STATION FIELDS

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

December 2021

AXIS
LAND PARTNERSHIPS

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1.0 Introduction

This document is submitted by LDA Design on behalf of Axis Land Partnerships ('Axis') to the Greater Cambridge Local Plan: First Proposals consultation 2021. It includes additional information regarding a previously submitted site - Station Fields, Foxton (site ref. 40084) and a response to the Housing and Employment Land Availability Assessment (HELAA, September 2021) appraisal of Station Fields.

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

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

LDA Design are also submitting representation on behalf of Axis to the Greater Cambridge Local Plan 'First Proposals' (Regulation 18: Preferred Options 2021) consultation. The spatial strategy set out in the First Proposals Plan consultation document does not currently allocate Station Fields, Foxton for development. We consider it is appropriate and necessary to allocate this site for development, noting the potential to deliver a significant amount of new housing and other infrastructure in a sustainable location with significant planned public transport improvements, to help ensure the Council meet the housing need identified.

2.0 Response to the Housing and Employment Land Availability Assessment

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

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

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

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

4.1. Red scores:

4.1.1. Landscape and Townscape

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

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

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

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

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

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

Guide (2010) describes the site as falling within The Chalklands:

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

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

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

As shown in the Green Infrastructure Strategy prepared by LDA Design (Appendix 1), the proposals have identified the relevant character of the landscape and topography and sought to respond and retain existing vegetation and the rural character to the site. Of the 98ha site, the masterplan indicates that only 50% would be developed, ensuring a significant proportion of the site would remain undeveloped and retained and enhanced as open space, including to provide a new countryside park, woodland area and semi-natural areas of landscaping. The transformation of Station Fields creates an opportunity to connect and enhance these important natural systems and deliver significant benefit to Cambridgeshire through the enhancement of important chalk stream habitats, flood alleviation and recreation through its landscape.

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

The landscape vision has been centred around key placemaking principles:

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

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

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

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

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

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

It is not considered that the proposed development result in any adverse or harmful impact on the landscape and townscape and therefore the site would be suitable subject to high quality landscaping proposals and careful mitigation.

4.1.2. Archaeology

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

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

An Archaeological Appraisal of the site and surrounding heritage assets was undertaken in December 2019 by EDP (Appendix 3). This report presents the evidence available to date including intrusive investigation and aerial photographic evidence supplemented by a geophysical survey (undertaken in 2019 by Headland Archaeology). The Scheduled Monument (SM) (Brown Spinney Roman settlement) appeared on the Historic England 'Heritage at Risk' list prior to 2020 with its vulnerability referenced as 'arable ploughing'. The SM has since been removed from the at risk register as of 2020.

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

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

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

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

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

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

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

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

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

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

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

4.1.3. Transport and Roads

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

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

As a point of principle, we note that there are a number of other sites in the HELAA assessed as 'Amber' in response to transport and highways impacts, despite similar capacity issues on the local road network being identified. There are

only three other sites assessed as 'Red' where there are capacity issues on the local network. Of these three sites, the comments are more specific and conclusive as to why development would result in unacceptable impacts, for example in respect of 'Land at Rockery Farm, The Broadway, Bourn, CB23 2T' (Site Reference: 48151) the HELAA states:

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

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

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

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

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

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

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

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

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

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

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

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

4.1.4. Summary

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

4.2. Amber scores:

4.2.1. Development Plan Framework

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

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

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

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

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

4.2.2. Flood Risk

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

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

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

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

4.2.3. Biodiversity and Geodiversity

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

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

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

and play provision and a`new countryside park.

A Preliminary Ecological Appraisal has been prepared by BSG Ecology (Appendix 5). This confirms the site is predominantly arable land which is of low ecological value and there are no designated sites of wildlife value within its boundary. There are some localised habitat features of value including semi-natural deciduous woodland, ponds, watercourses, hedgerows and scrub. The appraisal recommends that priority habitat woodlands, hedges, ponds and watercourse should be retained and this has been accommodated as part of the landscape vision where possible.

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

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

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

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

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

4.2.4. Heritage

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

Any application for development of the site would be accompanied by a full Heritage Impact Assessment to assess the associated impact on the setting of the designated and non-designated heritage assets identified. Axis have already appointed Bidwells to undertake an Initial Heritage Appraisal (2021) (Appendix 6) which identifies that there are a number of heritage assets which have the potential to be affected by proposed development. The appraisal provides a series of recommendations that should be taken into account to limit the impacts of the proposed development on the identified assets, including buffer along the site boundaries to reduce impact on the Barrington Conservation Area to which the site has the closest relationship, landscape buffer between the site and A10 and to conserve and enhance views from the site towards Church of All Saints Barrington. The enclosed Green Infrastructure Strategy (LDA Design) demonstrate how these principles have been established as part of the overall design and layout of the scheme. The Heritage Appraisal

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

4.2.5. Access to Services

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

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

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

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

4.2.6. Site Access

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

We do not disagree with this response and agree that suitable and safe points of access to the site can be provided and would be subject of further detailed design work. Generally, the Site is bound to the south by the A10 and east by Barrington Road, therefore allowing a number of vehicle access points into the site from the strategic road network. Further details of the proposed access arrangements would be provided in the Transport Assessment submitted with any planning application.

4.2.7. Noise, Vibration, Odour and Light Pollution

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

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

Axis commissioned Stantec to prepare an initial Noise Impact Assessment to be undertaken (Appendix 7). This confirms that the main noise sources at the A10 and the Great Northern Railway Line. This sets out a series of mitigation measures to ensure there will be no adverse impact from noise on potential occupiers of the site and to ensure suitable internal and external noise levels would be achieved. It is considered that the use of appropriate setbacks of any new development from the A10 and Great Northern Railway Line would provide appropriate noise levels.

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

There are not considered to be any sources of light pollution that would impact on the development of the site and careful consideration

would be given the lighting strategy proposed within the landscape to mitigate any harmful impact on the wildlife and nature being encouraged as part of the biodiversity strategy.

4.2.8. Air Quality

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

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

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

4.2.9. Contamination

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

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

4.3. Green scores:

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

4.3.1. Summary

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

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

4.4. Sustainability Appraisal

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

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

The sites are grouped by the sources of supply (i.e. Densification of Cambridge urban area; Edge of Cambridge: Green Belt; etc) and spatial options considered in the GCLP First Conversations consultation. Each of the sites are assessed against the fifteen SA Objectives and Appendix D of the SA presents the methodology and appraisal criteria applied in the assessment of Site Options. We would comment on the overall approach in the SA and are concerned that it is not clear from the SA site assessment how the sites compare to each other and there is no

overall score provided in relation to the sites that means they can be easily ranked. There isn't a clear link between the scores of the SA and the sites that have been chosen for allocation. It is therefore not clear how the site allocations have been evidenced and justified because of the SA assessment.

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

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

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

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

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

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

Whilst some minor negative effects are identified in relation to Station Fields this is largely based on the SA methodology. Subject to appropriate mitigation and no harmful impacts arising it is considered these effects would in reality be considered negligible or minor positive.

Our assessment of land at Station Fields, Foxton only results in two significant negative effects. Firstly, in relation to the efficient use of land as the site comprises more than 25% agricultural land (Grade 2 - provisional classification). However the loss of greenfield land of some agricultural value is largely unavoidable when identifying land in the Plan area and allocating sites for development. The Council have concluded that it is necessary to allocate greenfield sites and those in the rural area, given the finite supply of brownfield land in the urban area. Therefore there will be the loss of some agricultural land. We would note that land at Station Fields is not the highest grade agricultural land, and the Grade 2 classification is based on provisional information via the DEFRA national dataset. A detailed Agricultural Land Classification Report will be prepared in due course to confirm the classification and extent of any Best and Most Versatile land. Furthermore, the proposed development seeks to retain 50% of the site area will remain undeveloped and

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

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

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

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

Economic Benefits

* New jobs will be created through the construction phase of the development, both directly and through supply chains;
* New residents will help to sustain existing services and facilities within the adjacent villages of Foxton and Barrington, as well as facilitate the delivery of new community uses and services within the proposed development;
* The development is likely to generate CIL and Section 106 contributions towards improving local infrastructure; and
* Additional revenue will be generated through the New Homes Bonus, Council Tax payments etc.

Social Benefits

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

Environmental Benefits

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

the site which will also contribute towards biodiversity enhancement.

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

Appendix 1 - Station Fields Green Infrastructure Strategy

Appendix 2 - Arboricultural Survey

Appendix 3 - Archaeology Appraisal

Appendix 4 - Station Fields Access and Movement Strategy

Appendix 5 - Preliminary Ecology Appraisal

Appendix 6 -
Initial Heritage Appraisal

Appendix 7 -
Noise Impact Assessment

Appendix 8 -
Odour Impact Assessment

Appendix 9 -
Air Quality Assessment

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