

**GRANGE FARM,
GIRTON
GREATER CAMBRIDGE
LOCAL PLAN – ISSUES
AND OPTIONS
CONSULTATION 2020**

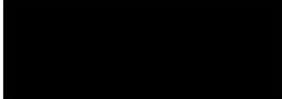
Quality Assurance

Site name: Grange Farm, Huntingdon Road, Girton

Client name: Chivers Farms Ltd

Type of report: Issues and Options Consultation Representation

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Signed 

Date 24 February 2020

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Signed 

Date 24 February 2020



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1.0 Introduction

- 1.1 These representations are made on behalf of Chivers Farms Ltd and in response to the Greater Cambridge Local Plan Issues and Options 2020 consultation. These representations follow those previously submitted in respect of the 2019 Call for Sites consultation.
- 1.2 In the context of these Issues and Options Consultation comments, Chivers Farms Ltd is promoting land at Grange Farm, Huntingdon Road, Girton for employment development. A location plan is included at **Appendix 1**.
- 1.3 The proposal will bring a number of benefits to support the delivery of a sound and sustainable spatial strategy as part of the Local Plan, including:
- Delivery of local employment facilities;
 - It is a flexible site that would suit a wide range of commercial uses;
 - Strategically located to serve local and regional markets, its location would be attractive to the local and regional industrial market;
 - Supporting the employment activities of an existing Site near homes and essential infrastructure. The site is located within walking and cycling distance of Girton village, reducing the need to travel by private car;
 - Support the area's local economy, including shops and services; and
 - Providing biodiversity enhancement together with employment opportunities.
- 1.4 These representations are accompanied by the following documents:
- Preliminary Ecology Appraisal (Ecology Solutions);
 - Flood Risk Assessment (EAS);
 - Transport Access Review (EAS);
 - Opportunities and Constraints Plan (Bidwells Urban Design Studio); and
 - Masterplan (Bidwells Urban Design Studio).
- 1.5 Comments are made to relevant questions in the Issues and Options consultation document as follows:
- Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?
 - Question 6. Do you agree with the potential big themes for the Local Plan?
 - Question 7. How do you think we should prioritise these big themes? Rank the options below 1-4 (1-Most Preferred 4-Least Preferred)
 - Question 8. How should the Local Plan help us achieve net zero carbon by 2050?
 - Question 9. How do you think we should be reducing our impact on the climate? Have we missed any key actions?

- Question 10. Do you think we should require extra climate adaptation and resilience features to new developments?
- Question 12. How should the Local Plan help us improve the natural environment?
- Question 13. How do you think we should improve the green space network?
- Question 14. How do we achieve biodiversity net gain through new developments?
- Question 15. Do you agree that we should aim to increase tree cover across the area?
- Question 16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?
- Question 20. How do you think we should achieve improvements in air quality?
- Question 24. How important do you think continuing economic growth is for the next Local Plan?
- Question 25. What kind of business and industrial space do you think is most needed in the area?
- Question 26. Do you think we should be protecting existing business and industrial space?
- Question 27. How should we balance supporting our knowledge intensive sectors, with creating a wide range of different jobs? What kind of jobs would you like to see created in the area?
- Question 37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?
- Question 39. Should we look to remove land from the Green Belt if evidence shows it provides a more sustainable development option by reducing travel distances, helping us reduce our climate impacts?
- Question 42. Where should we site new development? Rank the options below 1-6 (1 Most Preferred 6-Least Preferred)

2.0 Site Context and Background

- 2.1 Chivers Farms Ltd are submitting Grange Farm, Huntingdon Road, Girton. The site was submitted for consideration as part of the Call for Sites in March 2019. The site is located northwest of Cambridge, off Junction 31 of the A14, with easy access to the M11 and A428. Girton is to the east of the site which is approximately 1.9km, Bar Hill is to the south-west of the site which is approximately 4.3km, and Oakington is to the north of the site which is approximately 7.4km. The site lies within South Cambridgeshire District Council (SCDC).
- 2.2 The site currently comprises a mixture of agricultural, farm buildings and telecommunication masts. The site also contains redundant buildings which were previously used for grading, packing and storage for agricultural produce.
- 2.3 As part of the A14 modifications the existing access from the south bound slip will be severed. Parallel to this and closer to the site frontage a completely new access road is proposed. This commences to the north from the Dry Drayton Road and will be a lower classified road than the previous south bound slip and more suited to local use. As a result of the new road being closer to the site, the actual site access becomes shorter. It is not yet known what the speed limit of the new local access road will be, but it is anticipated that it would be no more than 40mph.
- 2.4 The majority of the site is located in Flood Zone 1 of the Environment Agency (EA) Flood Zone Maps. However, there is an area adjacent to the Beck Brook which is within Flood Zone 2 and 3. It is also shown to be predominantly at very low risk of surface water flooding with some small isolated areas at risk of surface water flooding and areas adjacent to the brook similar to the fluvial Flood Zones.
- 2.5 The site is not located within a Conservation Area, nor are there any Listed Buildings on site. The current adopted South Cambridgeshire Local Plan (2018) Policies Map shows the site as being within the Green Belt.

Girton

- 2.6 The closest existing settlement to the site is Girton which is classified as a Minor Rural Centre in the settlement hierarchy within the adopted Local Plan. Whilst Minor Rural Centres have a lower level of services, facilities and employment than Rural Centres, they still perform an important role in providing services and facilities for a small rural hinterland.
- 2.7 A number of bus services operate through the Village providing public transport links to Cambridge.

3.0 Development Proposals

Question 2: Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan.

- 3.1 The site was submitted as part of the Call for Sites consultation in 2019 and Chivers Farms Ltd are continuing to promote the site for allocation in the Local Plan. The Site provides an opportunity to deliver small scale employment development to help meet the needs of the District and provide local employment opportunities, particularly given its location, being close to Cambridge on the A14 travel corridor.

Description of Proposals

- 3.2 An illustrative masterplan has been prepared to show how the site can be redeveloped. The total site area is 6.28ha. The proposed developable area equates to 3.25ha which is located within Flood Zone 1. The remainder of the site will be utilised for green infrastructure and biodiversity enhancements.

Summary of Technical Assessments

Flooding and Drainage

- 3.3 A Flood Risk and Drainage site appraisal has been carried out to support this promotion. It notes that the site falls mostly within Flood Zone 1 of the Environment Agency (EA) Flood Zone maps. However, there is an area adjacent to the Beck Brook which is within Flood Zone 2 and 3. It is also shown to be predominantly at very low risk of surface water flooding with some small isolated areas at risk of surface water flooding and areas adjacent to the brook similar to the fluvial Flood Zones.
- 3.4 The following recommendations are made within the Flood Risk and Drainage Site Appraisal:
- The site's mudstone geology is unlikely to be suitable for infiltration drainage, therefore an attenuation strategy is recommended;
 - The drainage strategy will be restricted to the 1 in 1 year greenfield runoff rate and storage will be provided for all events up to and including the 1 in 100 year + 40% climate change event with at least one source control feature included within the design;
 - As the site is currently served by a sewage treatment plant, it is recommended that non-mains drainage is the most viable solution; and
 - The existing sewage treatment plant will likely need to be upgraded as part of any future development.
- 3.5 The appraisal concludes that provided all built development remains within Flood Zone 1 and outside of the areas at risk of surface water flooding adjacent to the Beck Brook, the overall risk of flooding is low with practical and sustainable solutions for both foul and surface water drainage.

Highways

- 3.6 A Transport Access Review of the existing site access has also been carried out to support this promotion. The site's access falls within part of the A14 modifications. A new access is proposed which commences to the north from the Dry Drayton Road. The proposed land uses of B1, B2 and B8 have consecutively less traffic per equal area of GFA. Therefore, a mix for this site would be found containing these three land uses that generates traffic suited to the final road type constructed.
- 3.7 As the access layout is not finalised and is still in the early stage of construction due to the A14 amendments, nevertheless as significant level of development could be served off this new layout.

Ecology

- 3.8 A Preliminary Ecology Appraisal also accompanies this promotion. This document indicates that the site falls within the outermost development Impact Risk Zone of the Madingley Wood SSSI, which is located approximately 2.4km to the south. The Madingley Brickpits County Wildlife Site is located approximately 760m to the south-west of the site boundary.
- 3.9 The Preliminary Ecology Appraisal also notes that the site has a baseline biodiversity value of 12.15 habitat units. In order to achieve no net loss to biodiversity, the report stipulates that 1.5 hectares of grassland would need to be created (24% of the total site area). To achieve a 10% net gain, then 1.8 hectares of grassland would need to be created (29% of the total site area). Such calculations, however, do not take into account the opportunity for the provision of additional ecological compensatory measures e.g. the provision of bird and bat boxes across the site. It is therefore likely that less grassland would need to be created in order to achieve a biodiversity net gain, on the basis that additional ecological mitigation is provided as part of the development.
- 3.10 In terms of protected species, the report indicates that the site has the potential to support the following fauna:
- Great Crested Newt;
 - Water Vole;
 - Otter;
 - Bat; and
 - Bird.
- 3.11 The Preliminary Ecology Appraisal concludes that surveys of the above species will likely be required in order to enable an assessment of the impacts of the proposed development.

Benefits to be delivered by the proposals

- 3.12 It is considered that the development proposals could deliver numerous tangible social, economic and environmental benefits to the local area, including:

- Delivery of local employment facilities;
- It is a flexible site that would suit a wide range of commercial uses;
- Strategically located to serve local and regional markets;
- Supporting the employment activities of an existing Site near homes and essential infrastructure. The site is located within walking and cycling distance of Girton village, reducing the need to travel by private car;
- Support the area's local economy, including shops and services; and
- Enhance biodiversity levels across the site.

4.0 General

Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?

- 4.1 Agree - The proposed Local Plan period up to 2040 is considered appropriate and to accord with the requirements set out within the NPPF for local authorities to identify a sufficient supply and mix of sites between years 1-15 of the plan (Para 67).

5.0 Themes

Question 6. Do you agree with the potential big themes for the Local Plan?

- 5.1 Agree - The four big themes for the Local Plan are considered suitable and all are considered to be important in the consideration of the spatial distribution of growth in the district, and for the determination of planning applications. The four big themes will generate a new way of planning, this may require a different way to make decisions; to allow other impacts to happen in order to achieve these four priorities. The Local Plan policy framework will need to allow for a clear planning balance to take place to assess and prioritise impacts.

Question 7. How do you think we should prioritise these big themes? Allocate 10 points across the following four themes:

- 5.2 The development proposal at Grange Farm, Girton would contribute to the four big themes as follows:
- **Climate Change** - new employment buildings will be designed and constructed in a manner to be energy efficient and as appropriate incorporate renewable technologies.
 - **Biodiversity and Green Spaces** – development proposals provide opportunities to enhance and implement new landscaping that will provide a clear biodiversity net gain to the site;
 - **Wellbeing and Social Inclusion** - local employment opportunities close to existing settlements will help create 'sustainable development'. Employment close to existing communities will help promote healthy lifestyles and wellbeing through reduced travel time (better work/life balance) and the opportunity to use active modes of travel; and
 - **Great Places** – a landscape-led approach is central to the design and layout of the scheme, as shown in the Illustrative Masterplan which shows how the site could come forward with improvements to landscaping and biodiversity.
- 5.3 The four big themes are all considered to be important aspects to achieving positive development. All four themes should be used to inform the spatial strategy within the Local Plan in terms of distributing growth and determining planning applications to deliver growth. It is therefore not considered necessary to rank the options in order of preference.

Theme 1 Climate Change

Question 8. How should the Local Plan help us achieve net zero carbon by 2050?

- 5.4 The increased focus on climate change is welcomed. Climate change policy and good practice is changing quickly, and the plan will need to build in suitable flexibility to accommodate these changes within the lifetime of the plan. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes.
- 5.5 A needlessly stringent policy may inadvertently impede progress towards later years in the plan, or undermine results by not allowing for site-specific refinement. For example, policy for electric

vehicle charging points should be sufficiently flexible to accommodate that quickly changing technology, as well the current grid challenges in implemented EV charging places. Energy policies should include flexibility for changing legislation, and technology, as well as the opportunity to refine a plan-wide policy for site specifics. As the Zero Carbon Futures Symposium Report (2019) submitted within the evidence base notes on page 10: where targets are too limited, and without consideration of project contexts, policy can drive dysfunctional behaviour such as photovoltaic solar panels being installed on North facing roofs merely to achieve policy compliance not to produce effective carbon reductions.

5.6 Allowing for changing technologies and approaches should also help with viability as technology and approaches improve and are more widely adopted, thereby reducing costs. Escalating targets and policies may be able to accommodate these changes, while providing clarity to developers on the costs of development over time.

5.7 The local plan Sustainability Appraisal (SA) should address variable climate change scenarios, as we would expect that different climate change scenarios will be of interest at examination. Lack of rigorous assessment of these scenarios in the SA could lead to the plan being found unsound.

5.8 The site is considered to present an opportunity to contribute to successfully achieving the goal of net zero carbon by 2050. Modern construction will allow the new buildings to be constructed in a manner to ensure that energy use is reduced and that renewable forms are used. The site is also located in a sustainable location, whereby future employees would not necessarily be reliant on the private car.

Question 9. How do you think we should be reducing our impact on the climate? Have we missed any key actions?

5.9 Greater Cambridge is a leading local authority on climate change policy, such as through the early declaration of a climate change emergency and also through the newly adopted Sustainable Development SPD. This leadership should continue, as it is central to the sustainable development of Cambridge, leading to better development for humans, the environment, and for economic development. It should be borne in mind that Cambridge's knowledge economy increasingly demands high sustainability standards: sustainability, health and wellbeing, with climate change at the heart, is a key part of continuing Cambridge's economic development. This should remain a priority as part of a policy framework that recognises climate change as a key part of sustainable development across social, environmental and economic objectives.

Question 10. Do you think we should require extra climate adaptation and resilience features to new developments?

5.10 A policy approach with multiple options for delivering net zero carbon is likely to be most effective in delivering development, as well as carbon neutrality. A multi-pronged approach should allow different solutions for different developments, reflecting context. For example, for some developments, Passivhaus energy standards may be achievable (going well above and beyond minimums set out in the Building Regulations), but for others, Building Regulations may need to be followed but an offset solution, such as a green bond or offset fund, could be used to achieve

a net carbon reduction. Possible options need to be worked up in more detail as the Plan progresses and must build in flexibility.

Theme 2 Biodiversity and Green Spaces

Question 12. How should the Local Plan help us improve the natural environment?

- 5.11 This Local Plan must deliver effective policy which protects and enhances natural capital. We support delivery of net gain for new development. Such policy must be flexible enough to enable creative and cost-effective solutions for the delivery of net gain and support the Vision for the Natural Future of Cambridgeshire in 2050 as outlined by Natural Cambridgeshire and affiliated organisations. An off-site net gain solution should be clearly allowed for by policy. While it is a Local Plan priority as a part of one of the four big themes, the Local Plan policy must allow for a planning judgement and balanced decision to allow for site and development specific issues to be taken into account.
- 5.12 The site provides an opportunity to help improve the natural environment and also to protect existing ecological features within the surrounding area. As part of the proposal, improvements/enhancements will be made to screen the site which will also have the added benefit of increasing the site's ecology and biodiversity.

Question 14. How do we achieve biodiversity net gain through new developments?

- 5.13 The new Local Plan must ensure that policy in this matter is sufficiently flexible to accommodate the required biodiversity net gain in the most effective and efficient way for each development, with both on-site and off-site solutions possible.
- 5.14 The proposed masterplan for Grange Farm demonstrates the opportunities for biodiversity net gain and how this can be achieved onsite. The development proposal can provide new green infrastructure as well as improving existing planting and landscaping that would provide a clear biodiversity net gain.

Question 15. Do you agree that we should aim to increase tree cover across the area?

- 5.15 Yes. With the right trees, in the right areas. A policy framework to seek tree cover increase, but allows for a planning balance within decision-making to enable the benefits and impacts of each development to be assessed.
- 5.16 This could be part of an on-site/off-site solution, which could generate notable s106 funds to achieve significant, meaningful and long-term planted and ecological areas. Ecological outcomes rather than an unconditional focus on native species should be considered in new planting.
- 5.17 The proposals for Grange Farm would seek to retain existing vegetation whilst also delivering substantial new tree planting to both provide landscaping and ecological benefit.

Theme 3 Wellbeing and Social Inclusion

Question 16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?

- 5.18 The Local Plan should deliver a spatial strategy that creates connections between homes and jobs. The proposal would provide new employment opportunities which would contribute to achieving 'good growth'. The site is within close proximity to a range of services, facilities and public transport modes. Such a proposal will provide improved employment opportunities for existing and future residents which in turn will have positive influences on their overall health and lifestyle.

Question 20. How do you think we should achieve improvements in air quality?

- 5.19 Principally through the reduced use of polluting vehicles by:
- Locating development where there is good access to active travel, coupled with access to affordable, frequent, reliable and high-quality public transport options;
 - Better cycle lanes, parking and cycle security – achieved by developments directly and through a coordinated s106 infrastructure programme;
 - Tree planting along road frontages: species selected for their pollution absorbing properties.

6.0 Jobs/Economy

Question 24. How important do you think continuing economic growth is for the next Local Plan?

- 6.1 It is essential to Greater Cambridge and the surrounding area as identified by CPIER (Cambridgeshire and Peterborough Independent Economic Review). As part of the devolution contract to Cambridgeshire and Peterborough is a commitment to doubling the economic output of the area (Gross Value Added) over 25 years. This is a challenging target and needs to be a factored at the heart of the Plan. Employment site such as Bedlam farm provide a key, and often undervalued, role in economic growth. The new Local Plan should be flexible to allow the expansion of such sites and also their allocation.

Question 25. What kind of business and industrial space do you think is most needed in the area?

- 6.2 A wide variety of space by location, size, function and price needs to be available to support the growth of the economy, offering choice to meet an occupier's individual needs:

"The requirements for physical space, like finance, have stages. What a business needs in its start-up phase is different to its needs as it matures and grows. It is vital, if an innovation ecosystem is to be effective for there to be variety and availability at every stage¹."

- 6.3 There must be flexible commercial space in both urban and rural areas. This is essential in order to support growth of local business and strengthen opportunities for local supply chains to engage in the growth industries of the region. While the Science and Technology sector is considered the engine of the Cambridge Phenomenon, it is important to have all types of commercial space to provide for a wide range of job opportunities. This will ensure Greater Cambridge is served at close quarters and does not overly rely on long-distance travel to service the area with goods and services.

- 6.4 The plan should make provision of storage and distribution buildings, Cambridge lacks distribution hubs where goods are consolidated into loads for last mile (5 mile) delivery, thereby reducing the volume of HGVs moving in and through the city and reducing air pollution. Well located sites with access to main distribution arteries, such as the A14 should be considered to avoid local HGV diversion and disruption to local communities. Delivering first-mile-last-mile connections across the Arc is a strategic priority of the Cambridgeshire & Peterborough Industrial Strategy 2019 and recognised in CPIER:

"improving the "last mile" – the ability to move around within the city of Cambridge – is of a higher immediate priority than [these] inter-city links, as their effectiveness will be severely blunted without this" CPIER p80.

¹ Cambridgeshire and Peterborough Industrial Strategy 2019 p 41

- 6.5 The adopted Cambridge and South Cambridgeshire Local Plans identify sites for future employment development. However, most of these sites are allocated only for B1 uses or have access and design constraints. None are located on the strategic road network. As such, the choice of sites on offer for industrial uses is severely limited.
- 6.6 Grange Farm is ideally located on the strategic highway network with the ability of providing a deliverable site with good access to main distribution arteries. The site is suitable for high quality light industrial and/or warehouse buildings with the opportunity to provide a local distribution hub, improving the 'last mile' to reduce HGV movements into the city.

Question 26. Do you think we should be protecting existing business and industrial space?

- 6.7 A broad range of employment opportunities accessible by active modes of transport (including public transport) needs to be maintained in both urban and rural areas to ensure local jobs are available. Changes to Permitted Development Rights in recent years and the values associated with residential development has resulted in many employment spaces being lost to other uses. A range of employment sites is required to ensure the new Local Plan meets economic needs of the area.

Question 27. How should we balance supporting our knowledge intensive sectors, with creating a wide range of different jobs? What kind of jobs would you like to see created in the area?

- 6.8 Whilst the focus of Cambridge is the Science and Technology sector as the driving force of the economy, there is a requirement for a range of job opportunities, in urban and more rural areas. The Local Plan policy framework needs to provide for a full range of opportunities; as planned allocations and windfall employment opportunities.

7.0 Infrastructure

Question 37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?

- 7.1 This can principally be achieved through locating new development in locations which have good access to sustainable modes of transport. New development should be located to take advantage of existing or planned transport infrastructure and should be designed in a manner which encourages the take up of active modes of travel.
- 7.2 The site is well positioned next to the A14 providing excellent transport links with a dedicated pedestrian and cycle path to the village of Girton, which can be reached within a 9-minute cycle journey/21 minute walk. Its location means that there are options for sustainable travel.

8.0 Where to Build?

Question 39. Should we look to remove land from the Green Belt if evidence shows it provides a more sustainable development option by reducing travel distances, helping us reduce our climate impacts?

- 8.1 The Local Plan should be focussed on providing sustainable development in the most appropriate locations. To prioritise the four big themes will result in some development impacts.
- 8.2 Notwithstanding the underlying purposes of the Green Belt (Para. 134 of the NPPF), where it can be demonstrated that appropriate development can be brought forward in the Green Belt, sites should be considered within the context of their individual circumstances. Applications should be considered in the context of Para. 136 of the NPPF including an assessment as to whether it can be demonstrated that a proposed development would bring substantial benefits, outweighing the loss of Green Belt land and thereby demonstrate exceptional circumstances needed to justify Green Belt release. In accordance with Para. 138, Green Belt boundaries should be reviewed to reflect the need to promote sustainable patterns of development. If the release of Green Belt can facilitate more sustainable patterns of development, particularly if the land has been previously developed or is well-served by public transport, there should be policy provision to allow for a consideration of this in order to determine Green Belt planning applications within the emerging Local Plan.

Question 40. How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages?

- 8.3 The presumption in favour of sustainable development is recognised, however there should be a degree of flexibility in terms of allowing appropriate development outside of the settlement boundaries of villages, in particular, if development meets a particular local business or community need as set out within Para. 84 of the NPPF. Sustainable development in rural areas is also supported under Para. 78 of the NPPF, which requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services. A degree of flexibility is even more pertinent to the largest, most sustainable villages in the District, such as Rural and Minor Rural Centres, which provide the facilities and services to encourage more sustainable behaviours.

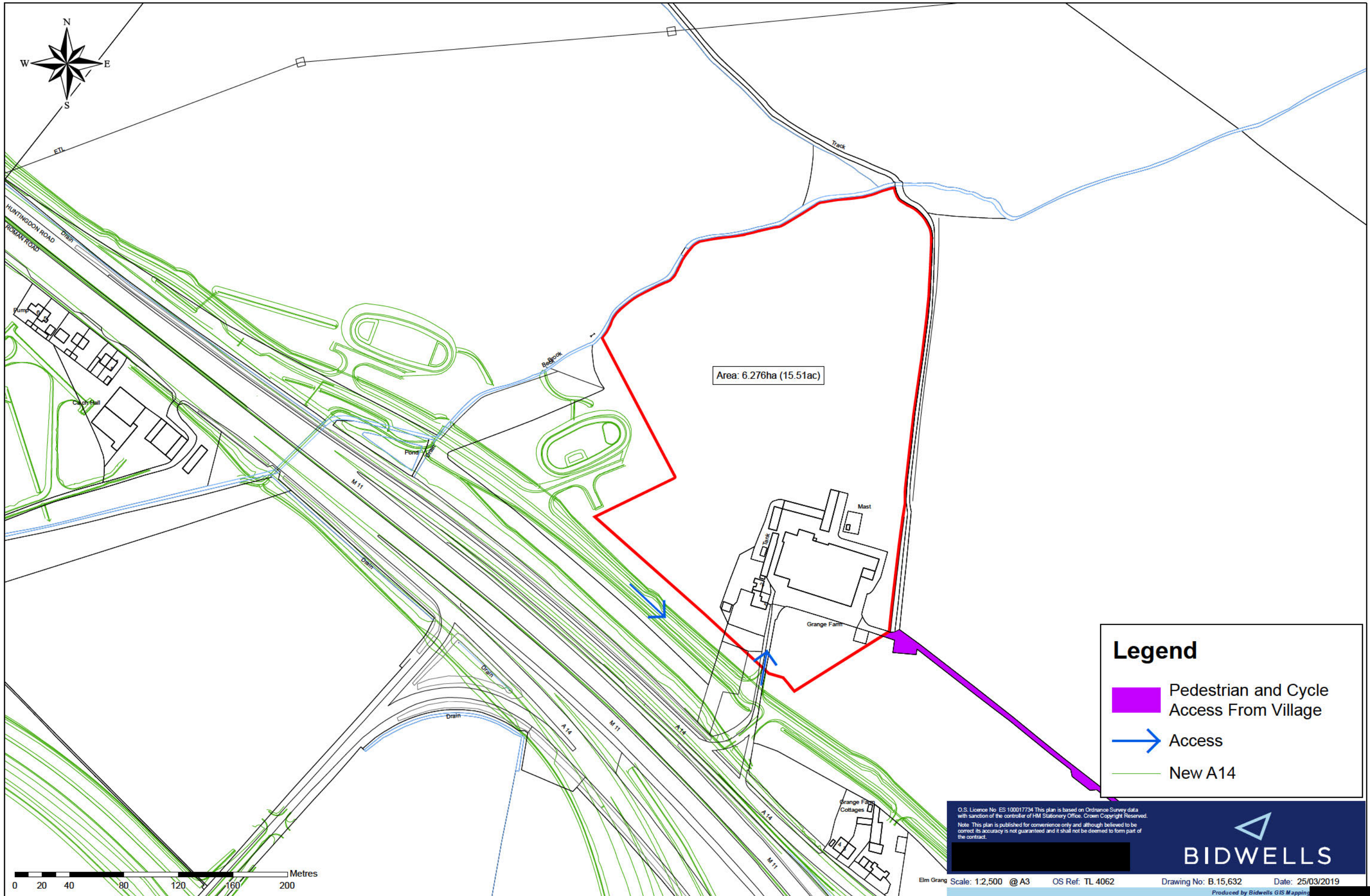
Question 42. Where should we site new development? Rank the options below 1-6 (1 Most Preferred 6-Least Preferred)

- 8.4 No single solution will deliver a sound Local Plan; rather, a combination of approaches to the distribution of spatial growth will be necessary in order to establish the appropriate locations of new housing and employment development in the district. A hybrid approach will be required but underpinned with a focus on transport corridors and accessible areas. In terms of providing employment opportunities. The Plan must provide flexibility for existing employment sites to grow, meaning small employment sites such as Grange Farm, which is located on the strategic transport corridor, should be allocated.

- 8.5 It is considered that an element of village dispersal should form part of a hybrid spatial strategy. Whilst a village dispersal approach should consider villages from across the settlement hierarchy, it should seek to allocate sites for development at locations in villages which are or can be made sustainable.




APPENDIX 1
LOCATION PLAN

Grange Farm, Huntingdon Road



Area: 6.276ha (15.51ac)

Legend

-  Pedestrian and Cycle Access From Village
-  Access
-  New A14

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BIDWELLS



BIDWELLS

