

By email: planningpolicy@scambs.gov.uk

Date 25th March 2019

Ref: JJ/19

Dear Sir/Madam

Land to the south of Great Abington and North of Great Chesterford – Representations on behalf of Abington Farms Ltd.

These representations have been prepared by Cheffins Planning on behalf of Abington Farms Ltd to promote land to the south of Great Abington in the Council's call for sites consultation. This is with a view to gaining an allocation for a mixed-use development in the emerging Greater Cambridge Local Plan. The location of the site and its context are shown on the location plan and the Landscape Visual Impact Assessment which has been produced to accompany these representations. Before assessing this proposed site in detail, it is important to understand the context of putting forward this site which is located on the southern boundary of South Cambridgeshire District with the site following the administrative boundary of Uttlesford District

Context

It is contended that this site should be considered as the northern extension of the proposed new Garden Community at North Uttlesford. A garden community for 5,000 new homes is proposed on the northern boundary of Uttlesford District, which provides no tangible benefits to South Cambridgeshire, but will unquestionably impact on the infrastructure and environment of this District. This is emphasised by the following statement in the Regulation 19 Pre-submission Local Plan which states that "*The site at Great Chesterford benefits from its proximity to M11 Junction 9 and Great Chesterford Railway Station and Whittlesford Parkway Railway Station; as well as access to biomedical and research and development employment opportunities north of Saffron Walden and south of Cambridge*".

This Garden Village arose from a regulation 18 consultation in 2017 in which the Council identified three new settlements at North Uttlesford, Easton Park and West of Braintree. It was considered that "*While all of these sites have issues that need to be overcome, they all have good access to the strategic road network, existing jobs and services, are of a scale to support significant infrastructure provision and are outside the Green Belt policy designation*". Following this consultation these sites have been taken forward into the emerging plan.

The Pre-submission Local Plan summarises the Garden Community as "**North Uttlesford:** *The whole garden community will comprise 5,000 new dwellings, of which a minimum of 1,925 homes will be built by 2033 and a range of local employment opportunities and services and facilities including schools, health, retail and leisure. This garden community will maximise opportunities for economic and sustainable transport linkages with nearby science parks, such as the Wellcome Genome Campus and Chesterford Research Park*".

Policy SP 2 The Spatial Strategy 2011-2033 of the emerging Local Plan states that "*Development will be distributed on the following basis:*

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1. *The majority of development will be focused at the towns of Saffron Walden and Great Dunmow and the new Garden Communities at Easton Park, West of Braintree and North Uttlesford,."*

The Local Plan provides a set of principles as to how the garden communities will be developed which is of equal relevance to the site being promoted in South Cambridgeshire.

The emerging Local Plan states that *"The garden communities will be developed in accordance with garden city principles developed by the Town and Country Planning Association. These are:*

1. *Land value capture for the benefit of the community;*
2. *Strong vision, leadership and community engagement;*
3. *Community ownership of land and long-term stewardship of assets Mixed-tenure homes and housing types that are genuinely affordable for everyone;*
4. *A wide range of local jobs within easy commuting distance from homes;*
5. *Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy, vibrant communities and including opportunities to grow food;*
6. *Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains and using zero-carbon and energy-positive technology to ensure climate resilience;*
7. *Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods;*
and
7. *Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport".*

It is advised that the delivery of the garden communities will commence in 2022/23. This is as result of the scale of growth which will continue to be built beyond the Local Plan Period, i.e. after 2033, and thus also contribute towards longer-term growth and development objectives for the district.

The plan states that *"Options for the extent of the boundary will be considered as part of the preparation of the Garden Community DPDs but will include:*

1. *Identification of clear and defensible boundaries (watercourses, roads, woodland belts);*
2. *Appreciation of distance and separation of communities (physical, visual and perceived);*
3. *Relationship to existing settlements;*
4. *Nature of land that will perform the role of a 'green buffer' which will define an envelope within which a new community can be accommodated and that remains distinct from other existing settlements;*
and
5. *Planning policy protection (how might this land be protected 'in perpetuity' from built development whilst allowing complementary activities that support both the new community and existing communities).*

The effects of constraints on potential land use will be identified through consideration of the evidence base and by engagement with landowners, statutory agencies, utility service providers and others. Based on this process, absolute constraints on development, such as easements and buffers to existing settlements can be defined and removed from the boundary of the Garden Community altogether or from the developable area if they remain within the boundary. Remaining constraints, such as areas of high landscape sensitivity will influence decisions on proposed land uses and potential residential densities".

The emerging plan states that the "North Uttlesford Garden Community is located in the north west of the District. It adjoins the northern boundary of the district with South Cambridgeshire. It has the potential to deliver 5,000 new homes, local employment opportunities, supporting social and

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community infrastructure. It is anticipated that housing delivery will commence in 2022/23 and continue beyond the Local Plan period".

It is interesting to note that the Landscape and Visual Appraisal undertaken to support this allocation "finds that land at North Uttlesford is of high landscape and visual sensitivity, given its steeply sloping landform and elevated position; its open fields and its limited vegetation structure; and the potential for long distance cross-valley views into the Site".

It is advised that "The strategy for the development will ensure the A11 is the preferred route for northbound travel, this is to minimise impacts on the A505. This strategy should explore the possibility of a northbound access to the old A11 and onwards to Granta Park and the proposed new Park and Ride in this vicinity. A northbound public transport, walking and cycling link to this destination has the opportunity to deliver considerable benefits to the scheme.

The proposed developer funded highway improvements could accommodate up to 3,300 new homes at North Uttlesford which would be expected to come forward in the first 15 -17 years of development. Development beyond that level would depend upon strategic highway improvements such as dualling of the A505 between M11 and A11 junctions. It is proposed that beyond the end of the plan period, a cap of 3,300 new homes is placed on any allocation at North Uttlesford Garden Community to ensure that development over this figure does not take place until strategic highway improvements have been implemented".

To provide clarity as to the extent and implications of the proposed Garden Community the full text of Policy SP7 is detailed below.

"Policy SP 7 North Uttlesford Garden Community

Permission will be granted for a new garden community in North Uttlesford of 5,000 homes. The details and final number of homes will be set out in a Strategic Growth Development Plan Document.

The Strategic Growth Development Plan Document will set out the nature and form of the new community. The DPD will be produced in consultation with stakeholders and will include a concept plan showing the disposition and quantity of future land-uses, and give three dimensional indication of the urban design and landscape parameters which will be incorporated into any future planning applications; together with a phasing and implementation strategy which sets out how the rate of development will be linked to the necessary social and physical infrastructure to ensure that the respective phases of the development do not come forward until the necessary infrastructure has been secured.

The DPD will provide the framework for the subsequent development of more detailed masterplans and other design and planning guidance for the North Uttlesford Garden Community. The DPD will set out mitigation measures relating to the criteria and text of this policy. Planning applications will be consistent with the approved DPD which will need to be in place before any consent is granted for the new Garden Community.

The new Garden Community in North Uttlesford will:

Land Uses

1. Deliver 5,000 new dwellings to the North-East of the B184, of which 1,925 will be delivered by 2033. A mix of housing sizes and types of housing will be delivered in accordance with housing needs including

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40% affordable homes and homes for older people, including residential care and nursing home accommodation. Specific provision will be made for self and custom build housing.

2. Deliver a range of local employment opportunities integrated into the new community, with a particular focus on maximising economic links to the Wellcome Genome Campus and Chesterford Research Park and other nearby centres of employment. The development will be informed by the Uttlesford Economic Development Strategy for North Uttlesford and will be phased in line with the **residential elements** of the development. Floorspace allocations to be defined within the Strategic Growth Development Plan Document.

3. Include a new local centre incorporating a mix of retail, business and community uses (including A1, A2, A3, A4, A5, B1(a), D1 and D2 uses). Deliver appropriate civic buildings at the heart of the community, for example a town hall. Land and financial contributions towards four primary schools and one secondary school will be provided. Early years and childcare facilities, community and youth facilities will also be provided. Increased primary healthcare capacity will be provided to serve the new development as appropriate. This may be by means of new infrastructure or improvement, reconfiguration, extension or relocation of existing medical facilities.

4. Provide allotments, open space, sports facilities, play, leisure and recreation in line with standards established in the Local Plan and the Essex Design Guide and the Strategic Growth Development Plan Document.

5. Provide natural, semi-natural and amenity green space in accordance with standards established in the Local Plan and the Essex Design Guide and the Strategic Growth Development Plan Document.

Transport

6. Incorporate, from the early delivery phase of the garden community, a package of measures to provide transport choice, including the delivery of high quality, frequent and fast public transport services to Saffron Walden, Cambridge, Whittlesford Rail Station, Audley End Rail Station, Great Chesterford Rail Station and nearby employment parks (including the Wellcome Genome Campus and Chesterford Research Park). A network of direct, high quality, safe walking and cycling routes will also be provided to enhance permeability within the site and to access nearby employment areas, transport hubs and communities, including linking the existing cycle path from Hinxton to Saffron Walden and linking to Great Chesterford Rail Station via the PROW adjoining Great Chesterford to the North-West of Jackson's Lane.

7. Deliver other specific transport-related infrastructure requirements identified through the Development Plan Document in a phased manner.

8. Mitigate the transport impacts of the proposed development on the strategic and local road network including on the B184 and B1383. An access strategy that connects with the A11, A1301 and the Cambridge Park & Ride (on the A1307), with the A11 being the preferred route for northbound travel. The access strategy will explore the potential of a northern access for the site. The primary southern access into the site will be via Field Farm Drive, access via Park Road will be limited to ensure the character of Park Road is protected. There will be no vehicular access to the site from Cow Lane. Access for construction traffic will be via Field Farm Drive. Contributions towards capacity improvements along the A505 and junction of the A505 and A1301 will be sought, requiring cross boundary agreement with South Cambridgeshire District Council, Hertfordshire, Cambridgeshire, Essex County Councils and Highways England. Other specific transport related infrastructure requirements identified through the Strategic Growth Development Plan Document and masterplans for the Garden Community will be delivered in a phased manner. The development will avoid the use of unsuitable roads by car through existing communities.

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Historic Environment

1. Positively respond to the landscape and historic value of this location, with proposals accompanied and influenced by landscape/ visual and heritage impact assessments. Careful consideration will be given to the siting and design of development, the use of building and landscaping materials, the improvement and restoration of degraded landscape features, and new woodland/ tree belt and structural planting within and around the site. The sense of tranquillity within the site should be maintained.

2. Proposals Shall:

- a. Respond positively to the landscape character and significance of the historic environment, including designated and non-designated heritage assets.
- b. Conserve, and where appropriate enhance, the significance of heritage assets and their settings both within the site and the wider area including The Roman Temple (scheduled monument) and Park Farmhouse (Grade II listed) and the Roman Town and Fort (both scheduled monuments).
- c. Be informed by appropriate landscape/visual and heritage impact assessments, the latter to include the results of archaeological field evaluation as required by the Local Authority.

3. Conserve and where appropriate enhance the significance of heritage assets and their settings both within the site and the wider area. Where mitigation is required, measures will have regard to the HIA and include:

- a. Density, scale, form, materials of new development against existing in the area;
- b. Existing boundaries, routes reflected in new development; and
- c. Appropriateness and working with the topography and geology when planning buffer zones.

4. Conserve and where appropriate enhance the significance of heritage assets and their settings, both within the site and in the wider area. Where mitigation is required, measures will have regard to the HIA and include:

- a. Reinforce screening where appropriate along site boundaries;
- b. Provide soft transition zones around the boundaries of the deer park, open tree screens and ditches. This is particularly important along the northern boundary of the deer park which abuts the County boundary and Hildersham Wood, an area of ancient woodland;
- c. The creation of buffer zones incorporating areas of open land;
- d. Consider development on the lower slopes to reduce visual impact;
- e. Protect the Scheduled Monument onsite and its setting;
- f. Retain visual and historic association between the Roman Temple and the Roman Town;
- g. Detailed design informed by archaeology investigations of the site this may involve evaluations, geo physical surveys or trenching; and
- h. As far as possible retain the character of existing historic routes through the site, narrow lanes and mature tree lines.

Natural Environment

13. Careful consideration will be afforded to the improvement and restoration of degraded landscape features, and new woodland/tree belt and structural planting within and around the site. The sense of tranquillity within the site should be maintained.

14. Protect the separate identity of the nearby community of Great Chesterford as an existing community close to but separate from North Uttlesford Garden Community. The nature of the transition between North Uttlesford and the nearby existing community of Great Chesterford will be an important

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element of the design of the new Garden Community and the development will provide a strategic landscaped buffer.

15. Enhance wider green infrastructure and networks including maintenance and enhancement of existing watercourses, ponds and lakes within the site.

16. Careful consideration will be afforded to the improvement and restoration of degraded landscape features, and new woodland / tree belt and structural planting within and around the site. The sense of tranquillity within the site should be maintained.

Utilities

17. Ultrafast broadband will be provided throughout the Garden Community and homes will include specific spaces to enable working from home.

18. Enhance the water recycling centre at Great Chesterford, new connections, network upgrades and reinforcements to the sewerage network. The delivery of smart, innovative and sustainable water efficiency/re-use solutions that fosters climate resilience and a 21st century approach towards water supply. Provision of improvements to waste water treatment and off-site drainage improvements aligned with the phasing of the development within the plan period and that proposed post 2033.

19. Provide Sustainable Urban Drainage systems to provide water quality, amenity and ecological benefits as well as flood reduction whilst ensuring that there is no harm to nationally important archaeological assets whether scheduled or not.

20. Include new network or primary substations in the medium to long term, and reinforcements to the energy network in the shorter term to meet the needs of the development.

Governance and Stewardship

21. Establishment at an early stage in the development of the Garden Community of appropriate and sustainable long-term governance and stewardship arrangements for community assets including green spaces, public realm areas and community and other relevant facilities; such arrangements to be funded by the development and include community representation to ensure residents have a stake in the long term development, stewardship and management of their community".

In conclusion due to the advance stage of the Uttlesford Local Plan and the various stages of consultation undertaken it is apparent that this strategic allocation has a good chance of being accepted. This proposal will unquestionably impact on South Cambridgeshire and this call for sites provides the opportunity to seek to derive benefits from the scheme rather than having to mitigate against the impacts from the development.

Benefits arising from extending the North Uttlesford Garden Community into South Cambridgeshire.

It is clear that the benefits which could be achieved by developing this site in conjunction with the proposed Garden Community would be wide ranging when considered against the economic, social and environmental objectives as detailed at Paragraph 8 of the National Planning Policy Framework.

Economic Objectives

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In terms of the **economic objectives** the proposal will unquestionably give rise to significant employment during the construction and operational phases of the development. Future occupiers of the scheme are likely to use local services and facilities within the new development making a positive contribution to vitality and viability. In addition, the education, shopping, community and B1 uses provided on this site and the North Uttlesford Garden Community will bring long term economic opportunities. Another particular economic benefit is the provision of social housing. The benefits of this development will also spread off site in terms of public transport enhancement and servicing of the proposed dwellings and businesses.

Social Objectives

The social objectives of this scheme are the provision of circa 1,000 dwellings. The allocation of this site would assist in delivery of the Garden Community as only 3300 dwellings can be provided until highway improvements are undertaken on land which is within South Cambridgeshire. As detailed in the access section below, circa 12 hectares of this submitted site are required to assist in providing strategic highway improvements such as dualling of the A505 between M11 and A11 junctions. This site will also help to create the northern access to the Garden Community which is seen as an important component in the delivery of the Garden Community.

The provision of circa 1,000 dwellings will help the Council to achieve a deliverable five-year housing land supply and allow a full range of houses, including bungalows, flats, sheltered housing to meet the needs of families, young couples, single people and retirees. Bungalows and sheltered housing are particularly suited to the ageing population and those with limited mobility.

The provision of circa 400 dwellings will unquestionably make a positive contribution to housing affordability. The provision of 400 dwellings will also help meet the objectives of paragraph 59 of the NPPF.

The development will also allow for the contributions or works towards the provision of primary and secondary schools and improvements to public transport which will not only meet the needs of the development but South Cambridgeshire.

Environmental Objectives

The Environmental Objectives include the sustainability credentials of the site in terms of access to local services and facilities, which will be provided as a consequence of this development. The planned onsite and offsite enhancements to cycling, rail, bus and pedestrian infrastructure will help to meet the environmental objectives. In terms of cycling it must be recognised that this site is within close proximity to Wellcome Trust, Granta Park, Babraham Institute, and Addenbrookes, with the provision of appropriate infrastructure allowing a modal shift from the private car.

The indicative design of the proposal has been landscape led which will allow significant new habitats to be created and biodiversity enhancements as well as retaining the existing rich and diverse habitats. This will not only help to mitigate the visual impacts of the development but also enhance an agricultural landscape devoid of natural features.

Site Capacity

It is considered that the site has a capacity of circa 1,000 dwellings. Whilst this 230 hectare site could conceivably accommodate more than a 1000 dwellings, utilising a density of 30 dwellings per hectare, the level of built development to open space is at a ratio of 16:86. This is in recognition of the findings of the Landscape Visual Impact Assessment and the principal objective that this scheme must be

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landscape led. It is clear that a considerable amount of the site will need to be allocated for landscaping, public open space and bio-diversity enhancements. This is of particular note due to the undulating topography of the site and the need to use blocks of planting to break up development and create views into and out of the site. Any allocation relating to this site would need to make it clear that the capacity is indicative and that the capacity would be informed by a master planning exercise. This would also need to show how this site and the Garden Community scheme could be integrated.

Access

An allocation of this magnitude will support significant enhancements to public transport, and all dwellings can be within 400m of bus stops. The enhancement of these services could also improve the accessibility of existing towns and villages, with the existing populations of these settlements being too low to justify either the expansion of or the provision of new services.

The entire scheme will allow opportunities for contributions to be sought to link the site to the Cambridge Guided Busway, potential through route to Great Chesterford Station and a potential interchange (Park and Ride at Granta Park, Abington).

Due regard also needs to be given to the findings of the Greater Cambridge Mass Transit Option Assessment (January 2018) which is seeking to provide a mass transit system to allow for a substantial modal shift from car to public transport. This proposal will allow for connections to be made to this system once the precise route and location of stations/interchanges are known. If this rapid transit system is provided it will allow the traffic impacts of this scheme to be further mitigated.

The allocation of this site will also allow cycle networks to be extended to important employment sites. The actual form of the development will also need to be designed to give priority to pedestrians and cyclists, including landscaped and attractive off-road routes. It should be noted that although the site has attractive public footpaths, there are no cycle ways across it and the public footpaths are not suitable for cycling – particularly in the winter.

It is clear that further work will be required in conjunction with Cambridgeshire County Council and other bodies to agree measures to address the strategic impacts of this site.

Bio-diversity

The majority of the site is used for intensive agricultural production and would appear to offer limited habitats for protected species. An ecological assessment will be required, and the biodiversity enhancements provided in relation to this site will need to acknowledge the findings of this assessment. It is clear that the development of this site will have the potential to enhance both site-specific biodiversity and the wider area.

Contaminated Land

The majority of the site comprises greenfield land which is unlikely to be contaminated. However, it is recognised that the site will need to be subject to an appropriate contamination assessment.

Flood Risk and Drainage

The majority of the site is within Flood Zone 1. This allocation will need to be subject to a strategic flood risk assessment and surface water drainage strategy to confirm that this site and the adjacent site can be drained in a sustainable manner and will not increase flood risk downstream. It is also clear that there is sufficient land available to provide on-site mitigation and attenuation if required.

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Heritage

An analysis of the constraints maps of the Council have revealed that this proposal will not have an impact on the setting of listed buildings or the character and appearance of any Conservation Areas. Any development will need to be subject to an appropriate archaeological assessment to confirm the archaeological interest of this site and propose appropriate mitigation if required.

Landscape Impact

The landscape impact of the proposed development has been considered via the Landscape Visual Impact Assessment which has been produced to accompany this submission. The principal objective is that this scheme must be landscape led and it is clear that a considerable amount of the site will need to be allocated for landscaping, public open space and bio-diversity enhancements. This is of particular note due to the undulating topography of the site and the need to use blocks of planting to break up development and create views into and out of the site.

The landscaping of this site will also have due regard to the protecting the setting of the Great Abington Land Settlement Association which has recently adopted the Great Abington Former LSA Estate Neighbourhood Plan.

This LVIA provides further advice regarding this issue and advises how the development scheme could be designed to minimise the landscape impact and mitigation measures required to ameliorate the impact of the proposal.

Services and Utilities

It is recognised that this development and the Garden Community will increase pressure on services and utilities and these will need to be reinforced and upgraded in a coordinated manner and, with appropriate consultation, co-ordinated joint planning with UDC will provide scale economies to the benefit of all.

Public Rights of Way

The site is dissected by a public footpath which runs north to south, the route of which will be safeguarded and enhanced as part of these proposals. This could potentially be upgraded to a bridleway. A further footpath is located on the eastern boundary. The development of this site will allow a more comprehensive footpath and bridleway network to be provided and allow east to west connections to be created between the existing footpaths. It must also be recognised that there is an existing tunnel under the A11 which will facilitate a safe means of access to the Wellcome institute.

Topography

As detailed in the landscape visual impact assessment, the undulating topography allows for housing to be built with minimum visual impact, whilst the open space can be sited on the elevated parts of the site affording far reaching aspects for the residents to enjoy. The master planning of the site will need particular care to ensure that the constraints and opportunities associated with the site are taken into account. However, it is clear from initial work undertaken that the topography of the site is not an impediment to development.

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Availability

The entirety of the site is in the ownership of Abington Farms Ltd who are committed to promoting it for a mixed-use development.

It is considered that this site represents a sustainable location and will ensure that South Cambridgeshire benefits from the Garden Community. The site is attracting interest from promoters who are interested in delivering development in this location.

There are no known legal constraints which could delay or prohibit development.

Deliverability

The site is within the sole ownership of the promoter and it is considered that the development at the site could be delivered in its entirety within 20 years. The site is greenfield and there are no constraints at the site which could prohibit delivery within the time period. In fact, the allocation of this site will also help the delivery of the Garden Community and provide benefits to the wider area. Work undertaken to date has confirmed that the site is viable and deliverable.

Viability

Given the character, location and nature of the site we do not consider that there would be any issues associated with the viability or deliverability of the site.

Supporting Evidence

The following plans/documents are attached in this representation, which further demonstrate the site's suitability for development.

1. Site location plan – land subject to these representations
2. Landscape Visual Impact Assessment
3. Site constraints plan –produced from the Council's online mapping

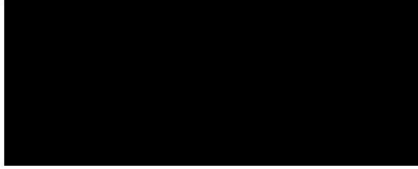
Conclusion

It is clear that the allocation of this site will allow South Cambridgeshire District Council to participate in the planning of the Garden Community and actually gain some benefits from this allocation, whereas at the moment the District will only share in the dis-benefits. The social, economic and environmental objectives associated with this site are considerable and will provide an important resource of housing to the south of Cambridge. The site is outside the Green Belt and subject to care being taken over the design and master planning of the site the impacts of the proposal can be ameliorated to an acceptable level. The proposal will also help facilitate the Garden Community and allow the non-private car benefits of this scheme to be shared.

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Yours sincerely,



Jon Jennings
Director - Planning



Enc.

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