royston Road), Foxton to provide an integrated new community to provide approximately 1,500 homes, new community uses, employment opportunities and significant open space provision and enhancement. The proposed allocation of the site responds to the plans for the Foxton Travel Hub being progressed by Greater Cambridge, comprising delivery of a multi modal transport interchange at Foxton Station, making this a sustainable and appropriate location for growth and the delivery of new housing and infrastructure.

Axis have promoted the Station Fields site throughout the Local Plan process, and it was first submitted for consideration under the 2019 Call for Sites consultation. The site was also promoted as part of the Issues and Options consultation in February 2020. This included the submission of a Vision Document and Concept Masterplan (Barton Willmore, 2020) for the site which demonstrate how development of the site could respond to the various opportunities and constraints presented and would form a sustainable new community on the edge of Foxton village, outside of the green belt, linking to planned infrastructure and public transport improvements.

The spatial strategy set out in the First Proposals Plan consultation document does not currently allocate Station Fields, Foxton for development. We consider it is appropriate and necessary to allocate this site for development, noting the potential to deliver a significant amount of new housing and other infrastructure in a sustainable location with significant planned public transport improvements, to help ensure the Council meet the housing need identified. Axis wish to object to Policy S/DS Development Strategy. We have structured our response as follows:

1) Station Fields Representations Response (this document) including:

a. Response to the proposed Housing Trajectory outlined in Policy S/DS, demonstrating that the First Proposals Plan does not allocate sufficient homes to meet the identified need under policy S/JH up to 2041, and that inclusion of Station Fields as a site allocation is required to assist meeting the housing need within the plan period.

b. Response outlining concerns in relation to the Sustainability Appraisal process for identifying the First Proposals Development Strategy as well as our concerns as to whether the strategy described in Policy S/DS Strategy represents the best performing spatial option.

c. Response to the Housing and Employment Land Availability Assessment (HELAA, September 2021) appraisal of Station Fields (site ref. 40084).

- 2) Station Fields Green Infrastructure Strategy (separate document), building on the Vision Document and Concept Masterplan (2020) and demonstrating how the proposals for Station Fields respond to key placemaking themes identified in the First Proposals Plan, including Green Infrastructure and Nature Recovery.
- 3) Access and Movement Strategy for Station Fields (separate document) highlighting how the delivery of a by-pass solution to the level crossing at Foxton and how the Greater Cambridge Partnership's Foxton Travel Hub Proposals can be successfully integrated into a comprehensive access and movement strategy.
- 4) Supporting appendix (Separate document), including topic specific environmental assessments.

1.0 Response to First Proposals Housing trajectory

The representation object to in the housing trajectory proposed to deliver the identified need identified under Policy S/JH.

2.1. Summary:

The First Proposals Plan identifies the following objectively assessed needs for development in the period 2020-2041:

- * 58,500 jobs
- 44,400 homes, reflecting an annual objectively assessed need of 2,111 homes
- * per year, which is rounded for the plan.

These targets are based on the 'medium+' growth level option tested in the preparation of the First Proposals Plan. The Strategy Topic Paper (September 2021) states that "the final Housing Delivery Study (October 2021) has confirmed that the medium+ growth level option is deliverable in relation to housing delivery. The Study concludes that the *medium+ growth level option performs similarly to the* previously assessed 'medium' requirement but slightly better in that it better-matches housing supply against jobs. The Study notes that to ensure the Councils are *able to demonstrate a five year supply from plan* adoption and pass the Housing Delivery Test, new allocations would need to provide supply in the mid*latter part of the plan period, as the beginning of the* plan period is largely met by existing commitments."

The First Proposals Plan identifies sites that would eventually deliver 48,794 which represents an overall 10% buffer over the plan target. This over delivery is intended to build in flexibility and resilience of supply as per the recommendations of the final Housing Delivery Study (October 2021), which states at paragraph 11.20:

"The housing delivery assumptions in this report still show that in order to optimise housing delivery, demonstrate a five-year housing land supply and maintain delivery across the plan period, it will be necessary to gap-fill the 'troughs' in the housing trajectory with additional sources of supply. This should be underpinned by cautious but realistic lead-in times and build-out rates, and an 'over-allocation' of land against the eventual housing requirement (we recommend at least a 10% buffer) in order to ensure that any unforeseen delays to delivering individual site allocations during the plan period, or changes to market conditions, do not result in under-delivery that would threaten the five year housing land supply or performance against the Housing Delivery Test."

However, **the housing trajectory set out in the First Proposals Plan does not assume 'cautious but realistic lead in times'** on a number of the new strategic site allocations. The First Proposals assume significantly more ambitious and unrealistic lead in times than those recommended in the Housing Delivery Study (October 2021), and the Greater Cambridge Local Plan Strategic Spatial Options for Testing – Methodology November 2020 – appendix 6.

The shortened lead in assumptions have been applied to three major allocations:

- * North East Cambridge 3900 homes
- * Cambridge East- 2850 Homes
- * Cambourne Additional 1950 homes

These three sites provide 75% of the overall allocation for homes in the First Proposals Plan and all relay on highly complex delivery factors outside of the control of the Councils, which need to be resolved to demonstrate that the development proposed on these sites could be delivered.

Despite these complexities, which in two instances rely on Nationally Significant Infrastructure Projects Development Consent Order outcomes, there appears to be no detailed justification set out in the supporting documentation to the First Proposals Plan which explains why the significantly more ambitious lead in times are appropriate.

The First Proposals Plan also fails to apply recommended build out rate assumptions, as identified in the Housing Delivery Study and Strategy Topic paper. The Chesterton Sidings parcel at North East Cambridge assumes peak build out rates that are 100 units per year higher than the assumption for sites of this size. The additional dwellings at North West Cambridge achieved through site densification assumes build out at 250 per year until the full delivery of the site, not accounting for the tapering of build out rates as the site nears completion. Even applying these unrealistic delivery lead in times and build rates, **the last 5 years of the plan only delivers on average a 4.7% housing buffer** with a heavy reliance on very large complex sites delivering at the maximum build out rates.

Applying the recommended lead in times and build out rates as identified in the Housing Delivery Study (October 2021) report, the GCLP allocates sites that would only achieve 47,094 units by 2041. This only secures an overall delivery buffer of 6% over the plan period, and a 0.95% buffer in the last 5 years of the plan.

The Councils have failed to allocate sufficient homes to provide a reliable supply of sites over the plan period and have applied lead-in times and build out rates that are artificially quicker rather than reflected in the evidence.

Inclusion of Station Fields, Foxton as a new development allocation, and using the recommended lead in times as and build out rates as identified in the Housing Delivery Study, the GCLP would deliver 48,394 units by 2041, securing a 9.95% buffer over the plan period, and a 10.4% buffer in the last 5 years of the plan.

It is important to note that the further allocations in the middle period of the plan would still be required to 'smooth' housing trajectory and secure a suitable range of sites to allow a robust supply of homes to 2041. However, inclusion of Station Fields, Foxton provides a vital contribution and deliverable solution to secure a robust and housing supply.

2.2. Lead in time assumptions

To inform the First Proposals Plan, the Strategy Topic paper (September 2021) states that the recommendations from the Housing Delivery Study (October 2021) have been used to inform the housing delivery assumptions incorporated within the draft housing trajectory that accompanies the First Proposals. In particular, the study recommends:

- new settlements can deliver up to a peak of 300 dwellings a year, with a gradual build up at the start of developing the site and a gradual tailing off as the settlement is completed,
- sustainable urban extensions can deliver up to a peak of 350 dwellings a year, with a gradual build up at the start of developing the site and a gradual tailing off as the development is completed,
- assumptions for lead in times of strategic sites (over 200 dwellings) that can be considered alongside site specific information such as specific dates for infrastructure provision and relocation of existing uses

The Housing Delivery Study (October 2021) bases their recommendations on analysis of strategic sites (200 dwellings and above) across the OxCam Arc, as summarised in Table 28. Table 29 of the study sets out the assumptions for build out rates for different type of allocation and the combination of lead in times and build out rate assumptions for strategic sites (more than 200 units) is set out in table 30 – reproduced below.

Table 28

- FINAL VER							
Table 28: Str	ategic site lead-in time and build	-out rate assump	tions				
Site Size	Plan adoption to submission*	Submission to Approval**	Approval In first Completion	Average build-out rate	Average outlets	Peak build- out rate	Peak
200-499	2 years	4	2	50	1	50	1
500-999	2 years	4	2	90	1.2	100	2
1000-1499	3 yea/s	4	2	120	2.3	150	3
1500-1999	3 years	4	2	145	3.4	200	4
2000+ New Settlement	3 years	4	2	200-250	4-5	300	5
2000+ Lirban Extension	8 years	4	2	225-275	5	350	<u>v</u>

Table 29

- FINAL VERSI Table 29: Strat		built	d-out	rate	nha	sina	3651	mot	ions		nole												
Size band	1. A. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	¥2									Y	Y 12	Y 13	Y 14	Y 15	Y 16	Y 17	Y 18	Y 19	Y 20	Total	Average dpa	Equivalent
200-499	50	-90	59	50	90									-			-	1		_	250	50	1.0
500-999	50	100	100	100	100	100	50														600	86	1.7
1000-1499	50	100	150	150	150	150	150	150	100	50						-					1200	120	2.4
1500-1999	50	100	150	200	200	200	200	200	150	100	50		_	-		_			_	-	1600	145	2.9
2000+ NS	50	100	150	200	250	300	300	300	300	300	300	300	300	300	300	250	200	150	100	50	4500	225	4.5
2000+ SUE	50	150	250	350	350	350	350	250	150	50						-			_	-	2300	230	4.6

Table 30

HENTE -	30: 1	Exar	nple	stra	tegi	c site	e traj	ecto	ries	linc	ludir	ng le	ad-ir	i tim	e pos	st ad	optic	m, a	SSLUT	ned A	pril	2025)		
Size band	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	10/00	31/32	32/33	33/34	34/35	35/36	16/35	37/38	96/36	39/40	40/41	Total in plan period	Peak dwellings per year	Average dwellings per year
200-	*	+	-	÷	1	+	×	4	4	×	-	2	50	50	50	50	50	-	-	9	÷	250	50	50
500- 999	÷	-	~	~	*	-	Ξ.	4	÷.	5	-	÷.	50	100	100	100	100	103	50	~	Ť.	600	100	56
1000-		÷	e.	è.	÷.	-		9	-		•		2	50	100	150	150	150	150	150	150	1050	150	131
1500-	1	Ŧ	÷	÷	4	÷	~	÷	÷	-	•	*	4	50	100	150	200	200	200	200	200	1300	200	163
2000+ NS	•	4	*	•	÷	-	1		÷	î	- 1	-	~	50	100	150	200	250	300	300	300	1650	300	206
2000+ SUE	-	-	2	•	*	-	*	-	÷	\hat{T}		•	×	50	150	250	350	350	350	350	250	2100	350	263

The Housing Delivery Study (October 2021) states:

"These assumptions are considered realistic and reliable for use in plan-making in the Greater Cambridge area, reflecting the strength of the market but without being overly-optimistic and avoiding applying a single average to all site sizes/types."

As indicated in the tables, the Housing Delivery Study assumptions for lead-in times of strategic sites are that they take 8-9 years from being allocated to delivering first completions, on the basis that some form of supplementary guidance is required such as a masterplan, design guide/ code, Area Action Plan or Supplementary Planning Document.

It is noted in Chapter 7 of the Housing Delivery Study that there is potential for 2-3 year time savings "should the Councils depart from their historic approach of requiring additional documents to be prepared after the initial adoption of a site allocation policy in the Local Plan." the document also states "that site specific information such as specific dates for infrastructure provision and relocation of existing uses can be considered alongside the delivery assumptions in the study"

Responding to the first assumption, the Councils would either need to employ significantly more resource to provide development brief level of detail into the plan making process, or abandon the requirement for this level of detail altogether.

The latter is not considered an appropriate option given the scale of allocations identified and would fail to meet the Great Places objective of the GCLP - "Great places: Sustain the unique character of Cambridge and South Cambridgeshire, and complement it with beautiful and distinctive development, creating a place where people want to live, work and play."

As noted in section 3.4 Great places – of the First Proposals document, Greater Cambridge has a strong track record of delivering high quality design, evidenced through award winning schemes and overall growth delivery. This success can be attributed to the additional development guidance for strategic sites formalised as brief Supplementary Planning Documents (SPDs), Design Codes or Area Action Plans (AAPs).

As noted in the Housing Delivery Study: *The Councils have experience of delivering strategic* sites and using a variety of approaches through which to provide the planning policy and quidance for the delivery of these sites. Area Action Plans *were prepared for Northstowe, Cambridge East, Cambridge Southern Fringe, and North West Cambridge, with adoption following on after* the adoption of the Core Strategy or Local Plan. *Supplementary Planning Documents were prepared* for Waterbeach New Town, Bourn Airfield New Village, and Cambridge East: North of Cherry Hinton and other local plan sites in Cambridge, with some following on after the adoption of the local plan, with others prepared alongside later stages of the Local Plan to be ready for adoption at a similar time to the Local Plan.

Large scale complex sites require considerable resource and considered masterplanning which would be beyond the level of detail achievable in a development plan policy. It is considered unlikely, and undesirable, that the Councils would abandon a successful approach to delivering the Great Places objective – i.e. by securing good design outcomes via post local plan adoption development brief SPDs and design codes for strategic sites. As implied by the potential time saving in note preparing documents of the nature outlined above, preparing an additional DPD or SPD would add approximately 2-3 years to the lead in time for strategic sites.

Incorporating the equivalent level of detail into the plan itself, or twin tracking the preparation of site specific SPDs require significant resource and development industry cooperation that risks significantly delaying the adoption of the GCLP. The feedback summarised in Appendix 3 -Greater Cambridge Local Plan Housing Delivery Study: development industry survey – noted lack of local authority resourcing as a key barrier to delivery. It noted the following key points in relation to lead in times:

- * The Councils need more resourcing to reduce lead-in times
- * Pre-application advice needs to be more detailed with more seamless communication and responsiveness
- * The data (in table 15 of the questionnaire) is too optimistic and does not fully take account of the delays created by the planning process and infrastructure provision

As will be demonstrated in the following sections, each of the sites where the lead in time has been reduced have complex delivery requirements which rely on external factors outside of the Councils control to implement. Considering the Housing Delivery Study (October 2021) recommendation that "site specific information such as specific dates for infrastructure provision and relocation of existing uses can be considered alongside the delivery assumptions in the study" there is a clear argument that these sites require **longer** lead in times than the standard assumption to provide a realistic baseline for housing delivery within the plan period.

2.3. Policy S/NEC North East Cambridge

Under Policy S/NEC the First Proposals Plan identifies North East Cambridge as having potential to deliver 3900 homes during the Local Plan Period, and an overall total (beyond 2041) of 8,350 new homes and circa 15,000 additional jobs.

The Councils are preparing an Area Action Plan (AAP) to determine the amount of development, site capacity, viability, timescales and phasing of development.

The overall quantum and timetable for delivery of development on the site is predicated on the relocation of the existing Waste Water Treatment Works (WWTW), which requires a Development Consent Order (DCO), being led by Anglian Water. It is also reliant on the successful implementation of the North East Cambridge Trip Budget. The Trip Budget is calculated to ensure that there are no additional vehicle trips on Milton Road at peak times (from 2017 levels) and subsequently not result in queuing on the A14 at Milton Interchange (Junction 33). The Proposed Submission version (regulation 19) of the AAP has been prepared for the Councils various committee processes to approve prior to consultation. However, the as noted in the

Local Development Scheme 2020, the Councils will only be able to progress to Regulation 19 stage public consultation after the DCO process for the WWTW has concluded. This is because of the need at Examination of the AAP to be able to demonstrate that the development proposed on the site could be delivered. The table below outlines the assumed timeline for the preparation of the AAP as detailed in the Local Development Scheme 2020, versus the revised timeline adjusting for Anglian Water's latest programme for the submission of the WWTW DCO.

AAP Timeline

Milestone	LDS 2020 assumption	Revised timeline
Anglian Water submit	Summer 2022	Anglian Water's Phase 2
WWTW DCO to PINS		consultation material states
		DCO submission target
		2022/2023
PINS Decision	Assumes a circa 15 month	Assuming 15 month
	examination - Autumn 2023	examination Spring 2024
Proposed submission AAP	Autumn / Winter 2023	Spring/Summer 2024
consultation*		
AAP submission for	Spring 2024	Winter 2024/5
Examination		

* note – this stage is now referred to as 'anticipated 2024' as per the JPAG Officer presentation 30th November 2021.

As can be seen, the programme is running at least 9 months behind schedule. It should be noted the EIA scoping request due to be submitted in Summer 2021 according to Anglian Water's most recent programme for the WWTW DCO was actually issued in on the 19th October 2021 – which suggests a further 3 month delay an overall delay of 12 months.

It should also be noted that PINS are advising that factors such as the notification periods, response to any advice issued following an Acceptance decision, Relevant Representation (RR) period and any proposed changes to the application and given the COVID-related restrictions are resulting longer pre-examination timeframes for DCO projects.

Once the DCO process is finally concluded, and assuming a positive outcome, the AAP can be consulted upon. Following review of representation, the plan can be submitted for Examination, with the timing of the remainder of the AAP process in the hands of the Inspector.

Therefore, factoring the known delay in the preparation of the Anglian Water WWTW DCO, it is reasonable to assume that the AAP may not be adopted until as late as 2026.

Notwithstanding this delay, for the purpose of the First Proposal Plan the Councils have assumed that North East Cambridge will have some early delivery on part of the Chesterton Sidings parcel in 2026/27, with a first year build rate of 100 units per year, peaking at 200 units per year. This assumes that an Outline Planning Application would twin track the preparation of the AAP – an approach which the Inspector for the Uttlesford District Local Plan Examination expressed concern with given the high level of uncertainty and risk of advancing a planning application in advance of an adopted Development Planning Document.

The assumed build out rates are also well in excess of the build out rate assumption of the Housing Delivery Study, which anticipates a peak of 100 units per year delivery on sites of the scale deliverable at the Chesterton Sidings parcel.

For the remainder of the site the Councils have assumed that delivery will start in 2030/31. This lead-in time assumption is 3 years shorter than Housing Delivery Study assumptions. The lead in time is 4 years earlier than recommended when the known delay to the Anglian Water WWTW DCO, and subsequent adoption of the AAP is factored into the process.

The First Proposals Plan notes that North East Cambridge proposed allocation is required to be delivered in line with the Vehicular Trip Budget. North East Cambridge has good non-car accessibility, through the delivery of Cambridge North Station (which opened in 2017), plus the Cambridgeshire Guided Busway. However, there are significant highway capacity constraints along the Milton Road corridor, such that the allocation and the emerging North East Cambridge Area Action Plan depends on all development in the area, both existing and proposed, not exceeding a defined Vehicular Trip Budget. Due to the level at which the Trip budget is set, this has significant implications for future development proposals because the trip budget does not allow any further car trips to be generated over and above that already being generated by existing development in the area.

The means that either:

A) Any new development has to achieve a 0% car driver mode share. Despite the comparatively good non-car accessibility of the area, this is a very challenging target; or

B) Any new development has to commit to reducing the car mode share for existing developments in the area in order that they can generate some car tips. The latter option presents a clear challenge in how new developments are meant to have control over the travel patterns (including car mode share) of existing developments to reduce those existing developments' car mode share. These are challenges that will need to be factored into the AAP and would potentially have implications for build out rates, assuming that modal shift and trip budget capacity (however it is achieved) will be secured in phases linked to occupations. This should be carefully monitored and reflected in future housing trajectories.

The Housing Delivery Study – Interim Findings and Spatial Options Commentary notes that there is a risk to rely on delivery from North East Cambridge during the middle part of the plan period, given uncertainties surrounding the relocation of the wastewater treatment works. The known complicating factors around plan making, and reliance on third party planning processes and Trip Budget uncertainties make reliance on the North East Cambridge site delivering significant housing number of this site by 2030/31 unrealistic.

Factoring in the recommended lead in times, and known delay to the APP adoption, the North East Cambridge site would only deliver 2500 units by 2041.

2.4. Policy S/CE: Cambridge East

Under Policy S/CE the First Proposals document identifies Cambridge East as having potential to deliver 2900 homes during the Local Plan Period, and an overall total (beyond 2041) of 7,000 new homes with circa 8,000 additional jobs.

Development on the site is subject to continued evidence from Marshall of its commitment to relocate the Airport related uses and demonstrate the availability and deliverability of the site.

The First Proposal document assumes relocation will be achieved in 2030. It states:

(Marshall) advises that it has a signed option agreement at Cranfield Airport, Bedford and that there would be no commercial, planning, technical or regulatory impediment to a move to Cranfield and vacant possession is anticipated by 2030. This gives a reasonable level of confidence at this early stage in the plan process that the site is likely to come forward in time to help meet development needs in the plan period as well as beyond. It is important that there should be sufficient evidence to demonstrate clearly that the plan can be delivered by the time it reaches the later formal stages and so the position will be kept under review during the plan making process.

In a press release update from October 2021 Marshall CEO Kathy Jenkins states: "Whilst we are disappointed that we haven't been able to make either Duxford or Wyton work for us we believe, given the obvious synergies between our Aerospace business and Cranfield, that it is a very compelling option.

"As such, we will shortly begin the process of preparing an outline planning application, with submission planned in Autumn 2022 in order give us further confidence that we have a deliverable site should we wish to relocate to Cranfield.

This statement implies that both planning and technical issue are yet to be resolved, and require an application to be prepared, supported by the relevant technical information, to provide confidence regarding deliverability of the relocation. The CEO goes on to state...

"...like so many businesses, Covid-19 has changed a lot of things for us and this, coupled with recent announcements in relation to the early withdrawal of the RAF's C-130 fleet, means we are not yet in a position to make a final decision about a choice of new home for our Aerospace or Land Systems businesses."

While these uses do not directly relate to the operation of the airspace operations, it highlights the general uncertainty in the industry and potential uncertainty related the commercial elements of the relocation.

This uncertainty is reflected in The Housing Delivery Study – Interim Findings and Spatial Options Commentary stated the following for the spatial options within which Cambridge Airport was a component of the supply: "There may be a risk to relying on housing delivery from Cambridge Airport during the middle of the plan period, notwithstanding that Marshall recently confirmed to the Councils its commitment to relocate and seeks to demonstrate the availability and deliverability of the site, whilst being keen to stress that no final decisions have yet been made... The position should be kept under review during the plan making process as appropriate."

The First Proposals document identifies that delivery of the full development will require the Greater Cambridge Partnership Cambridge Eastern Access scheme Phase B to be in place which will provide high quality public transport connections, with the amount of development that can come forward ahead of the scheme to be determined.

Development is also reliant on the successful implementation of a Trip Budget approach, to ensure that the level of vehicle trips is limited to an appropriate level for the surrounding road network.

The Councils' Preferred Options trajectory has a 2 year shorter lead-in time than the Housing Delivery Study assumptions with first completions in 2031/32 and 350dpa from 2035/36 onwards.

This assumes that both the relation of the airport is achieved to stated timeframes and reflects and that the Councils will either not require a supplementary guidance document after an allocation is made in the new Local Plan or that this will be prepared alongside the final stages of the Local Plan and adopted around the same time.

It can be assumed that a formally adopted supplementary guidance document is required for a development of this scale to ensure deliverability against infrastructure improvements and quality of outcomes. This has been required for Cherry Hinton, a much small-scale development proposal with a single applicant on the eastern side of the city with a similar development context.

As noted in section 2.2 above, it is unrealistic to expect development brief level of guidance to prepared either as part of, or in tandem with, a development plan document. The circumstances at Cambridge East do not warrant exclusion from standard lead in assumptions.

Applying the recommended assumptions as set out in Chapter 7 of the Housing Delivery report the typology for this site would assume that first completions would be in 2033/34 ramping up to 350dpa from 2036/37 onwards as an 'urban extension' to Cambridge.

Factoring in the recommended lead in times, the Cambridge East site would only deliver 2,200 units by 2041.

2.5. Policy S/CB: Cambourne

The First Proposals document states that the emerging policy will set out the intention to identify Cambourne as a broad location for future growth in the 2030's to respond to

the opportunity that will be provided by the proposed East West Rail that includes a station at Cambourne.

The first proposal document state that "Given that the East West Rail route and station location at Cambourne have yet to be confirmed, it Is too early to identify a specific development area and amount of development" As such the site is identified as a broad location for longer term strategic scale growth as an expansion to Cambourne and does not identify a quantum for potential for development.

The first proposals document justifies this approach with reference to National planning policy, which allows for longer term growth in plans to be identified as broad locations, where the exact quantity, locations and design will be defined through future plan reviews.

This implies that there will be some form of further plan making process required to appropriately identify the 'exact quantity, locations and design' of the additional growth opportunity at Cambourne.

The nature of the opportunity for growth brings with it significant risks. The growth is predicated on delivery of a major infrastructure project, outside the control of the Councils which is recognised in the Housing Delivery Strategy which states:

"Growth around Cambourne is reliant upon delivery of a new East West Rail railway station and the Cambourne to Cambridge Public Transport Scheme, for which there is uncertainty about when they will be delivered."

And:

Given the ongoing work to progress the East West Rail project, there remains uncertainty about the potential location of an East West Rail station, and therefore the location and scale of growth for an expanded Cambourne.

Notwithstanding this identified uncertainty the Councils are proposing the allocation of 1950 additional homes at Cambourne and that the site will start delivering in 2032/2033. It has also been assumed that the build out rate will be maximised. This timeframe assumes that the Councils will either not require a further supplementary guidance document after an allocation is made in the new Local Plan or that this will be prepared alongside the final stages of the Local Plan and adopted around the same time.

This approach is at odds with the Councils own justification for inclusion of a broad location for growth, i.e. that a further plan making processes will be required to set out in suitable detail the nature of the proposals for allocation.

It is unrealistic, and detrimental to good place making outcomes to assume that formal supplemental plan guidance is not required for a development of this scale. This would be required not only for the future overall growth opportunity, but also for the level of growth proposed in the First Proposal Plan.

As noted in section 2.2, it is unrealistic to expect development brief level of guidance to prepared either as part of, or in tandem with, a development plan document. The circumstances at Cambourne do not warrant exclusion from standard lead in assumptions.

The Councils have placed themselves in a similar situation as the North East Cambridge site, where they are reliant on the delivery of a major infrastructure project and outcome of a DCO process before they can confidently demonstrate that the development proposed on the site could be delivered.

The East West Rail Bedford- Cambridge DCO is in its very early stages and has not completed its statutory phase of consultation or submitted a Scoping request to PINS. The only formal documentation available is the S51 advice which indicates that the DCO is targeting a submission in 2022. Assuming there are no delays to the process, the outcome of the DCO could reasonably be assumed to be concluded around summer / autumn 2023 – which would allow for Reg 19 on the proposed GCLP consultation to proceed with more confidence.

However, as has been demonstrated with the WWTW DCO, timing a plan making process to the outcome of a major infrastructure project include inherent risks that in this instance could serve to delay the adoption of the GCLP overall – not just in relation to a specific site allocation.

Housing delivery to the west of Cambridge, including the 2018 Local Plan allocations at Bourn Airfield and Cambourne West are partly reliant on the Cambourne to Cambridge Better Public Transport Project (C2C). the C2C project which will provide a segregated public transport link, similar to the infrastructure used for the Cambridgeshire Guided Bus but with flexibility to potentially allow autonomous buses. The Independent Audit of Key Assumptions and Constraints (July 2021) for the C2C project states in section 7 "The housing developments in Cambourne West and Bourn Airfield require the C2C project to be opened by 2025, otherwise the planned growth will be put at risk".

The latest GCP update for the C2C project, identified that an Environmental Impact Assessment is currently being prepared with a view to submit a Transport and Works Act Order application in 2022. This would be followed by a public inquiry in 2023, and then expectation of works starting in 2024 and being complete in 2026.

This would appear to represent a 12 month delay from the point at which 'planned growth will be put at risk'. No adjustment for delivery of the C2C project appears to have been factored into the housing trajectory for Borne Airfield or Cambourne West. The impact of the delivery date of the C2C project should be factored into the future housing trajectory forecast for the GCLP. This is particularly important given the concentration of development in the West of Cambridge. A potential delay in the 2018 Local plan allocations would potentially cause overlap with the GCLP allocation at Cambourne creating delivery rates to saturate. This should be kept under review and adjusted accordingly in line with the recommendations of the Housing Delivery Study (October 2021).

Factoring in the recommended lead in times and adjusting build out rates to reflect the potential market absorption rates and the scale of the development opportunity within the plan period, the Cambourne additional site would only deliver 1,300 units by 2041.

2.6. Station Fields, Foxton

It is clear that in order to secure a robust housing supply to 2041, additional site allocations are required both in the mid and latter stages of the plan period.

The First Proposals Plan states that **"Our proposed strategy is heavily informed by the location of existing and committed public transport schemes."**

However, a comparison of Figure 6 showing proposed sites for inclusion in the Plan, and

Figure 11 showing existing and proposed major transport projects, illustrates that the spatial strategy is disproportionately reliant on the delivery of significant levels of new major and complex transport infrastructure projects such as the Cambourne to Cambridge (C2C) transport link and East West Rail, the provision of the latter being outside the control of the Authority.

The independent audit review of the C2C project recognised that housing developments in Cambourne West and Bourn Airfield require the C2C project to be opened by 2026 to provide reliable public transport services, otherwise that planned growth will be put at risk.

As has been demonstrated 75% of the housing supply in the First Proposals Plan relies on a significant level of growth to be delivered from sites that are reliant on external factors and does not have the level of certainty on delivery timeframes necessary to support a robust Local Plan.

The rationale behind the reliance on uncertain, complex and third-party infrastructure projects to deliver significant levels of growth, as opposed to aligning growth with existing and inherently sustainable and deliverable public transport investments not only represents a missed opportunity – but significantly limits the flexibility required to deliver a sound development plan.

Station Fields has the inherent advantage of being located an existing public transport route with committed investments being made along the A10 corridor and national rail network – including the Melbourn Greenway and Foxton Travel Hub, the latter due to be operational in 2024. These projects are in the direct control of the Greater Cambridge Partnership, delivery of which would enable high levels of sustainable growth to be realised with the plan period. The site is also outside of the Green Belt and would not require an exceptional circumstance case to be prepared to justify it's inclusion in the plan.

The site falls into the 'development along public transport corridors' spatial option, which was identified in the First Conversation Consultation as performing well in sustainability terms as a spatial option receiving broad support at public consultation.

As such, inclusion of the Station Fields site would not represent a departure from the current hybrid of spatial options presented in the First Proposals Plan, noting that the justification for the late inclusion of additional Cambourne allocation was justified for its location along a (to be delivered) public transport corridor.

The Housing Delivery Study (October 2021) is also supportive of the inclusion of additional sites to supplement the two spatial strategy options tested in the First proposals plan: Paragraph 1.22 states:

"...To provide a sufficient buffer of sites we would still recommend that for these two growth level options the Councils include new allocations that provide short/ medium/long-term 'top-up' supply alongside the existing commitments; and/or a small number of sites could be replaced with alternatives to help deliver a 'smoother' trajectory over the plan period."

The document goes on to confirm that additional growth (which is considered as required to delivery an appropriate development buffer) could be accommodated within the 'medium+' growth option, paragraph 1.24 states:

"Overall in terms of the housing growth level options we still consider that there is scope to deliver higher rates of delivery in Greater Cambridge than under the Medium growth level option."

Finally, the Housing Delivery Study (October 2021) identifies that there is a clear advantage in the inclusion of a variety of sites, stating at paragraph 125:

"It is still the case that generally the spatial options that mix short-medium term sources of supply (smaller sites in urban areas and villages) with longer-term sources (new settlements, urban extensions and Green Belt release) are better able to deliver across the plan period as a whole with a smoother trajectory. These sites also have different characteristics and are likely to result in variety in terms of location, size, type and tenure of housing, and also be more geographically spread to reduce competition, thus better matching the housing supply with demand."

In summary, Station Fields is located along an existing transport corridor, fits into the preferred spatial strategy hybrid option, is outside of the Green Belt and provides variety in geographical location and character. Therefore, Station Fields' Foxton makes a vital contribution to the supply of homes within the plan period.

Inclusion of Station Fields, Foxton as a new development allocation, and **applying 'cautious**

but realistic lead in times' identified in the Housing Delivery Study, the site is able to commence delivery in 2033/34 – delivering 200 units per year by 2036/37 and supplying 1300 units within the plan period.

It is important to note that these are cautious estimates, there is a robust case for Station Fields to deliver both earlier in the plan period and at accelerated build out rates given the greenfield nature of the site and there being no reliance on third party infrastructure improvements that are outside of the control of the developers, or the Greater Cambridge Partnership.

It is noted in Appendix 6 of the Strategic Spatial Options for Testing – Methodology Document Nov 2020: that lead in times for strategic settlements and edge of Cambridge sites vary widely subject to the complexities of the individual circumstances, as noted below:

- Strategic Settlements: between 3.3 and
 7.4 years for delivery = av. 5 years
- Edge of Cambridge Sites: between
 3.3 and 9.6 years = av. 7.5 years
- * Non-strategic sites: av. 3 years

Given the range in quantum and complexity of development scenarios considered above, it is not considered appropriate to take an overall average lead in, especially given the range of Edge of Cambridge sites. However, as noted Station Fields is a greenfield site, does not require any Green Belt release, is located adjacent to existing public transport infrastructure, and the Greater Cambridge Partnership Foxton Travel Hub proposals are scheduled to be completed in 2024, in advance of the predicted adoption of the local plan.

Assuming a 2024/25 adoption of the GCLP, 1 year for completion of an SPD Development Brief, 4 years from submission to approval of first Reserve Matters and 1 year to first completion, Station Fields Foxton would be able to commence delivery in 2030/31 – delivering 200 units per year by 2033/34 and supplying 1500 units within the plan period. (see Table 4 in the Appendix)

3.0 Response to Spatial Strategy and Sustainability Appraisal

This section of the Representations responds to Policy S/DS Development Strategy of the Greater Cambridge Local Plan 'First Proposals'. The representations outline our concerns in relation to the process for identifying the First Proposals Development Strategy as well as our concerns as to whether the First Proposals Development Strategy represents the best performing spatial option. The First Proposals Development Strategy reflects 'Spatial Option 9: Preferred Options Spatial Strategy (Blended strategy including Cambourne)', and references to these are therefore used interchangeably in this representation

Lack of transparency as to why the components of the First Proposals development strategy have been taken forward, and how this has been directly informed by the analysis of the evidence, outcome of Sustainability Appraisal and consultation feedback.

The approach taken to identifying the outline proposed First Proposals Policy S/DS Development Strategy is summarised in the Development Strategy Topic Paper (September 2021). The First Proposals development strategy is said to draw upon an analysis of the evidence, sustainability and consultation feedback as well as detailed evidence of site specific opportunities and constraints (Section 7.5 of the Development Strategy Topic Paper). However, our client is concerned that at present there is insufficient clarity as to how the conclusions of this analysis has directly informed the choice of the Preferred Options Spatial Strategy, and ultimately the First Proposals Development Strategy. In particular, there seems to be a gap in the explanation as to why the components of the First Proposal Development Strategy (which reflects Spatial **Option 9: Preferred Options Spatial Strategy** (Blended strategy including Cambourne)) have been taken forward, and why other Spatial Options that were subject to appraisal have been discounted and/or why only certain elements of other Spatial Options are considered suitable for taking forward.

The Development Strategy Options – Summary Report (November 2020), along with the Development Strategy Options -Summary Report Supplement (contained as Appendix 1G to the Development Strategy Topic Paper) does provide a summary of the outcomes from the evidence base testing and Sustainability Appraisal of the Spatial Options. However, this does not provide an explanation as to how Spatial Option 9: Preferred Option Spatial Strategy (which is presented in the later Supplement) was formed on the basis of the evidence base testing that had been carried out by that point. Spatial Option 9: Preferred Option Spatial Strategy (Blended strategy including Cambourne), along with the Spatial Option 10 (Blended Strategy including Edge of Cambridge: Green Belt), appear as standalone options without reference to the previous eight Spatial Options that had been subject to Appraisal prior to this. Indeed, in the final, 'Key Findings and Issues' chapter of the Development Strategy Options – Summary Report it is explicitly stated that, 'the final section draws out some overarching findings, issues and themes with *regard to the testing and assessment of the spatial and* growth level options in the proceeding section. These are presented neutrally, without overlaying any value *judgements about the performance of the various* options. This will avoid prejudging the outcomes of the stakeholder engagement and subsequent work undertaken by the Councils to determine a *preferred development strategy, once the evidence base is finalised*'. Furthermore, Appendix E to the Sustainability Appraisal ('Council's justification for selecting sites to take forward for allocation and *discounting alternatives'*) ostensibly provides the justification for the Preferred Option Spatial Strategy, however this also does not explain why the Preferred Option Spatial Strategy is considered to be the best performing option when compared to other Spatial Options, nor does it give reasons for why other Spatial Options have been discounted. Instead, it only presents the components of the Preferred Options Spatial Strategy, including specific locations for development, and provides high level justification for this, without specific reference to the Sustainability Appraisal and evidence base findings.

A stage is missing from the process of defining and justifying Spatial Option 9: Preferred Option Spatial Strategy (and therefore the First Proposals Development Strategy) which clearly sets out how the findings of the assessment of all ten Spatial Options have informed the First Proposals Development Strategy. This omission means the process by which the Councils have reached their preferred First Proposals Development Strategy, which should be based on the outcomes of the evidence, cannot be identified. It also makes it difficult to understand why certain Spatial Options have been discounted, especially when they seemed to perform well in the Sustainability Appraisal. Our client would draw particular attention in this regard to the lack of clarity surrounding how Spatial Option 6: Public Transport Corridors has been treated, as there does not appear to be a clear explanation as to why Public Transport Corridors as an option has been discounted, as discussed below.

The 'Greater Cambridge Local Plan: First Proposals Sustainability Appraisal (October 2021) ('the Sustainability Appraisal')' indicated that Spatial Option 6: Public Transport Corridors performed well against the various Sustainability Appraisal (SA) Objectives. For the majority of the SA Objectives Spatial Option 6: Public Transport Corridors scores the same as Spatial Option 9: Preferred Option. For SA Objectives 3 (Social inclusion and equalities) and 4 (Health), and arguably also for SA Objective 2 (Access to services and facilities), Spatial **Option 6: Public Transport Corridors scores** more favourably than Spatial Option 9: Preferred Option. In addition, the Development Strategy Topic Paper indicates that Spatial Option 6: Public Transport Corridors was supported by the public via the response to the First Conversation consultation, where it states that Public Transport Corridors was the second most popular location.

It is considered that Spatial Option 6: Public Transport Corridors would deliver well in terms of meeting the 'primary implications' of the emerging Local Plan aims for the preferred development strategy, which comprise:

- * 'Reduce climate impacts through compact development located where active and sustainable travel can be maximised
- * Make best use of suitable safeguarded and brownfield land
- * Make best use of existing and committed key sustainable transport infrastructure
- * Support rural communities to thrive and sustain services'.

The Sustainability Appraisal scores Spatial Option 6: Public Transport Corridors well under SA Objective 2 (Access to services and facilities) and it is scored equally with the Preferred Option for both SA Objective 11 (Adaptation to climate change) and SA Objective 12 (Climate Change Mitigation). In respect of SA Objective 12, the Sustainability Appraisal notes that both Spatial Option 6 and Spatial Option 9, 'perform relatively well, as they would lead to a higher modal share for sustainable transport'. Spatial Option 6: Public Transport Corridors was the second best option for carbon emissions according to the Development Strategy Options - Summary Report, where it noted that 'this option has a mixture of homes in urban settings and settlements on public transport corridors, hence it has good transport links and therefore second lowest transport carbon'.

Yet despite the favourable outcomes from the evidence, Sustainability Appraisal and First Conversation Public Consultation for Spatial Option 6, 'Public Transport Corridors' is not presented as one of the sources of supply that make up the components of the First Proposals Development Strategy in Section 7.5 (Proposed Approach: First Proposals Development Strategy option) of the *Development Strategy Topic Paper*.

The *Development Strategy Topic Paper* only mentions the benefits of development along Public Transport Corridors in respect of the 'New settlements' source of supply, where it reflects on the fact that, 'our evidence, Sustainability Appraisal and consultation responses [...] show that in principle, *new settlements located on public transport corridors can be sustainable locations for development if they* are well connected by public transport to larger *settlements – particularly Cambridge, but that they* are reliant on significant infrastructure investment, and as a result may take a significant time to start *being developed*'. On this basis, the expansion of Cambourne is proposed as a component of the First Proposals Development Strategy, though this does not specifically draw upon, and relate to, the outcomes of the assessment of Spatial Option 6: Public Transport Corridors. It should be noted that the assumptions underpinning Spatial Option 6 did not specifically include Cambourne, so its inclusion does not necessarily reflect the outcome of the assessment of Spatial Option 6, or the results of responses from the public. The benefits of forming a preferred spatial strategy that is driven more strongly by development along public transport corridors, not just through development of new settlements, therefore appears to have been overlooked and our client believes that there has been insufficient justification as to why the Public Transport Corridors spatial option is not considered further. In fact, the Public Transport Corridors option should be included as an

integral part of the chosen Development Strategy so that it properly reflects public opinion.

SA Appendix E appears to suggest that Cambourne has been taken forward as part of the Preferred Option Spatial Strategy approach as an element of Spatial Option 8 'Expanding a growth area around transport nodes'; paragraph E.21 states that, 'the preferred development strategy *identifies Cambourne as a broad location for future* development, in association with the opportunities provided by East West Rail and in particular the proposed new railway station'. This is despite the fact that as is reported in the Development Strategy Options – Summary Report, '[Spatial Option 8] *performs relatively poorly within the plan* period, as it is unlikely that the full infrastructure to *support development will be provided*'(paragraph) 6.9.2). The Development Strategy Options – Summary *Report* also cautions that, *'there is a substantial amount of uncertainty about when* [the East West] railway station and Cambridge Autonomous Metro] will be delivered and the ranking of this option is dependent on delivery of those links. It is also noted *that growth outside of Cambourne (i.e., in the villages)* may put pressure on local services and facilities and have greater car dependency'.

It is also noted that Spatial Option 8: Expanding a growth area around transport nodes was not subject to consultation during the First Conversations stage, and our client would suggest that this has been taken forward in to the First Proposals development strategy without a public mandate. Despite these risks, the reason given for inclusion of expansion of Cambourne in the Preferred Options Spatial Strategy, as stated in paragraph E.7 of SA Appendix E, simply refers to the *'benefits that will be provided by the proposed East West Rail station as well as the improvements already anticipated from the Greater* Cambridge Partnership's Cambourne to Cambridge scheme. The significant improvement in public transport provides an opportunity to grow an existing new town, enhancing the critical mass of population, *employment and services available locally to those* communities'. Given the risks that have been identified through the Sustainability Appraisal and evidence base testing process, there needs to be far more robust justification as to why expansion of Cambourne has been included as a key part of the First Proposals Development Strategy, clearly linking this justification to the assessment findings. It is also noted that the First Proposals Plan actually presents Policy S/ CB: Cambourne under the 'New Settlements' source of supply, which further confuses the degree to which the Sustainability Appraisal and

evidence base testing work has directly informed the choice of First Proposals Development Strategy, as 'New Settlements' was assessed as a different spatial option to 'Expanding a growth area around transport nodes' (Spatial Option 4 compared to Spatial Option 8). We comment on this further in our critique of the Council's Housing Trajectory, where in our view, there is too great a reliance placed on sites to deliver where major infrastructure is required, with no clear timetable for its provision.

Greater clarity and transparency is therefore required to explain the basis on which the Preferred Option / First Proposals Development Strategy was developed. As currently presented, it appears that the Councils have made assumptions about the performance of the Preferred Option Spatial Strategy in isolation from the evidence testing and results of the Sustainability Appraisal. Our objection in this regard is that there seems to be an element of pre-determination in the inclusion of the preferred 'core strategic sites' that have been taken forward into the First Proposals Development Strategy (namely North East Cambridge, Cambridge Airport, and in particular, extension to Cambourne), which does not necessarily reflect the outcomes of the spatial option assessment through the Sustainability Appraisal and evidence base testing and may not therefore represent the best performing growth areas. Several principal sites have been selected on a 'cart before horse' basis, when the selection is supposed to be informed by the chosen spatial strategy. The Councils fail to demonstrate that the conclusions of assessment of the Spatial Options have led the determination of the best performing strategy for the First Proposals Plan. Instead, there is the very strong suspicion that a spatial strategy has instead been retrofitted to suit a series of pre-chosen sites.

Greater clarity is needed as to why the First Proposals Development Strategy is considered to represent the best performing spatial strategy.

Our client strongly believes that the Council's own Sustainability Appraisal does not demonstrate that the First Proposals Development Strategy is the best performing option when compared against the other Spatial Options.

Chapter 4 of the Sustainability Appraisal (read alongside SA Appendix C) presents the Appraisal of Spatial Options. This presents the comprehensive scoring exercise of the SA effects for the ten Spatial Options against each of the fifteen SA Objectives and summarises the performance of each Spatial Option. It also presents a summary of the 'best performing option' for each SA Objective. From reviewing these summaries, Spatial Option 9: Preferred Option Spatial Strategy does not clearly perform better when compared to the other Spatial Options. For all the of SA Objectives, Spatial Option 9 either performs equal to the other Options or performs less well; there are no SA Objectives where Spatial Option 9: Preferred Option Spatial Strategy clearly performs better than the other Spatial Options. In addition to this, in the summary of the challenges for Option 9 - Preferred Option blended strategy, the Development Strategy Options Summary *Report Supplement* identifies what are arguably fundamental risks to the Preferred Options Spatial Strategy option relating to housing delivery. It identifies there, 'may be a risk to relying on delivery from **North East Cambridge** during *the middle part of the plan period subject to progress in the process to relocate the Cambridge Waste* Water Treatment Plant' and states that the 'level of *confidence in the availability and deliverability of the* site will be kept under review during the plan making *process*'. It also identifies that, *'there may also be a* risk to relying on housing delivery from **Cambridge** *Airport* during the middle of the plan period, notwithstanding that Marshall recently confirmed to the Councils its commitment to relocate and seeks to demonstrate the availability and deliverability of the site, whilst being keen to stress that no final decisions have yet been made'. Again, it is stated that, 'deliverability will be an important factor when considering if the site is taken forward and the position will be kept under review during the plan making *process as appropriate*'. Finally, with respect to the Cambourne Expansion, it identifies that, 'If the phasing of East-West Rail and the new railway station at Cambourne is delayed, then this could delay *housing completions from the Cambourne Expansion.* Uncertainty over the location of the new station could also affect lead in times. There is also a risk of potential competition between Cambourne, Bourn Airfield and the Cambourne Extension with all three under construction at the mid-latter part of the plan period'.

In light of these potentially fundamental risks to delivery of the Preferred Options Spatial Strategy (and therefore the First Proposals Development Strategy), which all suggest risks to delivery of housing in the mid-part of the plan period, our client's view is that the Councils have not demonstrated that the First Proposals Development Strategy is the best performing strategy. It builds in far too much uncertainty, so it should be supplemented by including additional sites that have more certainty of delivery, e.g., within an existing Public Transport Corridor, where the investment in infrastructure has already been made.

The Councils claim in the *Development Strategy Topic Paper* that, *'in summary, drawing on our* evidence and consultation feedback, alternatives to our preferred option would either distribute development to less sustainable locations that are distant from Cambridge or without the benefit of very high quality public transport (existing or proposed) that would generate greater car use contrary to our climate change theme, or would require the release of large areas of Green Belt on the edge of Cambridge which would cause significant harm to the purposes *of the Cambridge Green Belt.*'Our client strongly disagrees that this is the case, given the fact that land promoted at Station Fields, Foxton (also known as Land north-west of A10 Royston Road), should be included as part of the First Proposals Development Strategy, that should include much greater emphasis on the benefits of locating future development in Public Transport Corridors. Our client's site could deliver development in a sustainable location that benefits from high quality public transport (both existing and proposed infrastructure) and furthermore would not require the release of Green Belt land. We have made further sitespecific submissions that describe the benefits of our client's site.

Concern with the process for identifying sites to take forward for Sustainability Appraisal and therefore to be considered as part of the First Proposals Development Strategy

Our client also objects to the process that has been undertaken by the Councils for identifying the sites to be taken forward as part of the First Proposals Development Strategy.

The Sustainability Appraisal presents the appraisal of the likely effects of potential site allocations in Chapter 4. SA Appendix E provides an explanation on how sites were identified and tested, and clarifies that, 'the testing of sites through the sustainability appraisal has focused on sites informed by the emerging preferred strategy option, and the testing carried out via the HELAA as to where a site was suitable, available and achievable for development'. In our view this approach has prevented the allocation of suitable sites that could be included in a more appropriate development strategy.

The Sustainability Appraisal summarises effects according to the 'source of supply' that the sites fall within. Appendix E states that the Sustainability Appraisal has used the *'categorisation of broad strategy choices used to inform plan making*'. However, in the Sustainability Appraisal, the 'Public Transport Corridors' source of supply is combined with Villages to create a category of 'Dispersal: Villages / Transport Corridors' for which no clear explanation is provided. It does not reflect and stay consistent with the 'source of supply' categories that were assessed for the spatial option assessment, which had previously treated these as two separate options. It is assumed that this approach is taken due to the fact that, as referred to above, the testing of sites has 'focused on sites informed by the emerging strategy option', and that this is reflective of there being a preference against including sites that fell within Spatial Option 6: Public Transport Corridors. However, in combining the two options, many of the benefits of aligning major development sites (200+ units) to a Public Transport Corridor location are neutralised by the disbenefits of Dispersal Villages.

The approach to assessment of sites in the Sustainability Appraisal, and therefore consideration as part of the First Proposals Development Strategy, also results in the exclusion of sites that were not concluded to be suitable, available and achievable through the HELAA process. Paragraph E.15 of SA Appendix E states that, 'Where sites were identified *in the HELAA as either not suitable, not available or not achievable these sites have not been subject* to appraisal, as they are not considered reasonable options'. The next section of these representations explain our client's concerns with the HELAA methodology in detail, but in short, our client's view is that the approach to scoring sites through the HELAA is inconsistent and flawed and this has unfairly and inaccurately discounted sites that should be considered positively as reasonable alternatives.

4.0 Response to the Housing and Employment Land Availability Assessment

The Station Fields site was assessed by the Council in the Housing and Employment Land Availability Assessment (HELAA, September 2021) under site ref. 40084. The HELAA (Appendix 2) concludes that the site is not currently developable and has therefore been discounted as a potential allocation. The detailed site assessment is provided in HELAA Appendix 4(c). The detailed assessment confirms the site is available and achievable, but not entirely suitable, having been assessed as red against three of the key criteria used in the assessment methodology. The HELAA states:

"Sites were deemed to be unsuitable if they were assessed as 'Red' against any of the criteria used".

However, we consider that the Council's assessment of the site is not accurate and that the concerns raised resulting in a 'Red' score (related to transport, archaeology, and landscape) have not been justified, and could be appropriately addressed and mitigated through careful design and landscaping. As such, the site would be suitable for development, subject to appropriate consideration and mitigation of all impacts.

We provide detailed comments on the findings of the HELAA below. Our comments should be read alongside the various supporting technical information that has been prepared and is submitted with our representations to the Plan, as referenced below.

4.1. Red scores:

4.1.1. Landscape and Townscape

The HELAA concludes the site is not suitable for development having regard to the resultant impact on the surrounding landscape and townscape:

"Development upon this site would be an encroachment into the countryside and have a significant adverse effect upon the rural local landscape character and existing gateway into the village of Foxton. Minor development could be accommodated to the south east of the site but significant landscape mitigation works would be required to enhance the new village edge".

When considering impact on the surrounding landscape and townscape, it is important to understand the existing context of the site, which is not located in the Green Belt. Whilst it is greenfield land, it currently comprises open agricultural fields (Grade 2 agricultural land - provisional classification) with limited vegetation within the site. The site is bound by existing infrastructure on three sides comprising Foxton Road to the north, Barrington Road to the east and Royston Road (A10) to the south. The Great Northern Rail Line from London to Cambridge crosses the site in eastwest alignment, with convenient access to the adjacent Foxton Station. To the north of the site is an existing waste water treatment works which is outside of the development boundary. This is an edge of village site and not one that is entirely rural in nature.

The HELAA considers development of the site could harm the rural character and existing 'gateway' into the village of Foxton. However, the existing settlement of Foxton is not regular in its form and already extends both north-south and east-west along the A10. There is development to the north of the A10 and Foxton Station on the eastern side of Barrington Road and as a result any 'gateway' is not clearly defined or apparent.

We believe the Local Plan site allocations should be consistent with and respond to the Greater Cambridge Partnerships proposals for the Foxton Travel Hub. The travel hub will lead to a significant change to the southern part of the site, adjacent to the A10 and Foxton Station to provide a new transport interchange comprising car and cycle parking space and enhanced local bus services, to improve access to the station. Development of the travel hub would significantly alter the character of the area and extent of the Foxton urban edge and associated landscape. Proposed development of the Station Fields site seeks to build on the improved sustainable travel connections and would be designed to connect into the travel hub proposals.

The HELAA identifies that the site falls within National Character Area NCA87 (East Anglian Chalk National Character Area) defined as visually simple and uninterrupted landscape of smooth, rolling chalkland hills. At the local Guide (2010) describes the site as falling within The Chalklands:

"a broad scale landscape of large fields, low trimmed hedgerows and few trees. By way of contrast, the eastern part of the area is cut through by the valleys of the rivers Granta and Rhee, which have an intimate character of small grazing meadow and wet woodlands".

The Greater Cambridge Landscape Character Assessment (2021) describes the site as falling within Area 3C: Rhee Tributaries Lowland Farmlands characterised as:

"a large swathe of gently undulating rural landscape with distinctive linear features that forms the wide, shallow valley of the River Rhee".

As shown in the Green Infrastructure Strategy prepared by LDA Design (Appendix 2), the proposals have identified the relevant character of the landscape and topography and sought to respond and retain existing vegetation and the rural character to the site. Of the 98ha site, the masterplan indicates that only 50% would be developed, ensuring a significant proportion of the site would remain undeveloped and retained and enhanced as open space, including to provide a new countryside park, woodland area and semi-natural areas of landscaping. The transformation of Station Fields creates an opportunity to connect and enhance these important natural systems and deliver significant benefit to Cambridgeshire through the enhancement of important chalk stream habitats, flood alleviation and recreation through its landscape.

The landscape vision builds on precedents from the surrounding landscape and build these into the open space to provide a variety of functions including communal village green spaces, informal and natural countryside park, enhanced woodland habitats, edible landscapes in the form of community orchard and allotments. The vision will create a place where both people and nature can thrive. The site offers prime opportunities for increasing biodiversity and delivery new green space on land that is currently predominately intensive arable farmland with little ecological value.

The landscape vision has been centred around key placemaking principles:

* Defined by Landscape – to be guided by the existing landscape context and the

opportunity to increase biodiversity and landscape value for the wider community of South Cambridgeshire. Creating neighbourhoods that are defined by their landscape setting – creating social spaces at the heart of the development and wilder habitats on it's edge that wraps the site in natural spaces.

- * Health and Wellbeing to create natural open space for recreational use and a restorative landscape that will provide somewhere to escape to and connect with nature, offering local people spaces where they can relax and enjoy the natural environment. The landscape will also encourage lifestyles by designing a place that responds to local needs – creating walking, running and cycle loops across the site and providing sports facilities, allotments and children's play facilities that will support integration with neighbouring communities.
- * Climate Change Resilience the use of green infrastructure and SuDS features will help to reduce flood risk along the River Cam corridor by providing swales, ponds and wet woodlands that protect homes and farmland. Also designed to promote and encourage active travel by new green links and corridors across the site and to surrounding area.
- * Access to Nature the site currently has limited ecological potential. The proposals will provide a landscape that provides biodiversity enhancements and ecological gain to encourage nature and provide opportunities for community to interact to this. This will include returning arable land to its past use and opening up areas of natural grassland and wildflower meadows, within the site, whilst taking advantage of the existing wildlife corridors along the watercourses.
- * Communities significant areas of communal open space providing variety of functions including sports pitches, new community orchard and allotments and open village green spaces to allow space for people to come together. Green spaces will provide natural movement corridors that encourage sustainable travel across the local area and result in a well-designed network of safe, direct and beautiful green walking and cycling routes.
- Inspire and Educate to work with the community to develop detailed design proposals and shape the landscape and open space to facilitate community ownership of high quality assets. Open spaces will

protect and enhance unique historic assets like the Roman Villa Scheduled Ancient Monument, enabling us to share and promote the history of the landscape.

These key principles respond directly to the 'big themes' of the GCLP First Proposals document and will ensure that allocation and development of the site is aligned with the aspirations of the Plan.

Landscape buffers will be formed along the boundaries of the site to help integrate the development within the wider rural area and help the site to sit as a new settlement within a high quality landscaped setting. Appropriate separation would be retained between the Station Fields site and the village of Barrington to the north, Shepreth to the west and Foxton, whilst also delivering improved active travel connections between these sites with pedestrian and cycle green routes.

The Council also identify that there are a number of trees at the site that are subject to a Tree Preservation Order. Axis appointed Lockhart Garret as arboricultural consultant to undertake an initial tree survey on the site in 2019 (Appendix 2). This survey has identified that the majority of the tree stock exists on the boundaries of the site and these trees, especially those of better quality, will be substantially retained. The proposals also comprise a significant amount of new planting, including along the railway line and along the western edge of the site proposed as a new countryside park. The arboricultural survey did not identify any trees or woodlands that are classified as ancient or veteran and would warrant most protection.

Our enclosed Green Infrastructure Strategy (Appendix 2) demonstrates how a high-quality development can be delivered across the site which strengthens and protects existing landscape character and will provide a significant amount of new open space for both recreational use but also to deliver substantial biodiversity enhancements. More detailed proposals for the scheme and variety of open space will be developed further and include community engagement to help share the character and nature of the area to make sure if reflects the needs and aspirations of the community and will deliver wide ranging public benefits.

It is not considered that the proposed

development result in any adverse or harmful impact on the landscape and townscape and therefore the site would be suitable subject to high quality landscaping proposals and careful mitigation.

4.1.2. Archaeology

The HELAA assessment references evidence of extensive cropmarks on site and considers these to be:

"Part of the same complex as the scheduled Brown Spinney Roman settlement and of demonstrably equivalent status to designated heritage assets".

An Archaeological Appraisal of the site and surrounding heritage assets was undertaken in December 2019 by EDP (Appendix 5.2). This report presents the evidence available to date including intrusive investigation and aerial photographic evidence supplemented by a geophysical survey (undertaken in 2019 by Headland Archaeology).

The Scheduled Monument (SM) (Brown Spinney Roman settlement) appeared on the Historic England 'Heritage at Risk' list prior to 2020 with its vulnerability referenced as 'arable ploughing'. The SM has since been removed from the at risk register as of 2020.

No part of the designation falls within the boundary of the site, although the Monument retains its broadly rural setting, provided today by the southern half of the field within which it is located and the field to the east (i.e. the southern portion of the site). However, this setting is much changed from the Roman period when it would have comprised a network of smaller fields and enclosures interspersed with buildings, small scale industry and a cemetery.

The evidence for the presence of cropmarks and buried remains on site is not disputed. However, there is a clear cluster of remains within the south western portion of the site which are likely to have had historic and former functional relationships with it. These remains are considered to be of 'moderate' contribution to the significance of the SM and only of 'regional' interest indicating areas of settlement, industry and some cultivation activity. This precludes them being of sufficient significance to warrant SM status in themselves (Monuments are by definition considered to be of national importance). The level of knowledge of the remains within the boundary of the Site is similar to that of the SM itself, but the boundary

From the available knowledge, it is therefore not plausible or likely for the remains within the site itself to be of 'equivalent status' to the SM as asserted by the HELAA.

Furthermore, the evidence for remains of moderate significance relates to only the south western portion of the defined site. Evidence elsewhere within the site boundary highlights the potential for agricultural Roman remains (field boundaries and cropmarks for example) which are extensive and relatively common in this area. The evidence is not necessarily a guarantor of the presence of underlying geological remains. Therefore, the evidence on the remainder of the site is inconclusive and considered to be of 'local' interest. This means it does not meet the high bar for scheduling and no available evidence demonstrates the potential for it to be, contrary to the assertion of the HELAA.

The Green Infrastructure Strategy (Appendix 2) for the site demonstrates that development can be focused on the area with lower archaeological potential, avoiding the need for structures within the southwestern portion of the site which is within the setting of the SM, and itself has potential for below ground remains of moderate significance.

The Archaeological Appraisal finds that allocation and development of the site could contribute several public benefits to the preservation of the SM and associated archaeological remains including:

- * Preserving the setting of the SM by retaining the south west corner as open space which contributes to the 'ruralness' of its setting;
- Ending arable activity on the field to reduce the potential truncation of remains by arresting the damage of ploughing;
- Works on site would facilitate further excavations and archaeological assessments which would advance the current piecemeal understanding of the setting of the SM and surrounding activities;
- * Development of the site can provide interpretation of existing below ground assets, furthering public understanding and appreciation which in turn embeds protection and passive surveillance.

The preparation of a masterplan for the site, allows full consideration for the preservation of buried remains and their setting, proportionate to their significance. The Archaeological Appraisal finds that where any remains discovered outside of the south west corner of the site are of such significance to require retention, they would be contained within localised 'pockets' and could easily be accommodated by the site's development.

In summary, allocation and subsequent development of the site would allow retention and protection of the south western corner of the site where buried remains are considered to be of 'regional' value and which contributes to the setting of the SM. The assessed level of value and their exclusion from the SM designation adjacent confirms that the site is not of equivalent status as asserted by the HELAA. Beyond the south west corner of the site, there is considered to be a low potential for archaeological remains. Any finds would not prohibit the deliverability or capacity of the Site.

The Green Infrastructure Strategy (Appendix 2) for the site demonstrates that there is an opportunity for the south western portion of the site to contribute to the setting of the SM and non-designated buried remains which accords with the requirements of paragraph 190 of the NPPF. The previous 'at risk' status of the SM confirms that current arable ploughing indeed is the main risk to the asset. The retention of this area as open space assists in preserving the historic setting of the SM defined by its 'ruralness' and is likely to enhance the heritage asset as set out by paragraphs 197 and 200 of the NPPF.

The Archaeological Appraisal finds that, taking the Palmer approach to assessing harm, development of the site has some potential to cause harmful impacts but can also deliver beneficial impacts, drawing the conclusion that there would be no overall harm in accordance with NPPF paragraph 199.

4.1.3. Transport and Roads

The assessment raises concerns in respect of capacity issues on the local road network and the HELAA states:

"Capacity issues on adjacent links and railway crossing, may bring forward the need for A10 bridge. Transport Assessment and Travel Plan required".

As a point of principle, we note that there are a number of other sites in the HELAA assessed as 'Amber' in response to transport and highways impacts, despite similar capacity issues on the local road network being identified. There are only three other sites assessed as 'Red' where there are capacity issues on the local network. Of these three sites, the comments are more specific and conclusive as to why development would result in unacceptable impacts, for example in respect of 'Land at Rockery Farm, The Broadway, Bourn, CB23 2T' (Site Reference: 48151) the HELAA states:

"The A428 corridor is already at capacity in this area and requires investment to unlock the growth included within the last Local Plan. This development is likely to increase the level of traffic on the B1046 which has existing capacity issues. Capacity assessments are likely to show local junctions are over capacity without the development. There is, therefore, **limited scope for further development and the likelihood of severe impacts.** Development of the site **would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated".**

It therefore appears the Council have been inconsistent with the scoring within the HELAA. In relation to Station Fields, Foxton, the HELAA is not conclusive that development would result in severe adverse impacts or impacts that could not be reasonably mitigated (in accordance with paragraph 111 of the NPPF which restricts development in these instances). Any future application for proposed development on the site would be supported by a Transport Assessment, including assessment of cumulative development impacts to demonstrate there would be no adverse impacts and to detail any highways improvement works required, as well as a Travel Plan to demonstrate how active travel and the use of public transport will be promoted to avoid reliance on private car use. In relation to the HELAA Further Considerations and Strategic Highways Impact the Station Fields site is assessed as 'Amber', with impacts likely to be acceptable subject to the relevant supporting evidence.

However, we note that two of the sites proposed as draft allocations for new housing in the First Proposals consultation document have scored 'Red' against these criteria. The HELAA states a 'Red' score in relation to these further criteria means 'Constraints to development that would seriously constrain development potential'.

For example, land at Great Shelford, Stapleford (HELAA ref. OS216) is a Green Belt site allocated in the draft Plan for 100 dwellings albeit the HELAA scores 'Red' in relation to Strategic Highways Impact and states:

"Within Highways England Zone 8 - M11 North No capacity for growth. Sites would need to ensure no net increase in vehicles trips on the Strategic Road Network".

Noting the greenfield nature of land at Great Shelford, it unclear how the development of 100 new dwellings delivered on this Green Belt site in Stapleford would not result in additional trips on the strategic network and therefore there is uncertainty whether Highways England could support development in that location. Highways England do not raise the same concerns in respect of the Station Fields, Foxton site.

In respect of Station Fields, Foxton the existing capacity issues on the local road network and congestion associated with the level crossing on the A10 are noted. It is agreed that the current level crossing arrangements need to be altered significantly to help improve traffic flow in this key location around Foxton Station. However, this should not be a barrier to development in the local area. In fact, development of the scale proposed at Station Fields provides opportunity to contribute toward local highway improvement works, including the proposed delivery of a new A10 bypass which would bypass of the level crossing at Foxton Rail Station, reducing existing delays, including for the bus services running along this route. This would encourage the bulk of vehicle movements along a more appropriate route and significantly increase capacity of the road network adjacent to the site and remove queueing in this location. This should be seen as a substantial benefit associated with the proposals. Full details of the proposed transport benefits associated with the proposed development are set out in the Access and Movement Strategy prepared by Stantec and submitted with this response (Appendix 4).

The benefits of development of the Station Fields site also support the allocation of Foxton as a Travel Hub by Greater Cambridge Partnership. The travel hub proposals comprise the development of a new transport interchange in the south eastern corner of the site to provide additional car parking, cycle parking and improved local bus service connectivity to enhance access to Foxton Station. This development makes the Station Fields a prime location for growth and new development, to provide a holistically planned travel hub and new community. The current plans for the travel hub have yet to be finalised. On behalf of Axis, we responded to the last round of consultation

to share our 'in principle' support for the hub proposals. However, we did raise serious concerns regarding the current layout and design of the scheme, including the lack of a clear and safe crossing point across the A10, failure to reflect the character of the village and limited green infrastructure proposed with limited value for the existing community. The masterplan presented in the enclosed Green Infrastructure Strategy prepared by LDA Design (Appendix 2) demonstrates how a travel hub can deliver much more than just a car park, it should be forming part of an integrated and sustainable new development, contributing to the key draft Plan objectives, whilst delivering new housing and benefits to the wider community, and making best use of existing infrastructure.

The masterplan also demonstrates how the site will make a significant open space and contribution to green infrastructure, including improved active travel and greenway connections for pedestrians and cyclists, both within the new development proposed but also connecting to surrounding area to ensure the new community is integrates and helps to improve connectivity to the station.

Notwithstanding the planned improvements as a result of travel hub proposals, Foxton is already a sustainable location given the proximity of the train station and the bus routes that serve the village. It is therefore appropriate as a location for further development given the public transport infrastructure to support delivery. This compares favourably with some other strategic allocations currently proposed in the GCLP First Proposals document. For example, Cambourne is a proposed strategic allocation for 1,950 homes albeit the site area is not confirmed and the development strategy is reliant on the opportunities provided by East West Rail and the proposed new railway station at Cambourne. However, there are no confirmed timescales for the delivery of this scheme and this is noted in the Council's own evidence base. As set out in representations under Policy S/ DS we therefore consider it is not appropriate to rely on significant housing delivery from such an uncertain site and the Plan needs to allocate further sites to ensure the Plan will meet the identified housing need.

Overall it is considered that the location of the Station Fields, Foxton site will allow the development of a new community which will meet sustainable transport objectives of maximising non-car travel modes whereby future residents can live their lives without the need to rely on the private car, and delivering a new residential development where the private car does not dominate the site and to provide a high quality place for people to live their lives in a healthy and safe environment. As concluded in the enclosed Access and Movement Strategy, the site is deliverable, accords with national and local transport policy guidance, in a sustainable location, and there are no transport nor highways reasons why it should not be allocated for development in the Greater Cambridge Local Plan.

4.1.4. Summary

It is clear from our comments above there is no justification for any of the 'Red' scores assessed against the Station Fields, Foxton site as concluded by the Council. On the contrary, the principle of development should be supported and any issues could be addressed through the appropriate technical work and a design and landscape-led approach to the development of the site. These findings mean the site is entirely suitable for development and it has already been agreed by the Council that the site is also available and deliverable, as defined by the NPPF.

4.2. Amber scores:

4.2.1. Development Plan Framework

The site is assessed as 'Amber' against the relevant development plan policy, located outside of a defined development framework (settlement) boundary and within 200m of the Green Belt.

However, the site is not within the Green Belt and therefore the proposed development is not subject to the relevant tests set out in the NPPF. There are no exceptional circumstances required to justify the release of the site from the Green Belt through the local plan process. Development of the site would need to consider impact on any purposes the Green Belt performs, the boundary of which is located to the east of the site from Barrington Road. The landscaping proposals discussed will seek to screen the site and reduce visual impacts when viewed from the surrounding area. Any application for development on the site would be accompanied by a Landscape Visual Impact Appraisal.

Land at Great Shelford, Stapleford (HELAA ref. OS216) is allocated in the draft Plan for 100 dwellings. However, the site is located in the

Green Belt, and the Cambridge Green Belt Study (2021) identifies that release of land in this area would result in a moderate high level of harm to the Green Belt. Noting the level of harm to the green belt identified in the Council's own assessment, and the availability of a number of other suitable, available and deliverable sites not in the green belt, it is unclear why this site has been favoured over others, including the Station Fields, Foxton site which is comparable in terms of accessibility and proximity to the Station, and can contribute significantly more to meeting the Plan's housing needs.

The site is located on the edge of Foxton village. We note that existing residential development to the north of the station and railway line is outside of the defined development framework according to the South Cambs Local Plan (2018) and extends the village to the north along Barrington Road. The village is a highly sustainable location, with direct connection to Foxton Station and local bus services which provide access to the surrounding area. The accessibility and sustainability of the village as a location for future growth will only be strengthened through the provision of a new travel hub in Foxton.

4.2.2. Flood Risk

The HELAA suggests the site falls part within Flood Zones 2/3. However, according to the Environment Agency's Flood Map for Planning, the majority of the site falls within Flood Zone 1, considered to be at low risk from flooding and suitable for all forms of development. A small area of the Station Fields site in the north west corner is located in Flood Zone 2 and 3, which is in relation to the awarded watercourses located along the western boundary of the site.

The majority of the site is at 'Very Low' risk of surface water flooding. The north-west corner of the site is shown to be at 'Low', 'Medium' and 'High' risk of surface water flooding, associated with the awarded watercourse. There is also some potential for flooding from groundwater.

However, the area at risk from flooding is only a small area and the masterplan presented in the enclosed landscape vision demonstrates how this area of the site would remain free from development. Development of the site provides an opportunity to use green and open spaces to manage water in a way that can reduce flood risk and ensure that water levels are not increased from green field rates off the ground whilst creating landscape features and habitats for nature to thrive. Drainage infrastructure would form an integral part of the masterplan and significant areas have been allocated for sustainable urban drainage including the use of swales and other attenuation features that are able to more sustainably manage water runoff and storage. SUDS features would ideally be in the west of the site within the courtyards park. This would create a range of wetlands and waterbodies that would create new habitat within the site.

Any development on the site would be supported by the relevant technical assessments to demonstrate how flood risk will be managed and the infrastructure required to support a sustainable drainage strategy. There is not considered to be any reasons why drainage or flood risk would preclude development on the site and this strategic development site would be located and designed so as to be resilient to future climate change and the risk of flooding.

4.2.3. Biodiversity and Geodiversity

The HELAA considers that development on the site has potential to impact on designated SSSI and other features of ecological value. However, the HELAA concludes "the impact could be reasonably mitigated or compensated".

There are not considered to be any specific ecological constraints to development of land at Station Fields, Foxton and the site is not subject to any specific environmental or landscape designations or protections. In comparison, we note that the strategic allocations of land at North East Cambridge (HELAA ref. OS062) and Cambridge East (HELAA ref. OS270) both comprise designated wildlife site, priority woodland habitat and form part of national forest inventory. Development on these sites will therefore be more constrained by ecological matters.

The designated SSSI closest to the Station Fields site comprise the L-Moor Shepreth SSSI approx. 1.6km west of the site, the Barrington Chalk Pit SSSI approximately 2.5km north of the site and Fowlmere Watercress Beds SSSI approx. 4km south of the site. Any development must take account of associated impacts on these sites. It is not considered the proposed development would result in any additional recreational pressures on these sites noting that the site can provide significant areas of open space for recreational use including new village green space, sports and play provision and a new countryside park.

A Preliminary Ecological Appraisal has been prepared by BSG Ecology (Appendix 5.3). This confirms the site is predominantly arable land which is of low ecological value and there are no designated sites of wildlife value within its boundary. There are some localised habitat features of value including semi-natural deciduous woodland, ponds, watercourses, hedgerows and scrub. The appraisal recommends that priority habitat woodlands, hedges, ponds and watercourse should be retained and this has been accommodated as part of the landscape vision where possible.

The masterplan for the site demonstrates that significant areas of open space will be retained across the site, including an attractive and extensive network of green spaces that facilitate improvement to the natural environment. The Green Infrastructure Strategy (Appendix 2) enclosed demonstrates how a green infrastructure framework has informed the emerging layout and could provide a variety of open spaces including formal and informal amenity and playspace, semi-natural open space and woodland areas and drainage infrastructure.

The emerging proposals have identified and responded to the opportunity presented by the western boundary features and stream to enhance and create significant areas of green space and habitat for biodiversity. The Green Infrastructure Strategy (Appendix 2) has allowed for green space to permeate through the development providing connectivity and corridors for people and wildlife and mixed with this will be water management areas (SuDS) that will provide attractive areas for people and wildlife to move through the development.

The scale of open space being created allows for the green space accessible to all and for green space 'reserved for nature'. The south west of the site will be an area for more active access by people walking and cycling along paths and walking and playing across grassland – an open space that will be buzzing with wildlife. The north west of the site will encourage a quieter approach to nature leading to woodland and meadows but leaving areas with no identified access where more sensitive wildlife can flourish.

The enhancement, management and creation of flower rich native grassland, native hedgerows and wet woodland responds to the aspirations of the county Biodiversity Action Plan and to the aspiration to double the area of nature rich land in the county.

In terms of achieving a biodiversity net gain, the emerging vision for the site seeks to capitalise on opportunities for biodiversity enhancement on site, in line with the Council's aim for all major development proposals to offset the loss and secure a net gain in biodiversity through the strengthening, management and / or creation of new habitats. The site will be able to achieve a 20% biodiversity net gain, as required by GCLP draft Policy BG/BG.

4.2.4. Heritage

Land at Station Fields is not located within a conservation area but is within 100m of the Foxton Conservation Area boundary and Barrington Conservation Area. There is one statutorily listed building within the development site boundary (Grade II Concrete Barn, listed March 2021) and there are no locally listed buildings. The site is within 100m of the Brown Spinney Scheduled Monument. The allocation of the site as proposed will provide an opportunity to identify a beneficial use for the presently vacant concrete barn and improve the setting and significance of this, as well as landscaping proposals to better highlight the Scheduled Monument and improvement this setting noting the current agricultural use of the site.

Any application for development of the site would be accompanied by a full Heritage Impact Assessment to assess the associated impact on the setting of the designated and non-designated heritage assets identified. Axis have already appointed Bidwells to undertake an Initial Heritage Appraisal (Appendix 5.4) which identifies that there are a number of heritage assets which have the potential to be affected by proposed development. The appraisal provides a series of recommendations that should be taken into account to limit the impacts of the proposed development on the identified assets, including buffer along the site boundaries to reduce impact on the Barrington Conservation Area to which the site has the closest relationship, landscape buffer between the site and A10 and to conserve and enhance views from the site towards Church of All Saints Barrington. The enclosed Green Infrastructure Strategy (Appendix 2) demonstrate how these principles have been established as part of the overall design and layout of the scheme. The Heritage Appraisal

concludes that there would negligible or only minor harm to the setting of these assets, subject to the use of careful location, form, scale and design of the proposals as well as the use of landscaping mitigation.

4.2.5. Access to Services

The site scores 'Amber' in relation to access to local services and facilities. However, the site comprises a highly accessible location with access to existing public transport services, proposed improved public transport services, key employment areas and the amenities within surrounding villages. The accessibility of the site is discussed in full in the Access and Movement Strategy prepared by Stantec (Appendix 4). Given the scale of development proposed at Station Fields, there will be opportunity to provide some new local amenities and facilities, including a new school and some commercial uses including small retail, coffee shops and leisure use.

Development at Station Fields also provides opportunity to enhance connectivity between villages, including a network of green corridors and active travel routes, whilst retaining the individual character of the villages. The planned Foxton Travel Hub will also improve the sites accessibility and access for the wider community to services in the local area through improved rail and bus connections, as well as pedestrian and cycle infrastructure.

Foxton village does provide a number of amenities and facilities, including Foxton Station which provides fast train services to Cambridge and access to bus services which serve the local area, as well as to the city. Foxton also provides local amenities such as a village store, village hall, cricket pitch and playing fields. There are therefore a number of existing amenities for the local population.

We therefore consider the 'Amber' score does not fully reflect the site and the opportunities offered by its location and proposed transport improvements.

4.2.6. Site Access

The HELAA simply states "The proposed site is acceptable in principle subject to detailed design".

We do not disagree with this response and agree that suitable and safe points of access to the site

can be provided and would be subject of further detailed design work. Generally, the Site is bound to the south by the A10 and east by Barrington Road, therefore allowing a number of vehicle access points into the site from the strategic road network. Further details of the proposed access arrangements would be provided in the Transport Assessment submitted with any planning application.

4.2.7. Noise, Vibration, Odour and Light Pollution

As identified in the HELAA, the closest noise sources to the site are the railway line and road (A10), with possible vibration from the railway line also. The HELAA states:

"The proposed site will be affected by road traffic noise from nearby main roads and by railway noise (and possibly vibration) but is acceptable in principle subject to appropriate detailed design considerations and mitigation".

Axis commissioned Stantec to prepare an initial Noise Impact Assessment to be undertaken (Appendix 5.5). This confirms that the main noise sources at the A10 and the Great Northern Railway Line. This sets out a series of mitigation measures to ensure there will be no adverse impact from noise on potential occupiers of the site and to ensure suitable internal and external noise levels would be achieved. It is considered that the use of appropriate setbacks of any new development from the A10 and Great Northern Railway Line would provide appropriate noise levels.

Odour is also an important consideration for the development of this site, noting the proximity of the sewage treatment works to the north of the site on Foxton Road. In accordance with the Cambridge Waste and Minerals Plan (2021) an initial Odour Impact Assessment has been prepared to determine the extent to which odours from the sewage treatment works are likely to impact on development proposals (Appendix 8). Localised effects of odour were mapped and the Green Infrastructure Strategy (Appendix 2) responds to this constraint allowing sufficient setback for there to be no impact on new homes and subsequently no impact on the existing operation of the treatment works.

There are not considered to be any sources of light pollution that would impact on the development of the site and careful consideration would be given the lighting strategy proposed within the landscape to mitigate any harmful impact on the wildlife and nature being encouraged as part of the biodiversity strategy.

4.2.8. Air Quality

The site is not located in an Air Quality Management Area. The HELAA concludes:

"Large site and lots of residential units - potential for AQMA traffic impact without mitigation. Site does not lie within an AQMA".

Axis appointed Stantec to prepare an initial technical note (Appendix 9) in relation to the likely environmental constraints with respect to air quality relating to the proposed development at Station Fields. Monitoring of NO2 concentrations in the area indicate that concentrations are well below the annual mean objectives. In relation to potential constraints due to existing transportation sources, the A10 borders the site's southern boundary and is likely to dominate pollutant concentrations within close proximity to the road. Some separation from the A10 to residential properties would be beneficial and it is considered that the noise related setbacks already considered would provide adequate protection in relation to air quality impacts also. The Green Infrastructure Strategy (Appendix 2) shows how the location of development along the A10 has been set back and a landscape buffer provided. The incorporation of a wide range of low emission and sustainable transport measures to reduce development related traffic generation will also be utilised to reduce vehicle emissions generally.

4.2.9. Contamination

The HELAA notes the previous agricultural use of the land and buildings with potential for historic contamination, conditions required. Prior to any works commencing on site, the relevant ground condition surveys would be completed and findings shared, including the need for any remediation or validation works. This could be secured by way of an appropriately worded planning condition.

It is not considered that there would be any significant contamination on the site or that couldn't be addressed through appropriate scope of works.

4.3. Green scores:

The site achieves a 'Green' score in relation to Open Space and Green Infrastructure and the HELAA confirms the site is not subject to any open space designation. As shown in the Green Infrastructure Strategy prepared for the site, (Appendix 2), the proposed development provides substantial opportunity to deliver a significant amount of new open space providing a variety of functions, including for both nature and recreational use. This is considered to be a significant benefit of the development and as discussed earlier in our response, aligns with the key themes of the GCLP in terms of promoting health and wellbeing, mitigating impacts from climate change and supporting biodiversity.

4.3.1. Summary

The overarching vision for Station Fields is to create a place that is planned and delivered as a sustainable new community and provides a unique opportunity to sustainably connect people, creating healthier, happier places where people thrive and where nature is embedded, existing features protected, and new habitats are created for wildlife to flourish.

Having addressed the HELAA comments above, it is not considered that there are constraints which should preclude development of the site. The emerging masterplan and landscape vision has been designed to take into account the relevant opportunities and constraints and mitigate any impacts as required through careful design, layout and landscaping.

4.4. Sustainability Appraisal

The Sustainability Appraisal (SA) confirms that the testing of sites has:

'focused on sites informed by the emerging preferred strategy option and the testing carried out via the HELAA as to where a site was suitable, available and achievable for development'.

The sites are grouped by the sources of supply (i.e. Densification of Cambridge urban area; Edge of Cambridge: Green Belt; etc) and spatial options considered in the GCLP First Conversations consultation. Each of the sites are assessed against the fifteen SA Objectives and Appendix D of the SA presents the methodology and appraisal criteria applied in the assessment of Site Options. We would comment on the overall approach in the SA and are concerned that it is not clear from the SA site assessment how the sites compare to each other and there is no overall score provided in relation to the sites that means they can be easily ranked. There isn't a clear link between the scores of the SA and the sites that have been chosen for allocation. It is therefore not clear how the site allocations have been evidenced and justified because of the SA assessment.

Taking into account our response to the HELAA and on the basis the site should be considered suitable for development, we have carried out an assessment of the site in accordance with the SA site assessment methodology. We have scored the site positively where the proposed development would result in improvements or enhancements compared to the existing state of the site.

	SA Objective	Score	Comment
1.	Housing	+	Minor positive effect We note that all sites with proposed residential allocation, including the strategic site allocations, score only a 'minor positive effect'. However, in reality the development of a significant amount of new housing, including new private and affordable dwellings, that helps the Council meet its identified housing need in a highly sustainable location and within a scheme that has been design and landscape-led should be considered a significant positive effect.
2.	Access to services and facilities	+	Minor positive impact The SA assesses two sites in Foxton which both score as having significant negative effect. The HELAA suggests that Foxton is located over 2000m from any defined centre, including local or minor rural centre. However, the site located between the existing villages of Barrington and Foxton and the proposed development will provide enhanced pedestrian and cycle connectivity to both. Both Foxton and Barrington provide access to a range of facilities including village shop, post office, village hall and primary schools (within c.500 to either village from the site) and the new development will generate people to help sustain these services. The site is also well located to make use of existing and planned public transport services to wider area and larger centres. Furthermore, development of the scale proposed will also provide a small amount of and supporting community and employment uses to support the amount of housing proposed and delivery of a new community on this site. Given the planned delivery of new services and facilities on site, as well as the connectivity to amenities within the local and surrounding area, we consider this should have a positive effect.
3.	 Social Inclusion a) Achieving regeneration b) Deprivation 	a) 0 b) 0 c) +	 a) Negligible effect – the site comprises greenfield land b) Negligible effect – the site is not within a 40% most deprived area

	c) District and rural centre		c) Minor positive effect – the site will contain retail and/or community uses, albeit located outside of an existing centre, but will provide choice for local community and help to sustain existing amenities in the villages of Foxton and Barrington.
4.	Health a) Access to healthcare b) Open space / sports	a) + b) 0	 a) Minor positive – the site is not within 720m of a healthcare facility. The closest surgeries are Orchard Surgery in Melbourn or Harston surgery in Harston, both accepting new patients. The site will provide a significant amount of new open space and sports pitch provision. b) Negligible – the site would not result in the loss of public open space. The proposed development would provide a significant amount of recreational and natural functions, which is a significant benefit of the scheme. We have based this on the Council's scoring but in reality the provision of a large amount of new open space including countryside park, new woodland habitat alongside more formal village greens and sports pitch provision would be a significant benefit.
5.	Biodiversity and Geodiversity	0	Negligible There are a number of SSSI sites in the vicinity of the site, albeit all over 1km distance from the site. It is considered that the impact could be reasonably mitigated or compensated and would not result in any detrimental impact on these. Furthermore, the development will deliver a number of ecological enhancements to improve biodiversity on the site and access to nature, delivering the required biodiversity net gain overall.
6.	Landscape and Townscape	0	Negligible Whilst the site will alter the character and appearance of the open landscape at present, it is not considered there would be a detrimental impact on sensitive landscapes. The site is not subject to any environmental or landscape designations. The landscape vision document demonstrates how the landscape character identified has been retained and most of the boundary tree planting can be retained. Significant new planting is proposed across the site

		as well as provision of 50% of the site as providing a variety of recreational and nature use. We have based this on the Council's scoring but in reality the provision of a landscape-led scheme which promotes health and wellbeing, biodiversity enhancement and active travel is a significant positive effect.
7. Historic Environment	0	Negligible Development would not have a detrimental impact on a designated or non designated heritage asset or the setting of a designated or non-designated heritage asset or archaeology. The proposed landscape-led approach will improve the setting of these assets and provide opportunity to better integrate them and educate the community on the relevant history. Development of the site also provides opportunity to provide a new use for the currently vacant listed barn on site.
8. Efficient Use of Land	?	Significant negative According to the Council's assessment, the site achieves a significant negative score as it comprises more than 25% greenfield land which is Grade 2 agricultural land ((provisional classification).
9. Minerals	?	Significant negative The site is located in a Mineral Safeguarding Area for sand and gravel and falls within a Consultation Area. However there is some uncertainty as to value of this site depending on whether minerals could be extracted before development. It is not considered this would preclude development of the site.
10. Water	0	Negligible effect The site is not located within a ground water source protection zone, as defined by the EA.
11. Adaptation to climate change	-	Minor negative effect The majority of the site is in Flood Zone 1 however small areas of the site are within Flood Zone 2 so we have scored accordingly. However, the layout of the site has been designed to locate built development outside of the flood zone and provide opportunity to sustainability manage flood risk and drainage infrastructure.
12. Climate change mitigation	a) ++	a) Significant positive effect – the site is located adjacent to, and will provide enhanced direct

a) Access to public transportb) Access to city, district or rural centre	b) +	 access to, Foxton Station. The site is also within 450m of bus stops on Royston Road. b) Minor positive effect - the site is in close proximity to connect to and sustain existing services and amenities in the surrounding villages, as well as providing a small amount of additional community and employment use on site for new residents.
13. Air Quality	0	Negligible The site is not located within a defined Air Quality Management Area. There are no significant risks from air quality impacts and the site is capable of being developed to provide healthy internal and external environments through careful design and mitigation.
14. Economy	+	Minor positive effect The site will provide a small amount of new employment floorspace.
15. Employment	-	Minor negative effect The site is located more than 1.8km from an employment area and more than 720m from a local, neighbourhood or minor rural centre.

Overall it is considered that the site performs well against the SA site assessment methodology. There are a number of positive and neutral scores and the site performs better than other sites in Foxton that were taken forwards from the HELAA and assessed in the SA. In comparison to these sites (HELAA ref. 40382 and HELAA ref. 40418) the Station Fields site provides opportunity for a number of positive effects related to the proposed development, including direct connection to public transport infrastructure, significant landscape and biodiversity enhancements, new community use and supporting non-residential use to support new community and opportunity to enhance setting of heritage and archaeological assets.

Whilst some minor negative effects are identified in relation to Station Fields this is largely based on the SA methodology. Subject to appropriate mitigation and no harmful impacts arising it is considered these effects would in reality be considered negligible or minor positive. Our assessment of land at Station Fields, Foxton only results in two significant negative effects. Firstly, in relation to the efficient use of land as the site comprises more than 25% agricultural land (Grade 2 - provisional classification). However the loss of greenfield land of some agricultural value is largely unavoidable when identifying land in the Plan area and allocating sites for development. The Council have concluded that it is necessary to allocate greenfield sites and those in the rural area, given the finite supply of brownfield land in the urban area. Therefore there will be the loss of some agricultural land. We would note that land at Station Fields is not the highest grade agricultural land, and the Grade 2 classification is based on provisional information via the DEFRA national dataset. A detailed Agricultural Land Classification Report will be prepared in due course to confirm the classification and extent of any Best and Most Versatile land. Furthermore, the proposed development seeks to retain 50% of the site area will remain undeveloped and

provide new high quality open space for both recreation and nature use, including significant biodiversity enhancements. The use of the site to provide a significant amount of new housing and supporting services and infrastructure, alongside the proposed travel hub, is an efficient use. This aligns with the NPPF which encourages development proposals to make the most of opportunities to promote walking, cycling and public transport use.

Secondly, the site receives a significant negative impact in relation to mineral resource and the site is located in a Mineral Safeguarding Area for sand and gravel. Consultation would be required with the waste and minerals authority to understand the potential for resource extraction from this site. It is also worth noting the significant amount of site area that will remain undeveloped and provide open space which would not impact on mineral resource. We note that large areas of Greater Cambridge fall within a mineral safeguarding area and that the majority of the sites assessed in the SA also have a 'significant negative' score in relation to Criteria 9, including the proposed allocation of North East Cambridge. It is therefore not considered that this should preclude development of the Station Fields site.

Overall, we consider the performance of the site is strong and demonstrates that there would be limited negative effects resulting from the development, and a wide range of benefits. Land at Station Fields, Foxton provides a unique opportunity to deliver a new community that will help meet the Council's housing needs in a highly sustainable and accessible location and within a scheme that is landscape-led to provide a range of benefits for the community and for nature.

The site has the potential to deliver sustainable development in accordance with the three dimensions of sustainable development identified at paragraph 8 of the NPPF:

Economic Benefits

- New jobs will be created through the construction phase of the development, both directly and through supply chains;
- New residents will help to sustain existing services and facilities within the adjacent villages of Foxton and Barrington, as well as facilitate the delivery of new community uses and services within the proposed development;

- * The development is likely to generate CIL and Section 106 contributions towards improving local infrastructure; and
- Additional revenue will be generated through the New Homes Bonus, Council Tax payments etc.

Social Benefits

- The potential to deliver approximately 1,500 market and affordable new homes to assist Greater Cambridge in meeting its housing needs;
- The potential to deliver a range of dwelling sizes, type and tenure to meet locally identified housing need and creating a mixed and sustainable community;
- Delivery of a new primary school and other facilities to foster social interaction and sense of community;
- * The site is well connected in terms of public transport, with direct access to a range of locations and their associated services and facilities; and
- * There is potential to create a range of high quality accessible open spaces, to provide a variety of functions (recreation, travel, play etc) connecting across the site which encourages active and healthy lifestyles and promotes health and wellbeing.

Environmental Benefits

- * The site is well located to promote pedestrian, cycle and public transport trips, thus reducing carbon emissions;
- * The majority of the existing tree and hedgerow planting around the periphery of the site can be retained, as well as opportunity to retain and enhance existing landscape and wildlife corridor through the site;
- * The site is well contained within the landscape and the approach has been to retain and enhance existing natural features where possible including the retention of trees and hedgerows to provide mature planting with aesthetic value that helps to mitigate the visual impact of the development;
- * The site also offers the opportunity to provide a landscape corridor connecting landscape assets. These landscape corridors provide conduits for local wildlife and safe and attractive routes for pedestrians and cyclists; and
- * Significant additional tree planting can be incorporated throughout
the site which will also contribute towards biodiversity enhancement.

Overall, the proposed allocation of Station Fields aligns with the requirements of the NPPF to promote a sustainable pattern of development that seeks to meet the development needs of their area, align growth and infrastructure, and improve the environment and mitigate climate change. We consider that it is entirely appropriate, and necessary, to allocate this site for development. This approach would be consistent with the findings from public engagement during the First Conversation, where there was substantial support for the location of new development in public transport corridor, noting this is a site with high quality existing infrastructure as recognised by the Greater Cambridge Partnership and noting the travel hub proposals planned.

Table 1: GCSP preferred option detailed housing trajectory - as per Appendix 10 of the Housing Delivery Study October 2021

Housing Delivery Study – FINAL VERSION Additional sites

Source	2020/	2021/	2022/	2023/	2024/	2025/	2026/	2027/
Source	21	22	23	24	25	26	27	28
Faster delivery at Northstowe	0	0	0	0	0	0	50	50
Faster delivery at Waterbeach	0	0	0	0	0	0	50	50
Smaller sites in Cambridge urban area	0	0	0	0	0	0	0	0
North East Cambridge	0	0	0	0	0	0	100	200
North West Cambridge	0	0	0	0	0	0	0	0
Cambridge East	0	0	0	0	0	0	0	0
Cambourne Additional	0	0	0	0	0	0	0	0
Smaller sites in southern cluster villages	0	0	0	0	0	0	0	0
Smaller sites in rest of the rural area villages	0	0	0	0	40	24	0	0
Total	0	0	0	0	40	24	200	300

Full trajectory

Source	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 2 28 2
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021)	1,095	2,371	2,597	2,121	2,432	2,081	2,094	2,168
Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation	82	43	154	77	120	99	75	75
Faster delivery from existing sites or densification of existing sites	0	0	0	0	0	0	100	100
New sites	0	0	0	0	40	24	100	200
Total	1,177	2,414	2,751	2,198	2,592	2,204	2,369	2,543
Medium Plus requirement	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111
Comparison against Medium Plus	-934	303	640	87	481	93	258	432
Cumulative delivery	1,177	3,591	6,342	8,540	11,132	13,336	15,705	18,248
Cumulative requirement Medium Plus Rolling HDT	2,111	4,222	6,333	8,444	10,555	12,666	14,777	16,888
% buffer	-44.244	14.353	30.317	4.1213	22.7854	4.4055	12.222	20.464

2028/	2029/	2030/	2031/	2032/	2033/	2034/	2035/	2036/	2037/	2038/	2039/	2040/	Total to
29	30	31	32	33	34	35	36	37	38	39	40	41	2041
50	50	50	50	50	50	50	50	50	50	50	50	50	750
50	50	50	50	50	50	50	50	50	50	50	50	50	750
12	0	0	0	0	0	0	0	0	0	0	0	0	12
200	150	50	150	250	350	350	350	350	350	350	350	350	3900
0	0	0	0	250	250	250	250	0	0	0	0	0	1000
0	0	0	50	150	250	300	350	350	350	350	350	350	2850
0	0	0	0	50	100	150	200	250	300	300	300	300	1950
0	80	60	20	0	0	0	0	0	0	0	0	0	160
40	40	40	40	0	0	0	0	0	0	0	0	0	224
352	370	250	360	800	1050	1150	1250	1050	1100	1100	1100	1100	11596
1028/ 19	2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	2038/ 39	2039/ 40	2040/ 41	Total to 2041
2,017	1,969	1,969	1,744	1,534	1,434	1,404	1,245	1,150	1,060	1,000	1,000	1,000	35,485
75	71	71	75	75	75	75	75	75	75	75	75	96	1,713
100	100	100	100	350	350	350	350	100	100	100	100	100	2,500
252	270	150	260	450	700	800	900	950	1,000	1,000	1,000	1,000	9,096
2,444	2,410	2,290	2,179	2,409	2,559	2,629	2,570	2,275	2,235	2,175	2,175	2,196	48,794
2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	44,331
333	299	179	68	298	448	518	459	164	124	64	64	85	4463
20,692	23,102	25,392	27,571	29,980	32,539	35,168	37,738	40,013	42,248	44,423	46,598	48,794	
18,999	21,110	23,221	25,332	27,443	29,554	31,665	33,776	35,887	37,998	40,109	42,220	44,331	
15.775	14.164	8.4794	3.2212	14.117	21.222	24.538	21.743	7.7688	5.874	3.0317	3.0317	4.0265	10.0674

Table 2: GCSP preferred option detailed housing trajectory – adjusted applying recommended lead in and build rate assumptions from Housing Delivery Study October 2021

Housing Delivery Study – FINAL VERSION Additional sites

Source	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29
Faster delivery at Northstowe	0	0	0	0	0	0	50	50	50
Faster delivery at Waterbeach	0	0	0	0	0	0	50	50	50
Smaller sites in Cambridge urban area	0	0	0	0	0	0	0	0	12
North East Cambridge	0	0	0	0	0	0	50	100	100
North West Cambridge	0	0	0	0	0	0	0	0	0
Cambridge East	0	0	0	0	0	0	0	0	0
Cambourne Additional	0	0	0	0	0	0	0	0	0
Smaller sites in southern cluster	0	0	0	0	0	0	0	0	0
villages	0	U	U	0	0	U	0	U	U
Smaller sites in rest of the rural area	0	0	0	0	40	24	0	0	40
villages			-				-		-
Total	0	0	0	0	40	24	150	200	252
New Sites total	0	0	0	0	40	24	50	100	152
Full trajectory	Ū	C C	C C	Ū				200	
	2020/	2021/	2022/	2023/	2024/	2025/	2026/	2027/	2028/
				2023/	2024/	2023/	2020/	20277	2020/
Source		22	23	2023/ 24	2024/ 25	2023/ 26	2020/ 27	•	2028/ 29
Source Housing supply as included in the Greater	21	22	23	24	25	26	27	28	29
		•	•	-	•	-	•	•	
Housing supply as included in the Greater	21 1,095	22	23	24	25	26	27	28	29
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021)	21 1,095	22 2,371	23 2,597	24 2,121	25 2,432	26 2,081	27 2,094	28 2,168	29 2,017
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing	21 1,095	22	23	24	25	26	27	28	29
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation	21 1,095	22 2,371	23 2,597	24 2,121	25 2,432	26 2,081	27 2,094	28 2,168	29 2,017
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or	21 1,095	22 2,371	23 2,597	24 2,121 77	25 2,432	26 2,081	27 2,094 75	28 2,168 75	29 2,017
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites	21 1,095 82 0	22 2,371 43 0	23 2,597 154 0	24 2,121 77 0	25 2,432 120 0	2,081 99 0	27 2,094 75 100	28 2,168 75 100	29 2,017 75 100
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites	21 1,095 82 0 0	22 2,371 43 0 0	23 2,597 154 0 0	24 2,121 77 0 0	25 2,432 120 0 40	26 2,081 99 0 24	27 2,094 75 100 50	28 2,168 75 100 100	29 2,017 75 100 152
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites Total	21 1,095 82 0 0 1,177	22 2,371 43 0 2,414	23 2,597 154 0 0 2,751	24 2,121 77 0 0 2,198	25 2,432 120 0 40 2,592	26 2,081 99 0 24 2,204	27 2,094 75 100 50 2,319	28 2,168 75 100 2,443	29 2,017 75 100 152 2,344
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites Total Medium Plus requirement	21 1,095 82 0 0 1,177 2,111	22 2,371 43 0 0 2,414 2,111	23 2,597 154 0 0 2,751 2,111	24 2,121 77 0 0 2,198 2,111	25 2,432 120 0 40 2,592 2,111	26 2,081 99 0 24 2,204 2,111	27 2,094 75 100 50 2,319 2,111	28 2,168 75 100 2,443 2,111	29 2,017 75 100 152 2,344 2,111
Housing supply as included in the GreaterCambridge Housing Trajectory (April 2021)Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodationFaster delivery from existing sites or densification of existing sitesNew sitesTotal Medium Plus requirement Comparison against Medium Plus	21 1,095 82 0 0 1,177 2,111 -934	22 2,371 43 0 0 2,414 2,111 303	23 2,597 154 0 0 2,751 2,111 640	24 2,121 77 0 0 2,198 2,111 87	25 2,432 120 0 40 2,592 2,111 481	26 2,081 99 0 24 2,111 93	27 2,094 75 100 50 2,111 208	28 2,168 75 100 100 2,443 2,111 332	29 2,017 75 100 152 2,344 2,111 233
Housing supply as included in the GreaterCambridge Housing Trajectory (April 2021)Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodationFaster delivery from existing sites or densification of existing sitesNew sitesTotal Medium Plus requirement Comparison against Medium Plus Cumulative delivery	21 1,095 82 0 0 1,177 2,111 -934 1,177	22 2,371 43 0 2,414 2,111 303 3,591	23 2,597 154 0 2,751 2,111 640 6,342	24 2,121 777 0 2,198 2,111 87 8,540	25 2,432 120 0 40 2,592 2,111 481 11,132	26 2,081 99 0 24 2,111 93 13,336	27 2,094 75 100 50 2,319 2,111 208 15,655	28 2,168 75 100 2,443 2,111 332 18,098	29 2,017 75 100 152 2,344 2,111 233 20,442
Housing supply as included in the GreaterCambridge Housing Trajectory (April 2021)Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodationFaster delivery from existing sites or densification of existing sitesNew sitesTotal Medium Plus requirement Comparison against Medium Plus	21 1,095 82 0 0 1,177 2,111 -934	22 2,371 43 0 0 2,414 2,111 303	23 2,597 154 0 0 2,751 2,111 640	24 2,121 77 0 0 2,198 2,111 87	25 2,432 120 0 40 2,592 2,111 481	26 2,081 99 0 24 2,111 93	27 2,094 75 100 50 2,111 208	28 2,168 75 100 100 2,443 2,111 332	29 2,017 75 100 152 2,344 2,111 233

2029/	2030/	2031/	2032/	2033/	2034/	2035/	2036/	2037/	2038/	2039/	2040/	Total to
30	31	32	33	34	35	36	37	38	39	40	41	2041
50	50	50	50	50	50	50	50	50	50	50	50	750
50	50	50	50	50	50	50	50	50	50	50	50	750
0	0	0	0	0	0	0	0	0	0	0	0	12
100	100	100	100	0	50	150	250	350	350	350	350	2500
0	0	0	250	250	200	150	100	50	0	0	0	1000
0	0	0	0	50	150	250	350	350	350	350	350	2200
0	0	0	0	50	100	150	200	200	200	200	200	1300
80	60	20	0	0	0	0	0	0	0	0	0	160
40	40	40	0	0	0	0	0	0	0	0	0	224
320	300	260	450	450	600	800	1000	1050	1000	1000	1000	8896
220	200	160	350	350	500	700	900	950	900	900	900	7396
2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	-	2039/ 40	•	Total to 2041
1,969	1,969	1,744	1,534	1,434	1,404	1,245	1,150	1,060	1,000	1,000	1,000	35,485
71	71	75	75	75	75	75	75	75	75	75	96	1,713
100	100	100	350	350	350	350	100	100	100	100	100	2,500
220	200	160	350	350	500	700	900	950	900	900	900	7,396
2,360	2,340	2,079	2,309	2,209	2,329	2,370	2,225	2,185	2,075	2,075	2,096	47,094
2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	2,111	44,331
249	229	-32	198	98	218	259	114	74	-36	-36	-15	2763
22,802	25,142	27,221	29,530	31,739	34,068	36,438	38,663	40,848	42,923	44,998	47,094	
21,110												
	23,221	25,332	27,443	29,554	31,665	33,776	35,887	37,998	40,109	42,220	44,331	

Table 3: GCSP preferred option detailed housing trajectory - adjusted applying recommended lead in and build rate assumptions & including Station Fields, Foxton

Housing Delivery Study – FINAL VERSION Additional sites

Source	2020/	2021/	2022/	2023/	2024/	2025/	2026/	2027/	2028/
Source	21	22	23	24	25	26	27	28	29
Faster delivery at Northstowe	0	0	0	0	0	0	50	50	50
Faster delivery at Waterbeach	0	0	0	0	0	0	50	50	50
Smaller sites in Cambridge urban area	0	0	0	0	0	0	0	0	12
North East Cambridge	0	0	0	0	0	0	50	100	100
North West Cambridge	0	0	0	0	0	0	0	0	0
Cambridge East	0	0	0	0	0	0	0	0	0
Cambourne Additional	0	0	0	0	0	0	0	0	0
StationField, Foxton	0	0	0	0	0	0	0	0	0
Smaller sites in southern cluster villages	0	0	0	0	0	0	0	0	0
Smaller sites in rest of the rural area	0	0	0	0	40	24	0	0	40
villages	U	U	-	U	40	24		U	40
Total	0	0	0	0	40	24	150	200	252
New Sites total	0	0	0	0	40	24	50	100	152
Full trajectory									
			1	/				/	
Courco	2020/	2021/	2022/	2023/	2024/	2025/	2026/	2027/	2028/ 2
Source	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	-	•	2028/ 2 29 3
Source Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021)	•	•	-	-	-	-	-	•	29
Housing supply as included in the Greater	21 1,095	22	23	24	25	26	27	28	29
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021)	21 1,095	22	23	24	25	26	27	28	29
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student	21 1,095	22 2,371	23 2,597	24 2,121	25 2,432	26 2,081	27 2,094	28 2,168	29 3 2,017
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or	21 1,095 82	22 2,371 43	23 2,597 154	24 2,121 77	25 2,432 120	26 2,081 99	27 2,094 75	28 2,168 75	29 : 2,017 75
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites	21 1,095 82 0	22 2,371 43 0	23 2,597 154 0	24 2,121 77 0	25 2,432 120 0	26 2,081 99 0	27 2,094 75 100	28 2,168 75 100	29 2,017 75 100
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites Total Medium Plus requirement	21 1,095 82 0 0	22 2,371 43 0 0	23 2,597 154 0 2,751 2,111	24 2,121 77 0 2,198 2,111	25 2,432 120 0 40	26 2,081 99 0 24	27 2,094 75 100 50 2,319 2,111	28 2,168 75 100 100	29 : 2,017 75 100 152 2,344 2,111
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites Total Medium Plus requirement Comparison against Medium Plus	21 1,095 82 0 1,177	22 2,371 43 0 0 2,414 2,111 303	23 2,597 154 0 0 2,751 2,111 640	24 2,121 77 0 0 2,198	25 2,432 120 0 40 2,592	26 2,081 99 0 24 2,204	27 2,094 75 100 50 2,319 2,111 208	28 2,168 75 100 2,443	29 : 2,017 75 100 152 2,344 2,111 233
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites Total Medium Plus requirement	21 1,095 82 0 0 1,177 2,111	22 2,371 43 0 0 2,414 2,111	23 2,597 154 0 2,751 2,111	24 2,121 77 0 2,198 2,111	25 2,432 120 0 40 2,592 2,111	26 2,081 99 0 24 2,204 2,111	27 2,094 75 100 50 2,319 2,111	28 2,168 75 100 100 2,443 2,111	29 : 2,017 75 100 152 2,344 2,111
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites Total Medium Plus requirement Comparison against Medium Plus	21 1,095 82 0 0 1,177 2,111 -934	22 2,371 43 0 0 2,414 2,111 303	23 2,597 154 0 0 2,751 2,111 640	24 2,121 77 0 2,198 2,111 87	25 2,432 120 0 40 2,592 2,111 481	26 2,081 99 0 24 2,111 93	27 2,094 75 100 50 2,319 2,111 208	28 2,168 75 100 100 2,443 2,111 332	29 2,017 75 100 152 2,344 2,111 233

2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	2038/ 39	2039/ 40	2040/ 41	Total to 2041
50	50	50	50	50	50	50	50	50	50	50	50	750
50	50	50	50	50	50	50	50	50	50	50	50	750
0	0	0	0	0	0	0	0	0	0	0	0	12
100	100	100	100	0	50	150	250	350	350	350	350	2500
0	0	0	250	250	200	150	100	50	0	0	0	1000
0	0	0	0	50	150	250	350	350	350	350	350	2200
0	0	0	0	50	100	150	200	200	200	200	200	1300
0	0	0	0	50	100	150	200	200	200	200	200	1300
80	60	20	0	0	0	0	0	0	0	0	0	160
40	40	40	0	0	0	0	0	0	0	0	0	224
320	300	260	450	500	700	950	1200	1250	1200	1200	1200	10196
220	200	160	350	400	600	850	1100	1150	1100	1100	1100	8696
0000/	2020/				-	-		_	_			
2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	2038/ 39	2039/ 40	-	Total to 2041
-		-	-	-	35	-	-	38	39	-	-	
30	31	32	33	34	35	36	37	38	39	40	41	2041
30 1,969	31 1,969	32 1,744	33 1,534	34 1,434	35 1,404	36 1,245	37 1,150	38 1,060	39 1,000	40 1,000	41 1,000	2041 35,485
30 1,969 71	31 1,969 71	32 1,744 75	33 1,534 75	34 1,434 75	35 1,404 75	36 1,245 75	37 1,150 75	38 1,060 75	39 1,000 75	40 1,000 75	41 1,000 96	2041 35,485 1,713
30 1,969 71 100	31 1,969 71 100	32 1,744 75 100	33 1,534 75 350	34 1,434 75 350	35 1,404 75 350	36 1,245 75 350	37 1,150 75 100	38 1,060 75 100	39 1,000 75 100	40 1,000 75 100	41 1,000 96 100	2041 35,485 1,713 2,500
30 1,969 71 100 220	31 1,969 71 100 200	32 1,744 75 100 160	33 1,534 75 350 350	34 1,434 75 350 400	35 1,404 75 350 600	36 1,245 75 350 850	37 1,150 75 100 1100	38 1,060 75 100 1150	39 1,000 75 100 1100	40 1,000 75 100 1100	41 1,000 96 100 1100	2041 35,485 1,713 2,500 8,696
30 1,969 71 100 220 2,360	31 1,969 71 100 200 2,340	32 1,744 75 100 160 2,079	33 1,534 75 350 350 2,309	34 1,434 75 350 400 2,259	35 1,404 75 350 600 2,429	36 1,245 75 350 850 2,520	37 1,150 75 100 1100 2,425	38 1,060 75 100 1150 2,385	39 1,000 75 100 1100 2,275	40 1,000 75 100 1100 2,275	41 1,000 96 100 1100 2,296	2041 35,485 1,713 2,500 8,696 48,394
30 1,969 71 100 220 2,360 2,111	31 1,969 71 100 200 2,340 2,111	32 1,744 75 100 160 2,079 2,111	33 1,534 75 350 350 2,309 2,111	34 1,434 75 350 400 2,259 2,111	35 1,404 75 350 600 2,429 2,111	36 1,245 75 350 850 2,520 2,111	37 1,150 75 100 1100 2,425 2,111	38 1,060 75 100 1150 2,385 2,111	39 1,000 75 100 1100 2,275 2,111	40 1,000 75 100 1100 2,275 2,111	41 1,000 96 100 1100 2,296 2,111	2041 35,485 1,713 2,500 8,696 48,394 44,331
30 1,969 71 100 220 2,360 2,111 249	31 1,969 71 100 200 2,340 2,111 229	32 1,744 75 100 160 2,079 2,111 -32	33 1,534 75 350 350 2,309 2,111 198	34 1,434 75 350 400 2,111 148	35 1,404 75 350 600 2,429 2,111 318	36 1,245 75 350 850 2,111 409	37 1,150 75 100 1100 2,425 2,111 314	38 1,060 75 100 1150 2,385 2,111 274	39 1,000 75 100 1100 2,275 2,111 164	40 1,000 75 100 1100 2,275 2,111 164	41 1,000 96 100 1100 2,296 2,111 185	2041 35,485 1,713 2,500 8,696 48,394 44,331

Table 4: GCSP preferred option detailed housing trajectory - adjusted applying recommended lead in and build rate assumptions & including Station Fields, Foxton with accelerated lead in

Housing Delivery Study – FINAL VERSION Additional sites

Source	2020/ 21	2021/ 22	2022/ 23	2023/ 24	2024/ 25	2025/ 26	2026/ 27	2027/ 28	2028/ 29
Faster delivery at Northstowe	0	0	0	0	0	0	50	50	50
Faster delivery at Waterbeach	0	0	0	0	0	0	50	50	50
Smaller sites in Cambridge urban area	0	0	0	0	0	0	0	0	12
North East Cambridge	0	0	0	0	0	0	50	100	100
North West Cambridge	0	0	0	0	0	0	0	0	0
Cambridge East	0	0	0	0	0	0	0	0	0
Cambourne Additional	0	0	0	0	0	0	0	0	0
Station Fields, Foxton	0	0	0	0	0	0	0	0	0
Smaller sites in southern cluster villages	0	0	0	0	0	0	0	0	0
Smaller sites in rest of the rural area	0	0	0	0	40	24	0	0	40
villages	-		-	-	40			-	-
Total	0	0	0	0	40	24	150	200	252
New Sites total	0	0	0	0	40	24	50	100	152
Full trajectory									
Source	-	-	-	2023/	-	-	•	-	2028/ 2
Source	•	-	-	-	-	-	•	•	2028/ 2 29 3
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021)	21 1,095	-	-	-	-	-	•	•	-
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing	21 1,095	22	23	24	25	26	27	28	29
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021)	21 1,095	22	23	24	25	26	27	28	29
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student	21 1,095	22 2,371	23 2,597	24 2,121	25 2,432	26 2,081	27 2,094	28 2,168	29 3 2,017
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or	21 1,095 82	22 2,371 43	23 2,597 154	24 2,121 77	25 2,432 120	26 2,081 99	27 2,094 75	28 2,168 75	29 3 2,017 75
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites Total	21 1,095 82 0	22 2,371 43 0	23 2,597 154 0	24 2,121 77 0	25 2,432 120 0	26 2,081 99 0	27 2,094 75 100	28 2,168 75 100	29 : 2,017 75 100
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites	21 1,095 82 0 0	22 2,371 43 0 0	23 2,597 154 0 0	24 2,121 77 0 2,198 2,111	25 2,432 120 0 40	26 2,081 99 0 24 2,204 2,111	27 2,094 75 100 50	28 2,168 75 100 100	29 2,017 75 100 152
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites Total	21 1,095 82 0 0 1,177	22 2,371 43 0 2,414	23 2,597 154 0 2,751	24 2,121 77 0 0 2,198	25 2,432 120 0 40 2,592	26 2,081 99 0 24 2,204	27 2,094 75 100 50 2,319	28 2,168 75 100 2,443	29 2,017 75 100 152 2,344
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021) Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodation Faster delivery from existing sites or densification of existing sites New sites Total Medium Plus requirement	21 1,095 82 0 0 1,177 2,111	22 2,371 43 0 0 2,414 2,111	23 2,597 154 0 2,751 2,111	24 2,121 77 0 2,198 2,111	25 2,432 120 0 40 2,592 2,111	26 2,081 99 0 24 2,204 2,111	27 2,094 75 100 50 2,319 2,111	28 2,168 75 100 2,443 2,111	29 2,017 75 100 152 2,344 2,111
Housing supply as included in the Greater Cambridge Housing Trajectory (April 2021)Update to existing supply from review of existing sites, review of windfall allowance and student or older peoples accommodationFaster delivery from existing sites or densification of existing sitesNew sitesTotal Medium Plus requirement Comparison against Medium Plus	21 1,095 82 0 1,177 2,111 -934	22 2,371 43 0 0 2,414 2,111 303	23 2,597 154 0 0 2,751 2,111 640	24 2,121 77 0 2,198 2,111 87	25 2,432 120 0 40 2,592 2,111 481	26 2,081 99 0 24 2,204 2,111 93	27 2,094 75 100 50 2,319 2,111 208	28 2,168 75 100 100 2,443 2,111 332	29 2,017 75 100 152 2,344 2,111 233

2029/ 30	2030/ 31	2031/ 32	2032/ 33	2033/ 34	2034/ 35	2035/ 36	2036/ 37	2037/ 38	2038/ 39	2039/ 40	2040/ 41	Total to 2041
50	50	50	50	50	50	50	50	50	50	50	50	750
50	50	50	50	50	50	50	50	50	50	50	50	750
0	0	0	0	0	0	0	0	0	0	0	0	12
100	100	100	100	0	50	150	250	350	350	350	350	2500
0	0	0	250	250	200	150	100	50	0	0	0	1000
0	0	0	0	50	150	250	350	350	350	350	350	2200
0	0	0	0	50	100	150	200	200	200	200	200	1300
0	50	100	150	200	200	200	200	150	100	100	50	1500
80	60	20	0	0	0	0	0	0	0	0	0	160
40	40	40	0	0	0	0	0	0	0	0	0	224
320	350	360	600	650	800	1000	1200	1200	1100	1100	1050	10396
220	250	260	500	550	700	900	1100	1100	1000	1000	950	8896
	-	2031/ 32	2032/ 33	•	-	2035/ 36	2036/ 37	2037/ 38	2038/ 39	2039/ 40	•	Total to 2041
2 029/ 30 1,969	31	•		•	-	-		38	39	•	•	
30	31	32	33	34	35	36	37	38	39	40	41	2041
30 1,969	31 1,969	32 1,744	33	34 1,434	35 1,404	36 1,245	37 1,150	38 1,060	39 1,000	40 1,000	41 1,000	2041 35,485
30 1,969 71	31 1,969 71	32 1,744 75	33 1,534 75	34 1,434 75	35 1,404 75	36 1,245 75	37 1,150 75	38 1,060 75	39 1,000 75	40 1,000 75	41 1,000 96	2041 35,485 1,713
30 1,969 71 100	31 1,969 71 100	32 1,744 75 100	33 1,534 75 350	34 1,434 75 350	35 1,404 75 350	36 1,245 75 350	37 1,150 75 100	38 1,060 75 100	39 1,000 75 100	40 1,000 75 100	41 1,000 96 100	2041 35,485 1,713 2,500
30 1,969 71 100 220	31 1,969 71 100 250	32 1,744 75 100 260	33 1,534 75 350 500	34 1,434 75 350 550	35 1,404 75 350 700	36 1,245 75 350 900	37 1,150 75 100 1100	38 1,060 75 100 1100	39 1,000 75 100 1000	40 1,000 75 100 1000	41 1,000 96 100 950	2041 35,485 1,713 2,500 8,896
30 1,969 71 100 220 2,360	31 1,969 71 100 250 2,390	32 1,744 75 100 260 2,179	33 1,534 75 350 500 2,459	34 1,434 75 350 550 2,409	35 1,404 75 350 700 2,529	36 1,245 75 350 900 2,570	37 1,150 75 100 1100 2,425	38 1,060 75 100 1100 2,335	39 1,000 75 100 2,175	40 1,000 75 100 1000 2,175	41 1,000 96 100 950 2,146	2041 35,485 1,713 2,500 8,896 48,594
30 1,969 71 100 220 2,360 2,111	31 1,969 71 100 250 2,390 2,111	32 1,744 75 100 260 2,179 2,111	33 1,534 75 350 500 2,459 2,111	34 1,434 75 350 550 2,409 2,111	35 1,404 75 350 700 2,529 2,111	36 1,245 75 350 900 2,570 2,111	37 1,150 75 100 1100 2,425 2,111	38 1,060 75 100 1100 2,335 2,111	39 1,000 75 100 2,175 2,111	40 1,000 75 100 1000 2,175 2,111	41 1,000 96 100 950 2,146 2,111	2041 35,485 1,713 2,500 8,896 48,594 44,331
30 1,969 71 100 220 2,360 2,111 249	31 1,969 71 100 250 2,390 2,111 279	32 1,744 75 100 260 2,111 68	33 1,534 75 350 500 2,459 2,111 348	34 1,434 75 350 550 2,111 298	35 1,404 75 350 700 2,111 418	36 1,245 75 350 900 2,111 459	37 1,150 75 100 1100 2,425 2,111 314	38 1,060 75 100 1100 2,335 2,111 224	39 1,000 75 100 1000 2,175 2,111 64	40 1,000 75 100 1000 2,175 2,111 64	41 1,000 96 100 950 2,146 2,111 35	2041 35,485 1,713 2,500 8,896 48,594 44,331

STATION FIELDS

Green Infrastructure Strategy | December 2021



Landscape led Placemaking at Station Fields

This report is a response from Axis Land Partnerships ('Axis') and the landowners to the call for additional evidence to support our submission to the Greater Cambridge First Proposals Plan (Regulation 18). Axis is a land promotion and development company with a proven track record of working collaboratively to deliver sustainable development.

Axis are promoting land north-west of Royston Road for allocation as a new village of c. 1500 homes, alongside a travel hub and bypass, employment land, community facilities and open space. The site, known as Station Fields, Foxton has an important role to play in securing a robust and deliverable supply of homes over the plan period

The vision submitted by Axis in 2020 as a response to both the call for sites, and Issues and Options Consultation, set out how this strategically important site can uniquely deliver against the Council's Big Themes: Climate Change, Biodiversity and Green Space, Wellbeing and Social Inclusion and Great Places.

Our response to the GCP travel hub consultation established how the site could make a significant contribution to the regions transport infrastructure through the provision of a holistically planned travel hub that will act as a catalyst for low carbon living.

This document now sets out how the vision can deliver significant benefits to Cambridgeshire through its landscape setting. Our vision has been inspired by a landscape-led approach to design that seeks to maximise opportunities for both nature and people to thrive as well as identifying benefits the development would bring for the wider community of Foxton, Shepreth and Barrington.

To support promotion of the site, and in addition to this document, further details are being submitted to the Councils latest Housing Land Availability Assessment (HELAA) call for sites. Representations are also being made to the First Proposal Plan highlighting how Station Fields performs well against sustainability appraisal scoring (both at the spatial strategy and site level), and how the site supports the Councils housing trajectory.



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The Vision	14
Delivering Bio-diversity Net Gain	16
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Station Fields offers a unique opportunity for creating a wildlife rich nature recovery network for Greater Cambridge, between the villages of Barrington, Foxton and Shepreth.

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AMBRID

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FOXTON TRAVEL HUB

A10 FOXTON LEVEL CROSSING BARRINGTON

ny fet

SHEPRETH FOXTON

MELDRETH

MELBOURN

Strategic context plan

PAGE 3 STATION FIELDS GREEN INFRASTRUCTURE STRATEGY

Harst A10

Whittlesford

WHITTLESFORD

Planning Context

Station Fields is a sustainable location for growth outside of the Cambridge Green belt. Its strategic position has been recognised by the Greater Cambridge Partnership, making it a preferred location for infrastructure investment that builds on fast rail connections to Cambridge and London.

The site, submitted as part of the 2020 Call for Sites in Greater Cambridge delivers:

Homes and jobs for Greater Cambridge

The emerging proposals provide for up to 1,500 homes in a village setting, sympathetic to the surrounding villages and inspired by their unique landscape characteristics. They can be delivered at pace, with immediate access by road and rail and no major constraints to development.

Over 2ha of employment space is proposed within the mixed-use heart of the new village around the station and mobility hub. Further engagement can continue to define how the emerging proposals can complement and deliver strategic economic growth.

Infrastructure

Station Fields is positioned at an interchange between rail, road and regional walking/ cycling routes, including the Melbourn Greenway. A new cycle greenway to Barrington and a proposed travel hub could bring local investment.

The aspirations for the cluster of villages should capitalise on this strategic location and act as a catalyst for low carbon living. Development at Station Fields provides an opportunity to draw together these disparate projects into a coherent vision of a community with a sense of place.

Development would also enable further investment in a by-pass, realigning the A10 to deliver multiple local and regional benefits: reducing congestion, improving air quality, increasing pedestrian and cycle connectivity and enhancing safety around the station.

The critical mass of 1,500 new homes would support existing facilities within the 3 neighbouring villages alongside new community facilities.

Call for Green Sites

The Call for Green Sites in 2020, asked for suggestions of land to 'grow and enhance the green space network'.

The process was intended to provide support for the exploration of Green Infrastructure (GI) opportunities within Greater Cambridge and potential sites for green space and wildlife habitats. It is also intended to facilitate strategic planning for the green space network, connecting existing green spaces including opportunities crossing the boundary of Greater Cambridge.

The responses received include sites not within the ownership of those putting them forward and therefore there is no certainty over the deliverability of the submissions and their ability to deliver the aspirations of the GI Plan

The submitted sites have subsequently been assessed as part of the GI evidence base study and whilst there does appear to be some minor overlap between the submission sites the two strategies are currently not aligned.



By linking GI delivery with growth sites, there are significant levers to deliver on the Strategic Initiatives, and deliver on the ambitious nature recovery targets. The evidence base also recognises the need for developer contributions, both on and off site, to deliver Biodiversity Net Gain against the 20% recommended target.

At Station Fields, the landowner is able to guarantee early deliverability of the GI. The GI Plan sets out an aspiration for 20% Biodiversity Net Gain (BNG) which is feasible within the red line boundary at Station Fields.

Nature Recovery through new Green Infrastructure

The Site at Station Fields is capable of delivering a range of green infrastructure improvements, where the landowner is able to guarantee early delivery of the GI. Station Fields has the potential to contribute towards a number of the Strategic Initiatives identified by the Greater Cambridge opportunities mapping as part of the Local Plan evidence base.

This extends to open space provision including publicly accessible open space, biodiversity net gain (20%) and sustainable drainage.

The countryside park and wild meadows to the west of the site would create pollinator corridors and increase flood resilience along the Cam.

The protection and expansion of woodland belts and hedgerows could expand tree canopy cover across the site and there are significant opportunities for urban greening, community gardening and even co-farming, connecting communities across an enriched landscape.

This document explains how Station Fields can contribute towards the Strategic Initiatives identified by the Green Infrastructure policy direction.



Strategic Context: The Cam Valley

The development of Cambridgeshire and the Cam River valley has been shaped by the geology and landscape of the region. The site sits within a belt of East Anglian chalk that gives the River Cam it's special quality – the river feeding the mills in places such as Barrington and bringing wealth and prosperity to Cambridge and its surrounding villages.

Both the River Cam and the nearby River Shep, are chalk streams, providing important riverine habitats due to their unique physical characteristics, which allow the slow passage of water through calcareous rock from ground water aquifers. The River Cam is part of the Greater Cambridge chalk stream project and has been assessed as being important for water vole and otter presence, alongside brown trout, and a range of course fish.

Cambridgeshire is a farmed landscape, drained by a network of streams and ditches that feed the River Cam and run through the city and out to the fens. This landscape is prone to seasonal flooding and green infrastructure that supports new development can play a significant role, storing and dispersing water upstream to help manage flood risk.

Where remnants of the natural landscape remain, they form critical but isolated habitats for wildlife within a wider patchwork of intensively farmed land. The transformation of Station Fields creates an opportunity to connect and enhance these important natural systems and deliver significant benefit to Cambridgeshire through the enhancement of important chalk stream habitats, flood alleviation and recreation through its landscape.

The proposals for Station Fields have been shaped by an appreciation of the place itself and the landscape setting. Our landscape vision is an exploration of opportunities that deliver sensitive, good growth that results in benefits to wider Cambridgeshire and the neighbouring communities.

History

The development site lies within the gap of flat, open agricultural fields between the villages of Shepreth, Barrington and Foxton.

Each village developed its own character, but each was intrinsically linked to the landscape, connected by water, small-scale agriculture and food production. They each provide inspiration for the development of Station Fields:

- The long village green of Barrington, dotted with ponds and the focus for village life
- The streams that meander through Shepreth, harnessed for clean water and power by the community
- And the meadows that come into the heart of Foxton, bringing nature onto the doorstep

These villages grew organically within an agricultural landscape, intrinsically linked to the orchards and meadows that were critical to biodiversity but have been largely replaced by industrialised farming.

The village cluster

In the current South Cambridgeshire Local Plan the settlement hierarchy classifications of Foxton, Barrington and Shepreth means there is little scope for development and as such provision of any meaningful services to futureproof the villages for generations to come.

With its location in the centre of these 3 villages, Station Fields is perfectly located and connected to provide rural jobs, natural open space, housing and services that will compliment the existing communities of Foxton, Barrington and Shepreth, whilst protecting their individual identities and supporting them as attractive places to live for years to come.



GAMERID CERTINE CLAMANDS

87. BAST ANGUAN GHAUK

Duxford.

BARRINGTON

LER SHEP

FOXTON

SHEPRETH

Strategic landscape plan

Melbourn

River flood zone Site of Special Scientific Interest Green Belt

> Great Chesterford

Local Context: Opportunities & Considerations

Connectivity and Facilities

The fields between the existing villages are intensively farmed and public access is limited. The footpath south from Barrington splits to the east and west connecting the River Cam to Shepreth and Foxton.

Each village has a cricket pitch at its heart and Foxton has, over time added tennis courts, a playground and a skate park. Barrington has two playgrounds set within the substantial village green that is the setting for village life – the pub, the village shop and church all front onto this spectacular public space. Shepreth has limited facilities beyond an open field and playground.

The proposed network of open spaces that create the framework for development at Station Fields can become a new focus for community life, forging safe, car free new greenway links between the new and existing developments, providing access to wilder open space.

63

BARRINGTON

Hydrology

The section of the River Cam to the north of the site splits in two, with a faster, deeper river corridor being located close to Barrington, and a smaller, shallower tributary being located further south, closer to the site. The wider, faster river has many veteran pollarded willows along its bank, with pedestrian bridges crossing the river offering views down its length.

The entire length of the Cam here is largely degraded due to past dredging and a lack of course sediment supply. The river has been realigned for milling, creating a perched channel and levees, disconnecting the river from its floodplain in places.

The River Shep lies to the west and feeds the Cam. It is joined by a series of drainage ditches and meandering streams that mark the western boundary of the site and supply water to a series of ponds and natural lakes.

The site experiences limited flooding although standing water is a regular feature of the land proposed for the Foxton Travel Hub. Opportunities for providing flood attenuation within a green grid of parks, swales and woodland belts would relieve localised flooding as well as benefits to those living downstream on the Cam and provide additional benefits to the community.



Woodland

The site is predominantly open with a concentration of woodland shelter belts to the west. TPO trees are planted along the boundaries, along the Royston Road to the south near Foxton, Station Road to the east and the riverine landscape of the west close to Shepreth Lakes.

The woodland shelter belts that surround the cluster of ponds and natural lakes to the west extend the riverine woodland planting along the Cam to the north. Trees can play a powerful role in this flat landscape, these small pockets of woodland visually connect across long views to the north. Opportunities exist to extend these woodland blocks along the boundaries, and through additional planting providing enhanced green infrastructure.

Ecology

The underlying solid geology of the site is dominated by Upper Cretaceous Chalk, a narrow continuation of the chalk ridge that runs south-west to north-east across southern England. The overlying soils were deposited by river or ice, are nutrient poor, and described as freely draining lime-rich and loamy. The rolling downland of the region, mostly under cereal production, contains remnant chalk grasslands. A 2 km desk study undertaken as part of the ecological appraisal concludes that the area contains a total of three designated SSSI's including one biological SSSI and two Geological Conservation Review sites. In addition there are three County Wildlife Sites (CWS) and two protected road verges (PRV) within 2 km of the survey Site. The SSSI's are Barrington Chalk Pit, Barrington Pit and L-moor, Shepreth. The CWS's are Hoffer Brook Pollard Willows, River Rhee and Shepreth RSV.

The preliminary ecological appraisal concludes that there are no designated sites of wildlife value within the sites boundary and that constraints are limited to the existing small areas of deciduous woodland, ponds, scrub and hedgerows.

The enhancement, management and creation of flower rich native grassland, native hedgerows and wet woodland responds to the aspirations of the county Biodiversity Action Plan and to the aspiration to double the area of nature rich land in the county.

The Site offers prime opportunities for "Increasing Biodiversity & Green Spaces" on land that is currently predominately intensive arable farmland with very few ecological constraints.

A more detailed discussion on Biodiversity Net Gain and Developing with Nature is set out later in this report.



Place-making influences

Inspired by the landscape setting, these key influences would define the landscape strategy and help to meet our vision

> Protect the setting of the three villages and wrap the new community in the landscape

Barrington

Shepreth

Foxton

Protect and enhance the woodland shelter belts



Sustainable connections through the landscape to Foxton Station and beyond

Barrington Constant Constant Constant Constant Cycle super highway Cycle super highway

Extend the Cam River nature corridor into the site



Improve nature to capture carbon



NUMBER OF STREET

their vitality with complimentary services and facilities

Enhance the cluster of villages - adding to

Bring the Roman Villa and road to life

Concept Landscape Plan

Barrington

The Sports Hub creates 4 new 4G or hard courts for 5-aside football and one full size 4G pitch

Village Green

The new Countryside Park includes areas of wildflower meadow and woodland bordering the restored stream beds

Village Green

Village Gre

Greenway Link o Barrington

Raitway

River Cam

Contraction /

Countryside Park

Shepreth

Foxton		
	Кеу	
		Residential (high/med/low density)
		Mixed-use (Education / Commercial)
		Travel Hub
		Community Hub
		Existing PROW's
		Proposed Footpaths
		Proposed Cycleway
		Existing Ponds
A10 The community hub may include a new primary	1	Proposed Attenuation / SuDS
school subject to further	TR.	Existing Woodlands
consultation	1	Proposed Woodlands
ommunity Hub	3	Proposed Countryside Park
	H	Proposed Sports Pitches
Foxton Station An integrated Travel Hub brings together commercial and		LAP
community uses with cycling, the station and parking		LEAP
the station and parking		NEAP
		Neighbourhood Skate Park
		Proposed Allotments
Foxton	122	Proposed Wet Woodland
	5	Proposed Pollarded Willows
en / A A A A A A A A A A A A A A A A A A		The site delivers
		Circa 1,500 Homes
		Potential for a one F.E. Primary School
		Mobility Hub
	1)	Allotments in each neighbourhood
	TI	A new A10 bypass
		Safe pedestrian and cycle rail crossings

OUR VISION: STATION FIELDS WILL BE A PLACE THAT WILL

Be defined by its landscape

We shall be guided by our landscape context and the opportunity to increase biodiversity and landscape value for the wider community of South Cambridgeshire.

The extent of land under the same ownership enables us to protect and enhance the landscape setting of Barrington, Foxton and Shepreth whilst creating neighbourhoods that are defined by their landscape setting – creating social spaces at the heart of the development and wilder habitats on it's edge that wraps the site in natural spaces.



Connect Communities

Our green spaces would provide natural movement corridors that encourage sustainable travel across the local area. A well-designed network of safe, direct and beautiful green walking and cycling routes shall enable car-free connectivity to Foxton Station and a new travel hub.

New homes would create a critical mass of people that enables viable new services, leisure facilities and jobs in Station Fields, which would be beneficial for existing communities.



Connect people to nature

We would create 25.48ha of countryside park and 54.71ha of new informal open space and SuDS to increase biodiversity and ecological gain. New wet woodlands and wild spaces shall create a network of valued habitats that connect people to nature. We would promote access to nature and the wider countryside including the River Rhee County Wildlife site, by returning arable land to its past use and opening up areas of natural grassland and wildflower meadows, within the site, whilst taking advantage of the existing wildlife corridors along the watercourses.



Improve local health and well-being

Healthy lifestyles shall be engendered by designing a place that responds to local needs – creating walking, running and cycle loops across the site and providing sports facilities, allotments and children's play facilities that would support integration with neighbouring communities.

Station Fields would be a restorative landscape – somewhere to escape to and connect with nature, offering local people spaces where they can relax and enjoy the natural environment.



Inspire and educate residents and visitors

Nature shall be used to inspire existing and future residents. We work hand in hand with the community to support local decision making, facilitating leadership, and community ownership of high quality assets. We would welcome this stewardship being secured at early stages as part of the planning process.

Our open spaces shall protect and enhance unique historic assets like the Roman Villa Scheduled Ancient Monument, enabling us to share and promote the history of the landscape.



Improve local climate resilience in changing times

Station Fields' green corridors and countryside park would reduce flood risk along the River Cam corridor by providing swales, ponds and wet woodlands that protect homes and farmland.

The scale of the landscape setting would enable a patchwork of allotments and orchards that promotes stewardship and community involvement.



Developing with Nature

Station Fields is at present almost wholly farmed intensively providing little space and little food for wildlife.

The richest areas are at its western end with a wooded stream corridor, ponds and grassland. Elsewhere there are only thin ribbons of grass, shrubs and trees running alongside the roads and railway lines. With the proposal for half of the land to be open space the opportunity will be taken to provide great gains for biodiversity.

The aspirations of the wildlife conservation organisations for developments to achieve a 20% net gain in biodiversity can be delivered at Station Fields within the red line boundary along with a contribution to the county wide aspiration to double nature in Cambridgeshire.

The wildlife richest area to the west can be improved with restoration of the stream corridor. That stream has in the past been deepened and straightened and its channel is disconnected with its floodplain. Providing a more diverse channel with pools and shallow riffles, gravel bottoms and dappled shade from an open, wet woodland corridor will make what is good so much better.

The stream flows north to join the River Cam, itself an important wildlife corridor and chalk stream, and so restoring the stream at Station Fields will contribute to improving the conditions across the water catchment including by slowing the flows downstream and trapping nutrients and silt.

The large arable fields provide little for wildlife. As part of the open space and green infrastructure for the Station Fields development they can be vibrant meadows, buzzing with bees, a blaze of colour through a succession of flowers from cowslips to wild carrot all to the background of the song of thrushes and warblers. This haven for wildlife will also be a haven for us, with winding paths through the meadows providing places to relax and take in the restorative value of nature all around us. At night, when we have gone, the bees and butterflies flitting across the meadows will be replaced by badgers on the search for worms and bats hunting down beetles and moths. Turning ploughed land to meadows and trees will also lock up carbon in the soil and in the plants, contributing to moving toward a net zero society.

Station fields will provide a major net gain for biodiversity and for us. Homes for wildlife, locked up carbon, cleaner water, more nature.





Responding to the Big Themes

The vision for Station Fields presents an exciting opportunity to deliver a sustainable community that delivers homes and much needed infrastructure to meet local and regional needs. This document has demonstrated that the site can also deliver high value landscape, space for people and wildlife to support the Green Infrastructure Strategy and strategic Initiatives.

The vision for Station Fields responds to the Greater Cambridge Plans Big Themes:

Climate Change

Station Fields can promote low-carbon lifestyles, and promote alternatives to private car use. The plan envisions a series of walkable neighbourhoods, that are interconnected through a series of green links that connect Station Fields with the surrounding villages.

The development of an integrated and sustainable Travel Hub is at the heart of the Axis vision for Station Fields. Whilst we have significant concerns over the current GCP proposals, we have responded to the public consultation with an ambitious plan to create an integrated travel hub at the heart of this cluster of villages.

Our alternative option demonstrates in one way how a travel hub can deliver more than just a car park, contributing to the key GCP objectives, whilst delivering benefits to the wider community.

Our proposal clearly demonstrates how local benefits can be delivered alongside the travel hub. The innovative model seeks to combine the element of transport interchange with enhanced public realm and facilities to create a vibrant and safe place for all.

This is one example of our approach to design - making efficient use of land and precious resources. Water and SuDS will define the identity and character of the place but perform a critical job for the Cam Valley and Cambridge, storing and slowing water in more extreme weather events.

Bio-diversity and Green Space

The site provides 54.71ha of open space and SuDS and a major new countryside park. The open spaces provide the structure of the development, putting nature on everyone's doorstep.





The site promotes access to nature and the wider countryside including the River Cam to the north of the site, by returning arable land to its past use and opening up areas of natural grassland and wildflower meadows, within the site, whilst taking advantage of the existing wildlife corridors along the watercourses.

With further engagement of the neighbouring villages we can restore this landscape to its natural state, with significant Biodiversity Net Gain, health and social value to residents.

Well-being & Social Inclusion

Station Fields capitalises on its proximity to Foxton Station, the planned Melbourn Greenway and Barrington cycleway by promoting walking and cycling.

There would be spaces for recreation, wild spaces for reflection and growing space to stimulate people's interest in healthy foods and local produce.

Residents would be able to use the walking and running loops that meander through the site and out into the wider restored landscape, offering opportunities for escapism. Local vernacular would be an inspiration for designing a network of connected and active public spaces, to foster a sense of community and reduce crime, including the 'Countryside Park', sports provision, children's play areas, and streets and local village greens, inspired by Barrington and Foxton.

Great Places

Station Fields preserves the historic and distinctive characters of Barrington, Foxton and Shepreth. Its unique character will be defined by its setting within an improved landscape. By providing new complimentary facilities it will support the vibrancy and vitality of the existing cluster of villages.

The travel and community hubs will provide an opportunity to create a vibrant place where people can meet friends and connect. The landscape that weaves through the site will put people in touch with nature, and create spaces for the community to come together.

Our approach to the site demonstrates how by thinking holistically about homes, jobs, infrastructure and nature we can create more sustainable communities and deliver on the ambitions of the Greater Cambridge Local Plan.





Eaton Court Maylands Avenue Hemel Hempstead HP2 7TR

www.axislp.com

LDĀDESIGN

www.lda-design.co.uk

LDA Design Consulting Ltd Registered No: 09312403 17 Minster Precincts, Peterborough PE1 1XX

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Foxton Travel Hub

Consultation Response | September 2021





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Part 1: Our Comments on the GCP Proposal

This report is a response from Axis Land Partnerships ('Axis') and the landowners to the consultation on the Foxton Travel Hub presented by the Greater Cambridge Partnership in September 2021.

Axis is a land promotion and development company with a proven track record of working collaboratively to deliver sustainable development.

Axis are promoting land north-west of Royston Road for allocation as a new village of c. 1500 homes, alongside a travel hub and level crossing bypass, employment land, community facilities and open space through the Greater Cambridge Local Plan. The travel hub proposed by the Greater Cambridge Partnership (GCP) falls within the land being promoted by Axis in this regard.

The supporting vision submitted by Axis in response to both the call for sites, and Issues and Options Consultation, sets out how this strategically important site can deliver against the Council's Big Themes: Climate Change, Biodiversity and Green Space, Wellbeing and Social Inclusion and Great Places through a holistically planned travel hub and new community.

The vision is based on an appreciation of the significance of villages like Foxton, Barrington and Shepreth as an important part of the Greater Cambridge picture and sets out how a new rural community can be planned in a sensitive way whilst delivering tangible benefits to existing communities. Foxton's Neighbourhood Plan, adopted in August 2021, sets out the communities' aspirations for development including the provision of transport infrastructure.

Axis support the principle of a travel hub in this location however, this document sets out concerns with the proposals presented in the GCP consultation. The current proposals appear to take a narrow and short-term approach to both local and wider issues and as a result do not realise the potential of the site.

The first part of this report sets out Axis' concerns that the travel hub as proposed fails to deliver any of the objectives of GCP, any tangible benefits for Foxton, it fails to address significant highways safety issues and it represents a missed opportunity in the wider Greater Cambridge context.

The second part of this document sets out a potential alternative solution to the Travel Hub which Axis believes addresses these issues.

The Travel hub as proposed:

- A. Doesn't deliver on the objectives of GCP.
- **B.** Doesn't deliver for Foxton
- C. Doesn't address highways safety concerns
- D. Doesn't deliver for Greater Cambridge

A. Doesn't deliver on the objectives of GCP

GCP have previously set out their scheme objectives within the business case for this proposal. Their primary purpose is to ensure that the scheme meets the needs of Greater Cambridge and the objectives do not take account of local need or opportunities.

GCP has committed to working with a range of partners to explore opportunities for funding and delivery of schemes that support its vision. Collaboration is central to that vision and yet there has been no attempt to communicate with Axis or the landowners to deliver a more comprehensive scheme or to design a scheme that would meet local objectives including a bypass funded by private sector contributions that would enable the closure of the level crossing and reduce congestion on this part of the A10.

We do not believe that the scheme achieves the proposed key objectives:

- Maximise the potential for all journeys to be undertaken by sustainable modes of transport

 the proposed travel hub increases vehicular movement on the rural road network
- Improve overall connectivity and accessibility within Greater Cambridge to support economic growth – the scheme misses a significant opportunity to enable economic growth and the development of new community assets in a sustainable location
- To accommodate future growth in trips along the corridor to Cambridge and reduce traffic impact levels and congestion only the removal of the

level crossing will reduce congestion at Foxton and the proposed scheme blocks any future delivery of a bypass

Contribute to the enhanced quality of life for those living and working within Greater Cambridge – the proposed scheme will increase congestion and therefore local noise and air pollution. It will also dramatically increase the number of people crossing a high-speed road creating significant risk to those using the facilities



A10 Cyclepath to Foxton

B. Doesn't deliver for Foxton

South Cambridgeshire contains over 100 villages which vary greatly in size. Many of them emerged along the historic road corridors and grew as the rail network developed. Each of the villages have a unique character that responds to their landscape setting. More people live in the villages that surround the city than in the city itself and the villages are therefore an important part of the Greater Cambridge identity, quality of life and its future success.

This proposal is situated on the edge of Foxton among a network of villages within the Chalklands to the south of Cambridge and therefore any proposals should be sensitive to the local context and needs. Through their Neighbourhood Plan, the community have stated their need for a travel hub to clearly demonstrate its benefits to the community of Foxton, by including integrated transport services and employment opportunities whilst minimising negative impacts on traffic and congestion, residential amenity, and the local environment. The proposals fail to provide any benefit to Foxton – in GCP's own list of key objectives there is no mention of the local community and what this scheme might do for them.

The proposals also do not resolve the transport and safety issues caused by the level crossing which was identified as a clear priority for the community during community consultation.

- The plan as shown is a large car park bolted onto the village that is out of scale and character, the proposals do not relate to surrounding uses and characteristics of the village.
- The scale of the car park prevents future placemaking potential around the station which is one of the key attributes of the village and key to an accessible and low carbon future.
- Surface parking at this scale is an inefficient use of important and valuable land.
- The increased congestion caused by significant additional vehicular movements, will make

it harder for residents to get in and out of the village onto the A10.

• The proposed green infrastructure is of limited value in terms of its benefit to the community.

Railway stations have an important function at the heart of our villages, towns and cities. This is why Network Rail and a broad range of stakeholders have set out their aspirations for well-designed travel hubs that can support communities whilst providing a first-class experience for the travelling public.

The current proposals are no more than a Park & Rail facility, delivering little or no local benefit. We believe that more innovative thinking can provide a civic heart to the village whilst delivering the transport improvements sought by GCP.



Foxton Road level crossing

C. Doesn't address highways safety concerns

In May 2013 Network Rail published a GRIP-2 feasibility study to review options to close the existing railway level crossing at Foxton, Cambridgeshire, and provide a suitable replacement infrastructure to cross the railway safely. The report was driven by the safety/ security risks of the level crossing and the resultant congestion.

The report concluded that the only feasible scheme to remove the level crossing and improve safety was to construct a bypass over the railway to the north of the station, landing on the site of the proposed GCP travel hub.

The GCP proposals do not deliver the A10 bypass allowing the closure of the level crossing. The location and scale of the proposed car park blocks any future delivery of a feasible scheme. The GCP proposals are not clear on how highways safety concerns have been assessed and what alternatives have been considered to address them fully. The proposed non-signalised road crossings are a significant concern and will put people at serious risk of injury and death as they attempt to cross a busy road. The lack of a safe crossing point, together with plans to reduce the approach speed to the level crossing to 30mph, will likely lead to drivers stopping or slowing down to allow people across the road more safely which will in turn lead to wider congestion.

A signalised crossing would enable people to cross safely, especially for those with impaired mobility or young children. However, this option has not been proposed due to safety concerns of Network Rail, meaning a safe crossing solution is not feasible.


D. Doesn't deliver for Greater Cambridge

The Greater Cambridge Local Plan (GCLP) is still at an early stage in its preparation, and the emerging spatial strategy presented in the recently published 'First Proposals' document 2021 (Regulation 18 Committee Stage Version) is yet to be consulted on. However, the First Proposals document sets out potential options for maximising the opportunities that have been identified under the 'Plan Themes' that underpin how homes, jobs and infrastructure are to be planned. The document states that 'We propose to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live'.

The First Proposals document sets a clear ambition for progressing a comprehensive and integrated approach to development. However, the current proposals for the Foxton Travel Hub fall short of this ambition, presenting a scheme that seeks to address transportation matters in isolation. The proposals are too narrowly focused and fail to maximise the opportunity to provide a comprehensive approach to development as promoted in the GCLP. The current proposals also do not sufficiently align with the understanding of what makes a 'great place' as set out in the First Proposals document, as somewhere that ensures that infrastructure is delivered coherently in a way that is integrated with place. They fail to consider how designing for climate change mitigation and climate change adaptation can be an opportunity to create distinctive and characterful developments, fail to ensure that services and infrastructure are developed alongside new housing and jobs, and miss the opportunity to create a wellused and active public place which helps to foster a sense of community.

The First Proposals document recognises that in Greater Cambridge emissions from transport is one of the largest contributors to climate change. Emerging policy I/ST Sustainable Transport and Connectivity seeks to address this issue by requiring new development to be located and designed to reduce the need to travel, particularly by car, and promote sustainable travel appropriate to its location. It states that developments should be designed around the principles of walkable neighbourhoods and healthy towns to encourage active sustainable travel. Therefore, the investment made in Foxton from the Travel Hub proposals should support the sustainability of the existing settlement and recognise the wider opportunity to support sustainable development on land north-west of Royston Road.



A10 Foxton level crossing



Level crossing remains in use for all modes of travel with greater level of use due to travel hub. Level crossing still likely to be preferred shortcut rather than safer bridge option.



Conflict at Station Road junction with vehicles joining stationary traffic and uncontrolled pedestrian crossing.



Uncontrolled crossing of the A10 conflict between cars waiting at signals and unsuitable for potential volumes of pedestrians.

Part 2: Our Response to the Wider Opportunity

A. A Strategic Location



Summary of strategic opportunities:

- The Travel Hub site sits at a strategic location where both the A10 road and regional rail network meet, making it an important site in the future of Greater Cambridge with potential for future growth.
- Vehicular access can be gained directly from the A10.
- Foxton Station is the penultimate stop before Cambridge station (approximately 9 minute journey to Cambridge Station).
- Train journey to Kings Cross London takes as little as 1 hour 15 minutes.

- Wide catchment area serving local communities including Foxton, Shepreth, Barrington as well as communities further afield.
- Located along the Melbourn Greenways project.
- Located outside the Green Belt.
- Situated close to the River Cam providing opportunity for significant green and blue infrastructure improvements for people and nature.
- Placemaking potential at a scale that fits with the rural qualities and village character of the area.



Aerial view: Foxton

B. Place Potential and Travel hubs

The aspiration and quality of this place should capitalise on the strategic location and act as a catalyst for low carbon living.

A travel hub facilitates the transition between sustainable and active transport networks. A well-planned travel hub can provide a much wider benefit to users and the local community by incorporating non-transport uses and public realm enhancements. The ambition is to create a real sense of place and vibrancy at the heart of the travel hub that delivers enhanced facilities.

The CoMoUk "Mobility Hubs Guidance" (November 2019) states that Mobility Hubs have three main characteristics:

"Co-location of public and shared mobility modes"

- 2 The redesign of space to reduce private car space and improve the surrounding public realm
- 3 A pillar or sign which identifies the space as mobility hub which is part of a wider network and ideally provides digital travel information."

In addition to the proposed car park, Foxton travel hub might include some or all of the following features:

- Bus interchange;
- 24/7 delivery lockers;
- Cycle and scooter hire;
- EV parking bays;
- Co-working spaces & meeting rooms;
- Cycle workshop;
- Cafe & pop-up stalls;
- Public realm improvements (places to dwell, socialise, cycle paths;
- Digital ticketing systems.

These elements should not be seen as easy addons but should be part of a comprehensive placemaking approach.



C. A Comprehensive and Integrated Alternative

The plans on the following pages set out a considered and achievable potential alternative solution to the travel hub which address the concerns outlined in the first part of this response. The plans capitalise on the sites strategic location to deliver a wider range of positive outcomes for Greater Cambridge, Foxton and the surrounding villages. The plans are shown as a sequence to demonstrate how a travel hub can be planned now without compromising future improvements and investment.

The visualisation below shows the current layout and highlights the severance caused by the railway and the lack of a coherent place around the station.



Existing condition





This first plan shows an alternative layout for the travel hub which:

- 1. Safeguards the alignment of the A10 level crossing bypass proposed in the GRIP 2 Feasibility Study Report (2013).
- 2. Provides a lightweight decked / multistorey car park which makes more efficient use of land and allows flexibility to expand or reduce in size without requiring additional land.
- Incorporates wider functions of a travel hub including space for mobility service office,
 e- scooter and cycle hire and repair shop, EV charging, car club, delivery storage lockers and cafe. These facilities are provided around a public square which also provides the focus for additional commercial uses including small scale work spaces, work hubs and a nursery

which can start to deliver a new sense of place close to the station to complement the existing employment spaces and village facilities.

- 4. Provides a new footpath connection and drainage channel linking to the Rhee Valley, Shepreth and the countryside. The footpath connection links into the public right of way to the east of Shepreth and forms part of an attractive loop.
- 5. Enables avenue planting on the approach to the village along the A10.
- 6. Station improvements including pedestrian and cycle bridge with stair and lift access.
- 7. Separate drop off and accessible / priority parking spaces closer to the station in a smaller surface level car park.





This second plan shows the same travel hub arrangement with the A10 level crossing bypass delivered at the same time or in a future phase. The plans include:

- 1. An overbridge or underpass as proposed in the GRIP 2 report.
- 2. Closure of the level crossing for all users.
- 3. Dedicated pedestrian and cycle routes between the travel hub and the station which require no crossing of the A10 or the railway.
- 4. Pedestrian and cycle access to the station from the north alongside the new bypass removing the need to use the level crossing.
- 5. Downgrading and street improvements to the current A10 and Station Road to provide space and priority for walking, cycling and buses. Potential to use Shepreth Road as the primary means of access to the A10 from Foxton allowing most traffic to be removed from Station Road.





This third plan shows the same alternative layout for the travel hub and A10 level crossing bypass, it also shows how the travel and commercial hub to the south of the rail line could expand in future including:

- 1. New areas of village expansion delivering the c.1500 new homes described in the vision document submitted by Axis through the Greater Cambridge Local Plan.
- 2. A new community hub including facilities for both new and incoming residents.
- 3. Expanded commercial and travel hub

providing further small scale work spaces.

- 4. Strategic areas of publically accessible green space along the edge of the village incorporating play, leisure as well as spaces for nature and managing water adjacent to the Rhee.
- 5. Potential further crossings of the rail line.

The areas shown as future village expansion are the same as those proposed in the vision documents submitted by Axis in response to the Greater Cambridge Local Plan process.

Summary

We support the principle of a travel hub in this location, we object to the current proposals as designed. It is clear that the proposals presented in the GCP consultation do not realise the full potential and importance of this site. The land use is inefficient and little consideration given to the impact of the proposal in regard to placemaking and wider community benefit. Ultimately, the proposed travel hub:

A. Doesn't deliver on the objectives of GCP.

- B. Doesn't deliver for Foxton
- C. Doesn't address highways safety concerns
- D. Doesn't deliver for Greater Cambridge

Our alternative option demonstrates in one way how a travel hub can deliver more than just a car park, contributing to the key GCP objectives, whilst delivering benefits to the wider community.

Our iteration of our proposal clearly demonstrates how local benefits can be delivered alongside the travel hub. The innovative model seeks to combine the element of transport interchange with enhanced public realm and facilities to create a vibrant and safe place for all.





Station Fields – Land North West of A10 Royston Road, Foxton

Access and Movement Strategy

December 2021

On behalf of Axis Land Partnerships

Project Ref: 332210742/5501 | Rev: A | Date: December 2021

Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU Office Address: 50/60 Station Road, Cambridge, CB1 2JH T: +44 (0)1223 882 000 E: cambridge@stantec.com

Document Control Sheet

Project Name: Station Fields – Land North West of A10 Royston Road, Foxton

Project Ref: 332210742

Report Title: Access and Movement Strategy

Doc Ref: 5501/001

Doc status: FINAL

Date: December 2021

	Name	Position	Signature	Date
Prepared by:	Jodie Welch / Nigel Pettitt	Transport Planner / Associate	Frick.	Dec 2021
Reviewed by:	Nigel Pettitt	Associate	400	Dec 2021
Approved by:	Matthew Ingrey	Director	topuquely	Dec 2021
	For and	on behalf of Stantec	UK Limited	

Revision	Date	Description	Prepared	Reviewed	Approved
Rev A	Dec21	FINAL	JW	NTP	МІ

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Appendices

Appendix A Framework Masterplan

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1 Introduction

1.1 Background

- 1.1.1 Stantec UK Ltd has been appointed by Axis Land Partnerships to prepare this Access and Movement Strategy report to assist with the promotion of Land North West of A10 Royston Road Foxton (Station Fields) for new residential-led development through the emerging Greater Cambridge Local Plan at the current First Proposals (Preferred Options) stage. The development proposal includes for some 1,500 homes alongside new community and amenity uses, employment floorspace and significant landscape proposals and biodiversity enhancements.
- 1.1.2 As shown in Figure 1.1 Station Fields is located on the north western edge of Foxton between Foxton, Barrington and Shepreth. It lies either side of the Cambridge to London Kings Cross railway and is bordered by the A10 to the south, agricultural fields & Shepreth to the west, agricultural fields & Barrington to the north, and Barrington Road to the east. The Site is currently made up entirely of agricultural fields.
- 1.1.3 This report sets out the access and movement ambition and commitments that complement the Site at this stage of the emerging Local Plan process in fulfilling commitments to sustainable transport. This strategy is based on capturing the multifaceted benefits resulting from a new residential-led development that will provide many of its own services and facilities that would meet many of the day to day needs of its residents, and its immediate location adjacent to Foxton Rail Station.
- 1.1.4 The Site's location is paramount to why developing a community here will meet sustainable transport objectives of maximising non-car travel modes whereby future residents can live their lives without the need to rely on the private car, and meaning we can deliver a new residential development where the private car does not dominate the Site. It is adjacent to Foxton Rail Station that will provide residents with sustainable travel options to many important employment centres, including Cambridge City Centre, Cambridge Station Square, Cambridge Biomedical Campus, Cambridge Business Park, Cambridge Science Park, Cambridge Regional College and further afield to London Kings Cross. Integral to the development will be the integration with existing and proposed walking, cycling and public transport networks, so that the development will have excellent connectivity to/from the site with surrounding areas by these modes.
- 1.1.5 This Access and Movement Strategy is being used to inform the development of the masterplan for Station Fields, prepared by LDA Design, attached at Appendix A. This shows potential development plots as follows:
 - 1,500 residential units
 - Community and amenity uses
 - Employment floorspace

- Sports facilities
- Walking/cycling loop
- Cycling connection to Barrington

- Significant provision of open space and landscaping
- 1.1.6 These development plots have been developed and determined taking into account existing and committed internal / external transport infrastructure, with a focus on encouraging sustainable travel and allocating land for sustainable transport infrastructure on site.

- 1.1.7 Further to this the Site will maximise the opportunities that are emerging for new types of mobility that are transforming how people travel, and be flexible to adopt future technologies that are not yet even known. This includes the need for e-bikes and electric vehicle charging, which will be a key mechanism to achieve net zero carbon targets. E-bikes can play an important role in delivering appropriate 'last-mile' connections between the site and nearby key facilities.
- 1.1.8 The transport strategy is not and will not be based on the way mobility has been planned in the past, because that would reinforce car dependent behaviour. The strategy will instead embrace a change in focus away from "highways" to a much more holistic "transport" approach, where mobility is focused on and prioritises sustainable travel modes. This way, we tackle the following serious challenges of perpetual car use:
 - Climate change road transport is the largest contributor to greenhouse gas emissions in the UK. Decarbonising transport is imperative to cutting our greenhouse gas emissions and therefore addressing climate change, to assist the UK in delivering net zero carbon emissions by 2050;
 - Air pollution related to greenhouse gas emissions, air pollution is one of the main environmental risks to human health in the UK, and the fourth greatest threat to public health after cancer, heart disease and obesity;
 - Lack of physical activity increasing car use is a major contributing factor to lower levels of physical activity, and this is one of the top 10 causes of disease and disability in England. Lack of physical activity is related to increases in obesity, risk of disease and problems with mental health and well-being;
 - Road Safety about 1,800 people are killed on Britain's roads annually, and nearly 25,000 seriously injured, as a result of road traffic accidents. About 85% of these accidents involved human error; and
 - Inequality and Social Isolation not everyone has access to a car. Designing new developments for car use therefore limits opportunities for many to access employment and key services and other facilities, and this can result in deprivation. It also reduces the opportunities for social interaction as there are fewer opportunities for people to stop and meet each other in the street. This can result in feelings of social isolation, particularly for the elderly, and which can have adverse mental health consequences.



Figure 1.1: Site Location and Potential points of access for Station Fields

1.2 Structure of this Report

- 1.2.1 The Greater Cambridge Partnership's Foxton Travel Hub is described in the following section, along with the benefits and opportunities that Station Fields could deliver to enhance the Travel Hub.
- 1.2.2 Section 3 summarises the transport policy context which will frame the transport vision and the strategy to deliver this vision for Station Fields, including the Four Key Themes from the Cambridgeshire Quality Charter for Growth Community, Connectivity, Climate and Character.
- 1.2.3 Section 4 describes the existing transport infrastructure surrounding Station Fields.
- 1.2.4 Section 5 goes onto outline the future transport context and opportunities that will be available to the site.
- 1.2.5 Section 6 discusses the opportunities and constraints for the site.
- 1.2.6 The vision for Station Fields is then presented in Section 7, along with the transport strategy to deliver this vision.

2 GCP's Foxton Travel Hub

2.1.1 Key to the benefits of Station Fields are the Greater Cambridge Partnership's (GCP's) proposals to provide a Travel Hub at Foxton Station¹. Whether this hub is provided or not, as the GCP are promoting this area as a location for a Travel Hub indicates that Station Fields has very good non-car accessibility, particularly to Cambridge. If provided the current GCP proposals include for in the region of 200 car parking spaces and 100 high quality cycle parking spaces - meaning more people can use the rail network to get into Cambridge, reducing the impact of future growth on road congestion and pollution in the city. The GCP reasoning behind a Travel Hub at Foxton is that:

"Foxton is currently served by local trains between London King's Cross and Cambridge North. Trains from Foxton reach Cambridge in 10 minutes, and Cambridge North – for Cambridge Science and Business Parks - in 17 minutes. Trains could also serve a future Cambridge South Station, which would provide easy access to the Cambridge Biomedical Campus and Addenbrooke's Hospital."

- 2.1.2 Axis support the principle of the GCP's Travel Hub in this location to be incorporated as part of the Site, but consider the proposals presented in the GCP consultation fail to deliver for Foxton, and the emerging Local Plan. Station Fields offers a genuine opportunity of delivering a significantly enhanced Travel Hub to better realise the full potential and importance of this site being adjacent to Foxton Station, for example by improving the connections between the Travel Hub and Foxton Station as discussed in this Strategy.
- 2.1.3 A key local and regional improvement would be the Site's delivery of a new A10 bypass of the existing level crossing, which will enable users of the A10 to avoid delays caused when the level crossing is closed. In existing peak periods, this can cause up to 15 20 minutes delay to through traffic on the A10. The GCP's current Travel Hub proposals do not include such a bypass, and therefore the existing constraints on the A10 would remain. This delay would be imposed on the community bus services that the GCP propose would call at the Travel Hub, therefore affecting the reliability and attractiveness of these services.
- 2.1.4 Furthermore, the GCP's proposals would involve people parking at the Travel Hub and then needing to cross the A10 via a new non-signalised at-grade crossing in order to access Foxton station. Pedestrians crossing the A10, which in 2019 carried over 12,000 vehicles a day, is not considered an ideal situation, and is a potential road safety hazard particularly in poor weather conditions. Users of the Travel Hub may be in a hurry to catch trains and therefore act in haste when trying to cross the A10, which could exacerbate this road safety concern. The GCP's plans do rely on a reduction in the speed limit of the A10 at this location from 50mph to 30mph, but this is a separate process which cannot be relied upon and usually needs the road environment to be suited to a 30mph. The Travel Hub alone may not induce this change of road environment, whereas the Station Fields development would achieve a real change in the character of the road conducive to the change in speed limit.
- 2.1.5 It is welcomed that the GCP's plans include a new footbridge over the railway line, linking the two platforms at Foxton station, as this means that people accessing the Cambridge-bound platform from the Travel Hub will not be affected by the closure of the level crossing. However, Axis consider this could be delivered with a more holistic design as shown on the proposed Masterplan in Appendix A.

¹ The committee papers for the Executive Board's meeting on 9 December 2021 note they will be working with stakeholders with the intention of submitting a planning application in the Spring of 2022.

- 2.1.6 Therefore, with the delivery of the A10 level crossing bypass that the Masterplan proposes for the Site, it is considered that the Site will significantly assist with the GCP's proposals for the Travel Hub because it will result in a significant reduction in traffic flows on the current section of the A10 south of the level crossing that would be bypassed. This will enable the ability for people to safely cross this bypassed section of road and the potential to introduce a signal-controlled crossing, making journeys on foot between the Travel Hub and Foxton Station much more attractive and avoiding significant conflict with vehicular traffic.
- 2.1.7 The bypass will also reduce the current vehicular delays experienced when the level crossing is closed and this would benefit the community bus services that the GCP plans to serve the Travel Hub, making their journey times much more reliable. Bypassing the level crossing would eliminate the existing 15-20 minute delay that occurs in peak periods as a result of the level crossing being closed, with this delay being experienced by bus services along the A10.
- 2.1.8 Some early release of development at Station Fields could be deliverable prior to the implementation of the level crossing bypass. This would be part of more detailed technical assessment and discussions with both the local highway authority and Network Rail. No detailed assessment has been undertaken at this stage, however it is useful to note that the GCP's original Travel Hub plans involved a 500-space car park for the site, compared to the latest proposals for only a 200-space car park, and this reduction is not as a result of road capacity. It therefore suggests that there would be vehicular capacity on the Station Fields site equivalent to the number of trips generated by 300 Travel Hub car parking spaces.
- 2.1.9 Overall, the inclusion of the Travel Hub within the Site's masterplan offers a more efficient land use and better consideration to placemaking and wider community benefit. The Masterplan proposed for Station Fields shows how an alternative Travel Hub option can deliver more than just a car park, contributing to the key GCP objectives, whilst also delivering benefits to the wider community.
- 2.1.10 The Travel Hub would significantly benefit from being located close to a developed area that offers connected sustainable transport modes supplemented with facilities, amenities, public realm and information features to attract and benefit the traveller towards sustainable travel and away from the private car. As part of the proposed Masterplan for Station Fields, an alternative Travel Hub layout has been designed and spatially organised in a more optimal way so as to facilitate access to and transport between sustainable modes (walking, cycling, public transport). Ultimately, the Travel Hub should include for some/all of the following in one location so that existing and future staff / visitors / residents / commuters / leisure users know where to go to connect to various forms of sustainable travel:
 - High spec bus stops and waiting facilities
 - Bus interchange for the existing 915 service operating along the A10 and any future services
 - 24/7 delivery lockers
 - Limited car parking provision but sufficient to meet demand, and intercept car trips and negate the need for commuters to travel further into Cambridge
 - Cycle/scooter parking/hire

- Cycle repair unit/workshop
- Wi-Fi/phone charging
- Electric bike and car charging and electric bike battery lockers
- EV parking bays
- Café & pop-up stalls
- Facilities to create a safe, convenient, comfortable and attractive area
- Clear and comprehensive travel information in one location

- 2.1.11 A Travel Hub will also include for public realm and other facilities to attract more people (both existing and future residents) who wouldn't normally travel by sustainable modes and potentially change their preferred choice of travel mode.
- 2.1.12 The incorporation of a Travel Hub and Community Hub as part of the Site's Masterplan clearly demonstrates how local benefits can be delivered alongside the Travel Hub. The innovative Masterplan model seeks to combine the element of transport interchange with enhanced public realm and facilities to create a vibrant and safe place for all.

3 The Transport Policy Context

3.1 Introduction

3.1.1 National and local transport policies form an important basis for the transport strategy for Station Fields. They are summarised below, the overall theme being to reduce the need to travel, particularly by private car.

3.2 National Planning Policy Framework (2021)

- 3.2.1 The NPPF contains the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development, meaning development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
- 3.2.2 In 'Promoting sustainable transport' (under Section 9), the NPPF advises that transport issues should be considered at an early stage in development proposals so that:
 - The potential impacts of development on transport networks can be addressed;
 - Opportunities from existing and proposed infrastructure, and changing transport technology and usage, are accommodated;
 - Opportunities to promote walking, cycling & public transport use are identified & pursued.
 - The environmental impacts of traffic and transport infrastructure can be identified, assessed, and considered, including appropriate opportunities for avoiding and mitigating any adverse effects; and
 - Patterns of movement, streets, parking, and other transport considerations are integral to the design of schemes and contribute to making high quality places.
- 3.2.3 At the same time, the NPPF recognises that opportunities to maximise sustainable transport solutions will vary from urban to rural areas.
- 3.2.4 It notes that new developments should:
 - Take up appropriate opportunities to promote sustainable transport modes, given the type of development and its location;
 - Achieve safe and suitable access to the Site for all users;
 - The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - Cost effectively mitigate, to an acceptable degree, any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety.
- 3.2.5 At paragraph 111, the NPPF advises that:

"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

3.3 South Cambridgeshire Local Plan (2018)

- 3.3.1 The above national transport policy aims are reflected in South Cambridgeshire District Council's (SCDC's) Local Plan 2018. This includes Policy TI/2 'Planning for Sustainable Travel', which requires that "*Development must be located and designed to reduce the need to travel, particularly by car, and promote sustainable travel appropriate to its location.*"
- 3.3.2 The Local Plan notes that South Cambridgeshire is predominantly a rural district, meaning that the car will remain an essential mode of travel for some, and that the car has a role in improving access to local services and facilities. However, the benefits of enabling travel by non-car driver modes are considerable, relating to improved health through walking and cycling, reduced emissions and improved operation of the highway network in terms of congestion and road safety.
- 3.3.3 All development should strive to offer real travel choice for all people by non-car modes appropriate in scale and kind to the development, and the Local Plan notes that car and cycle parking provision can be used as part of a comprehensive approach to achieving this. Policy TI/3 'Parking Provision' notes that *"Car parking provision should be provided through a design-led approach in accordance with the indicative standards"* [referred to in Section 2 of this report]. Furthermore:

Car parking provision will take into consideration the site location, type and mix of uses, car ownership levels, availability of local services, facilities and public transport, and highway and user safety issues, as well as ensuring appropriate parking for people with impaired mobility.

The Council will encourage innovative solutions to car parking, including shared spaces where the location and patterns of use permit, and incorporation of measures such as car clubs and electric charging points

3.4 Cambridgeshire Quality Charter for Growth (2010)

- 3.4.1 The Charter sets out core principles for achieving quality new homes and neighbourhoods in new development in the five authorities that make up the County of Cambridgeshire.
- 3.4.2 There are four themes (Community, Connectivity, Character and Climate Proofing), and each is supported by nine guidelines. The principles are based on what works.

Community

- 3.4.3 Building a sense of community, places where people live out of choice and not necessity, creating healthy communities with a good quality of life.
 - i. Community involvement consulting with people who are going to move in.
 - ii. Housing should allow for changes in needs and lifestyles as people's circumstances and ages change, they can remain fully included in their neighbourhood.
 - iii. People should be encouraged to take active roles in the development and continuing management of their community.
 - iv. Social infrastructure (health, education, leisure)is just as important as the physical infrastructure of roads and utilities.

- v. There should be a mixture of formal and informal green space promoting interconnectivity between new and existing Green Infrastructure.
- vi. Initial and on-going community development support should be provided to 'build your own community'.
- vii. Public spaces should encourage social interaction and support healthy lifestyles there should be clear allocation of responsibilities for managing communal spaces and the public realm.
- viii. Community buildings should be designed to be flexible and make use of the latest technology.
- ix. Space should be made available for local shops and services to set up building a sense of community and minimising car dependence.

Connectivity

- 3.4.4 Places that are well-connected enable easy access for all jobs and services using sustainable modes
 - i. Having public transport in place at the start of the development to encourage people to get used to green options.
 - ii. Public transport should integrate with existing transport systems with frequent service and stops.
 - iii. Linkages with existing and potential employment opportunities should be recognised.
 - iv. New developments should contribute to the wider environmental goals for the Cambridge area enhancing the feasibility of walking and cycling.
 - v. The streets, footpaths and other links to major urban extensions should be designed as a user hierarchy it should be clear who and what they are for. Primacy should be given to walking, cycling and community transport.
 - vi. Easy mobility for all, including those using wheelchairs and pushchairs should be taken into account.
 - vii. Bus stops should offer well designed waiting areas, providing information on services and local facilities, and should feel safe and overlooked.
 - viii. Parking management such as charges and the provision of car sharing / car clubs should be used to discourage unnecessary car use.
 - ix. Road design should include permeable surfaces.

Character

- 3.4.5 Places with distinctive neighbourhoods and where people create 'pride of place'
 - i. The existing landform and features of the site, such as water and landscape and the relationship to existing settlements, should be used to create varied and memorable townscapes.

- ii. An overriding masterplan should aim to provide the vision for the development, with neighbourhood design strategies and design codes establishing the qualities and characteristics that will make the new places distinctive
- iii. To ensure the successful realisation of the masterplan experienced and fully-skilled masterplanners should be retained for the duration of the project to ensure that the overall vision is maintained.
- iv. Densities and massing should vary, with higher densities around local shops and transport nodes, to provide the full range of house types that are needed.
- v. Creative thinking, simple designs well built, using high quality materials and careful detailing.
- vi. Open space requirements should be integrated with buildings throughout the scheme.
- vii. The creation of good landscapes is as important as the creation of good townscapes.
- viii. All buildings commercial, residential, and public should be flexible and adaptable, which means providing large enough spaces or space for appropriate expansion and changing lifestyles.
- ix. Car and cycle parking, storage and waste recycling should be integrated within the design of the new homes.

Climate

- 3.4.6 Places that anticipate climate change in ways that enhance the desirability of the development and minimise environmental impact
 - i. Major new developments should enable residents and workers to adopt sustainable lifestyles that minimise the use of energy and other resources, by reduced car use.
 - ii. Environmental targets should be challenging and where possible go beyond the minimum standards so that new schemes act as exemplars.
 - iii. New development should not be located in areas of unacceptable environmental risk, such as areas which are liable to flooding.
 - iv. Arrangements for sustainable waste management should be built into new developments to make recycling easy and unobtrusive, and encourage people to waste less.
 - v. The utilities should be engaged in a collaborative design process to help promote energy and water conservation.
 - vi. Public buildings, housing and neighbourhoods as a whole should be designed to anticipate climate change so they are capable of being upgraded and adapted easily and economically.
 - vii. Biodiversity and wildlife should be encouraged through a network of green spaces and Sustainable Urban Drainage Systems (SUDS).
 - viii. Sustainable energy partnerships or trusts should be encouraged, for example, through education, marketing and schemes that help people cut energy use.

ix. Trees and planting should be used extensively to provide cooling in summer and to soak up rain, as well as to provide a landscape that encourages people to walk and cycle.

3.5 HELAA (October 2021)

- 3.5.1 The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) was published in September 2021 and included an assessment of Station Fields in respect of Accessibility to Services and Facilities (score Amber), Site Access (score Amber), Transport and Roads (score Red) and Strategic Highways Impact (score Amber).
- 3.5.2 Axis consider that these scorings do not fully reflect Station Fields and the opportunities offered by its location and proposed transport improvements, because:

Accessibility to Services & Facilities

- Station Fields offers excellent non-car accessibility for its residents to key employment areas, facilitated by the existing Foxton Rail Station and an appropriately designed Foxton Travel & Community Hub that will also intercept car trips along the A10 before they reach Cambridge.
- The whole of Foxton and its existing amenities (including a local shop, primary school, post office, local employment, church, public house, village hall, rail station and bus stops) are within a 15-minute walk of the Site. Barrington & Shepreth and associated amenities/employment opportunities (including a second primary school, play areas, post office, restaurants, public house, and wildlife park) are within a 25-minute walk of the Site.
- Station Fields will also benefit from the GCP's proposed Melbourn Greenway, a proposed route to enable cyclists, walkers and equestrians to travel sustainably between Melbourn and Cambridge. Station Fields will be designed to connect to the Melbourne Greenway, which will in turn benefit residents, as it will assist cyclists being able to travel sustainability into Cambridge, including the Cambridge Biomedical Campus.
- Barrington and Shepreth and associated amenities/employment opportunities are all within a 10-minute cycle of the site and Harston within a 15 minute cycle. Further afield many villages such as Hauxton, Haslingfield, Orwell, Meldreth, Melbourne, Fowlmere, Thriplow and the southern edge of Cambridge (Trumpington) and Addenbrookes are all within a 25 minute cycle of the site via the new and upgraded high quality A10 cycle route.
- Station Fields is accessible to Trumpington by bus within 15 minutes and Cambridge within 30 minutes.
- Foxton Rail Station is located adjacent to the Site and offers regular services (every 30 minutes) to Cambridge, Royston, Ely, Hitchin, and London Kings Cross amongst many other destinations.
- The Site Masterplan includes for a foot/cycle bridge over the railway line that will link the northern/southern parcels of land, Foxton Station, Travel/Community Hub and local amenities.

Site Access

• Station Fields is bound to the south by the A10 and east by Barrington Road, therefore allowing a number of vehicle access points into the Site from the strategic road network.

- To the northeast the A10 links through Harston, onto the M11 and into Cambridge. To the southwest the A10 connects to Royston, the A505 and onto the wider strategic road network.
- As outlined by the HELAA the proposed site is accessible in principle subject to detailed design that will be provided at the planning application stage.

Transport and Roads

- Improvements (proposed and some now open) to the local and strategic highway network, namely the A10 bypass of the level crossing at Foxton Rail Station, will reduce existing delays, including for conventional buses
- The level crossing at Foxton causes congestion on the A10 during peak periods as it can be closed for up to 20 minutes in an hour. The A10 bypass will significantly increase capacity of the road network adjacent to the site and remove queueing in this location generated by the level crossing.
- A new Travel Hub site near the M11 Junction 11, in addition to the improved road network, would mean that Foxton residents could drive to the new M11 J11 Hub, and then continue their journey into Cambridge by bus with improved journey time reliability.
- Station Fields includes for a 1km long boundary with the A10, therefore allowing for plenty of visibility, land and site frontage to provide a roundabout or signalised site access, with suitable capacity, onto the A10 should a simple priority T-Junction not be deemed viable for capacity reasons.

Strategic Highways Impact

- National Highways have raised no objection or 'Red' concerns in relation to Station Fields.
- The Site is located within National Highways Zone 10 and improvements to Girton Interchange (now open) and proposed Travel Hub at M11 J11 will reduce the impact of the Site on the National Highways Strategic Road Network.
- A Travel & Community Hub on site along with the existing Foxton Rail Station will reduce the impact of the Site on the National Highways Strategic Road Network.
- 3.5.3 Based on the descriptions above, it is considered that the HELAA scoring of the site underestimates its transport criteria, and that the site therefore:
 - Has good accessibility with services and facilities within the immediate and surrounding area;
 - Appropriate access is achievable for all main modes of transport;
 - Has an acceptable impact on the local and strategic highway network.

3.6 Transport Policy Summary

- 3.6.1 The above transport policy and guidance makes it clear that any new development must be located so that sustainable travel modes are maximised and that the use of the car does not dominate the development. The reasons for this are to tackle climate change and promote healthy lifestyles. Transport strategies must therefore manage down the vehicular traffic impacts of development through encouraging the use of sustainable modes of transport, planning development in sustainable locations and management of the residual traffic demand. Only as a last resort should highway capacity improvements be considered within the transport network.
- 3.6.2 The correct location of new development will be paramount to delivering new development proposals that are sustainable and minimise the overall impact of the development on the broader network. Station Fields provides this correct location. It will have excellent non-car accessibility for its residents to key employment areas, facilitated by the existing Foxton Rail Station and an appropriately designed Foxton Travel & Community Hub that will also intercept car trips along the A10 before they reach Cambridge. The employment land uses proposed on Station Fields will also benefit from the excellent non-car accessibility offered.
- 3.6.3 Whether or not the Travel Hub is provided, as the GCP are currently promoting this area as a location for a Travel Hub indicates that the site has very good non-car accessibility, particularly to Cambridge.

4 The Transport Context for Station Fields

4.1 Existing Context

- 4.1.1 As shown in Figure 1.1 Station Fields is located on the north western edge of Foxton between Foxton, Barrington and Shepreth. The Site lies either side of the Cambridge to London Kings Cross railway and is bordered by the A10 to the south, agricultural fields & Shepreth to the west, agricultural fields & Barrington to the north, and Barrington Road to the east. The Site is currently made up entirely of agricultural fields.
- 4.1.2 The centre of the Site is located adjacent to Foxton, less than one mile from Barrington and Shepreth, less than two miles from Harston and less than 7 miles from the centre of Cambridge city Centre. It has an extensive frontage with the A10 and Barrington Road
- 4.1.3 There are a number of important local facilities in Foxton, Harston, Barrington, and Shepreth including primary schools, local shops, post offices, church, public house, employment, and two rail stations. These meet many of the day-to-day needs of existing and new local residents, reducing the need to travel outside of these villages.

Walking

4.1.4 The walking accessibility of the Site is indicated by walking isochrones shown on Figure 4.1, which shows walking journey times from the Site at 5-minute intervals at a typical walking speed of 3mph (about 4.8kph). This demonstrates that the whole of Foxton is within a 15-minute walk of the site, and Barrington & Shepreth and associated amenities/employment opportunities are within a 25-minute walk of the site.



Figure 4.1: Existing Walking Isochrones

4.1.5 Station Fields will also benefit from the GCP's proposed Melbourn Greenway, a proposed route to enable cyclists, walkers and equestrians to travel sustainably between Melbourn and Cambridge. The Melbourn Greenway is one route within a wider and developing sustainable travel network that is being created by the GCP to provide better sustainable green routes for cyclists into Cambridge. This network is shown in Figure 4.2 below, and the current proposed route runs along the Station Fields' site frontage with the A10 (in addition to improvements through the village). The Site Masterplan has been designed to link into this route.



Figure 4.2: GCP's Greenway Network

4.1.6 Residents of Station Fields will therefore benefit from the proposed Melbourn Greenway, as it will assist cyclists being able to travel sustainability into Cambridge, including the Cambridge Biomedical Campus.

Cycling

4.1.7 Figure 4.3 shows cycling isochrones from Station Fields for journey times at 5-minute intervals up to 25 minutes, on the basis of an average cycling speed of 12mph (about 19kph), considered to be a typical 'cruising' cycling speed. The Department for Transport's Local Transport Note 2/08 'Cycle Infrastructure Design' advises that, for commuter journeys, cycling distances up to 5 miles are not uncommon, which at an average cycling speed of 12mph is therefore equivalent to a 25-minute cycling journey time. The cycling isochrones show that Foxton, Barrington and Shepreth and associated amenities/employment opportunities are all within a 10-minute cycle of the site and Harston within a 15 minute cycle. Further afield many villages such as Hauxton, Haslingfield, Orwell, Meldreth, Melbourne, Fowlmere, Thriplow and the southern edge of Cambridge (Trumpington) and Addenbrookes are all within a 25 minute cycle of the site via the new and upgraded high quality A10 cycle route.



Figure 4.3: Existing Cycling Isochrones

Public Transport

- 4.1.8 Station Fields in the context of public transport services and infrastructure is shown on Figure 4.4. This shows the Site has good access by public transport. Service 915 stops adjacent to the Site on the A10 and provide hourly services to Melbourn & Royston (to the south), and Trumpington & Cambridge (to the north).
- 4.1.9 Station Fields is therefore accessible to Trumpington by bus within 15 minutes and Cambridge within 30 minutes.


Figure 4.3 – Public Transport Network

4.1.10 As shown in Figure 4.4, Foxton Rail Station is located adjacent to Station Fields and offers regular services (every 30 minutes) to Cambridge, Royston, Ely, Hitchin, and London Kings Cross amongst many other destinations.

Vehicle Access

- 4.1.11 Station Fields is bound to the south by the A10 and east by Barrington Road, therefore allowing a number of vehicle access points into the Site from the strategic road network.
- 4.1.12 To the northeast the A10 links through Harston, onto the M11 and into Cambridge. To the southwest the A10 connects to Royston, the A505 and onto the wider strategic road network.

4.2 Future Transport Context

Walking & Cycling

4.2.1 Further to the existing walking and cycling infrastructure, Foxton's cycling accessibility will be significantly enhanced through transport improvements being promoted by the Greater Cambridge Partnership (GCP). This includes the potential for an upgrade to Trumpington Park and Ride or a new Park and Ride site on the western side of M11 Junction 11. It would mean that Foxton residents could drive to the M11 Junction 11 in less time, and then continue their journey into Cambridge by bus.

4.2.2 Station Fields will also benefit from the proposed GCP Melbourn Greenway, which was consulted on in the summer 2019 and the report was approved by the GCP Executive Board on 25th June 2020. Following this approval the detailed design stage of the process is now underway. The Melbourn Greenway is one route within a wider and developing sustainable travel network that is being created by the GCP to provide better sustainable green routes for cyclists into Cambridge. As detailed on the GCP project details website:

"The Melbourne route starts at Royston, with an improved path and a new bridge over the A505 near Royston being planned in partnership with Hertfordshire County Council. Heading towards Cambridge from Melbourn and Melbourn Science Park, the Greenway proceeds towards Foxton, with a spur to Shepreth on the way. At Foxton there is a route through the village as well as a direct route over the railway crossing at the proposed new Travel Hub. The Greenway continues past Harston to Hauxton, where it connects with the Haslingfield Greenway. The route will have a grass verge for horse riders, ramblers and joggers, and there will be landscaping with bee-friendly plants. There is a safe crossing of the M11 bridge by the proposed Cambridge South West Travel Hub. The route continues into Cambridge from the Trumpington Park-and-Ride along the Busway path. It links with the Sawston and Linton Greenways via existing networks around the Cambridge Biomedical Campus. The Greenway ends at Cambridge Station, where it joins the Chisholm Trail".

4.2.3 Furthermore, local cycle improvements are proposed in Foxton as part of the Greenway Study with new solar studs between Melbourne and Harston already installed.

Public Transport

- 4.2.4 Key to the benefits of a Site in Foxton are the GCP proposals to provide a Travel Hub at Foxton station. As the GCP are currently promoting this area as a location for a Travel Hub indicates that the site has very good non-car accessibility, particularly to Cambridge. As outlined above the current GCP Travel Hub proposals include for in the region of 200 car parking spaces and 100 high quality cycle parking spaces meaning more people (existing commuters and residents) can use the rail network to get into Cambridge, reducing the impact of future growth on road congestion and pollution in the city.
- 4.2.5 Again as outlined above, whilst Axis support the principle of a travel hub in this location as part of the Site, the proposed Masterplan (Appendix A) has been developed to incorporate a Travel Hub and offer more efficient land use and better consideration to placemaking and wider community benefit.
- 4.2.6 Furthermore, the West of Cambridge Transport Package includes for the expansion of the Trumpington Park & Ride (completed May 2020) and a proposed Cambridge south west Travel Hub. A planning application for the Cambridge south west Travel Hub was submitted on 29th May 2020 and is currently pending consideration (a decision was expected in early 2021 but has since been delayed due to Covid-19).
- 4.2.7 The proposed Cambridge south west Travel Hub is to include; "car parking, cycle, coach, and horse parking, travel hub building, lighting; significant infrastructure improvements to include road widening of the A10 along Cambridge Road, Hauxton Road and M11 Junction 11 north bound slip road, and a new dedicated busway to include strengthening of existing agricultural bridge; provision for a new Shared Use Path, including new bridge across the M11; with associated drainage, landscaping (including reconfiguration of bunds), biodiversity enhancement areas and infrastructure".

4.2.8 The combined West of Cambridge Package would offer better journey reliability for residents travelling by bus from Foxton and over the M11 into Cambridge, whilst also locating the existing Park and Ride closer to Foxton. This Package is a longer-term project but nevertheless will assist with the public transport accessibility of Foxton to key employment locations.

Vehicular Access

- 4.2.9 As outlined earlier Station Fields can be accessed via the A10 or Barrington Road. The A10 is a strategic road providing links into Cambridge and the M11 to the northeast, Royston and the A505 to the southwest, and further afield via direct links to the wider strategic road network.
- 4.2.10 On 21 November 2017 the Greater Cambridge Partnership (GCP) agreed to a package of measures to provide an improved Park & Ride, cycling and pedestrian facilities from the west of Cambridge City. These facilities would provide better access to employment sites such as the Cambridge Biomedical Campus and the West Cambridge site as well as the North West Cambridge site. The project was then widened to include further transport improvement options to assist with these package of measures, including the following:
 - Expansion of the Trumpington Park & Ride (completed May 2020)
 - Improvements to Girton Interchange (now completed)
 - Proposed Cambridge south west Travel Hub located west of the M11 J11
- 4.2.11 The improvements (proposed and some now open) to the highway network will increase capacity of the road network for those essential trips by private car from the Site via the M11 and beyond. Notwithstanding this, a new Travel Hub site near the M11 Junction 11, in addition to the improved road network, would mean that Foxton residents could drive to the new M11 J11 Hub, and then continue their journey into Cambridge by bus with improved journey time reliability.

4.3 Summary

- 4.3.1 Opportunities for a choice of travel modes to the Site therefore exist currently, and local villages, Trumpington, Cambridge, Cambridge Science Park and West Cambridge are all accessible from the Site by non-car modes. This will assist with achieving the transport strategy of reducing the need to travel as single occupant car driver.
- 4.3.2 Further to these existing opportunities to travel sustainably to/from the site, the Melbourne Greenway and Foxton Travel Hub will further benefit the site. An important mechanism to promote walking, cycling and public transport will also be a Residential Travel Plan, which will be implemented for the development.
- 4.3.3 Figure 4.4 shows Station Fields in the context of the wider key employment areas and existing/committed/proposed transport infrastructure. This plan shows how the location of Station Fields, adjacent to Foxton Rail Station, provides future residents with great potential to travel by sustainable modes to the following key employments destinations via rail and also via the committed Greater Cambridge Partnership's Cambridge South East Transport (CSET) scheme, which will provide a high-quality public transport link with Sawston, Stapleford and South Cambridge, including the proposed Cambridge South railway station at the Cambridge Biomedical Campus:
 - Cambridge Biomedical Campus via planned Cambridge South Station
 - Cambridge City Centre

- Babraham Research Campus and Granta Park
- Cambridge Business Park, St Johns Innovation Park, Cambridge Science Park and Cambridge Regional College via Cambridge North Rail Station
- Further destinations north east of Cambridge via the guided busway from Cambridge North Station



Figure 4.4: Wider Site Context

5 Transport Opportunities, Constraints and Mitigation

5.1 Introduction

5.1.1 This chapter builds on the previous section and highlights the potential transport opportunities and constraints to promote sustainable travel to and from Station Fields.

5.2 Constraints

- 5.2.1 The following constraints relating to Station Fields will need to be mitigated:
 - Existing A10 Strategic route passing adjacent to the Site
 - Existing vehicle speeds along strategic A10.
 - Level crossing at Foxton causes congestion on the A10 during peak periods as it can be closed for up to 20 minutes in an hour.
 - Need to significantly increase sustainable travel modes to help Government meet their Net Zero Carbon Target by 2050.
 - Walking/cycling links across A10 and railway line.

5.3 **Opportunities**

- 5.3.1 Station Fields offers and benefits from the following opportunities:
 - Highly sustainable site as confirmed by GCP choosing this location for a Travel Hub
 - Existing A10 Strategic route passing adjacent to the Site
 - Site boundary with A10 and Barrington Road allowing for four points of access
 - Foxton Rail Station immediately adjacent to the Site
 - Potential Foxton Travel Hub
 - A potential new Travel Hub at Junction 11 of the M11
 - Expansion of Trumpington P&R (complete)
 - Melbourne Greenway
 - New bridge across rail line for pedestrians and cyclists linking residential plots, Travel Hub, Community Hub, rail platforms and amenities.
 - New A10 bypass of the level crossing
 - Downgrading and street improvements to the current A10 and Station Road area, to provide space and priority for walking, cycling and buses, all facilitated by the proposed A10 level crossing bypass.

• Pedestrian and cycle access to the station from the north alongside a new bypass removing the need to use the level crossing.

5.4 Mitigation

- 5.4.1 The following measures are proposed for Station Fields to mitigate the above constraints:
 - Potential to incorporate an alternative GCP Travel Hub and connecting this to a Community Hub within the Site.
 - Street network to be designed with user hierarchy at the forefront to encourage walking, cycling and community transport over the private car.
 - Four potential points of access on to A10 and Barrington Road.
 - New bridge across rail line for pedestrians and cyclists linking residential plots, Travel Hub, Community Hub, rail platforms and amenities.
 - New A10 bypass of the level crossing allowing for the removal of the level crossing and reduced congestion.
 - Downgrading and street improvements to the current A10 and Station Road area, to provide space and priority for walking, cycling and buses, all facilitated by a new A10 overbridge or underpass.
 - Pedestrian and cycle access to the station from the north alongside a new bypass removing the need to use the level crossing.

6 Access and Movement Strategy

6.1 Planning for the Transport Mobility Needs of the Future, Not the Past

- 6.1.1 The vision for Station Fields is to offer a healthy, socially inclusive, and well-connected place, where existing / new employees / residents can travel easily within, around and beyond the site by sustainable modes of travel. This will address the key consequences of otherwise unfettered growth in the use and reliance on the private car, and therefore:
 - Help decarbonise the transport system for the surrounding area, meaning reduced greenhouse gas emissions and impacts on climate change;
 - Reduce air pollution;
 - Continue to increase physical activity through increased active modes of travel such as walking and cycling; and
 - Fewer road traffic accidents.
- 6.1.2 An important element in achieving this vision is the development of a transport strategy, for Station Fields, that does not perpetuate historic patterns of travel and mobility, which have been focussed primarily on use of the private car. As indicated earlier, the relationship people will have with the private car will be quite different in the future, due to changing patterns of travel, developing technologies and new attitudes to mobility. To achieve a healthy, socially inclusive, and well-connected place, the future transport strategy therefore needs to utilise the committed sustainable strategy for the area and have flexibility to allow for these and other transformative changes.
- 6.1.3 Fundamentally, we must recognise that a healthy, socially inclusive, and well-connected place is not one where travel by private car can continue unfettered. Do we want a development in which people are physically and mentally healthy? If the answer is yes, a key aspect will be the delivery of a transport strategy that reduces the use of the private car and connects with and uses the existing and proposed sustainable transport infrastructure (Foxton Rail Station and potential Travel Hub). This means turning transport planning on its head: instead of providing transport infrastructure and services based on past national experience, which would lead to increased capacity for the private car, the expansion's strategy will continue to prioritise people's safety, health and well-being, air quality and the non-car travel choices available to them.

6.2 Maximising Opportunities for New Types of Mobility

- 6.2.1 Mobility patterns are changing. We are travelling less. For example, pre-covid, car driver and passenger travel has reduced by 11% in England since 2002. The reduction in car travel is particularly marked amongst younger people, whose propensity to travel by car has fallen over the last 20 years, in men by some 47%. Whilst the older generation are generally travelling by car a little more, the trends amongst younger people away from car travel will have significant implications for how we plan the transport provision for Station Fields.
- 6.2.2 Travel patterns have changed significantly as a result of the Covid-19 pandemic, with significant reductions seen in vehicular traffic, increases in cycling and walking, and of course significant increases in the number of people working from home. We cannot tell at this stage how long-lasting these changes will be, but they demonstrate that we need to have the flexibility to allow for changing travel patterns in the future when we design proposals and the transport infrastructure and services to serve them.

- 6.2.3 As indicated earlier, the transport policy context is changing too. The Government have published a 'Road to Zero' strategy, which sets out the objective that all new cars and vans will be effectively zero emission by 2040. Its recent policy paper "Decarbonising Transport: Setting the Challenge" starts the discussion on what is needed to deliver the reduction in emissions required across all modes of transport to achieve this and stay within the carbon budgets until then. It suggests electric car charging points for all new homes, that public transport and active travel will be the natural first choice for our daily activities, and that we will need to use our cars less and be able to rely on a convenient, cost-effective, and coherent public transport network.
- 6.2.4 New technologies, changing travel patterns and the focus on zero carbon will play a pivotal role in how we plan new developments. The transport strategy and planning for Station Fields will need to be flexible and resilient so that it is responsive to these changes in order to maximise the resulting opportunities for new types of mobility. This will mean a mix use development that is relevant to the way people will be living and travelling in the future, rather than based on historic travel patterns that have perpetuated the use of the private car.

6.3 Prioritising Walking and Cycling for Local Trips

- 6.3.1 High quality walking and cycling connections have been considered from the inception of the proposed masterplan for this site, linking the site with existing and committed sustainable infrastructure. This will include internal footways and cycleways including across the railway line, so that areas northwest and southeast of the railway line are connected.
- 6.3.2 Walking and cycling will be encouraged as part of a Travel Plan that will be prepared for the Site.
- 6.3.3 Walking and cycling are important recreational activities in themselves, providing valuable opportunities for healthy and active lifestyles and improving well-being. The Site will therefore provide high quality sustainable recreational access including a new footpath connection and drainage channel linking to the Rhee Valley, Shepreth and the countryside. The footpath connection links into the public right of way to the east of Shepreth and forms part of an attractive loop.
- 6.3.4 The A10 level crossing bypass will significantly enhance the safety and convenience of people on foot between the GCP's Travel Hub and Foxton Station, as the resulting reduction in traffic flows on the current section of the A10 between the Travel Hub and Foxton Station will enable a much safer pedestrian crossing of this road by minimising conflict with vehicular traffic. This will assist with delivering the Travel Hub.
- 6.3.5 Through the promotion of walking and cycling, and the accessibility of the high-quality proposed and committed walking and cycling infrastructure linking through the Site and onto existing and future high quality committed sustainable transport infrastructure (such as existing A10 bus stops, Foxton Rail Station and Travel & Community Hub), the Site will achieve the important objective of prioritising walking and cycling for local trips both within the Site and with surrounding employment & residential areas.

6.4 Maximising the Use of Public Transport

6.4.1 As outlined above, Station Fields has very good access by public transport including an hourly bus service to Melbourn & Royston (to the south), Trumpington, and Cambridge (to the north). Station Fields is also located adjacent to Foxton Rail Station offering services to London, Cambridge, Royston, Hitchin, Ely and Kings Lynn at 30 minute frequencies.

- 6.4.2 The Masterplan proposed shows how the GCP's Travel Hub combined with a Community Hub, incorporated as part of a residential led development, can deliver more than just a car park, contributing to the key GCP objectives, whilst delivering benefits to the wider community. The incorporation of a Travel Hub and Community Hub as part of the development Masterplan clearly demonstrates how local benefits can be delivered alongside the travel hub. The innovative Masterplan model seeks to combine the element of transport interchange with enhanced public realm and facilities to create a vibrant and safe place for all.
- 6.4.3 The A10 level crossing bypass will reduce delays to conventional buses using the A10, and assist with the GCP's proposals for the Travel Hub to be served by community buses and it would make these services' journey times more reliable. The significant improvement for people being to access Foxton Travel on foot from the Travel Hub, through an enhanced pedestrian crossing and significant reduction in vehicular traffic flows on the current section of the A10 south of the level crossing that will be bypassed, will further encourage public transport by making it easier and safer to access Foxton station.
- 6.4.4 Furthermore, as outlined above, the West of Cambridge Transport Package includes for the expansion of the Trumpington Park & Ride (completed May 2020) and a proposed Cambridge south west Travel Hub located west of the M11 J11. The combined West of Cambridge Package would offer better journey reliability for residents travelling by bus from Foxton and over the M11 into Cambridge, whilst also locating the existing Park and Ride closer to Foxton. This Package is a longer-term project but nevertheless will assist with the public transport accessibility of Foxton to key employment locations.

6.5 **Private Car Strategy**

- 6.5.1 It is considered that a new roundabout or signalised access arrangement could be introduced on the A10 to serve the southern parcel of the site that would meet highways design guidance. There is sufficient site frontage with the A10 to achieve visibility requirements and therefore access onto the A10 is deemed viable at this stage. If required, a secondary point of vehicular access could also be provided in the form of a T-junction including a right turn lane from the A10 into the site (a 'ghost' island priority T-junction) and this would be provided separate to an access to the Travel Hub.
- 6.5.2 New accesses will also be introduced off Barrington Road to serve the northern parcel of land between Barrington Road and the disused railway line.
- 6.5.3 The developing masterplan will include for EV charging bays at a rate that will meet the relevant policy and standards at the time of planning submission. Additional ducting infrastructure will also be provided to allow for future proofing and phasing of Station Fields to meet future demand growth.
- 6.5.4 Car parking provision will be balanced at a level which recognises likely demand, but also seeks to deter habitual car use for journeys that could be made by non-car modes.
- 6.5.5 Car club spaces will also be included as part of the developing masterplan to assist with efficient use of the private car.
- 6.5.6 As part of any planning application for the Site, a detailed Transport Assessment would be undertaken, the scope of which would be agreed with highways officers of Cambridgeshire County Council. The Transport Assessment would provide a detailed technical assessment of the impact of the Site on the operation of local transport networks, including the road network, along with the resulting appropriate mitigation. The traffic impacts of Station Fields are likely to be significantly reduced by the benefits of the site location in the context of the GCP's plans to introduce a Travel Hub within the site and the existing adjacent Foxton Rail Station and regular bus connections towards Cambridge and Royston.

- 6.5.7 It is recognised that opportunities to maximise sustainable transport solutions will vary from urban to rural areas, and the adopted South Cambridgeshire Local Plan notes that South Cambridgeshire is predominantly a rural district, meaning that the car will remain an essential mode of travel for some.
- 6.5.8 A key part of the Site's transport strategy is therefore to maximise the use of non-car modes of travel to access the site, therefore tackling habitual use of the private car. This means accommodating and maximising sustainable infrastructure and devising a transport strategy which embraces behavioural and technological changes that are already taking place, and where many people in the future choose not to travel by the private car. It also recognises the serious health and environmental concerns that continued car use will bring, along with the associated levels of traffic congestion. The focus for transport mitigation and improvements will therefore be on non-car modes of travel and looking to the future, rather than perpetuating car use by planning the strategy on the basis of past travel patterns where car travel has dominated.

6.6 Cambridgeshire Quality Charter for Growth (2010) – Four C's

- 6.6.1 As outlined Section 3 at the heart of the strategy for this site are the four C's Community, Connectivity, Character and Climate Proofing, with a clear focus the 9 key points for 'Connectivity' forming the basis for this Access & Movement Strategy.
- 6.6.2 Below is a list of the 9 key connectivity points and how the development of the masterplan strategy has focused on each.
 - i. Public transport in place at the start of the development to encourage people to get used to green options.
 - a. Station Fields is located adjacent to the existing Foxton Rail Station
 - b. Existing 915 bus service located adjacent to Station Fields on the A10
 - ii. Public transport should integrate with existing transport systems with frequent service and stops.
 - a. Potential Foxton Travel Hub and Community Hub incorporated within Station Fields
 - b. Potential to provide link over railway to better link existing and future residents to Foxton Rail Station, Travel Hub, Community and existing buses.
 - c. New A10 level crossing bypass to improve conventional bus journey time reliability, and significantly enhance pedestrian access between Foxton Station and the Travel Hub.
 - iii. Linkages with existing and potential employment opportunities should be recognised.
 - Foxton Rail Station and existing bus stops provides links to key employment centres, including Cambridge City Centre, Cambridge Station Square, Cambridge Biomedical Campus, Cambridge Business Park, Cambridge Science Park and Cambridge Regional College
 - b. The reliability of community bus services linking to local employment centres will be significant enhanced through the A10 level crossing bypass, by reducing current delays to bus services caused by the level crossing.

- iv. New developments should contribute to the wider environmental goals for the Cambridge area enhancing the feasibility of walking and cycling.
 - a. The Site's Masterplan has been designed to connect into the committed Melbourne Greenway.
- v. The streets, footpaths and other links to major urban extensions should be designed as a user hierarchy it should be clear who and what they are for. Primacy should be given to walking, cycling and community transport.
 - a. The entire masterplan has been developed on the principle of the walking, cycling public transport hierarchy.
 - b. The masterplan includes for a street network that will promote low vehicles speeds and therefore a safe walking / cycling environment, by; avoiding straight roads, allowing for walk/cycle cut throughs, breaks in motor vehicle routes, and introducing natural traffic calming measures to reduce vehicle speeds.
- vi. Easy mobility for all, including those using wheelchairs and pushchairs should be taken into account.
 - a. With the masterplan focusing on the sustainable pedestrian and cycle network, the corridor widths and alignment throughout the site will allow for appropriate and direct wheelchair and pushchair accessibility.
- vii. Bus stops should offer well designed waiting areas, providing information on services and local facilities, and should feel safe and overlooked.
 - a. If designed efficiently with placemaking and the wider community in mind, as shown on the proposed Masterplan, the Travel Hub will provide bus interchange, high quality information boards, public realm, café & pop-up stalls, digital ticketing systems, well designed waiting areas, and other important facilities.
- viii. Parking management such as charges and the provision of car sharing / car clubs should be used to discourage unnecessary car use.
 - a. In addition to the highly sustainable location of the site and potential on site Travel Hub, the Site offers great potential to integrate appropriate car sharing and car club infrastructure to further discourage unnecessary car use. This can be introduced as part of a car club area for residents (as part of a successful Travel Plan) and also car sharing spaces within existing and future places of employment/destinations (employment and local centres).
 - b. Both the residential and employment land uses will be designed to meet the latest parking policy at the time of planning submission.
 - c. In addition to the EV charging bays proposed as part of a Travel Hub, both the residential and employment land uses will include for EV charging bays (to meet the latest parking policy at the time of planning submission).
- ix. Road design should include permeable surfaces.
 - a. Permeable surfaces have and will continue to be considered as the masterplan is developed.

7 Summary and Conclusion

7.1 Summary

- 7.1.1 This Access and Movement Strategy sets out the high-level transport strategy to assist with the promotion of Land North West of A10 Royston Road Foxton (Station Fields) for new residential-led development through the emerging Greater Cambridge Local Plan at the current First Proposals (Preferred Options) stage.
- 7.1.2 The transport strategy for Station Fields will seek to achieve the following objectives:
 - Reduce the need to travel as private car driver;
 - Maximise walking and cycling for local trips with surrounding areas over use of the private car; and
 - Encourage public transport use, primarily the railway line between Cambridge and Royston.
- 7.1.3 This strategy seeks to address future residents' ability to access employment opportunities and amenities by a choice of travel modes, along with promoting healthy lifestyles through walking and cycling. The public transport accessibility of the site is evidenced by the fact that the Greater Cambridge Partnership (GCP) are promoting the Foxton Travel Hub within the Site. The current GCP proposals include for a Travel Hub with 200 car park spaces along with high-quality cycle parking provision for in the region of 100 spaces. The objective is to encourage road users travelling into Cambridge from the Melbourn / Royston direction to park at the Travel Hub and continue their onward journey either by train or cycle.
- 7.1.4 Axis support the principle of the Travel Hub in this location to be incorporated as part of Station Fields, and consider the proposals could be enhanced to fully realise its potential to encourage non-car travel by the Site delivering a new A10 level crossing bypass. It is considered that the Masterplan proposed for Station Fields offers more efficient land use and better consideration to placemaking and wider community benefit, and delivery of an enhanced Travel Hub that has significantly improved accessibility on foot with Foxton station. The Masterplan proposed for Station Fields shows how an alternative Travel Hub option can deliver more than just a car park, contributing to the key GCP objectives, whilst also delivering benefits to the wider community.
- 7.1.5 As the GCP are promoting this area as a location for the Travel Hub indicates that the site has very good non-car accessibility, particularly to Cambridge. This presents a good opportunity for Station Fields, with the support of a developing transport strategy, to meet local and national transport planning policy objectives of reducing the need to travel by car.
- 7.1.6 In summary Station Fields offers the following strategic opportunities:
 - Station Fields sits at a strategic location where both the A10 road and regional rail network meet, making it an important site in the future of Greater Cambridge with potential for future growth.
 - Vehicular access can be gained directly from the A10.
 - Foxton Station is the penultimate stop before Cambridge station (approximately 9 minute journey to Cambridge Station).
 - Train journey to Kings Cross London takes as little as 1 hour 15 minutes.

- Located along the Melbourn Greenways project.
- Located outside the Green Belt.
- Situated close to the River Cam providing opportunity for significant green and blue infrastructure improvements for people and nature.
- Placemaking potential at a scale that fits with the rural qualities and village character of the area.
- Sustainable links to key existing and committed South Cambridgeshire and Cambridge City employment zones

7.2 Conclusion

- 7.2.1 The Site's location is paramount why developing a community here will meet sustainable transport objectives of maximising non-car travel modes whereby future residents can live their lives without the need to rely on the private car, and meaning we can deliver a new residential development where the private car does not dominate the Site. It is adjacent to Foxton Rail Station that will provide residents with sustainable travel options to many important employment centres, including Cambridge City Centre, Cambridge Station Square, Cambridge Biomedical Campus, Cambridge Business Park, Cambridge Science Park and Cambridge Regional College. Integral to the development will be the integration with existing and proposed walking, cycling and public transport networks, so that the development will have excellent connectivity to/from the site with surrounding areas by these modes.
- 7.2.2 Through its excellent sustainable location and non-car transport links, the Site will address the habitual use of the private car and provide a high quality place for people to live their lives in a healthy and safe environment.
- 7.2.3 With the implementation of this transport strategy combined with the A10 level crossing bypass to assist with accessibility for GCP's Travel Hub, it is considered that Station Fields is suitable for development, is deliverable, accords with national and local transport policy guidance, is in a sustainable location, and removes the capacity constraint generated by the A10 level crossing.
- 7.2.4 In summary, Station Fields should score Green in the HELAA for Transport and Roads, as the proposed Masterplan removes the A10 level crossing capacity constraint, and there are no transport nor highways reasons why Station Fields should not be allocated for development in the Greater Cambridge Local Plan.

Appendix A Framework Masterplan

$L D \overline{\Lambda} D E S | G N$

London 209–215 Blackfriars Road London SE1 8NL United Kingdom +44 (0) 20 7467 1470

Bristol Studio 4B 36 King Street Bristol BS1 4DZ United Kingdom +44 (0) 117 203 3628

Cambridge The Courtyard 17A Sturton Street Cambridge CB1 2SN +44 (0) 1223 949054

Exeter Kings Wharf The Quay Exeter EX2 4AN United Kingdom +44 (0) 1392 260 430 Glasgow Sovereign House 158 West Regent Street Glasgow G2 4RL United Kingdom +44 (0) 1412 229 780

Manchester Hilton Square 3 Tariff Street Manchester M1 2FF United Kingdom +44 (0)161 359 5684

Oxford Worton Rectory Park Oxford OX29 4SX United Kingdom +44 (0) 1865 887050

Peterborough 17 Minster Precincts Peterborough PE1 1XX United Kingdom +44 (0) 1733 310 471

www.lda-design.co.uk

LDA Design Consulting Ltd Registered No: 09312403 17 Minster Precincts, Peterborough PE1 1XX

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