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South Cambridgeshire District Council & Cambridge City Council
Call for Sites Consultation,
Planning Policy Team,
South Cambridgeshire District Council,
Cambourne Business Park, Cambourne,
Cambridge, CB23 6EA

Direct Dial:
Email:
Our Ref:



Park Farm/195648

25th March 2019

Email: 

Dear Sir or Madam

South Cambridgeshire District Council 'Call for Sites' Submission: Land west of South Road, Impington.

I write on behalf of our client, NIAB Trust, in relation to the above consultation which forms part of the commencement of the Greater Cambridge Local Plan. As part of the 'Call for Site' consultation, please find attached a red line site plan. I can confirm that the NIAB Trust as landowner fully support this submission.

The site is being put forward for consideration as a housing allocation within the Greater Cambridge Local Plan. It has a site area of 20.26 hectares and is located adjacent to existing housing development. The site for housing provides an opportunity to provide a high mix of units to address local housing need as well as make provision for self/custom building plots. There is a chronic shortage of smaller and affordable units within Cambridge and the villages on the edges which the allocation of this site could in part redress. It is one of three sites (edged red on the figure below) being put forward by NIAB on the land at Park Farm. This site could be developed in isolation to the other sites or as part of a more strategic proposal utilising other land within NIAB's control.

According to the Cambridgeshire and Peterborough Independent Review (CIPER) Final Report 2018, which is a critical review document of the key employment, housing, infrastructure and, well being and education profiles and requirements in Cambridgeshire and Peterborough. The review has been produced by the Cambridgeshire and Peterborough Combined Authority and Cambridge Ahead. The document states:

"In the Greater Cambridge economy businesses have brought about revolutionary advances in a wide array of fields, transforming lives around the world. The impacts of business growth have not been entirely positive, however. Growth in employment has not been matched by corresponding house-building, or developments in infrastructure. Consequently, house prices have soared and journey times have increased as congestion has intensified. This has meant that many have been forced to endure unpleasant commutes, or been priced away from the city altogether due to the unaffordability of rents. This is bad for both people and businesses, and we believe is an unsustainable approach to growth. We are rapidly approaching the point where even high-value businesses may decide that being based in Cambridge is no longer attractive. If nothing is done, the damage to society from the continuing drift away of less well-paid workers may become irreparable, the ageing of the city (whose housing ladder's bottom run is out of reach of the vast majority of



the young) will threaten its dynamism. Cambridge is at a decisive moment in its history where it must choose whether it wants to once again reshape itself for growth, or let itself stagnate and potentially wither. Therefore, improvements in infrastructure, and further development must start in and around Cambridge”.

Whilst the report is not a material document for the plan-making process, it highlights the significant cross road that the region and particularly Cambridge is at, and the importance of making the right next step in the regional and local growth strategy. Therefore, to continue the momentum of growth that Cambridge and South Cambridgeshire has been experiencing will be important and doing nothing or restricting/constraining sustainable development should not be an option. The rising house prices and lack of affordability issues, due to disproportionate rate of wage growth to house prices, are putting constraint on many if not most firms to find and retain staff. Therefore, there needs to be a focus on looking favourably on sustainable sites for housing. We consider that supporting these allocations would represent sustainable development. The scale of these allocations which include an area of employment, would be complimentary to each other and significant environmental benefits could be delivered through a more comprehensive approach to allocations.

To date, we have not undertaken any specific technical studies/reviews of the site. However, we believe the site is suitable for a sympathetic, sustainable and proportionate extension to the existing settlement of Impington for additional housing. Histon and Impington are ideally located on the edge of Cambridge with excellent transport links into the centre via public transport, cycling and walking. In view of this we would encourage our client to put forward a development that takes advantage of these links to reduce the amount of private car journeys into Cambridge.



In respect of the three sites (edged red above) being put forward by NIAB, they are located between Girton, Impington and Histon which are settlements located on the edge of Cambridge and have excellent public transport links into the centre, which is also easily accessible by cycling and walking. We are of the view that a strategic case for the allocation of all three sites can be made which would provide additional housing and employment space within compatible sites and in a sustainable location. We are aware that land to the north of this submission site and not in NIAB's ownership, is also being put forward by Kings Gate (edged blue above) and logically could be included as part of the any Green Belt relaxation. Paragraph 138 of the NPPF states promoting sustainable patterns of development should be taken into account when reviewing Green Belt boundaries. It goes on to state that local planning authorities should channel sustainable development towards urban areas within the Green Belt boundaries and the impact of removing land from the Green Belt should be offset through compensatory improvements. NIAB own a significant amount of land between the settlements which is currently used for agriculture and Government and private sector funded arable research trails. Therefore, the release of this site and the others that are being put forward could facilitate the creation of a significant strategic 'green wedge' that would link into the green space on Darwin Green, located on the opposite side of the A14. The southern part of the green wedge could be utilised in part as a country park which this part of Cambridge currently does not benefit from. This would not only provide a large area of public open space, it could also include flood mitigation measures to reduce flood risk in the surrounding settlements. The Green Wedge would maintain openness and be retained as Green Belt. The inclusion of a County Park would reinforce the Green Belt function preventing the coalescence of the settlements and enhance their setting. It should also be noted that most of the southern boundary of NIAB's land is delineated by the A14 which is currently undergoing significant upgrades which will change the overall character of this part of the Green Belt, having a more urbanising effect along this boundary. Additional, landscaping could mitigate some of these negative impacts and introduced both visual and biodiversity improvements.

The site is however located within the Green Belt and therefore the Council will need to amend the boundary to accommodate this site allocation. Paragraph 136 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 for this and the other sites being put forward by NIAB. In respect of this particular site it forms a parcel of land between the existing drain which runs along its western boundary. The existing settlement edge is inconsistent, stepping in towards the A14 with differing residential characters. To the south the A14 upgrades have had a negative and more urbanising impact on the character of the immediate area and setting of the edge of the settlement. The creation of a strong landscape corridor along the drain would provide a much softer edge, enhancing the character of the settlement and delivering environmental and biodiversity enhancement.

The principle of the compensatory improvements would provide significant environmental and accessibility enhancements to the Green Belt. Whilst at this stage we have not conducted a sequential test of other alternative sites, it is clear that suitable land within the settlement is a diminishing asset. We would therefore work with the Council to undertake research to justify amending the Green Belt boundary in this particular location. We would be confident of being able to argue that the sites form well-related extensions to the existing settlements which could be reinforced through additional landscaping. Furthermore, that they play a limited role in respect of the openness of the Green Belt and the proposals would reinforce and safeguard the settlements from coalescence and would enhance their setting.

We believe the site is suitable for a sympathetic, sustainable and proportionate extension to the existing settlement of Impington for additional housing. Impington is ideally located on the edge of Cambridge with excellent transport links into the centre via public transport, cycling and walking. In view of this, with the support of an allocation, we would encourage our client to bring forward a development that takes advantage of these links to reduce the amount of private car journeys into Cambridge.

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25th March 2019



If you have any queries in relation to the above, please do not hesitate to contact me.

Yours sincerely

Adam Davies
Associate Director
Cambridge Planning & Development
Strutt & Parker

Encs – Red line site plan
Call for Sites Form
Confirmation of support email