GREATER CAMBRIDGE LOCAL PLAN – THE FIRST PROPOSALS

Land to the south of Great Abington and north of Great Chesterford, CB10 1FE

Site Reference: 40352 & 45645

Representations on behalf of Abington Farms Ltd



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Client Abington Farms Ltd

Reference: 019-31

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1. Introduction

- 1.1. Cheffins Planning have been instructed by Abington Farms Ltd to promote their land interests in connection with the 234.97 hectares site located at land between Great Abington and north of Great Chesterford, CB216AX. This site has been subject to two separate assessments under HELAA site references 40352 and 45645. Due to the similarities between the two assessments these are considered together.
- 1.2. It is important to note that land is currently being promoted for a new settlement immediately to the south of the site in Uttlesford District, for the North Uttlesford Garden Community. This proposed community adjoins and is located immediately to the south of my client's land holding and is situated on the border between Uttlesford District and the Greater Cambridgeshire administrative area.
- 1.3. Whilst my client is not objecting per-se to development on the northern boundary of Uttlesford District, it is clear that if any development in this location is to be truly sustainable then linkages will need to be provided to the north, to connect to the proposed public transport interchange at the A11/Babraham. It is envisaged that the routes provided to this facility will need to meet the needs of pedestrians, cyclists and buses. These transport corridors will allow a modal shift from the private car to access businesses and facilities in and adjoining Cambridge.
- 1.4. It would be perverse not to provide these routes as it is evident that residents of the development in the north will not exclusively work within Uttlesford District with Cambridge and South Cambridgeshire being equally important destinations. To ensure that traffic patterns do not become established it is imperative that these routes are provided at the outset of the commencement of development. This would ensure compliance with the current consultation on changes to paragraph 73 of the NPPF which requires that large urban extensions or new settlements offer genuine public transport options. This is also supported by revisions seeking to promote sustainable transport in which Paragraph 104(d) has been amended to support the Building Better Building Beautiful commission's recommendations to encourage walking and cycling, ensuring that large scale developments are supported by the necessary infrastructure and facilities, including a genuine choice of transport modes.
- 1.5. At the current time Greater Cambridgeshire will not benefit from this proposed site and the land being promoted by my client is seeking to address this and provide non-vehicular links from this site to the proposed public transport hub at Great Abington.
- 1.6. There are also questions as to how Greater Cambridgeshire is dealing with the duty to cooperate in connection with the NUGC and despite requests for clarification of this issue no information has been forthcoming. At this juncture, if development in the north is accepted, will Greater Cambridgeshire be prepared to accept the provision of road and public transport corridors north from this site to link to the proposed travel hub and as the situation exists South Cambridgeshire will not realise any tangible benefits from such development? How would the Greater Cambridge Plan or South Cambridgeshire seek contributions towards the enhancement of public transport and associated infrastructure? This emphasises the need for Uttlesford to have a full and open dialogue with Greater Cambridgeshire.
- 1.7. Alternatively, if the NUGC does not come forward this site could provide a standalone settlement of up to 1500 dwellings which would assist Greater Cambridgeshire in meeting and maintaining a deliverable five-year housing land supply and provide a significant amount of affordable housing.

2. Context

2.1. In terms of the **economic objectives** the proposal will unquestionably give rise to significant employment during the construction and operational phases of the development. Future occupiers of the scheme are likely to use local services and facilities within the new

development making a positive contribution to vitality and viability. In addition, the education, shopping, community and B1 uses provided on this site will bring long term economic opportunities. Another particular economic benefit is the provision of social housing. The benefits of this development will also spread off site in terms of public transport enhancement and servicing of the proposed dwellings and businesses.

- 2.2. The site could provide circa 1,500 dwellings. The proposal will also allow the requisite highway improvements from the A11 to access this facility. This site will also help to create the northern access to the Garden Community if this scheme comes to fruition.
- 2.3. The provision of circa 1,500 dwellings will help the Council to achieve a deliverable five-year housing land supply and allow a full range of houses, including bungalows, flats, sheltered housing to the meet the needs of families, young couples, single people and retirees. Bungalows and sheltered housing are particularly suited to the ageing population and those with limited mobility.
- 2.4. The provision of circa 600 affordable dwellings will unquestionably make a positive contribution to housing affordability. The provision of 600 dwellings will also help meet the objectives of paragraph 60 of the NPPF.
- 2.5. The development will also allow for the contributions or works towards the provision of primary and secondary schools. The improvements to public transport will not only meet the needs of the development but the wider area of Greater Cambridgeshire.
- 2.6. There are significant sustainability credentials of the site in terms of access to local services and facilities, which will be provided as a consequence of this development. The planned onsite and offsite enhancements to cycling, rail, bus and pedestrian infrastructure will help to meet environmental objectives. In terms of cycling it must be recognised that this site is within close proximity to Welcome Trust, Granta Park, Babraham Institute and Addenbrookes, with the provision of appropriate infrastructure, including the extensions to the proposed public transport corridor allowing a modal shift from the private car.
- 2.7. The indicative design of the proposal has been landscape led which will allow significant new habitats to be created and biodiversity enhancements. This will not only help to mitigate the visual impacts of the development but also enhance an agricultural landscape devoid of natural features.

3. Site Capacity

3.1. It is considered that the site has a capacity of circa 1,500 dwellings. Whilst this 230 hectare site could conceivably accommodate more than a 1,500 dwellings, utilising a density of 30 dwellings per hectare, the level of built development to open space is at a ratio of 21:79. This is in recognition of the findings of the Landscape Visual Impact Assessment which accompanied the earlier representations and the principal objective that this scheme must be landscape led. It is clear that a considerable amount of the site will need to be allocated for landscaping, public open space and biodiversity enhancements. This is of particular note due to the undulating topography of the site and the need to use blocks of planting to break up development and create views into and out of the site. Any allocation relating to this site would need to make it clear that the capacity is indicative and that the capacity would be informed by a master planning exercise. This masterplan will also need to demonstrate how this site and the Garden Community scheme (if it occurs) could be integrated.

4. Master Planning Approach

4.1. As detailed on the masterplan accompanying these representations, the design of the proposal has been landscape led which will allow significant new habitats to be created and biodiversity enhancements. This will not only help to mitigate the visual impacts of the development but also enhance an agricultural landscape devoid of natural features.

- 4.2. The site will provide policy compliant levels of affordable housing. The use of the land will include for access roads, bus routes, an extensive network of cycleways and footpath, strategic open space, green infrastructure, as well as on plot landscaping.
- 4.3. As stated above the benefits of the proposed development are wide-ranging and will promote the social, economic and environmental objectives of the National Planning Policy Framework. The site is located in a highly sustainable location, which will allow the potential to link to existing services and facilities and those provided on site. The site will also deliver housing and assist in the continued economic growth in the region. The site is also immediately available for development.
- 4.4. In particular, development of the site will provide:
 - Further family housing;
 - Mixed house-types;
 - Affordable homes;
 - Potentially custom or self build housing
 - Educational and Community facilities
 - Public open space and sports facilities
- 4.5. The density of development of the site is circa 4 dwellings per hectare which is reflective of the landscape lead approach to the development of this site and the impact which topography will have on the positioning of the dwellings etc. The landscaping will not only soften the impact of the development but will also result in significant biodiversity and landscape benefits.

5. Technical Assessment

5.1. Some initial site and contextual assessments have been carried out in relation to master planning, landscaping and access. This work indicates that some of the scoring in the HELAA needs to be updated and reinforces the suitability of this site for development in the emerging Greater Cambridge Local Plan (GCLP). The following section provides commentary on the HELAA, including the assessment methodology and the individual scores given to sites 40352 and 45645.

6. Comments on the scoring methodology and system

- 6.1. The performance of sites proposed for the GCLP have been coded using a traffic light system (red/amber/green). Although traffic light scoring systems are commonly used in this context, the performance criteria applied by the Greater Cambridge authorities appears overly stringent and inconsistent.
- 6.2. According to the published assessment criteria and supporting text within the HELAA, a site will generally be scored as amber where there is a detrimental impact which could be satisfactorily mitigated. This is an unusually strict approach which results in sites seeming to score more poorly than they should. It is more common for such assessments to apply an amber score to indicate that there is a potential issue that would need to be addressed through further detailed technical work or master planning. Where there are clear opportunities for effective mitigation of an impact or evidence to suggest that the matter is unlikely to constrain development, then a green rating would be more appropriate.
- 6.3. Ultimately, the key question that needs to be answered by a site assessment would be, "is development of this site acceptable in planning terms?" A revised scoring system based on the following key principles would be easier for stakeholders to understand a site's suitability for development:
 - Red: NO. This is a major concern which would likely result in planning permission being refused.

- Amber: POSSIBLY. This is a potential concern for which there may be a design solution (i.e. further site-specific work is needed).
- **Green:** YES. This is unlikely to be a significant concern or constraint on development.

7. Suitability for Development

Adopted Development Plan Policies

7.1. Being outside the current settlement boundary for Great Abington (as defined in the South Cambridgeshire Adopted Policies Map), the site is assessed as being amber. However, these boundaries will need to be reviewed as part of the plan-making process for the GCLP, "with boundaries defined to take into account the present extent of the built-up area as well as planned new development" under proposed policy *S/SB Settlement Boundaries*. It is unclear if these planned boundary changes have been considered in the HELAA assessment. The settlement boundary of Great Abington will need to be reviewed to accommodate this development. The comments regarding the neighbourhood plan are noted, although the neighbourhood plan will need to be updated to align with the local plan. The close proximity of the site to the District Boundary should be seen as a positive, especially if the NUGC comes to fruition. There are questions as to whether this scoring should be altered.

Landscape and Townscape

- 7.2. The scoring in relation to Landscape and Townscape is considered too negative and fails to recognise the extent of landscaping which will be provided. At the current time the site represents an open agricultural landscape which is devoid of natural features. The proposed planting will break up the site and seek to limit views into and out of the site. The acceptability of this approach is confirmed in the landscape visual impact assessment submitted in support of the original representations.
- 7.3. In view of the above it is contended that an overly negative view has been made to the measures being taken to minimise the impact of development. Therefore, whilst is accepted that there will some impact this issue should be given an amber score.
- 7.4. <u>Flood Risk</u>
- 7.5. The comments made regarding flood risk do not accord with the amber scoring given. It is clear that the flooding and surface water impacts of this site can be readily mitigated utilising a sustainable drainage system. Therefore, it is considered that flood risk should be a green score.

Biodiversity and Geodiversity

- 7.6. It is considered that the size of the proposed allocation and low density of development will allow sufficient offsets to be created in relation to SSSIs and allow County Wildlife sites and ancient woodland areas to be maintained and augmented as part of the development proposals. The additional greenspace provided within the development will also help reduce the recreational impact on these areas of ecological importance.
- 7.7. The site assessment considers that this site is of low ecological value and this proposal will allow this to be enhanced. The applicants are also committed to meeting as a minimum the 10% net biodiversity gain as sought by the Environment Act, although there is the potential to seek to achieve a much higher level due to the extent of land available versus the actual level of development.
- 7.8. Again, it is questioned whether the scoring is too negative and fails to recognise the benefits that the development of this site could realise.

Open Space and Green Infrastructure

7.9. The comments regarding open space and green infrastructure are welcomed and unlike biodiversity and geodiversity it is recognised that the impact of the proposed development could be reasonably mitigated or compensated.

Historic Environment

7.10. Any application for the development of the site will need to be accompanied by a detailed Heritage Assessment. The design, layout and landscaping will seek to address the impacts that development will have on heritage assets.

<u>Archaeology</u>

7.11. In relation to archaeology the site will be subject to an appropriate archaeological assessment and intrusive investigations if deemed necessary. Therefore, this score should be changed to green on the proviso that the requisite investigations are undertaken.

Accessibility to Services and Facilities

7.12. The comments made within this section are questioned and fail to recognise that this site will create new links to key local services, transport and employment opportunities. The assessment is too focused on existing rather than proposed facilities and should be based on the facilities and linkages a development of this scale would be expected to provide.

Site Access and Transport and Roads.

- 7.13. The development of this site will include an access strategy that provides connections with the A11, and the Cambridge Park & Ride (on the A1307), with the A11 being the preferred route for northbound travel. The access strategy will explore the potential of a northern access for the site. It is recognised that significant contributions/works will be required to facilitate access to this site and the quantum of development proposed will facilitate this. No evidence has been provided to substantiate the claim that there is no possibility of creating a safe access to this site.
- 7.14. An allocation of this magnitude will support significant enhancements to public transport, and all dwellings can be within 400m of bus stops. The enhancement of these services could also improve the accessibility of existing towns and villages, with the existing populations of these settlements being too low to justify either the expansion of or the provision of new services.
- 7.15. The entire scheme will allow opportunities for contributions to be sought to link the site to the Cambridge Guided Busway, potential through route to Great Chesterford Station and a potential interchange (Park and Ride at Granta Park, Abington).
- 7.16. The allocation of this site will also allow cycle networks to be extended to important employment sites. The actual form of the development will also need to be designed to give priority to pedestrians and cyclists, including landscaped and attractive off-road routes. It should be noted that although the site has attractive public footpaths, there are no cycleways across it and the public footpaths are not suitable for cycling particularly in the winter.
- 7.17. It is clear that further work will be required in conjunction with Cambridgeshire County Council and Highways England and other bodies to agree measures to address the strategic highway impacts of this site. This accords with the comments that any impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.

Noise, vibration, odour and light pollution

7.18. It is clear that the design of the scheme/dwellings can mitigate the impacts of noise, odour and light pollution to an acceptable level and this issue should be given a green score.

<u>Air Quality</u>

7.19. The comments made regarding air quality are questioned especially taking into account how the parcels of development land will be broken up. Furthermore, the move to electric vehicles will reduce potential emissions in the short to medium term. The development will be designed so that all dwellings incorporate electric vehicle charging points.

Contamination

7.20. The site will need to be subject to a Phase 1 Contamination report and if contamination is identified it will be remediated in accordance with an agreed strategy. Therefore, it is not considered that contamination should be seen as an impediment to development. As stated the issue of contamination can be addressed by way of suitable conditions attached to a planning permission

7.21. Further Constraints

- 7.22. The comments within this section are noted and it is recognised that it is difficult to identify land which is within the lower grades of agricultural land classification. Its loss would also not prejudice the farming of adjacent agricultural land.
- 7.23. The scheme will incorporate a suitable drainage system to ensure that the EA Source Protection Zones 1, 2 and 3 are not adversely affected. In relation to public rights of way, existing routes will be incorporated into the development scheme as well as new routes being created.
- 7.24. It is welcomed that there is capacity for growth in the A11 to accommodate the flows arising from this site.

8. Conclusion

- 8.1. It is evident that this site has the potential to deliver a significant level of both market and affordable housing in conjunction with the NUGC or independently. The low density of development versus the landscape and ecological improvements will ensure that the landscape and visual impacts of the site are mitigated.
- 8.2. Contrary to the comments made it is possible to achieve vehicular access to the site whilst also contributing to off site local and strategic highway upgrades. This site will also seek a modal shift away from the private car with bus, cycle and pedestrian linkages having priority. In either scenario the site will allow linkage to be created to the south providing routes to local employment as well as public transport hubs. The development will also aim to achieve high levels of energy efficiency and incorporate air source heat pumps and electric vehicle charging points to all properties.
- 8.3. As detailed many of the technical constraints detailed can be overcome via the design of the scheme, incorporating appropriate technical solutions where necessary.
- 8.4. In view of the above it is contended that the scoring attributed to this site should be reviewed and details also provided as to how the Greater Cambridge Plan, via the duty to cooperate, will work with Uttlesford Council if the NUGC is allocated.