

Land at Highfields-Caldecote: Site promotion
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LAND EAST OF HIGHFIELDS ROAD SITE PROMOTION

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1.0 Introduction

1.1 Background

This document is submitted by Bidwells on behalf of Vistry Group in respect of a site representation for the Greater Cambridge Local Plan (First Proposals) consultation. The land in question is at Highfield-Caldecote and was promoted in the Council's 'call for sites' process in 2019. It has been assigned reference is 40011 (Land east side of Highfields Road, Highfields, Caldecote, CB23 7ZA) in the Council's assessment of the sites SHLAA document.

Land to the west of site 40011 also controlled by Vistry and is a preferred location for residential development. The Council has made a draft allocation of over six hectares of land (draft allocation S/RRA/H). The Council has assessed draft allocation S/RRA/H and site 40011 as a single entity in the SHLAA assessment document. Site 40011 would form an additional phase to the draft allocation S/RRA/H and it is appropriate to consider any cumulative impacts of residential development at the wider site. The wider site is known as Land at Highfields (Phase 3) Caldecote, CB23 7ZB and has been allocated reference 51599. The location and extent of the subject site is shown on the site location plan which accompanies this representation.

Draft allocation S/RRA/H is subject to planning permission by allowed appeal APP/W0530/W/16/3149854 (dated 05 July 2017). The permission is for up to 140 dwellings and associated development with all matters reserved except access. This planning application is subject to two phases. Development has commenced on Phase 1 for 66 dwellings but planning permission has lapsed on Phase 2 for 74 dwellings. A subsequent planning application has been submitted for Phase 2 and is currently being determined (21/02265/FUL). Phases 1 and 2 are subject to draft allocation S/RRA/H and it is understandable that the Council favours development at this site, which was found to be appropriate by the appeal inspector. Given this 'support in principle' it is highly likely that this site will come forward for development and will be delivered through planning application 21/02265/FUL and the draft allocation in future iterations of the Plan. Access to/from Phase 3 and the highway would be taken through draft allocation S/RRA/H.

This document assesses site 51599 and outlines how the site is available and deliverable if additional housing is required, particularly early in the Plan period.

2.0 Representation 1: Development Strategy

2.1 Development strategy

Policy S/DS (Development strategy) of the emerging Greater Cambridge Local Plan ('the Plan') outlines that the proposed development strategy for Greater Cambridge is to direct development to where it has the least climate impact. This includes where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.

The broad strategy for the Plan is to ensure that housing is in sustainable locations which will reduce the need for travel and carbon production. The Plan identifies the need to deliver 48,840 homes over the Plan period of which a significant proportion are planned to be in the Cambridge urban area or on the Cambridge fringe.

Development at the subject site clearly fits in with the aspiration for sustainable development which reduces the need to travel. Its location is in close proximity to a wide range of facilities and services fits neatly with the Council's development strategy for the Plan and the aspiration for sustainable development.

3.0 Representation 2: Housing and Job Numbers

3.1 Socio-economic analysis

Draft Policy S/JH (New jobs and homes) of the Plan identifies the following objectively assessed needs for development in the Plan period:

- 58,500 jobs
- 44,400 homes, reflecting an annual objectively assessed need of 2,111 homes per year

We have undertaken an assessment of the objectively assessed need and the evidence supporting the Plan. The Assessment is an accompanying document to this representation. Our assessment shows that the proposed job numbers across the Plan period are underestimated. Projected growth in the Plan area across the Plan period shows that additional jobs will require additional dwellings if 'in commuting' is to be limited. **We therefore object to Policy S/JH of the Plan** and have set out our rationale below.

The objective assessments of employment and housing need supporting the Plan's consultation are substantial. The employment need assessment considers that this rapid growth is unsustainable in the long term and would likely fall back to an average rate of growth seen in the early 2000s, before proposals in the adopted Local Plan took shape.

We believe that this approach undermines the 'Cambridge Phenomenon' that has been gathering pace since the 1960s, but is only now starting to convert the academic advances in life sciences into commercial success. It suggests that the possibility that growth can be sustained is not worth considering and instead the Plan area should be planning for a level of growth comparable to other areas that do not have a unique life sciences cluster, which contributes £2.9 billion annually to the UK economy.

This is happening at a time when the Covid-19 pandemic has highlighted the importance of all aspects of life science research, from rapidly developing a vaccine, designing effective equipment for rapidly increasing the number of intensive care beds, through to caring for those suffering the long term effects. It is also happening at a time when, following Brexit, the UK is seeking to determine its place in the global economy.

While the UK has much to offer, the life science research undertaken in Cambridge, and across the Oxford to Cambridge Arc, is one of the most unique and highly valued. Now is not the time to constrain growth simply because it 'might' be less than what has been sustained previously.

We acknowledge that economic growth must be sustainable and that it would be inappropriate to determine a level of need that is undeliverable, as advocated by the NPPF. It is also acknowledged that it is difficult to determine exactly how much employment need there is in the context of such a vibrant economy. Certainly, extra care is needed when considering the veracity of economic models, such as the East of England Forecasting Model that have consistently downplayed economic growth from key sectors over several iterations in recent years. It would therefore be more appropriate, at least as a reasonable alternative, to reverse the analysis and instead consider the available capacity for growth in the area and determine how this sits with the various economic projections under consideration.

On the subject of reasonable alternatives, the Sustainability Appraisal accompanying the Plan fails to consider the potential effects of a higher level of economic growth. This is clearly unreasonable - The evidence base itself highlights the uncertainty as to the level of employment need and identifies methodologies and scenarios that would result in a considerably higher level of employment need than the first proposals suggest.

Lessons must be learnt from the adopted Local Plan that did not anticipate the rapidity of growth they would facilitate, which would inevitably lead to far greater growth over their full Plan periods than was considered in their accompanying Sustainability Appraisals. It is this failure to consider the possibility of higher rates of economic growth that has led to the increasing level of commuting into the Plan area, which is clearly contrary to the development strategy for the Plan.

In terms of housing need, in the case of Greater Cambridge this is a function of facilitating economic growth and determining the acceptable level of commuting. The latter will inevitably be a strategic matter for the purposes of the Duty to Cooperate unless the combined authorities can show that it is accommodating its full objectively assessed housing need.

At this stage, with such uncertainty regarding the level of employment need, it is certainly the case that housing need is far higher than that set out in the first proposals consultation and therefore more land needs to be allocated for housing within the Plan area.

The Sustainability Appraisal fails to consider any alternative other than the level of need set out in the Plan. Clearly, if there is uncertainty about the level of employment need, there is also uncertainty about the level of housing need, and the Appraisal should reflect that. Equally, in its consideration of reasonable alternatives, the Appraisal fails to recognise that the greater in-commuting resulting from a higher employment need would be negated by increased housing. Its reasons for limiting the assessment of reasonable alternatives are self-defeating.

In terms of recommendations, it is clear that more analysis is required to determine the most appropriate level of employment need in the context of the unique life science cluster in Greater Cambridge, which will in turn determine the housing need. This work cannot reasonably progress until the 2021 Census is published in early 2022 and much of the data post-2011, on which the Plan is based, is revised. In the meantime however, the Councils should consider the realistic capacity for development within its boundaries – what could be achievable irrespective of need, based on the environmental and social constraints of the area. This work will be essential to determining if any unmet housing and/or employment needs exist for the purposes of the Duty to Cooperate, determining the level of employment and housing need that is actually deliverable, and convincing the Inspector at examination that the Plan has been positively planned in the context of the significant weight the NPPF places on the need to support economic growth and productivity.

4.0 Representation 3: Sustainability

4.1 Sustainability

The Development Strategy Topic Paper which informs the Plan assesses the services and facilities in settlements across the Plan area. It proposes that Highfields-Caldecote is a 'Group Village'. The adopted Local Plan indicates that within such villages, residential development and redevelopment up to an indicative maximum scheme size of 8 dwellings will be permitted within the development frameworks. Development may exceptionally consist of up to about 15 dwellings where this would make the best use of a single brownfield site. It is assumed that this definition will be incorporated as policy wording in future iterations of the Plan.

The definition applies to windfall development only, but its allocation as a 'Group Village' confirms its status as a settlement which contains a wide range of local facilities and services. The Plan affirms this by draft allocation S/RRA/H in the village and considers it to be a sustainable location for development. The site is located adjacent to the existing development framework for the village. Development at the site would be a natural extension of the village and it would not be an isolated incursion within the countryside.

We have reviewed the topic paper and consider that, given the range of facilities and services in the village and its accessibility by public transport, it should be a focus for development and it is therefore an appropriate location for additional dwellings. Highfields-Caldecote has a range of services and facilities, including a primary school, community facility, public house and shops. The village is also served by the Citi 4 bus service to/from Cambridge which runs every 20 minutes (Monday – Saturday) and hourly on Sundays. The Topic Paper specifically identifies Highfields-Caldecote as a village with very good access to public transport. Additional homes at Highfields-Caldecote could provide or contribute towards enhanced local services and facilities, further improving the sustainability of the settlement.

The village is close to Cambridge and is favoured for a site allocation for residential development. It is a sustainable village with a range of local facilities and services and it is an appropriate location for additional dwellings. The proposed Phase 3 site is available and could be delivered within five years, thereby making a positive impact on the Council's five-year housing land supply. We consider that additional dwellings should be delivered at Highfields-Caldecote across the Phase 2 and Phase 3 sites. This would fit neatly with the development strategy for the district and the need to site residential development in sustainable locations.

It should be noted that the main issue associated with the allowed appeal (APP/W0530/W/16/3149854) was whether the proposed development would be acceptable, having regard to the economic, social and environmental dimensions of sustainable development as defined in the NPPF. The main matter of the appeal is whether Highfields-Caldecote is a sustainable settlement and the appeal decision goes into some detail in this respect. The decision concludes that, taking all matters into account, the adverse impacts of the proposed development fall short of outweighing the benefits, assessed against the policies of the NPPF taken as a whole. The proposal would represent sustainable development in South Cambridgeshire which should be granted planning permission. This is a clear precedent which considers that the settlement is sustainable and is an appropriate location for new residential development. Taken with draft allocation S/RRA/H significant weight should be afforded to the sustainable nature of the village, in further assessing the subject site.

5.0 Representation 4: Site Assessment

We have reviewed the Council's assessment of site 51599, contained in the HELAA assessment document and in some cases, do not consider that the conclusions are justified or evidenced. We have assessed each technical element of the site assessment proforma document and have provided representations below.

5.1 Adopted development plan policies

This category was assessed as 'amber'. For this category, this means that development of the site would be incompatible/ inconsistent with an adopted Development Plan policy or allocation. The assessment concludes that it would be outside the defined Development Framework for the village.

We do not concur with this rating for the category. We consider that Highfields-Caldecote is an appropriate location for additional residential development as it is a sustainable village. Whilst the site is outside the Development Framework for the adopted Local Plan, its allocation for residential development would mean that it would be accommodated within the Framework and therefore the principle of development at the site would be acceptable. This would mean that it would be assessed as 'green'. Defined as where development of the site would not be inconsistent with an adopted Development Plan policy or allocation.

5.2 Flood risk

This category was assessed as 'amber'. For this category, this means that the site contains areas at high, or medium risk from surface water flooding and/or the site contains some land in Flood Zones 2 and/or 3 but there is sufficient land in Flood Zone 1 to accommodate at least five additional dwellings. The assessment concludes that the site is wholly in Flood Zone 1 and that 1% of the site lies within a 1 in 1000 year event.

We do not concur with the rating for this category. Whilst it is technically accurate, we do not consider its severity is such that it would prevent development at the site by means of flood risk, particularly if it was addressed through a drainage strategy. The site is located within an area of very low flood risk from external sources making it suitable for the proposed residential use.

An assessment of ground conditions identifies that the local geology indicates a clay soil and infiltration drainage would not be possible and an attenuation strategy for surface water drainage would be appropriate. An initial assessment suggests that two detention basins could be provided at the site. These would treat surface water pollution levels and provide attenuation to greenfield runoff to match that of the current agricultural use - so as not to increase flood risk elsewhere. The use of the detention basins will provide some biodiversity net gain and amenity value when used in combination with public open space. The basins will be designed so as to be adopted by Anglian Water. The foul water strategy for the site should utilise the foul water pumping station on the site to pump foul sewerage to the site subject to permission or Highfields Road.

Given the above, we consider that flood risk for this site should be assessed as 'green' with the requirement for a drainage strategy identified in the policy wording associated with any allocation for residential development at the site.

5.3 Landscape and townscape

This category was assessed as 'red'. For this category, this means that development of the site would have a significant negative impact which cannot be mitigated. The assessment concludes that the site is outside and abutting the settlement framework and states "*Wide views are limited*

but local and amenity views are high due to close proximity of residential plots and open/gappy hedgerows. Development upon this site would have a significant adverse impact to the landscape character. It would be an encroachment into the countryside, urbanisation of the rural landscape and not sympathetic to the existing settlement framework pattern. Limited development to the western side of the site may be acceptable with landscape mitigation.”

We do not concur with the rating for this category. The site promoter has undertaken a landscape appraisal which assesses any impact of development at the site on its wider setting. The landscape assessment recommends that development should be focused in the western half of the site in order to minimise encroachment into the countryside eastwards and minimise impacts on the open character of the site and views from the public footpath to the eastern boundary and the Harcamlow Way/Wimpole Way. The eastern half of the site could be used to deliver substantial benefits in the form of new open space to serve the development and existing village and could include a community orchard, play facilities, wildlife ponds, recreational walks and amenity greenspace. This open space could also assist in achieving biodiversity net gain on site.

Opportunities to improve connectivity between the eastern public footpath (which currently terminates at the north-eastern corner of the field) and the existing village would be maximised. Access into the site would be carefully considered, avoiding the ‘Category A’ and ‘B’ trees on the western site boundary.

The enclosed masterplan illustrates how the site could accommodate a scheme for around 200 dwellings, while incorporating appropriate landscape mitigation.

We consider that a well-designed development at the site would mitigate any adverse impacts in terms of the wider setting of the site. This would particularly be the case with landscaping in the western portion of the site. Through such mitigation, we consider that the site could effectively be assessed as ‘green’ in respect of landscape and townscape matters.

5.4 Biodiversity and geodiversity

This category was assessed as ‘amber’. For this category, this means that development of the site may have a detrimental impact on a designated site or those with a regional or local protection, but the impact could be reasonably mitigated or compensated. The assessment concludes that *“all residential developments will require consideration of impact on nearby SSSIs. Boundary and adjacent habitats including trees, hedgerows and adjacent woodland may qualify as Habitats of Principal Importance/be of high ecological value and support protected or notable species. Grassland quality will need to be assessed. Otherwise the rest of the site (arable) is likely to be of low ecological value, although may support farmland birds. Pond within site may support great crested newt (if suitable). Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.”*

We do not concur with the rating for this category. The promoter has commissioned a Preliminary Ecological Appraisal for the site in order to identify ecological constraints to development, inform recommendations for design, highlight opportunities for ecological enhancement and determine any additional investigation/survey work necessary. A survey was undertaken in July/August 2021 which means the assessment is ‘up-to-date’.

The site comprises part of an arable field with field margins and boundary hedgerows along the eastern boundary and parts of the north-western and western boundaries. There are no nature conservation designations at the site.

The arable land that dominates the site is of limited ecological interest, such that development is unlikely to result in significant adverse ecological effects. On-site ecological interest is restricted to the arable field margins and boundary hedgerows/trees. These habitats could be retained as far as possible and protected during the construction phase. Opportunities are available to deliver benefits for biodiversity including hedgerow planting along the site boundaries and creation of priority habitats. There are opportunities to accommodate biodiversity enhancement measures within open spaces at the site. These could deliver significant ecological enhancement, and Biodiversity Net Gain, as part of development at the site.

The assessment identifies no significant ecological constraints to development at the site. Development at the site would be subject to a range of biodiversity enhancement measures. As such we consider that the site should effectively be assigned a 'green' rating in respect of ecology and biodiversity.

5.5 Open space and green infrastructure

This category was assessed as 'green'. This means that development of the site would not result in the loss of any open space. The assessment concludes that the site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.

We concur with the rating for this category. The site is arable land the loss of which would not result in open space or green infrastructure.

5.6 Historic environment and archaeology

This category was assessed as 'green'. For built heritage this means that development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets. The assessment concludes that development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets. It also states that archaeological work has been completed in this area.

We concur with the rating for this category. The site promoter has undertaken a desk-based archaeology and heritage appraisal which reflects the finding of the assessment. The assessment confirms there are no designated heritage assets within or in proximity to the site. Designated heritage assets in the wider area include Hardwick Conservation Area, which contains Grade II* and II listed buildings and which lies approximately 1.2km east of the site. There are no views to these designated heritage assets from within the site, or any views to other designated heritage assets in the wider area. Development of the site would not adversely impact the significance of any designated heritage assets as a result of alteration to setting.

For non-designated heritage assets and as reflected in the HELAA assessment, a programme of archaeological works was undertaken in relation to residential development bounding the site to the west and south. These works identified an Iron Age farmstead, as well as a track and ditches most likely of early Roman date. The area of interest, approximately 50 metres north-west of the site, was subject to targeted excavation prior to development. To the south-east of the excavation area, along the western and southern site boundaries, geophysical survey and trenching recorded below-ground remains of ridge and furrow earthworks as well as a limited number of undated gullies/ditches but these remains were not of sufficient interest to warrant archaeological excavation.

It is clear that development of the site would not adversely impact any designated heritage assets as a result of alteration to setting. Archaeological works did not identify significant archaeological

remains immediately adjacent to the site and there is no evidence to suggest remains are likely to be present which would preclude development. It is anticipated that desk-based assessment, geophysical survey and trial-trench evaluation would be requested to inform an application for residential development of the site, to confirm the nature of the below-ground archaeological resource. The scope and timing of archaeological works would be agreed in discussion with the County Archaeologist.

5.7 Accessibility to services and facilities

This category was assessed as 'amber' with various measurements applied to accessibility criteria. The assessment concludes that the site has adequate accessibility to key local services, transport, and employment opportunities and the proposed development would not require delivery of accompanying key services.

We do not concur with the rating for this category. The site is clearly in a sustainable location and is easily accessible to a wide range of facilities and services by non-car modes a fact which is acknowledged by the site assessment. Its location adjacent to the existing built form and proximity to a range of facilities and services should carry significant weight in assessing the suitability of the site for residential development.

There are a good range of services within approximately 1km of the site. This includes a hairdresser, village hall, social club, recreation area, bus stop, primary school and small food retail outlet. The village is served by the Citi 4 bus service to/from Cambridge and Cambourne which runs every 20 minutes (Monday – Saturday) and hourly on Sundays.

There is a supermarket at Cambourne, within approximately 5km of the site. For access to these services, walking offers the greatest potential to replace car journeys whilst cycling also has the potential to replace many car trips of approximately 5km, which may also form part of longer journeys supported by public transport. A pedestrian refuge island is present on Highfields Road at Caldecote Social Club, near to the junction with Clare Drive/Hall Drive and near Grafton Drive to aid crossing on the route to the primary school. The settlements of Hardwick and much of Cambourne lie within cycling distance. As the development at Bourn Airfield progresses, the route for cyclists between the site and Cambourne will be improved over the existing situation via St Neots Road, increasing the likelihood of cycle trips to Cambourne in the future and its associated amenities.

The development subject to Phase 1 will provide a cycleway link that will assist connecting the north of Highfields-Caldecote to the Bourn airfield development and Cambourne. Caldecote Primary School is the closest primary education to the development. The school is located on the west side of Highfields Road, 1.05km to the south of the development. The route from the southern site access is to cross Highfields Road immediately south of the southern access (where a dropped kerb crossing point is to be provided) then proceed south along Highfields Road. The route crosses the minor residential private no through road of Bossert's Way and the no through road of Grafton Drive prior to the pedestrian access to the school.

The site falls in the catchment of Comberton Village College. As the school is over three miles from the development, school transport would be available to the future development in accordance with Cambridgeshire County Council school transport policy. The nearest bus stop that serves existing school buses is located at Caldecote Primary School.

It is clear that the site is in a sustainable location and is appropriate for proportionate additional development. Its location adjacent to a range of facilities and access to high quality, high frequency public transport means that the bus has the potential to replace many journeys by the private car.

Walking and cycling to local facilities is also a realistic proposition, with the Phase 1 development offering improvements for pedestrians and cyclists. We suggest that the rating for accessibility to services and facilities is 'green' and that the sustainable location and 'Group Village' status of the village would be sufficient justification for additional residential development in Highfields-Caldecote.

5.8 Site access

This category was assessed as 'amber'. For this category, this means there are potential access constraints, but these could be overcome through development. The assessment concludes that phases 1 and 2 need to be built out in order for Phase 3 to progress - subject to detailed design. There are potential access constraints, but these could be overcome through development.

We do not concur with this assessment. Phases 1 and 2 are subject to draft allocation S/RRA/H. Access to/from Phase 3 would be taken through this draft allocation. Given the support from the Council for development at this site and planning application 21/02265/FUL we consider that access to/from Phase 3 and the highway could be achieved and is deliverable.

. Access would be taken through phases 1 and 2 where access can be taken from the highway at two designated points. The site promoter retains control over those access points and access to/from the highway.

Access to/from Phase 2 is via two priority-controlled junction accesses off Highfields Road. Phase 1 of the development is served from the access to the north and is well underway with construction and occupation. Phase 2 is subject to planning application 21/02265/FUL and designs of the layout are being developed. However, it can enable the access road from the southern access position to be upgraded if necessary to accommodate a further phase. The current access on to Highfields Road will have appropriate visibility splays and its junction format can be reviewed as part of any future planning application, but a simple priority junction in a semi-rural location and 30mph speed limit should be appropriate to accommodate the likely traffic volumes expected.

Given the above, we consider that access to/from Phase 3 and the highway can be achieved. The various design specifications have been reviewed and we consider these would be acceptable to consultees as part of any future planning application. The Council should also consider the improvements delivered through Phase 1 which seek to make the wider site sustainable and well-connected. Any access or phasing requirements to ensure appropriate site access could be fixed through policy wording associated with any future site allocation at the site or through a condition or Section 106 Agreement associated with any planning permission for residential development.

5.9 Transport and roads

This category was assessed as 'amber'. For this category, this meant that any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated. The assessment concludes that the site is located within the A428 corridor which is highly congested and the level of growth allowed is limited. The adjacent Bourn Airfield site is dependent on the Greater Cambridge Partnership Cambourne to Cambridge 'Better Public Transport' (C2C) scheme (or equivalent) being delivered to allow a high sustainable mode share towards Cambridge. As this site is located next to the Bourn Airfield site, there is the possibility of linking to the proposed transport links. However, it should be noted that the Highway Authority cannot allow large car dominated developments in this area. The applicant must, therefore, consider sustainable links to and from the site. Capacity assessments will be required at local junctions and the impact of

Bourn Airfield and other committed/allocated sites must be considered. Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.

We do not concur with this assessment. The site assessment requires that the promoter should consider sustainable links to/from the site. Highfields-Caldecote is classified as a 'Group Village' and has a range of local facilities and services in addition to being well-served by public transport. It is also subject to draft allocation S/RRA/H which means it is a favoured location for development. In addition, Phase 1 has delivered significant improvements to walking/cycling infrastructure in the village. Planning permission for Phase 1 includes for the improvement of the bus stops at St Neots Road/Highfields Road prior to first occupation of the overall site. The condition has since been discharged under planning application S/3338/19/DC and Cambridgeshire County Council comments note that this includes cycle parking at the westbound bus stop.

Condition 18 requires improvements to the footway between the site and St Neots Road which has been discharged by planning application S/3338/19/DC. The footway improvements for the overall site include widening of the existing footway on the western site of Highfields Road between the southern site access and Clare Drive (to the south) to 1.8m. The western footway is also being widened to 1.8m north of the northern access to approximately 25m north of West Drive where a foot/cycleway is being provided towards St Neots Road.

The Council should not lose sight of the fact that the proposed additional development at the site is proportionate and in keeping with the level of services in the village and Cambourne. It also reflects the high quality of public transport at the village – both existing and proposed. This means that future occupiers will have a real choice and will not be bound by the private car for journeys to/from the village. The proposed C2C scheme will provide additional opportunities for faster journeys to/from Cambridge by a dedicated busway. The service will pass in close proximity to Highfields-Caldecote which means it is a realistic alternative to the private car for employment opportunities in Cambridge and other facilities and services in Cambourne. Combined with the local infrastructure improvements delivered through Phase 1, the C2C scheme will mean that Highfields-Caldecote is a sustainable location for development with the scheme being able to accommodate a higher modal share for transport types. This fits in with the wider development strategy for the Plan and the Council should give this significant weight in assessing this representation. If considered necessary, relevant aspects of trip generation and access specification could be secured by policy wording associated with any allocation at the site and/or condition/Section 106 Agreement associated with any planning application at the site.

5.10 Noise, vibration, odour and light pollution

This category was assessed as 'green'. For this category this means that the site is at low risk in regard to noise/vibration/odour. Development of the site would have either a neutral or positive impact on the noise, vibration, odour and light pollution. The assessment concludes that the site is capable of being developed to provide healthy internal and external environments in regard to noise/vibration/odour/light pollution after careful site layout, design and mitigation.

We concur with this assessment. There are no sources of noise, odour or pollution adjacent or near to the site and the assessment of the site as 'green' in respect of these matters is appropriate.

5.11 Air quality

This category was assessed as 'green'. For this category, this means that the site is at low risk in regard to air quality. The assessment concludes that site does not lie within an Air Quality Management Area (AQMA) with minimal traffic impact on AQMA.

We concur with this assessment. We do not consider that development at the site would have any adverse impacts on air quality either in itself or cumulatively.

5.12 Contamination and ground stability

This category was assessed as 'amber'. For this category, this means that the site is likely to be capable of being developed after appropriate mitigation or remediation of contamination / ground stability issues. The assessment concludes that the site has potential for historic contamination, with the requirement for planning conditions.

We do not concur with this assessment. There is unlikely to be significant contamination at the site as it is largely an arable field. The ground conditions are likely similar to the neighbouring land which is currently being successfully developed as Phase 1. A desk-based assessment could be prepared to support any planning application at the site but we consider that any contamination could be dealt with by a 'compliance' condition to any planning permission. The effect of this would be to ensure that the site could reasonably be assessed as 'green'.

5.13 Housing land supply

Phase 3 could deliver around 200 additional dwellings, the majority of which be delivered within five years, thereby making a positive contribution to the housing land supply for the Greater Cambridge area. This should be afforded significant weight in assessing this representation.

5.14 Deliverability

The HELAA assessment identifies that the site is available and achievable. This is still the case.

5.15 Indicative masterplan

This representation is accompanied by an indicative masterplan which has been informed by a review of the HELAA document and a wider review of the constraints and opportunities at the site itself. The masterplan demonstrates how the technical matters shown above can be addressed and how the rating for each matter could be classified as 'green'.

The masterplan shows the extensive frontage with Phase 2 which would be used to provide access to/from the Phase 3 site. Access to/from Highfields Road could be taken through phases 1 and 2 and would provide suitable and safe means of accessing Phase 3.

The masterplan has been developed to form a nucleus of built development adjacent to phases 1 and 2 which would be permeated by primary and secondary streets. The layout of the development would be such that hedges would be retained at the periphery of the site, wherever possible and these areas would be used for recreation and biodiversity enhancement. The area to the east of the built development would be given over to a more extensive area of public open space including landscaping/planting, a community orchard, play areas, trails and formal sports pitch. This would mitigate any adverse on views into the site and its wider setting. The eastern part of the site would also be given over to SuDS infrastructure which would facilitate sustainable drainage modes at the site and which would encourage biodiversity.

Phase 3 would be within close proximity to the facilities in Highfields-Caldecote and would be accessible on foot or bicycle. Permeable links through the site would facilitate and encourage active means of travel. It would also be close to public transport links and other local destinations, including Cambourne, which would be readily accessible by bicycle.

5.16 East – West rail

We note the proximity of the broad corridor for East-West rail which is proposed to the north of the site. The precise route of the railway and associated infrastructure has been subject to consultation and the outcome is not likely to be known until mid-2022. Nevertheless, we consider that development could be delivered across the majority of the site with the presence of the infrastructure, without significantly reducing the developable area of the site.

6.0 Conclusion

This representation is made in respect of site 51599 which includes part of the site subject to draft allocation S/RRA/H in the emerging Local Plan for Greater Cambridge.

Our assessment shows that the Council's objectively assessed need for jobs across the Plan is insufficiently positive and significantly underestimates likely growth and does not reflect previous trends for the Plan area. We consider that the Plan should provide for additional jobs the effect being that more dwellings are required in the district, to accommodate growth and to limit 'in commuting'. This is key theme of the development strategy for the Plan area. Therefore we object to the level of growth proposed by draft Policy S/JH as we do not consider it is well-founded or justified.

The site is located in close proximity to Cambridge and in a location where a range of facilities are available on foot or by bicycle. Highfields-Caldecote is well-served by a regular, high quality bus services to/from Cambridge and Cambourne and there are opportunities for future occupants to use public transport rather than be bound by the private car. Therefore, development at site 51599 would be in line with the overall development strategy for the Plan area.

The site is in close proximity to the existing urban form and would form a logical extension to allocation S/RRA/H. It would not be an isolated development in the countryside and would be viewed against the backdrop of existing dwellings on the eastern side of the settlement. Areas of landscaping and biodiversity enhancement within the proposed development would ensure that it is assimilated into the countryside.

We consider that Phase 3 is deliverable and achievable early in the Plan period. Whilst it is reliant on Phase 2 coming forward, we consider that this is a realistic proposition as the site is subject to draft allocation S/RRA/H and planning application 21/02265/FUL. Phase 3 would be delivered once the necessary infrastructure for access through Phase 2 was in place and if necessary, this could be secured by any policy wording associated with a site allocation or a condition or Section 106 Agreement attached to any granting of planning permission for Phase 3.

We have assessed the SHLAA assessment document and do not consider that all the conclusions are well-founded. The site promoter has undertaken a range of assessments to further examine those conclusions. We consider that, of those issues identified as 'red' and 'amber' those matters could be addressed through specific policy wording associated with any allocation at the site. This will ensure that site-specific matters can be assessed through any future planning application at the site.



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