



# **GREATER CAMBRIDGE LOCAL PLAN: FIRST PROPOSALS CONSULTATION 2021**

## **Land north-east of Villa Road, Impington, CB24 9PX**

Prepared by Strutt & Parker on behalf of NIAB Trust

December 2021

Site Name:	Land North-East of Villa Road, Impington, CB24 9PX
Client Name:	NIAB Trust
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Appendix A: Housing and Employment Land Availability Assessment, Site Reference: 40236;

Appendix B: Prospective Site Feasibility Study by pHp architects, issue 1, dated 6.12.2021

Appendix C: Flood Risk Management Note by Cannon Consulting Engineers dated 23 December 2020.

## 1. INTRODUCTION

- 1.1 This representation has been prepared by Strutt & Parker on behalf of NIAB Trust to support the promotion of Land north-east of Villa Road, Impington as part of the Greater Cambridge First Proposals Consultation 2021.
- 1.2 The site covers an area of approximately 2.19 hectares and is capable of delivering 4,100sqm of light industrial/research and development units including ancillary provisions such as car parking and landscaping. The site allocation would attract high-tech firms to the area to compliment the established firms that are located within Vision Park and also NIAB's crop research facilities at Park Farm. This would help to boost the local economy by attracting high-tech firms to the area and create job opportunities. It is also noted that this site could provide opportunities for lab space, which is in short supply in Cambridge.
- 1.3 In September 2021 Greater Cambridge Shared Planning Service (GCSPS) published the Greater Cambridge HELAA, which provided an initial assessment of the sites put forward for allocation as part of the Call for Sites consultation within Greater Cambridge.
- 1.4 This representation provides a response to the 'First Proposals' Consultations. The representation has been structured to respond to relevant questions as set out within the First Proposals Consultation. In addition, a detailed assessment is provided in respect of the HELAA Assessment for the site.
- 1.5 The HELAA excludes the Villa Road site from allocation primarily on the basis of concerns relating to the impact on flood risk, landscape and townscape; site access; and strategic highway impact.
- 1.6 In response to the areas of concern, a feasibility study has been prepared which considers the potential development opportunities including scale, access, connectivity, flood relief and biodiversity improvements. A technical note on flood management has also been produced to respond to the concerns raised regarding flood risk. Further analysis of this is set out within section 7 of this report.
- 1.7 In support of this report, the following documents have been prepared;
  - Prospective Site Feasibility Study by pHp architects;
  - Flood risk management note by Cannon Consulting Engineers



**2. QUESTION: Do you agree that new development should mainly focus on sites where car travel, and therefore carbon emissions, can be minimise?**

- 2.1 Yes, in principle the proposal to focus development on sites where car travel can be minimised is supported. Consistent with this strategy, it is considered to be very important that some growth is delivered in villages that have existing employment areas and have good access to local services and public transport links. National policy is clear within paragraph 79 of the NPPF that planning policies should identify opportunities for villages to grow and thrive, especially where they will support local services.
- 2.2 The growth strategy is to create nearly 60,000 (58,500) new jobs across within the plan period to support the economic growth of Greater Cambridge. This growth scenario is at the medium level which aligns with the medium scenario for the housing growth strategy. This strategy requires 2,786 new jobs to be created per year. Greater Cambridge is in a unique position outside London that it has a strong growing economy. The main factor holding back the unleashing the economic potential for Greater Cambridge is housing supply. Therefore, it is essential that the Greater Cambridge Local Plan puts forward an ambitious growth strategy so that it can attract and maintain the work force required to enable companies to grow.
- 2.3 The aim of the jobs policies in the First Proposals is to encourage a flourishing and mixed economy in Greater Cambridge with a wide range of jobs. Sensitive small-scale employment development can help sustain rural economies, and provide a wider range of employment opportunities for local residents. Providing jobs near to residents to reduce the need to travel is a key issue. Therefore, it is important that jobs are created in existing employment locations close to existing settlements in order to reduce car travel.
- 2.4 The CPIER report (2018), which is referenced as a key document within the evidence base provides a detailed analysis regarding the potential benefits of focusing growth along key transport corridors. Histon & Impington is a highly sustainable location with excellent transport links including the Guided Busway and other bus services. It also has a strong employment area which is located alongside the Guided Busway. In the settlement hierarchy, Histon & Impington is identified as a 'Rural Centre' which has no limitation on the size of individual schemes.
- 2.5 It is therefore essential that the existing employment areas which are located adjacent to the existing settlement are enabled to grow, particularly in such a sustainable and

attractive location as the Villa Road site. The allocation of the Villa Road site for employment use (B2 and E use classes) would attract companies to an establish employment area which has excellent links to a range of existing facilities which can be accessed without the need for car travel.

- 2.6 The Villa Road site is located within close proximity to the NIAB Agricultural Research facility which lies to the north along Villa Road which would complement the employment allocation of the site.
- 2.7 The Villa Road site is enclosed on three sides by an electricity terminal site to north-west, the Guided Busway to the north with large warehouses beyond, and housing to the south-east in Primrose Lane. No sites have been allocated for employment in Histon & Impington. The site represents an ideal and suitable site for employment due to having excellent transport links, being highly accessible by sustainable modes of transport and would not have a detrimental impact on the wider landscape context.

**3. QUESTION: We think we should be very limited about the development we allow in villages, with only a few allocated sites in villages, with good public transport connections and local services. Which villages do you think should see new development of any kind?**

3.1 Growth should be focused in villages, such as Histon & Impington, which benefit from having an established employment areas and excellent links to public transport. Histon & Impington is one of 5 Rural Centres which should be the focus of housing and employment growth.

3.2 It is considered very important that the Local Plan makes provision for a proportion of growth to be delivered from villages such as Histon & Impington to avoid them becoming dormitory villages where residents have to travel into Cambridge or further afield for work and leisure. It is therefore considered that additional growth should be provided within the most sustainable villages, such as Histon & Impington.

3.3 The allocation of the Villa Road site would provide an economic boost to the local area which would enable existing services and facilities to remain. The site is also located within close proximity to existing housing which the employment opportunity would be attractive to.



**4. QUESTION: What housing, jobs, facilities or open spaces do you think should be provided in and around these villages?**

- 4.1 It is important that a range of housing, jobs and facilities are provided within larger villages as part of new allocations to allow them to thrive and remain vibrant. NIAB Trust is responsible for the promotion of the Villa Road, Impington site, and have a track record of delivering high quality developments in Cambridge. NIAB are fully committed, to engagement with the GCSPS and Parish Council regarding the potential allocation of employment uses to be delivered on the Villa Road site.
- 4.2 The Villa Road site is located adjacent to an established employment area and within close proximity to local facilities and services in the village. It therefore essential to the local economy that there is space to cater for and attract the small to medium size firms to the area by providing an attractive location, close to sustainable transport links. The Villa Road site achieves both these objectives. The feasibility study demonstrates how the site could be laid out to respond to its context without impacting the uses on each of the site's boundaries.
- 4.3 It is important that the GCSPS growth strategy includes provision that caters for all needs and requirements. The Villa Road site is located adjacent to an established employment base which is vital to the local economy and so should be the focus of a new allocation to allow some expansion. The site could also provide much-needed lab space in the Cambridge area. Therefore, it is considered that the Villa Road site should be allocated for B2 and E use class employment uses in the emerging Greater Cambridge Local Plan as it meets the objectives of the economic growth strategy.

**5. QUESTION: Are there any sites which you think should be developed for housing or business use, which we haven't got on our map so far?**

5.1 Yes, Land north-east of Villa Road, Impington should be allocated for employment development and would represent a sound allocation as part of the emerging Local Plan as it complements the objectives of the Greater Cambridge economic growth strategy. The Land off Villa Road site was promoted originally at Call for Sites and Issues & Options stages.

5.2 We acknowledge that the focus of the economic strategy is to support the development of the Biomedical Campus, however, the crop science and food production research sectors are an equally important and rapidly expanding part of the Greater Cambridge economy and should be supported as well.

**Response to HELAA**

5.3 The key concern raised in the HELAA towards the site's allocation was with flood risk, landscape and townscape, site access, and highway impact. It is considered the impact on these issues can be satisfactorily addressed through the provision of detail and there should be no principle concerns with the allocation of the site.

5.4 A feasibility study and flood risk management note have been produced to support the allocation of the site at this stage and demonstrate why the site is acceptable for employment use. The study and note also rebut the issues raised in the HELAA.

5.5 A detailed review of the HELAA assessment in respect of the Land north-east of Villa Road, Impington site is set out below.

**Site Assessment Summary**

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

5.6 It is considered that the findings of the HELAA Report in relation to this site were on the whole positive. The HELAA Report found the site was both available and achievable. It was accepted that the development could be made available in the next 0-5 years and

can also be completed within this timescale. The HELAA Report did find that the site was not suitable, however, it is considered that the reasons given for this outcome can be addressed as explained below.

### Site Assessment

Issue	Assessment	Response	Amended Assessment
Adopted Development Plan Policies	Amber	<p>The site is located adjacent to an existing and established employment area that plays a vital role to the local economy. The site is also located within close proximity to public transport links and is within walking and cycle distance of local facilities and services including the City centre. The site represents an attractive location for employment use particularly given its close proximity to the existing NIAB facility which is access via Villa Road.</p>	Green
Flood Risk	Red	<p>A flood risk management note has been prepared by Cannon Consulting Engineers which provides options for reducing flood risk. The note demonstrates that by controlling the volume of flow from the existing drainage channels including the provision of compensatory storage areas around the field margins to the south combined with land-raising on site, would make the development safe and also reduce potential flood risk downstream in Histon.</p> <p>Therefore, the site should be reassessed as it can be demonstrated that flood risk can be mitigated and will deliver wider environmental benefits.</p>	Amber

Issue	Assessment	Response	Amended Assessment
Landscape and Townscape	<b>Red</b>	<p>The site is well related to the existing settlement and is enclosed on three sides by development. The only interface that would be apparent in the landscape is the south-west boundary. However, Villa Road provides a defined boundary to the agricultural fields beyond.</p> <p>As acknowledged, the development of the site would have limited negative landscape impact and that it may be possible at an appropriate height and design to include some development with a landscape buffer. It is therefore unclear as to why an assessment of <b>Red</b> has been given when there is existing development on either side of the site which makes it a logical infill site.</p> <p>Any development would respect the Local Character and Landscape Character of the area. It is considered that a sympathetic approach to the site, including appropriate heights and design as set out in the accompanying feasibility report, would result in an excellent development which would enhance the character of the area and improve the interface with the landscape and townscape beyond.</p> <p>It is acknowledged in the Council's own evidence base that the site is of moderate value to the Green Belt. Even this is considered to be generous. The site is considered to have low value to the Green Belt being bound on three sides by existing development.</p>	<b>Green</b>
Biodiversity and Geodiversity	<b>Amber</b>	The flood risk strategy note by Cannon Consulting Engineers	<b>Green</b>

Issue	Assessment	Response	Amended Assessment
		<p>identifies that the extensive off site mitigation areas which would be created would provide opportunities for extensive biodiversity enhancement.</p> <p>Any development would look to retain Habitats of Principle Importance/priority habitat of high ecological value, and the proposed development would ensure a net gain in biodiversity.</p> <p>As acknowledged, any impact on designated sites, or those with a regional or local protection could be reasonably mitigated or compensated.</p> <p>For the above reasons it is considered that the site cannot be considered unsuitable for reasons of biodiversity or geodiversity.</p>	
Open Space/Green Infrastructure	<b>Green</b>	The site has the potential to provide open space to serve the new and wider local community.	-
Historic Environment	<b>Green</b>	It was acknowledged that the site would have either a neutral or positive impact on designated or non-designated heritage assets.	-
Archaeology	<b>Amber</b>	The probable presence of prehistoric and Roman features are considered to be matters which can be dealt with at the application stage. As this site is limited in size, any delays associated with archaeology would be unlikely to be significant and would not undermine the overarching strategy to employment use.	<b>Green</b>
Accessibility to Services and Facilities	<b>Green</b>	It is acknowledged that the site is in an excellent location in terms of accessibility to local services and facilities including public transport links.	-

Issue	Assessment	Response	Amended Assessment
Site Access	Red	Villa Road already provides access to the housing development in Primrose Lane and the NIAB facility beyond the site. The existing private access road which connects to Villa Road would be retained and runs across the entire site frontage. The site is clearly capable of providing a direct and safe link to the adopted highway. If necessary, highway improvements can be achieved to enhance Villa Road. Therefore, the assessment of the site access should be made Green as there are no in principle concerns with accessing the site from Villa Road.	Green
Transport and Roads	Amber	It is acknowledged that any potential impact on the road network could be reasonably mitigated. Therefore, any scheme that came forward on the allocation would need to ensure it carries out the necessary assessments and improvements. The assessment of the site should therefore be Green. Contributions arising from any development could be used to help improve transport and roads in the area.	Green
Noise, Vibration, Odour and Light Pollution	Amber	As acknowledged, noise from nearby industrial/commercial activities could be considered and mitigated at detail design stage. The site is also proposed for employment uses a less sensitive receptor than a residential use.	Green
Air Quality	Green	No issues identified. The site is located in a sustainable location with good access to services.	-
Contamination and Ground Stability	Amber	The site has been in agricultural use. If any contamination is detected this could be suitably dealt with following the grant of planning permission.	Green



## Further Constraints

Issue	Assessment	Response	Amended Assessment
Constraints to development	-	No issues identified.	
Strategic Highways Impact	<b>Red</b>	<p>The site is extremely well connected to sustainable transport routes, being located directly to the south of the Guided Bus Way and within approximately 0.5 kilometres of a bus stop on this route. This route also acts as a cycle/walking route connecting the site to the wider city sustainable transport network.</p> <p>Furthermore, the approach and assessment of the site, in this regard, is not consistent with the scoring of the land which is situated within the North- East Cambridge Area Action Plan. The Cambridge North- East Action Plan establishes a vision for a new city district in North East Cambridge, comprising 182 hectares of brownfield land. The associated transport impact on the A14 would be vast. By contrast any transport impact associated with the site at Redgate Road would be relatively small. It follows that if Redgate Road is ruled out of allocation for Strategic Highways Impact, land covered by the Area Action Plan should also be ruled out. This approach clearly needs more thought, and a more holistic approach involving smaller and medium sites should be considered.</p> <p>For the above reasons, any application would demonstrate a highly sustainable mode share, and could include capacity local assessments at important local</p>	<b>Amber</b>

Issue	Assessment	Response	Amended Assessment
		<p>junctions. Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated. Contributions arising from any development could be used to help improve transport and roads in the area.</p> <p>An assessment of <b>Red</b> is considered to be unjustified, and should instead be changed to <b>Amber</b>.</p>	
Employment	-	No issues identified.	
Green Belt - Assessment of Harm of Green Belt Release	-	<p>No assessment has been made in relation to the suitability of releasing the site from the Green Belt. However, the HELAA does indicate a very high level of harm associated with the release of Parcel ID HI20 (which does not make up part of the site, but is located to its west), and a moderate high degree of harm to HI21 (which includes the site). It is considered that development of the site would not result in a moderate high degree of harm to the Green Belt because:</p> <ul style="list-style-type: none"> <li>• It would only involve approximately half of parcel HI21;</li> <li>• The site is enclosed on three sides by built development and contributes very little to the purposes of the Green Belt; and</li> <li>• Any development would be low density and would maintain openness.</li> </ul> <p>For the above reasons, an assessment of a low degree of harm is considered to be more appropriate.</p>	-



Issue	Assessment	Response	Amended Assessment
		<p>Although the release of this land from the Green Belt has not been flagged as making it unsuitable for allocation, the following comments are made:</p> <p>Paragraph 140 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation and updating of plans. The preparation of the new Local Plan therefore represents an opportunity to review the Green Belt boundary. Greater Cambridge is an exceptional area, both in its contribution to the national economy and its international reputation. In order to sustain its natural growth in a sustainable way, a wholesale review of the Cambridge Green Belt should be undertaken. This should be a balanced review, not simply an assessment of the performance of various parcels of land against the purposes of Green Belt. It should be a challenging assessment balancing the scale of development required to support the growth necessary to deliver the Cambridgeshire and Peterborough vision of doubling the total economic output of the area over the next 25 years. To support this level of job growth around 2,900 homes will need to be built each year to deliver a total of 66,700 homes between 2017 – 2040. It is imperative both locally and at the national level that Cambridge maintains its international reputation and the blanket protection provided by existing</p>	

Issue	Assessment	Response	Amended Assessment
		<p>outdated Green Belt policy only stifles sustainable growth.</p> <p>Cambridge as a city is exceptional and as such, a radical review of Green Belt policy is clearly justified to facilitate its growth. The tools available today to analyse and inform plan making decisions are highly sophisticated and should be used to undertake a challenging and balanced review of the existing Green Belt.</p> <p>Paragraph 142 of the NPPF indicates that Green Belt release should be targeted at sustainable locations well served by public transport such as Histon and Impington, which benefits from the guided busway. It goes on to state that compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land should be included. The NIAB Trust's extensive land holding at Park Farm would allow these objectives to be filled.</p> <p>We therefore conclude that the new local plan should take the opportunity to review the Green Belt boundaries around Park Farm and allocate all these additional development sites.</p>	

## 6. CONCLUSION

6.1 This representation has been prepared by Strutt & Parker, on behalf of NIAB Trust to support the allocation of a site for 4,100sqm of B2 and E use class employment development, associated landscaping and off site flood mitigation measures. The promotion of the site has sought to clearly respond to the HELAA Assessment of the site.

6.2 The site has a multitude of favourable attributes that would demonstrate it is a sound allocation for employment growth, within the emerging Local Plan:

- It is located in a sustainable location in terms of its proximity to the village core and employment areas;
- Histon & Impington is a very sustainable village to accommodate further growth and already has a range of services and community facilities along with excellent public transport connections including the guided busway which runs adjacent to the site.
- Employment development on the site would provide an economic boost to the existing facilities and businesses in the area, and provide employment opportunities for local people. The crop science and food production research sectors are a highly important and rapidly expanding part of the Greater Cambridge economy and should be supported. The location of this site next to the extensive existing NIAB research facilities would complement this objective;
- The site could provide lab space which is in high demand in the Cambridge area;
- The proposed flood risk mitigation strategy which includes extensive off site additional storage at Park Farm, will not only make the development site safe but will improve flood resilience downstream in Histon.
- The development has the opportunity to provide significant biodiversity enhancements and create a better defined edge of the village;
- The site is unconstrained and fully deliverable in planning terms;
- NAIB Trust are committed to detailed engagement with both Planning Officers and statutory and non- statutory consultees, including working closely with the local community in the evolution of their vision for the site.

6.3 In light of the above, it is therefore considered that the Land north-east of Villa Road, Impington provides an excellent location for an employment development and would be a sound allocation as part of the economic strategy in the emerging Local Plan.