Greater Cambridge Local Plan

Regulation 18: First Proposals

Response on behalf of Martin Grant Homes

December 2021



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Prepared by:	Paul Derry	Paul Derry	
Checked by:	Nick Patterson-Nield	Nick Patterson-Nield	
Authorised by:	Nick Patterson-Nield	Nick Patterson-Nield	

Barton Willmore St Andrews House St Andrews Road Cambridge CB4 1WB

Tel: 01223 345 555

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1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore LLP on behalf of Martin Grant Homes in respect of the Greater Cambridge Local Plan First Proposals document. They are submitted pursuant to their land interest at Silverdale Close, Coton (the 'Site').
- 1.2 The representations should be read in conjunction with the Call for Sites information submitted to the Greater Cambridge Authority in March 2019 and representations made to the Regulation 18 Greater Cambridge Local Plan Issues and Options document in February 2020.
- 1.3 The Site has not been included as an emerging allocation with the First Proposals document. These representations therefore seek to inform the Greater Cambridge Authority as to the suitability and deliverability of the site and that it should be included within the development strategy. This includes a direct response to identified policies as shown below.
- 1.4 The February 2020 representations were accompanied by an updated Vision Document dated 2020 and a Green Belt assessment. These are again appended for reference.
- 1.5 No constraints are identified that would preclude the development of the Site.

2.0 THE SITE

2.1 The Site is located at the western edge of the village of Coton, which itself is located just 2 miles to the west of the City of Cambridge. Coton is currently classified as a Group Village in the adopted Local Plan 2018. In terms of services and facilities, Coton benefits from a primary school, post office, farm shop, public house, village hall, church and garden centre. The location of the Site within Coton is shown on the Plan below:



2.2 The Site is located at the western edge of Coton. It consists of an area of grassland approximately 3.46 hectares in area. To the north and east is existing residential development, with Pendrick Close to the north previously forming part of the same field. To the west is a strong tree belt, beyond which is agricultural land. To the south is Bin Brook, which is again well planted, and further south is agricultural land. The plan below shows an aerial image of the Site:



2.3 The Site forms a logical extension to the village. As clearly shown on the image below, there are hard boundaries to each side of the Site, be it residential development or planting. The Site provides an opportunity to 'square off' the village and provide a coherent parcel to be released from the Cambridge Green Belt, which would not prejudice the use of any adjoining land.



- 2.4 The Vision Document includes an illustrative layout to demonstrate how the site could be developed. At 30 dwellings per hectare within the developable area, this equates to approximately 77 dwellings, which will include a number of affordable houses in line with policy requirements. The layout includes open space set against Bin Brook, which would provide a scenic outlook whilst also providing biodiversity enhancement opportunities along the northern side of the watercourse.
- 2.5 At present, Coton has a direct link for pedestrians to the western edge of Cambridge utilising the existing footpath network. This includes the existing bridge over the M11. This allows direct access to the City without the need to use the main road network.
- 2.6 There are two further infrastructure projects that will benefit the residents of Coton and reduce reliance on the motor vehicle. Firstly, the Greater Cambridge Partnership has confirmed the preferred route of the eastern phase of the Cambridge to Cambourne Busway route will pass on a new off road track to the north of Coton. This provides potential for a stop along Cambridge Road, giving access directly into Cambridge, as well as westwards towards Cambourne and the new development at Bourn Airfield. It includes a new bridge over the M11.

2.7 Secondly, the Site will benefit from its close proximity to the approved Comberton Greenway. This seeks to provide an upgraded pedestrian and cycle route into Cambridge, which is proposed to run along Whitwell Way passing north of the Site before continuing eastwards along The Footpath. This further increases the sustainable transport options for Coton residents. The Greater Cambridge partnership has produced the following graphic to show cycle times (at an assumed 10mph) into Cambridge along the Greenway. This shows Grange Road and Silver Street can be accessed in 11 and 17 minutes respectively from Coton:



2.8 There has been no material change to the Site or its immediate environs since the submission of the Call for Sites documentation or the Regulation 18 representations in February 2020.

3.0 THE COUNCIL'S ASSESSMENT OF THE SITE

- 3.1 The Site has been assessed for its suitability, availability and achievability through the assessment proforma's that form part of the Council's evidence base. The Site has the reference 40079 and is described as 'Land at Silverdale Close, Coton'.
- 3.2 The Site Assessment Summary within the proforma shows the following results:

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

- 3.3 The 'red' element is terms of suitability relates to site access, as shown on the proforma. It states that 'the proposed site does not have a direct link to the adopted public highway. No possibility of creating a safe access'. No other issues listed score a 'red' in relation to the Site.
- 3.4 On the access, Martin Grant Homes holds a right to use and connect to the estate roads and services on Pendrick Close. This is not therefore a constraint to development.
- 3.5 As such, the proforma results are clearly misleading, and the site should be reassessed against the 'site access' issue. In line with other profromas, this should be designated an 'amber' rating with comments confirming access is available to the public highways and the proposed site would therefore be acceptable in principle subject to detailed design. The amended result therefore would show an 'amber' rating in terms of suitability.
- 3.6 In terms of Flood Risk, the Site has been assessed with an 'amber' score given that 3% of the site in the southeast corner is located within flood zones 2 and 3. This is acknowledged in the Vision Document, and no built form would occur within this area. 3% land cover is a negligible amount and does not justify an 'amber' rating. The site should be scored as 'green' in terms of flood risk given the amount of land in question, which would not hinder the ability of the Site to bring forward 77 dwellings. This is demonstrated on the illustrative masterplan provided.
- 3.7 Within the further constraints element of the proforma assessment, two parcel ID's are noted pursuant to the Green Belt assessment. To confirm, the site lies fully within parcel



CT12, which concludes a 'moderate' harm. The plan below shows the site clearly wholly within parcel CT12 of the Green Belt Assessment parcels:

- 3.8 Reference to parcel CT11 (situated to the south of Bin Brook) within the proforma assessment is not therefore relevant to the consideration of the Site. Reference to the associated CT11 'high' level of harm is therefore misleading and should be deleted from the proforma accordingly.
- 3.9 For information, the Vision Document and Call for Site submission noted the capacity of the Site to be 77 units. the proforma notes 74 dwellings. We consider the higher figure is more appropriate and makes best use of the land.

4.0 POLICY S/JH: NEW JOBS AND HOMES

- 4.1 The emerging plan shows a requirement to provide 44,400 dwellings over the plan period of 2020-2041, which represents development at 2,114 dwellings per annum.
- 4.2 It is noted that the proposed housing number exceeds what would usually be required as a minimum figure through the standard methodology calculation. Using the December 2020 formula, this would result in 1,743 dwellings per annum. This stance taken by the Greater Cambridge Planning Service will assist in addressing concerns regarding affordability and will also cater for increased demand for dwellings for skilled workers given employment growth in the area.
- 4.3 However, it is not considered that the housing numbers go far enough to cater for growth in the area. The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Report September 2018 confirms that growth in the employment sector has not been matched by proportionate house building. The result has been large increases in house prices.
- 4.4 Whilst it is acknowledged the CPIER report was published pre-Covid, the concepts and ideas remain pertinent as the economy recovers. Greater Cambridge is located within the key economic corridors of the Oxford Cambridge arc, the London Stansted Cambridge corridor and the Cambridge Norwich tech corridor. The Oxford Cambridge arc seeks to create a strategic vision corridor between the University cities. It seeks to provide the infrastructure projects of East-West Rail and the Cambridge to Milton Keynes Expressway. At the eastern end of the arc, the driver is the City of Cambridge and its need for residential development to complement its skilled workforce.
- 4.5 The CPIER report provides a number of Key Recommendations to assist with growth in the area. Key Recommendation #5 of the CPIER Final Report September 2018 states:

"There should be a review of housing requirements based on the potential for higher growth in employment than currently forecast by the EEFM. This review should take into account the continuing dialogue between ONS and the Centre for Business Research on employment numbers as well as the impact of the Cambridge-Milton Keynes-Oxford Arc. This should be used to set new targets which

are likely to be higher than those already set – at the very least adding on accumulated backlog."

- 4.6 The CPIER concludes that a target of 66,700 dwellings should be planned for in order to make the best of the opportunities available. It is therefore considered that the emerging Local Plan should increase its housing targets accordingly. Not only will this assist in combating affordability, it will also provide much needed affordable housing.
- 4.7 Martin Grant Homes reserves the right to further assess provision of housing need through the next stages of the Local Plan production.

5.0 POLICY S/DS: DEVELOPMENT STRATEGY

- 5.1 In line with the above, policy S/DS seeks the plan to provide 44,400 dwellings with a 10% buffer added for flexibility, totalling a need for 48,840 dwellings within the plan period. Page 32 of the First Proposals document shows that 37,200 are commitments, windfall etc, leaving a further 11,640 to be planned for. Curiously, when totalled together, the proposed allocations only total 11,596 leaving a shortfall of 44 dwellings.
- 5.2 In order to make up this shortfall, the Coton site could come forward. Whilst it has a capacity for 77 dwellings, the additional 33 dwellings would assist the Council should any other site provide delayed delivery. However, concern is raised below about delivery potential within the Strategy, which would significantly increase shortfall within the Plan period. These representations show why the Coton site is considered appropriate, although this can be summarised as:
 - The Green Belt assessment for a wider plot shows a 'moderate' harm, whereby an assessment by EDP shows the Site itself provides a 'Low' contribution to Green Belt objectives;
 - Coton is within 2 miles of West Cambridge and the village has seen limited growth in recent years, not allowing the village to evolve;
 - The Comberton Greenway is improving access to West Cambridge for cyclists and pedestrians, with Grange Road, Cambridge a 17 minute cycle ride form the village;
 - Coton is situated on the proposed Cambourne to Cambridge Busway (as shown on Figure 11 of the First Proposals document) and a station at Coton will provide further transport alternatives to the car;
 - Delivery of 40% affordable housing;
 - Development would benefit services and facilities within the village including the public house, post office and garden centre.
- 5.3 When assessing the Development Strategy, it is important to look at past delivery rates. Unfortunately, there are no formal figures available beyond 2019/20. However, this does provide useful context when looking at 'current' delivery rates. The table below summarises housing delivery in the past four years. The 'total' figure shows a fluctuating delivery rate that falls well below emerging Local Plan target of 2,114 dwellings per annum. It highlights that a robust strategy is necessary to increase delivery rates beyond this level.

Area	2016/17	2017/18	2018/19	2019/20
Cambridge	1,183	1,112	868	460
South	551	737	1,152	1,107
Cambridgeshire				
Total	1,734	1,849	2,020	1,567

- 5.4 It is well known that larger sites have significant constraints to delivery compared to smaller sites. They have larger lead-in times, and therefore any delay will significantly impact delivery figures. A good example of this is Bourn Airfield. It is an allocated site in the current plan, yet it still does not benefit from a formal outline planning permission. The application (ref S/3440/18/OL) has now been with the Council for over 3 years without formal determination.
- 5.5 Given the need to then submit reserved matters applications, prepare necessary infrastructure and clarify the route of the Cambourne to Cambridge Busway, the ability for the site to commence delivery in 2023/24 seems very optimistic. Given the delays to the development already, the proposed delivery rates at Bourn Airfield does not appear reliable or robust.
- 5.6 The Development Strategy appears to have two key directions, those being development on the edge of Cambridge and increased delivery rates at the new settlements.
- 5.7 A key site at Cambridge is the North East Cambridge site. The proposed policy shows that the site will provide 3,900 dwellings between 2020 and 2041. The area has not been subject to a planning application as yet given the reliance upon the production of an Area Action Plan.
- 5.8 The Area Action Plan has been subject to a recent public consultation, and a report to the Joint Local Planning Advisory Group on 30 November 2021 sets out proposed changes to the Area Action Plan as a result of an assessment of the public responses. Of note, the proposed changes include a reduction in densities of development, a reduction in building heights and an increase in proposed open space provision by 17 hectares. However, despite these significant changes, the total housing numbers within the Local Plan remains the same. However, the nature of the changes to the Area Action Plan must impact upon delivery by its very nature. Proposed delivery rates at North East Cambridge must therefore be revised in line with the recommendations to the Joint Local Planning Advisory Group.

- 5.9 In addition to this, North East Cambridge is reliant upon the relocation of the existing sewage treatment works on the site. This is highly contentious locally and will no doubt be subject to legal challenge ahead of any relocation. The process has the potential to delay development and delivery at North East Cambridge. The ability of the area to provide 3,900 dwellings by 2041 therefore appears overly-ambitious, with any delay to the treatment works seriously impacting upon the Council's delivery ambitions.
- 5.10 With regards the increase in delivery rates at new settlements, the emerging policy specifies this will relate to the new settlements of Northstowe and Waterbeach. This raises an immediate concern regarding how this is to be achieved. The 'Housing Delivery Study for Greater Cambridge' October 2021 document provides a justification for Northstowe given the quicker delivery methods of Urban Splash within phase 2A. As per Waterbeach, the development is expected to deliver an additional 50 dwellings per annum from 2026/27 onwards, resulting in 750 additional dwellings by the end of the proposed plan period.
- 5.11 However, unlike Northstowe, there is no justification as to how Waterbeach will achieve this increase in housing delivery. It is assumed the figures factor in another 'peak outlet' to deliver the additional 50 dwellings per annum. However, if the scheme was capable of having 7 developers on site at the same time, why was that part of the original build out rates from the current iteration of the Local Plan? The proposals seem overly generous and lack any clear justification that the increased delivery rates are achievable.
- 5.12 Historically, South Cambridgeshire District Council has relied upon new settlements and urban extensions to deliver the majority of its housing need. Martin Grant Homes has previously argued that this is to the detriment of villages, which as a result become dormant and suffer from a lack of inward investment.
- 5.13 The above information confirms there is significant doubt regarding the spatial strategy and the associated housing trajectory. There are serious concerns regarding delivery rates at Bourn Airfield, Waterbeach and North East Cambridge, which will impact upon Greater Cambridge's ability to provide a five year housing land supply.
- 5.14 The solution therefore would be to add further small and medium sized sites within the trajectory. This would cover off any delays in delivery. Smaller sites benefit from limited infrastructure improvements, and take significantly less time in the planning system. These advantages are set out in paragraph 69 of the National Planning Policy Framework 2021.

- 5.15 The emerging Local Plan is reliant upon some Green Belt release to meet the housing delivery targets. This includes release of land around the edge of Cambridge, as well as two sites within Green Belt villages.
- 5.16 Martin Grant Homes support the release of Green Belt land in order to meet some of this housing need. By their location, Green Belt villages such as Coton are situated in close proximity to Cambridge and as such can play an important role in supporting the City. These representations justify why Green Belt release in Coton would promote sustainable development opportunities. The Local Plan however does not fully capitalise on appropriate Green Belt release, instead shifting development to more unsustainable locations (such as Melbourn and Duxford) where there will be more reliance upon the car.
- 5.17 Martin Grant Homes reserve the right to further assess delivery rates through the further phases of Local Plan preparation.

6.0 POLICY S/RRA: SITE ALLOCATIONS IN THE REST OF THE RURAL AREA

- 6.1 In terms of residential development, there are extremely limited emerging allocations within the villages of Greater Cambridgeshire. Discounting those sites that already benefit from planning permission, development in villages in the 'Rest of the Rural Area' is restricted to the following:
 - S/RRA/ML The Moor, Moor Lane, Melbourn 20 dwellings
 - S/RRA/H Land at Highfields (phase 2) Caldecote 64 dwellings
 - S/RRA/MF Land at Mansel Farm, Station Road, Oakington 20 dwellings
 - S/RRA/CR Land to the West of Cambridge Road, Melbourn 120 dwellings
- 6.2 Martin Grant Homes supports the opportunity for growth in villages. Villages are often located in highly sustainable locations, and provide significant opportunities at appropriate scales, to meet objectively assessed housing and employment needs. This brings significant benefits to the future vitality of villages, especially those such as Coton which have seen very limited growth in recent years. A failure to consider the villages as appropriate locations for growth could lead to a stagnation of these villages, and will locate development in less sustainable locations.
- 6.3 Village development will assist in meeting immediate delivery rates, which will benefit if larger allocations are delayed coming forward. No sites are allocated for development within Coton, despite its proximity to west Cambridge and the investment in infrastructure now (Comberton Greenway) and in the future (Cambourne to Cambridge Busway). This represents a missed opportunity to provide truly sustainable development in a village location.
- 6.4 Martin Grant Homes is keen to understand how the emerging sites have been chosen and as such have sought to compare these sites to Silverdale Close. A study has therefore been undertaken to compare the village allocations that form emerging allocations within the Local Plan. This study also includes the following residential sites allocated within emerging policy S/RSC:
 - S/RSC/HW Land between Hinton Way and Mingle Lane, Great Shelford 100 dwellings
 - S/RSC/MF Land at Maarnford Farm, Hunts Road, Duxford 60 dwellings

6.5 The following table shows a summary of the assessment proformas undertaken by the Council and shows the results for each of the sites. It shows that when compared to the emerging allocations, the Site has an equal if not better assessment result:

Site	Suitable	Available	Achievable
Silverdale Close, Coton.	Amended to 'amber' as		
	described in chapter 3		
	above		
The Moor, Moor Lane,			
Melbourn			
Land at Highfield			
(phase 2) Caldecote			
Land at Mansel Farm,	Landscape and		
Station Rd, Oakington	Townscape & Historic		
	Environment impacts		
Land W of Cambridge			
Rd, Melbourn			
Land between Hinton			
Way & Mingle Lane,			
Great Shelford			
Land at Maarnford			
Farm, Hunts Rd,			
Duxford			

- 6.6 It has been noted within chapter 3 of these representations that the assessment of suitability for the Silverdale Close site is incorrect. Necessary rights of way are available into the Site, and as such, the 'red' assessment is shown in the table above as the more appropriate 'amber' assessment. The Coton site would therefore score no worse than any of the emerging allocations.
- 6.7 The Oakington site also has a 'red' assessment for suitability and this is based on landscape and townscape impacts, and historic environment impacts. On the former, the proforma states:

"The proposed development of 102 dwellings (approximately 27 dph) would produce a large, dense area of development on the village edge that would be highly visible in the landscape at odds with the linear form and lower existing housing densities. It would also significantly reduce the separation between Oakington and Westwick."

6.8 It is acknowledged that this assessment is based on a larger area for a larger quantum of development. However, the points regarding the linear form of development and coalescence remain pertinent to the smaller scheme. On the historic environment, the proforma states

"Within 100m of a Conservation Area. Would cause significant harm to Conservation Area. Development of the site would cause substantial harm or severe or significant "Less than substantial harm" to a designated heritage asset or the setting of a designated heritage asset which cannot be reasonably mitigated."

- 6.9 The reduced area to the emerging Oakington allocation is situated directly adjacent to the Conservation, and the relationship of a reduced scheme would not be altered. As a result, the text above from the proforma remains relevant and there remains no mitigation proposal to ensure a satisfactory relationship to the Conservation Area. No evidence is put forward by the Council to demonstrate that a reduced area mitigates this harm.
- 6.10 Both the Oakington and Great Shelford sites are also located within the Cambridge Green Belt. A study of the Green Belt Assessment has also taken place to understand the potential harm to the purposes of the Green Belt. The Purposes are described as follows:
 - Cambridge Purpose 1 (to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre) for land to contribute to this purpose it needs to be located in the immediate vicinity of Cambridge
 - Cambridge Purpose 2 (to maintain and enhance the quality of Cambridge's setting)

 a two-element approach was taken considering: 1) the extent to which land constitutes countryside (that is to say has a rural character) based on its usage and distinction from an inset settlement; and 2) the extent to which land forms or contains other features or aspects that contribute to the quality of Cambridge's setting.

- Cambridge Purpose 3 (to prevent communities in the environs of Cambridge from merging into one another and with the city) an analysis was undertaken of the distribution of villages in and around the Green Belt and the physical features that separate and/or connect them from each other or from Cambridge, in order to determine the fragility of each settlement gap
- 6.11 The scale of Green Belt harm is listed as low, moderate, moderate-high, high, and very high. The table below summarises the Green Belt assessments for Coton, Oakington and Great Shelford.

Site	Мар	P1	P2	P3	Harm
		Contribution	Contribution	Contribution	
CT12 – Coton Containing Site 11.49ha		Limited/No Contribution	Moderate	Relatively Limited	Moderate
EDP Assessment of Site (see Appendix 2)					Low
OK2 – Oakington 19.75ha		Limited/No Contribution	Moderate	Relatively Significant	Moderate High
GS9 – Great Shelford 43.91ha		Moderate	Relatively Limited	Limited/No Contribution	Moderate High

- 6.12 The table above therefore confirms that the Site would result in a lower impact to the Green Belt purposes than the two Green Belt sites that form emerging allocations. To further justify this point, a Green Belt Assessment undertaken by EDP (see Appendix 2) relating to the Site only (rather than the wider parcel) concludes the Site to have an overall 'Low' rating when assessed against the five purposes of the Green Belt noted in the NPPF.
- 6.13 No justification is put forward by the Council as to why these two sites are put forward for Green Belt release ahead of sites such as Silverdale Close, Coton, which score more successfully in terms of reduced Green Belt impact. Topic Paper 1 suggests that the

proximity to the bus stop for 20 dwellings would provide the exceptional circumstances to provide Green Belt release. The Topic Paper does not reference the landscape and historic environment harm identified in the site proforma. However, the benefits of 20 dwellings in this location is not considered to overcome the moderate/high harm to the Green Belt. Green Belt release at Great Shelford appears to be based entirely on proximity to the railway station, despite moderate/high Green Belt harm being identified.

- 6.14 The result of these two assessments is that the Site is more appropriate for development and Green Belt release than both the Mansel Farm, Oakington and the Hinton Way/Mingle Lane site at Great Shelford.
- 6.15 The other sites are located outside of the Green Belt. However, their distance away from Cambridge is a disadvantage. The addition of a further 140 dwellings in Melbourn will increase pressure on the A10 and would likely see a reliance on the motor car. This would also be the case for the Duxford and Caldecote allocations, villages with limited services and facilities. Coton however benefits from the Comberton Greenway and will be on the proposed Busway route between Cambridge and Cambourne. It also benefits from proximity to Cambridge, ensuring that it provides valuable alternatives to the motor car for future residents.
- 6.16 The Coton site should therefore be considered more favourable and allocated for 77 dwellings, which would mean less Green Belt release or countryside development at more inappropriate sites.

7.0 POLICY BG/BG: BIODIVERSITY AND GEODIVERSITY

- 7.1 The text supporting emerging policy BG/BG states the proposed policy will 'require development to achieve a minimum 20% biodiversity net gain'. This figure is considerably above the minimum 10% biodiversity net gain noted within the Environment Bill 2021.
- 7.2 Martin Grant Homes support the principle of biodiversity net gain and have successfully implemented them within modern development. However, the minimum proposed figure of 20% is not considered appropriate. To make 20% net gain achievable, there will be considerable pressure on sites financially and spatially to ensure this ambitious target is met.
- 7.3 The result of this will be sites will become unviable and as such, would likely sacrifice other aspects of development such as affordable housing. Spatially, an increased net gain requirement will likely drive-up densities given the likely land take need for biodiversity purposes. Topic Paper 3 suggests an alternative to the policy. It references a mandatory 10% net gain, but does not consider this appropriate. However, the Topic Paper does not include any assessment of financial or spatial impacts.
- 7.4 It is therefore considered appropriate to amend the proposed policy direction to a minimum of 10% biodiversity net gain. A higher figure could be encouraged but not form part of the policy requirement.

8.0 POLICY BG/TC: IMPROVING TREE CANOPY COVER AND THE TREE POPULATION

- 8.1 Martin Grant Homes supports the provision of trees within developments and successfully ensure appropriate planting sits within their development to the benefit of future residents. The concept of policy BG/TC is therefore supported.
- 8.2 However, the policy and supporting text within the First Proposals document does not provide any guidance as to when the policy would be needed or any quantum of planting that a development would need to provide. As such, it is unclear whether this would be relevant to residential development, and if so, what would the potential land-take be as a result. The latter point raises concerns regarding densities and associated impacts upon viability that could result.
- 8.3 It is not therefore considered the policy at present gives clear guidance as to what is expected from developers, which raises concern. Greater clarity is needed before appropriate and informed comments can be made.

9.0 POLICY BG/B1 GREEN INFRASTRUCTURE

- 9.1 Policy BG/GI highlights areas within Greater Cambridge that are considered appropriate for green infrastructure initiatives. With regards to the promotion of land in Coton, area
 7 (West Cambridge green infrastructure buffer Coton Corridor) is relevant to land at Silverdale Close given it washes over the site.
- 9.2 The policy as proposed seeks to ensure development can benefit 'people, wildlife and the planet' and provides a list of criteria as to how that can be achieved, including the need to ensure 'proposed green infrastructure is appropriate to its local context'.
- 9.3 At Silverdale Close, open space is indicatively location to the south of the site, where it can benefit from views of the countryside and Bin Brook along the southern boundary. The development allows the opportunity to enhance Bin Brook by providing long term maintenance along the waters edge and providing suitable habitat features to encourage use of the brook by identified species. On site planting can also respect and supplement the tree planting beyond the western boundary.
- 9.4 The finalised wording of the policy should be drafted so as not to inhibit development within these areas. As noted, the Site brings forward significant benefits and is a logical extension to the village. The green infrastructure policy must be clear that appropriate development is suitable in this location and the policy should not be an opportunity to deny appropriate development in principle. The policy should then set out the potential requirements to be included within such development.
- 9.5 At this stage, it is unclear as to how the policy will be worded and therefore further representations will be made in further consultations as necessary.

10.0 SUMMARY

- 10.1 These representations are made on behalf of Martin Grant Homes pursuant to their land interest at Silverdale Close, Coton. This site presents the opportunity to locate 77 dwellings included much needed affordable housing in a sustainable location just 2 miles from the City of Cambridge. Coton benefits from pedestrian and cycle access into Cambridge, which will be further enhanced by the committed Comberton Greenway and the probably route of the Cambourne Cambridge Busway.
- 10.2 The Local Plan provides the opportunity for the Greater Cambridge Authority to continue to provide much needed residential development in and around Cambridge in order to meet significant demand and seek to lower affordability. The provision of a housing figure greater than the standard methodology is supported. However, there remains a missed opportunity to further impact growth and affordability, and a target of 66,700 dwellings in the plan period, as recommended by the CPIER report would be fully supported.
- 10.3 The evidence base is supported by an assessment proforma for each submitted site. The proforma for the Site scores 'red' in terms of links to the public highway. However, these representations confirm that necessary rights of access are in place and as such, the proforma should be amended accordingly. The Coton site scores equally, if not better, than other emerging village allocations in the Plan.
- 10.4 The Local Plan places emphasis on sites around the edge of Cambridge, as well as increased delivery rates at Northstowe and Waterbeach. These representations have highlighted concerns as to the robustness of this process, and highlights the lack of evidence as to how Waterbeach will increase delivery. Following a report to the Joint Local Planning Advisory Group in November 2021, the Local Plan must adjust to the lower densities, increased open space and lower building heights proposed at North East Cambridge. The representations also highlight the existing delays at Bourn Airfield, which still does not benefit from a formal planning permission three years after submission.
- 10.5 An assessment has been undertaken to compare the Green Belt impact at the Site to those village sites proposed to be released from Green Belt. This shows the Site scores better in terms of a more limited Green Belt harm to the sites at Great Shelford and Oakington. An independent Green Belt assessment confirms the Site itself makes a 'low' contribution to the objectives of the Green Belt. Given its sustainable location, it is better placed to deliver sustainable development on a Green Belt site than those currently within the Plan.

- 10.6 Comments are also made in terms of the specific development management policies relating to biodiversity and tree canopy coverage. On the former, the 20% target will lead to impacts upon viability and deliverability. The tree canopy policy detail is vague and does not provide details on when it will apply. Further comments will be made on those policies when a fully drafted version is available.
- 10.7 The Plan provides the opportunity to create additional vitality in appropriate villages such as Coton, where only very limited development has taken place over the previous two Local Plan cycles. Evidence suggests it is a more appropriate site than those currently within the Local Plan. As well as its attractive location in relation to Cambridge, development in Coton will assist in supporting existing services and facilities within the village.
- 10.8 Should the Greater Cambridge Authority require any additional information in relation to this Site, we would be happy to provide this detail.

APPENDIX 1

Land at Silverdale Close, Coton Vision Document

Land at Silverdale Close, Coton

VISION DOCUMENT

MARCH 2019



Land at Silverdale Close, Coton

VISION STATEMENT

The vision is to provide an attractive and logical extension to the existing settlement at Coton, Cambridgeshire. The proposal will integrate and compliment the adjacent housing, whilst redefine the village's boundary and the surrounding context.

The development comprises of residential units that respond sensitively to the surrounding countryside. The new homes will consist of a variety of housing types, sizes and tenures that will enable the development to contribute positively to the local housing needs. Residents will benefit from well-connected access to adjacent development as well as open space and other existing local facilities, including a primary school and a public house.

The design aims to utilise and enhance existing woodland and vegetation along the western and southern boundary to provide enclosure and reinforce the development edge. An accessible public open space area is provided within the development consisting of a public park and an outdoor children's play area with formal and informal landscape, which will promote social interaction and well-being for both new and existing residents of Coton.

The site is well-connected to the City of Cambridge, located just 2 miles to the east, and provides a unique opportunity to develop a site in such proximity.



INTRODUCTION

BACKGROUND

This Vision Document has been prepared by Barton Willmore on behalf of Martin Grant Homes in order to support a development proposal on land south of Silverdale Close, Coton in Cambridgeshire for the provision of housing and open space.

This document sets out a vision for the site, explaining the design principles and concept, showing how it can sensitively compliment the existing village of Coton while maintaining the purposes of the Green Belt. Design decisions are based upon an understanding of the site context through careful preliminary analysis and assessment of site opportunities and constraints as set out in this document. Key aims and objectives of this document area:

- To review the site in the context of current Planning and Green Belt Policy;
- To present an initial understanding of the site and its local context;
- To explain how the vision and initial site analysis has informed the design principles;
- To present the proposed illustrative concept masterplan within existing urban context.

The structure of the document is as follows:

- Site Context Planning Policy, Local Context and Local Services and Facilities
- Site Analysis Constraints and Opportunities
- Design Proposal Design Principles and Illustrative
 Masterplan
- Summary



Silverdale Close, Coton



Detached houses on High Street



St. Peter's Church



PLANNING POLICY

PLANNING POLICY

With a growing and ageing population, the need for housing remains high. The National Planning Policy Framework 2019 (NPPF) sets out the Governments planning policies and how these are expected to be applied. Paragraph 7 confirms 'the purpose of the planning system is to contribute to the achievement of sustainable development'. This is defined by the three overarching objectives, those being economic, social and environmental objectives. Paragraph 10 confirms that the 'heart of the framework is a presumption in favour of sustainable development'.

The South Cambridgeshire District Council Local Plan was adopted in September 2018. This document shows the level of residential and employment required in the District within the plan period to 2031. This includes the need to provide 19,500 new dwellings, which equates to 975 dwellings per annum. Policy S/12 of the adopted Plan confirms the Council's commitment to review housing land supply and allocation should strategic policies not achieve their targets. The NPPF also requires reviews of Local Plans every five years.

In February 2019, the Ministry of Housing, Communities and Local Government confirmed that emerging Local Plans will be assessed against the standardised methodology for calculating housing need, and this would utilise the 2014-based household projections, with the aim of building 300,000 dwellings a year in England. The standardised methodology in South Cambridgeshire would increase housing need to 1,167 dwellings per annum. This shows an upward trend in a District that is reliant upon the provision of large scale schemes to meet its need.

Coton is located within the Cambridge-Milton Keynes-Oxford development arc, where 1 million new dwellings are proposed by 2050. Cambridge itself is restricted by its Green Belt and therefore development is being pushed out to the City. Following a Green Belt review, the site provides an opportunity to provide dwellings closer to the City of Cambridge.

South Cambridgeshire District Council are now working with Cambridge City Council in the production of a joint Local Plan. The first stage of that exercise is to undertake a Call for Sites exercise, inviting the submission of details of potential development sites across the Greater Cambridge area. This Vision Document accompanies the Call for Sites document, and highlights the opportunities and constraints at the site, concluding the land would form an appropriate site for allocation within the joint Local Plan.



GREEN BELT ASSESSMENT

EDP, an independent environmental planning consultancy, has undertaken an in depth appraisal of the extent to which the site performs against the purposes of the tests within the NPPF. In undertaking the assessment, EDP has reviewed the relevant policy context and evidence base supporting the Council's recent releases of land from the Green Belt, and evaluated the site against four of the five tests (the fifth not being relevant to the site), underpinned by a detailed site assessment.

The results show that the site provides a low contribution to the Green Belt purposes. The table below notes the NPPF test, demonstrates the criteria used as part of the assessment, before demonstrating the site's performance:

GREEN BELT Purpose (NPPF)	EDP Methodology Criteria	Site Performance
Purpose 1 To check the unrestricted sprawl of large built-up areas.	Does the site form a contiguous open area between the existing settlement edge and the wider countryside and/or large built-up area?	Low contribution
	Does the site have a defensible boundary which can prevent sprawl?	No contribution
Purpose 2 To prevent neighbouring towns merging into one another.	To what extent is the site associated with the existing settlement edge(s)?	Low contribution
	Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?	Low contribution
Purpose 3 To assist in safeguarding the countryside from encroachment.	To what extent does the site represent the key characteristics of the countryside?	Low contribution
	To what extent is the site urbanised, either by on-site or off- site features?	Low contribution
Purpose 4 To preserve the setting and special character of historic towns.	To what extent does the site represent the special characteristics of the setting to the historic town?	No contribution
	To what extent is there intervisibility between the site and historic landmarks?	No contribution
Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Not tested.	N/A
Overall Weighting		Low Contribution

SITE DESCRIPTION

THE SITE AND ITS CONTEXT

The site is situated on the south-western edge of Coton, a small village that is approximately 2 miles (3km) west of Cambridge, within the administrative boundary of South Cambridgeshire District Council (SCDC) and is set within the Cambridge Greenbelt. According to 2011 census, the total population of Coton was recorded 910 people.

It benefits from a well-connected road network to other neighbouring villages, namely Barton, Comberton and Hardwick, and Cambridge City. Coton is well within a commutable distance of Cambridge and is served by good public transport via Citi 4 and X3 bus routes. There is also a dedicated cycleway between Coton and Cambridge passing over the M11.

The site is located just off Pendrick Close and Silverdale Close respectively, with a total area of approximately 3.45ha that comprises of mostly agricultural land and an area of mature woodland located along the southern edge of the site.

The site boundaries are defined by the following features:

- Existing residential development to the north and east of the site, off Silverdale Close, has low trimmed hedgerows that form a ribbon of soft edges between the site and existing adjoining settlements;
- The southern boundary is bounded by mature trees and Bin Brook with open countryside beyond;
- A belt of mature trees forms the site's western edges forming an immediate permanent defensible boundary.



Silverdale Close, Coton

LOCAL FACILITIES

Coton village currently offers a number of services and facilities, providing for the daily needs of residents, including a farm shop, post office, garden centre, a public house, a primary school and a village hall.

Public open spaces are provided in the forms of allotment gardens and a large area of recreational ground to the east of Coton that includes a children's play area and public parks. Other pocket parks are located within the adjoining development to the east of the site.

Furthermore, with its close proximity to Cambridge City Centre, the site also benefits from additional public services and a wider range of shops which are easily accessible by public transport within 15 minutes via Citi 4 and X3 bus.


UNDERSTANDING THE SITE

TREES & HEDGEROWS

EDP has undertaken a Green Belt Assessment at the site, which describes the hedge to the east. This forms a soft boundary between the site and existing settlement and it has come under some pressure. Its quality is compromised to some degree from the adjacent development.

The mature woodland to the west of the site is in a triangular shape that lies off-site and spans the full length of the boundary. It measures up to 90 metres in width in the southern and central portions, then narrows to approximately 20 metres in the northern portion.

LANDSCAPE SETTING & LANDFORMS

The majority of the site comprises of agricultural land, which has a gentle roll, rising from a low point at about 23mAOD near the Bin Brook, across the site to its high point in the north of approximately 28mAOD.

A notable local characteristic that influences the character of the site is the mature woodland along the south and western boundary. It creates an abrupt change from an urbanised character with two storey residential development to an open countryside landscape setting. Therefore, this mature woodland assists greatly in containing this urbanising character and would continue to limit urbanisation of the wider Green Belt, if the site were to be removed and developed (EDP, 2019).

DRAINAGE & FLOODING

The southern edge of the site fall within the EA Flood zones 2 and 3. As a result, built form will be located outside this small area and within the much bigger portion not affected by flooding.

The design will incorporate an appropriate drainage strategy (SuDS) in accordance with planning policy, which will include an attenuation option at the lowest point of the site.

ACCESS & MOVEMENT

Vehicular access to the site will be provided by extending and upgrading the existing Pendrick Close that is located to the north of the site from adjoining development. The site is also adjacent to the proposed Cambridge - Cambourne Public Transport Route. The proposed route will pass north of Coton, allowing a potential stop within walking distance of the site.

CONSTRAINTS & OPPORTUNITIES

- The proposal demonstrates that development is a logical extension of the existing built form within Coton. It has low contribution to Green Belt purpose and does not have a fundamental role in protecting the openness and permanence of the Green Belt (EDP, 2019).
- Residential development will be distributed across the site, while the low point adjacent to Bin Brook in the southern edge would provide opportunities for amenity open space for community use.
- Where possible, existing vegetation that includes large trees along the southern border and low trimmed hedgerows are desirable to be retained and enhanced within the development proposal and incorporated into public open space to compliment the landscape and visual character of the site.
- The proposed main entrance to the site is located along Pendrick Close, providing vehicular access to the site.
- There is an opportunity to address the backs of adjoining houses to the north. This will provide land-use efficiency and greater security by "closing off" the backs and maintaining continuity of frontage.

Silverdale Close, Coton



DESIGN PROPOSAL

The illustrative masterplan shows how the design proposal has been informed by the vision and initial site analysis presented in this document. The plan seeks to ensure that the scheme will offer a high quality and attractive place to live, guided by the following design objectives and principles:

DESIGN OBJECTIVES:

- » Provision of up to 77 dwellings at 30dph;
- Existing road in Pendrick Close will be upgraded and extended to provide the main vehicular access to the new development;
- Provision of public open space to promote social interaction and enhance well-being of both existing and prospective residents; and
- » Development will be structured to ensure the provision of a permeable and legible place.



Connect to the adjacent development by linking and upgrading Pendrick Close to create a permeable and legible internal network.



Maintain frontage continuity from adjoining development and protect privacy of existing properties by "closing off" their backs.



Retain vegetation along the southern edge, provide landscape buffers and incorporate it within the amenity public open space with development fronting onto the open countryside.



FIGURE 8: DESIGN PRINCIPLE DIAGRAM

FIGURE 9: ILLUSTRATIVE MASTERPLAN

Whitwell w

Pendrick Close

INPL

Silverdale Close

rdale Ave

Silverdale Close, Coton

Conclusion

Our proposal for Land at Silverdale Close, Coton has been informed by the vision and preliminary site analysis as set out in this Vision Document. In summary, the key benefits of the development are:

- The site has been assessed in terms of its contribution to the Cambridge Green Belt. The results confirm the site provides a low contribution to Green Belt purposes;
- The development is a logical and defensible extension to the south west of Coton, whilst reinforcing the permanence of the Green Belt;
- Provision of an attractive and high quality residential development, including affordable housing, that retains and enhances the existing landscape assets within the site and its surrounding context;
- Provision of a connected and accessible development with enhanced pedestrian/cycle connectivity to encourage sustainable use of public transport;
- Residential development with additional green infrastructure that provides areas for recreational activities and formal play area to foster community interaction, bringing benefits to both new and existing communities;
- » With its location within easy walking distance to amenities and close proximity to Cambridge City Centre by public transport, the residential development would help support the existing facilities and services in both Coton and Cambridge;
- » The site is therefore considered worthy of an allocation within the Greater Cambridge Plan.

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Barton Willmore The Blade, Abbey Square, Reading Berkshire RG1 3BE

T: 0118 943 0000 F: 0118 943 0001 E: masterplanning@bartonwillmore.co.uk

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APPENDIX 2

Green Belt Assessment by The Environmental Dimension Partnership Ltd



Silverdale Close, Coton, Cambridgeshire

Green Belt Assessment

Prepared by: The Environmental Dimension Partnership Ltd

On behalf of: Martin Grant Homes

April 2019 Report Reference edp4413_r002a

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Appendices

Appendix EDP 1	Green Belt Assessment Methodology and Criteria

- Appendix EDP 2 Detailed Green Belt Assessment
- Appendix EDP 3 Concept Masterplan (edp4413_d007a 08 April 2019 RA/PW)

Plan

Plan EDP 1Environmental Planning Context and Considerations
(edp4413_d004b 08 April 2019 GY/TR)

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Section 1 Introduction, Purpose and Methodology

- 1.1 The Environmental Dimension Partnership (EDP) Ltd have been appointed by Martin Grant Homes to prepare a Green Belt Assessment for potential residential development on land south of Silverdale Close, Coton, Cambridgeshire ('the site'). The site location and planning context is shown on **Plan EDP 1**.
- 1.2 EDP is an independent environmental planning consultancy with offices in Cirencester, Cheltenham, Shrewsbury and Cardiff. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website (www.edp-uk.co.uk). EDP is a Registered Practice of the Landscape Institute¹ specialising in the assessment of the effects of proposed development on the landscape.
- 1.3 The site is located at the south-western edge of Coton and falls within the South Cambridgeshire District Council Local Planning Authority (LPA). The site is situated entirely within the Metropolitan Green Belt, which washes over most of the site context, as illustrated by **Plan EDP 1**.
- 1.4 The proposals for the site are illustrated on the Concept Masterplan at **Appendix EDP 3**. The proposed development is for up to 77 residential units with associated Green Belt buffer around proposed public open space. Development is limited to the northern site area, with the southern site area retained as flood water mitigation, open space and additional tree planting to reinforce the permanence of the boundary.
- 1.5 This Green Belt Assessment is a response to South Cambridgeshire District Council's recent Call for Sites consultation and the opportunity identified to promote the site for the upcoming Greater Cambridge Local Plan.

Purpose and Structure of this Green Belt Assessment

- 1.6 This purpose of the Green Belt Assessment is to test whether bringing forward sustainable development on this site would allow the key purposes of the Green Belt, in the context of the wider settlement of Cambridge, to be maintained, or possibly even enhanced. The assessment considers the extent to which a continued sense of openness can be maintained within the tract of land around Greater Cambridge.
- 1.7 In undertaking the assessment described here EDP has:
 - Reviewed the relevant policy context and evidence base supporting the Council's recent releases of land from the Green Belt at **Section 1**;

¹ LI Practice Number 1010

- Provided a review of the Council's assessment of the extent to which the site performs against the purposes of the Green Belt at **Section 2** underpinned by the detailed assessment in **Appendix EDP 1**. This has been undertaken by a Chartered Landscape Architect and follows a bespoke methodology and assessment criteria prepared by EDP (see **Appendix EDP 2**). References are made to the concept masterplan, saved as **Appendix EDP 3**; and
- Reached overall conclusions in **Section 3**.

Methodology

- 1.8 EDP have developed a methodology for Green Belt Assessment that allows for assessment of land in landscape character and visual terms, against the purposes of the Green Belt, as set out in the National Planning Policy Framework (NPPF) 2019 paragraph 133 (included in Section 2), and our experience of Green Belt reviews. Unless stipulated otherwise, all references to the NPPF relate to the most recent release, published in February 2019.
- 1.9 For each NPPF purpose, the EDP criteria has been determined to allow for a more comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the purposes of the Green Belt in this location. The criteria for each purpose and its weighting in making judgements are described in detail and listed in **Appendix EDP 2**.
- 1.10 The weighting reflects the contribution the site makes towards meeting the purposes of the Green Belt. This ensures that, whilst the NPPF does not require all five purposes, or tests, to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from the Green Belt or retained within it.

Section 2 Policy Context and Considerations

National Policy

2.1 The NPPF February 2019 states at paragraph 133 that:

"The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

- 2.2 The NPPF (paragraph 134) states that Green Belt serves five purposes:
 - 1. "To check the unrestricted sprawl of large built-up areas;
 - 2. To prevent neighbouring towns merging into one another;
 - 3. To assist in safeguarding the countryside from encroachment;
 - 4. To preserve the setting and special character of historic towns; and
 - 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. "

Local Policy

- 2.3 The South Cambridgeshire Local Plan was adopted in September 2018 in which Policy S/4 Cambridge Green Belt is relevant. Policy NH/8 Mitigating the Impact of Development in and adjoining the Green Belt, is partly relevant where it applies to development of land at the edge of settlements, surrounded by the designation. This would be the resulting case to re-drawing the Green Belt boundary to align with the edge of the application site.
- 2.4 Policy S/4 is clear in stating that the designation chiefly relates to Cambridge and not surrounding villages:

"A Green Belt will be maintained around Cambridge that will define the extent of the urban area"

2.5 Therefore, the purpose of the Green Belt applies to controlling growth around Cambridge and not Coton. Arguably, a Green Belt Assessment is superfluous in this circumstance, as the site abuts Coton and not Cambridge. However, there appears to be a two-step process to addressing Green Belt matters: 1) removal of the site from the Green Belt, in which case policies relating to development *in* the Green Belt do not apply; or 2) development in the Green Belt, tested against Policy S/4, which states:

"New development in the Green Belt will only be approved in accordance with Green Belt policy in the National Planning Policy Framework."

- 2.6 In both cases, understanding the extent to which the site performs against the NPPF tests, enables a judgement to be made on the appropriateness of either removal from, or development within, the designation.
- 2.7 The Local Plan lists the purposes of the Cambridge Green Belt (para. 2.30) as being to:
 - *"Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;*
 - Maintain and enhance the quality of its setting; and
 - Prevent communities in the environs of Cambridge from merging into one another and with the city."
- 2.8 Special characteristics of the setting to Cambridge are listed (para. 2.31) as follows. It is notable that these focus on the land which is intervisible with Cambridge and not the application site at Coton:
 - "Key views of Cambridge from the surrounding countryside;
 - A soft green edge to the city;
 - A distinctive urban edge;
 - Green corridors penetrating into the city;
 - Designated sites and other features contributing positively to the character of the landscape setting;
 - The distribution, physical separation, setting, scale and character of Green Belt villages; and
 - A landscape that retains a strong rural character."

South Cambridge Local Plan Issues and Options

2.9 As part of the Local Plan process, the Issues and Options stage sought to identify land at the edge of Cambridge for release from the inner boundary of the Green Belt. Thereafter, several studies were commissioned to look at release of land around Cambridge and not the surrounding existing villages at the outer boundaries, as is the case with the site. In this planning context, Chapter 2 of the Local Plan, relating to Spatial Strategy, acknowledges that there should be development in villages for sustainability reasons (page 20).

2.10 The Greater Cambridge Local Plan, also adopted in 2018, contains Policy 4, relating to the Cambridge Green Belt. This follows similar wording to Policy S/4 above insofar as land should meet the purposes of the NPPF.

Other Relevant Considerations

- 2.11 The Cambridge Green Belt Study (September 2002) describes the setting to Cambridge but was not intended to identify specific land parcels for release.
- 2.12 The Inner Green Belt Boundary Study (2012) draws on and reviews the 2002 Study, from which it identified land on the edge of Cambridge, where it was considered that exceptional circumstances justified their release from the Green Belt. However, the study area focused on the land between Cambridge and the M11 to the west, the A14 and east Cambridge and did not include Coton or the site, which lies approximately 1.33km further to the west of the M11.
- 2.13 A newer document, the Cambridge Inner Green Belt Boundary Study (2015), reached similar conclusions to the previous 2012 Study. This too did not undertake a detailed assessment of the landscape west of the M11 and makes limited comment on the 'Outer Green Belt', which does not affect the site.
- 2.14 Two other documents pre-date the evidence base and are cited within them as contributing toward an understanding of the vision and setting of Cambridge:
 - Plan for Cambridge, Professor Sir William Holford and H Myles Wright (1950); and
 - The Cambridge Sub-Region Study, Colin Buchanan and Partners (2001).
- 2.15 Part of the vision of the 1950 document was to ensure "villages near the city boundary would require 'Green Belts' between them and the town"; whilst the second purpose of the 2001 Study was to "prevent further coalescence between settlements."
- 2.16 Aside from these documents, there is currently no evidence base that tests inclusion of the land within the outer parts of the Cambridge Green Belt. Given this apparent absence of a formal consideration of the site as part of any evidence base, EDP has undertaken its own assessment, as set out in the following section.

Coton Conservation Area

2.17 The Coton Conservation Area (CA) is entirely separated from the site by intervening 20th century residential built form. There is no intervisibility with the CA. The extent to which the site impacts on the historic setting to the CA falls outside of the remit of the Landscape and Visual Impact Assessment (LVIA) or this Assessment. The extent to which it contributes to its historic setting is therefore of limited relevance but is considered as part of the detailed assessment of the purposes of the site.

Landscape Character

- 2.18 The South Cambridgeshire District Design Guide: High Quality and Sustainable Development in South Cambridgeshire (adopted 02 March 2010) shows the Site as falling within the within the *C: The Western Claylands National Character Area* as defined in the *Countryside Character for East of England* (Countryside Agency 2005). This is relevant to understanding the contribution that the site makes to NPPF Purpose 3, "to assist in safeguarding the countryside from encroachment."
- 2.19 Landscape character is summarised as follows:

"This character area comprises gently undulating arable farmland with, mostly, large fields and low trimmed hedgerows. Occasional medium to large sized ancient woodlands provide a distinctive feature and church towers and spires are key landmarks. Despite the presence of some major roads, much of the area has a relatively tranquil, rural character." (para. 3.23)

2.20 Settlement Character is described as follows:

"The mostly small, scattered villages of this area often have well defined edges provided by mature trees, thick hedgerows, copses or parkland. Small fields and paddocks also contribute to their landscape setting, providing a transition to the surrounding countryside. Many of the villages have a strong, linear form with rows of cottages and a few, larger farmsteads facing roads and paths. ..." (para. 3.25).

2.21 The character of the village and its rural context is largely consistent with the description within the Design Guide. In particular, the vegetation at the site boundaries provides visual filtering and screening in views from the adjacent agricultural land towards the site and the existing settlement edge. This contributes to integration with the existing and proposed settlement edge. Further examination of the differences in representation of the characteristics is included in **Appendix EDP 3**, from which conclusions are drawn on the contribution the site makes to Purpose 3 of the NPPF, para. 133.

Section 3 Green Belt Assessment

EDP Green Belt Assessment

- 3.1 EDP has undertaken an assessment of the extent to which the site performs against the purposes of the NPPF Green Belt tests. This has been undertaken by a Chartered Landscape Architect and follows the bespoke methodology referred to in **Section 1** and assessment criteria prepared by EDP (see **Appendix EDP 2**) to examine the purposes in further detail.
- 3.2 The detailed findings are presented in the Green Belt Assessment within **Appendix EDP 2**. A summary of the findings in relation to each of criteria for examining the five purposes is provided in **Table EDP 3.1**.

Green Belt Purpose (NPPF)	EDP Methodology Criteria	Site
		Contribution
Purpose 1	What contribution does the site make to	Low
To check the unrestricted	providing a contiguous open area between	
sprawl of large built-up areas.	the settlement edge and the wider Green Belt?	
	What contribution do the site boundaries make to maintaining openness with the	None
	wider Green Belt?	
Purpose 2 To prevent neighbouring	To what extent is the site associated with the existing settlement edge(s)?	Low
towns merging into one another.	Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?	Low
Purpose 3	What contribution does the site make to	Low
To assist in safeguarding the	representation of the key characteristics of	
countryside from	the countryside?	
encroachment.	To what extent is the site urbanised, either by on-site or off-site features?	Low
Purpose 4	Does the site represent the special	No
To preserve the setting and special character of historic	characteristics of the setting to the historic town?	
towns.	Is there intervisibility between the site and historic landmarks?	No
Purpose 5	Not tested.	N/A
To assist in urban		
regeneration, by encouraging		
the recycling of derelict and		
other urban land.		
Overall Weighting		Low

 Table EDP 3.1: Summary of EDP Site-specific Green Belt Assessment

3.3 EDP's assessment of the site, in relation to the main purposes of Green Belt, shows that rather than being a high functioning part of the Green Belt, the sites provides a **low contribution** to the Green Belt purposes. Further detailed analysis, which has informed these findings, has been carried out by EDP and is detailed in **Appendix EDP 1**.

Review of The Findings of The Published Green Belt Study in Relation to The Site

3.4 The following paragraphs summarise the detailed findings of the EDP tests and considers these in light of the potential to remove the site from the Green Belt and redevelop it whilst ensuring the fundamental purpose of the adjoining Green Belt can be maintained.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- 3.5 The main finding in respect of this assessment is that the existing mature woodland to the site's western and southern boundaries prevent the site from allowing unrestricted sprawl to develop. There is no development within the site that has resulted through unrestricted growth.
- 3.6 Furthermore, redevelopment of the site is expected to come forward as part of a planned approach, dealt with formally through the planning process and not in a piecemeal fashion of an unrestricted nature.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

3.7 The geographic distances between Coton and the next nearest villages at Barton and Comberton as well as Cambridge to the east, are so great that the potential for merging as a result of removal of the site and redevelopment of it, is unlikely in the current plan period. Additionally, the effects of distance and intervening vegetation along the boundaries of the site and in the intervening landscape, ensures there is no perception of a reduction in the openness of the Green Belt from these surrounding settlements, were the site to be removed and re-developed.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- 3.8 The site makes only a limited contribution to the key characteristics of the landscape of the Western Claylands, principally as a small part of the wider agricultural landscape. However, the mature woodland along the southern and western boundaries considerably reduces the perceptual relationship of the character of the site with the wider Western Claylands. This level of containment also ensures that the site makes only a very limited contribution to the setting of the village, which is not readily appreciated due to the absence of public rights of way passing through the site.
- 3.9 In that regard, the site makes only a low contribution to the countryside of the Green Belt, defined as the Western Claylands.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

3.10 The site is screened from the CA and Cambridge by intervening 20th century-built form in Coton and there is no intervisibility between the CA or Cambridge where a full appreciation of their landscape setting can be appreciated. The site therefore makes no appreciable contribution to the historic setting to either the CA or Cambridge.

Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land

3.11 The most recent Green Belt studies commissioned by the relevant Councils have determined that this purpose cannot be tested in the context of demonstrating potential removal of land from the designation. This test therefore does not form part of the Green Belt Assessment.

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Section 4 Conclusion of Green Belt Assessment

- 4.1. EDP has been commissioned by Martin Grant Homes to undertake a Green Belt Assessment to examine the performance of the site against the purposes of the Cambridge Green Belt. Part of this approach has been to review the Cambridge and joint Cambridge/South Cambridge Council evidence base in relation to Green Belt, which has found that there have been no specific studies undertaken on the outer Green Belt boundary, including the site. In this instance, this Assessment includes consideration of the site using the bespoke methodology prepared by EDP for instances where no suitable evidence base or 'like for like' comparison exists.
- 4.2. This Green Belt Assessment concludes the site provides a **low contribution** to Green Belt purposes, primarily due to three key factors: 1) existing, proximate permanent defensible boundaries; 2) limited representation of key characteristics of the countryside; and 3) no valued contribution to the historic setting to Coton CA or the setting to Cambridge. As a result, the site relates far more closely to the existing settlement edge of Coton and does not have a fundamental role in protecting the openness and permanence of the Green Belt.
- 4.3. Removal of the site from the Green Belt can be undertaken immediately, without the reliance on establishment of new defensible boundaries. This is reflected in the Concept Masterplan (Appendix EDP 3) for redevelopment of the site, which includes clear opportunities to provide an on-site commitment to retain and reinforce the defensible boundaries. In combination with the low contribution to the NPPF purposes, removal of the site from the Cambridge Green Belt will preserve the special qualities of the setting to Cambridge and:
 - *"preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;*
 - maintain and enhance the quality of its setting;
 - prevent communities in the environs of Cambridge from merging into one another and with the city;"
- 4.4. This assessment has concluded that the site could reasonably be removed from the Green Belt and, it can be developed in accordance with the principles of the Concept Masterplan (as detailed in **Appendix EDP 3**) without harm to the openness and permanence of the Green Belt overall. Additionally, redevelopment of the site would provide potential benefits in terms of creation of an attractive, integrated settlement edge, a defensible Green Belt boundary over the current plan period, and maintain the identity of Coton as being entirely surrounded by Green Belt.

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Appendix EDP 1 Green Belt Assessment Methodology and Criteria

Review Criteria

A1.1 As noted in the NPPF, paragraph 133, the Green Belt serves five purposes. For each NPPF purpose, criteria have been developed that allow for a comprehensive analysis to be undertaken, in landscape and visual terms, of the contribution the site makes to the function of the Green Belt in this location. The criteria for each purpose is described in more detail and tabulated below.

Purpose 1: To Check the Unrestricted Sprawl of Large Built-up Areas

- A1.2 This is a test that considers whether the site is able to prohibit sprawl. Commonly sprawl is ribbon development but may also be piecemeal development in isolated areas or along settlement edges. A site may already have been compromised by some form of development, in which case it is relevant to consider the extent to which that development has eroded the sense of openness, this being whether or not there is a sense that the site within the Green Belt is still open and absent of development.
- A1.3 Sprawl may also be discouraged by defensible boundaries to existing settlements that are either natural (e.g. topography, woodland or water course) or man-made features (e.g. as a main road, main railway line, or settlement edge). These may be within the site or share a boundary with it. Sites that do not contain defensible boundaries may contribute towards greater openness.

Purpose 2: To Prevent Neighbouring Towns Merging into One Another

- A1.4 The consideration is whether or not the settlement growth could lead to merging with another town. The wording of the NPPF refers to 'towns', but often the Green Belt affects settlements of a considerably smaller geographical scale, in which it is more relevant to consider the potential for merging of neighbouring settlement edges to distinct settlement areas that might be defined as towns.
- A1.5 In essence, the purpose seeks to avoid coalescence of built form. This can be perceived in terms of geographic scale in either plan view or 'on the ground' by intervening natural or man-made features.
- A1.6 The interpretation of 'merging', in terms of geographic distances, differs according to the study area. Whilst a review of distinct towns might need to account for distances over several kilometres, when considering gaps between smaller settlements, the range can be much smaller with distances reducing to as little as 100m in some cases. It is of note that susceptibility to 'merging' depends on distance between two settlements, and each situation needs to be reviewed in relation to the local landscape and visual context.

Purpose 3: To Assist in Safeguarding the Countryside from Encroachment

- A1.7 In terms of Green Belt, the 'countryside' is the landscape outside of the current development limits, and which is generally defined by key characteristics such as hedgerow networks, varying field patterns, presence/absence of woodland, downland character, topographical features or open space and access to it, etc. Countryside is likely to be undeveloped land that is typically rural and often managed for agriculture or forestry, or simply kept as an open natural or semi-natural landscape. It may, however, contain manmade features such as historic landmarks, properties, mineral extraction or larger areas of settlement.
- A1.8 This assessment is informed by the identification of key landscape characteristics of the site and its surroundings, derived from a review of the published landscape character assessment and consideration against aerial mapping of the site, its surroundings and a site-based baseline review undertaken to inform the design of the concept masterplan. Consideration is also given to the extent of recreational access provided to the Green Belt through the site.
- A1.9 Sites that are highly representative of the key landscape characteristics, and exhibit them in good condition, make a stronger contribution towards safeguarding the countryside than land that is less representative of the landscape character area or contains features that are in poorer condition. This allows a relative and qualitative consideration to be applied to landscapes.
- A1.10 The matter of 'encroachment' is also a judgement that considers whether or not development (such as built form along the edge or within it, pylons and high voltage overhead cables, sub-stations, quarrying and urbanising features such as street lighting, road signs, road infrastructure, etc.) is found in the site or influences it, and also the degree to which it has preserved the key characteristics or divorced them from the wider countryside. A site that has limited or no urbanising influences has a stronger role in safeguarding countryside.
- A1.11 Finally, encroachment can also be prohibited by the presence or absence of particular natural or man-made features that separate existing settlement edges from the wider countryside. Typically, encroachment is prevented from progressing by large man-made features such as dual carriageways, or motorways; natural features might include woodland, large water bodies, such as lakes and rivers or deep, steeply sloped valleys. Such features may border a site or be contained wholly or partially within it.
- A1.12 However, natural features in particular, including woodland, rivers or ridgelines, may suffer a loss of their integrity as prominent features within the landscape if development is progressed upon, or near, them. These features should therefore be safeguarded where possible or integrated sensitively into design proposals.

Purpose 4: To Preserve the Setting and Special Character of Historic Towns

- A1.13 The setting and special character of an historic town is usually depicted by the presence of one or more conservation areas to denote an historic association with the built form. Consideration is also given to potential views towards historic landmarks such as churches, listed buildings or scheduled monuments.
- A1.14 This does not, however, constitute an appraisal of the historic setting of a designated or non-designated historic asset, the nature of which would be determined by a suitably experienced historic consultant and falls outside of the remit of this Green Belt assessment.

Purpose 5: To Assist in Urban Regeneration, by Encouraging the Recycling of Derelict and Other Urban Land

A1.15 This purpose falls outside the scope of this report and has not been tested.

Review Scoring

- A1.16 EDP has developed a methodology for Green Belt Reviews, which is based on landscape and visual assessment methodology with regard to the purposes of the Green Belt and our experience of Green Belt reviews.
- A1.17 The site is scored against the criteria for each purpose as shown in **Table EDP A1.1**, with criteria weighted as **no**, **low**, **moderate** or **strong** contribution towards meeting the purposes of the Green Belt. Occasionally, scores are spread if part of the site makes differing contributions. This ensures that, whilst the NPPF does not require all five purposes, or tests to be met simultaneously, the extent to which a site contributes to the criterion of a specific purpose will better inform the decision for it to be removed from or retained within the Green Belt.

NPPF paragraph 133 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Weighting: (No Contribution; Low; Moderate; Strong)
Purpose 1 To check the unrestricted sprawl of large built-up areas	 Creates a clear, recognisable distinction between urban fringe and open countryside; and Settlement scale will differ and 'large' may be relative to: hamlet, village, town, city. Typically, a settlement that is the size of a town or city would be considered as a large built-up area. 	 a. Yes, the site is absent of development and associated influences and strongly contributes to the openness of the Green Belt (Strong); b. There is an absence of development within the site, but it is overlooked by adjacent/nearby development (Moderate); c. No, the site contains development and/or does not clearly define a distinction between the settlement edge and the open countryside (Low); and d. Land use of the site results in it forming neither countryside or urban (No contribution).
	• Defensible boundaries have a role in limiting unrestricted sprawl as they create the boundaries to Green Belt parcels. These may be within the site or form part of its boundary; and	 a. The site does not have defensible boundaries and maintains openness with the wider Green Belt (Strong); b. The site has some defensible boundary/boundaries and maintains openness in some directions. Additional reinforcement needed (Moderate);
	• Such boundaries can be permanent, such as roads, steep topography, woodland or require additional reinforcement such as hedgerows, tree belts, streams. Fences do not form defensible boundaries. Incomplete or low boundaries may result in part/all of a site making a greater contribution to the openness of the Green Belt.	c. The site has some permanent boundaries such as roads/railways/rivers/high ground and partially defensible boundaries, some of which do not require additional

Table EDD A1 1. NPDE Paragraph 133 Green Belt Purpose

NPPF paragraph 133 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Weighting: (No Contribution; Low; Moderate; Strong)
Purpose 2 To prevent neighbouring towns merging into one another	 Settlements maintain a recognisable edge; The extent to which the site forms a logical fit with the settlement or, is perceived as an extension that could erode openness; 	 a. The site forms the gap between two settlement edges (Strong); b. The site abuts two settlement boundaries and therefore forms part of an indent (Moderate); c. The site abuts one settlement boundary but is not divorced from it (Low); and d. The site is clearly separated from the settlement boundary and would not undermine the sense of openness (No Contribution).
	 Prevent loss or noticeable reduction in distance between towns/settlement edges; this may also be affected by agricultural land use or topography. A larger distance or more prominent topographical change would be better capable of accommodating change than a narrow gap; and The gaps may contain different elements, be it natural (e.g. topography, woodland, agricultural land or large open spaces) or man-made features, which prevent merging. 	 a. Immediate and clear intervisibility with next nearest settlement edge (Strong); b. Partial intervisibility with next nearest settlement edges (Moderate); c. Limited intervisibility with next nearest settlement edges (Low); and d. No intervisibility with next nearest settlement edges (No Contribution).
Purpose 3 To assist in safeguarding the countryside from encroachment	 The countryside comprises 'key characteristics', which define the landscape and the way it is perceived in visual terms or through physical patterns; and Key characteristics may be derived from a review of published landscape character assessments and EDP's own review of landscape character. 	 a. The site is highly representative of host landscape character area/type; does not contain landscape detractors (Strong); b. The site is partially representative of host landscape character area/type; there are some landscape detractors (Moderate); c. The site has a low representation of characteristics; many landscape detractors (Low); and d. No representation of landscape character area/type; high number detractors that weaken landscape character considerably (No Contribution).

NPPF paragraph 133 Green Belt Purpose	Criteria	Application of Criteria to Site and Criteria Weighting: (No Contribution; Low; Moderate; Strong)	
	• Encroachment: features such as settlement edge, speed signage and street lighting affect the extent to which the countryside is perceived to change from rural to urban.	 a. There are no urbanising features within the site or directly influencing it (Strong); b. There are several off-site urbanising features affecting the site (Moderate); c. There are many off-site urbanising features affecting the site (Low); and d. The site is distinct due to its urbanising features (No Contribution). 	
Purpose 4 To preserve the setting and special character of historic towns	 The representation of the special characteristics that contribute to the setting of an historic town, as defined by one or more conservation areas; and The representation of the special characteristics that contribute to the setting of an historic town, if these are set out in the Council's supporting evidence base, where different from those defined for conservation areas. 	 a. The site is highly representative of the special characteristics associated with the setting to an historic town (Strong); b. The is partially representative of special characteristics associated with the setting to an historic town (Moderate); c. The site has some representation of special characteristics associated with the setting to an historic town (Low); d. The site has no representation of the special characteristics associated with the setting to an historic town (No Contribution). 	
Purpose 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	Not tested.	Not tested.	

Appendix EDP 2 Detailed Green Belt Assessment

Description of the Site

The site lies at the south-western edge of the village of Coton, with existing residential development characterised by predominantly 20th century development immediately to the north, off Pendrick Close and east, off Silverdale Avenue. The development spans the full length of these boundaries.

To the south, the site boundary is formed by Bin Brook and mature woodland aligning this watercourse.

To the west, mature woodland in a roughly triangular shape lies off-site, spanning the full length of the boundary. The woodland measures approximately 90m wide in the southern and central portions, narrowing to approximately 20m in the northern portion where it meets with the existing settlement edge. The context of the site is illustrated by **Figure EDP A.1**.



Figure EDP A.1: Site and immediate context.

Purpose 1: To check the unrestricted sprawl of large built-up areas		
Application of Criteria	Assessment	Score
Does the site form a contiguous open area between the existing settlement edge and the wider countryside and/or large built-up area?	The site is currently undeveloped and physically and visually separated from a much larger contiguous open area extending to the west and south. There are no roads extending through the site, and therefore no unrestricted ribbon development has extended into the wider countryside.	Low Contribution
Application of Criteria	Assessment	Score
Does the site have a defensible boundary, which can prevent sprawl?	The mature boundary to the south is effective in forming an immediate permanent defensible boundary, more so as a result of the Bin Brook. To account for the potential (but unlikely) removal of the mature woodland further south, the Concept Masterplan for redevelopment of the site indicates a large area of additional tree planting and Sustainable Drainage System (SuDS) basin to reinforce these boundaries.	No Contribution



Figure EDP A2.2: Aerial photograph showing the site in relation to Barton to the south (c.2.3km) and Comberton (c.2.15km) to the south-west.

Application of Criteria	Assessment	Score
To what extent is the site associated with the existing settlement edge(s)?	Figure A2.2 illustrates that the site forms an indent to the existing edge of Coton and therefore does not extend substantially further south or west than the existing settlement edge boundaries. In that respect, removal of the site from the Green Belt would only marginally reduce the extant of the designation between Coton and the next nearest settlements to the south, at Barton and south-west, at Comberton through the removal of a site spanning just c.235m between its south-western and north-eastern extents.	Low Contribution
Given the distance between the whole of the site and next nearest settlement edge, what is the effect of the perceived and actual intervisibility or potential for coalescence?	- 5	Low Contribution

Purpose 3: To assist in sar	eguarding the countryside from encroachment	
Application of Criteria	Assessment	Score
To what extent does the site represent the key characteristics of the countryside?	 At the smaller grain of the site itself there are, inevitably, local characteristics that influence the character itself, and as a result its representation differs from that of the Western Claylands: Northern hedge comprises a narrow belt of semi-mature native trees and shrubs that is likely to have been planted when adjacent residential development was introduced; The hedge to the east has come under some pressure from the adjacent housing so that its condition is compromised to some degree; Existing development to the north and east does little to reflect the characteristics of the historic village core and, in this respect, contributes little to the 'sense of place'; The existing development detracts from the rural tranquillity and exerts an urbanising influence across the site; Large buildings at High Cross erode the rural tranquillity in the locality; The near site context is consistent with the Design Guide description of 'settlement character' where "small fields and paddocks also contribute to their landscape setting, providing a transition to the surrounding countryside"; However, the mature woodland along the southern and western boundary which defines the edge of the site, also creates an abrupt change from the interior of the site to this wider character. 	Low Contribution

Application of Criteria	Assessment	Score
To what extent is the site urbanised, either by on- site or off-site features?	Two storey residential development immediately to the north and east exerts a strong urbanising influence on the site. The mature woodland to the west and south assists greatly in containing this urbanising character and would continue to limit urbanisation of the wider Green Belt, if the site were to be removed and developed.	Contribution

Application of Criteria	Assessment	Score
Application of Criteria To what extent does the site represent the special characteristics of the setting to the historic town?		No Contribution
	Figure EDP A2.3: Conservation Area (edged pink) is separated from the site to the south-west by more modern development	
	Coton Conservation Area (CA) is entirely separated from the site by much of the intervening 20^{th} century residential built form.	
	In terms of special characteristics listed in the adopted Local Plan, relating to the setting to Cambridge, there is no intervisibility between the site and Cambridge and therefore no full appreciation of the landscape setting to the city.	
To what extent is there intervisibility between the site and historic landmarks?	There are no public rights of way (PRoW) crossing the site from which views of the church are currently afforded.	No Contribution

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land			
Application of Criteria	Assessment	Score	
Is the site within the Green Belt, and therefore not representative of derelict or other urban land?	Not tested.	N/A	
Overall Weight		Low Contribution	

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Appendix EDP 3 Concept Masterplan (edp4413_d007a 08 April 2019 RA/PW)

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New residential development respects the privacy and amenity of existing dwellings by backing onto neighbouring properties on Pendrick Close

Vehicular access via **Pendrick Close**

Proposed residential development has generous back gardens, which _ back onto established woodland. Sensitive boundary treatments enable these rear gardens to benefit from a green outlook

The view of the existing woodland from the entrance to the site is complimented by new planting, which allows glimpsed views of the proposed play space

BROOKFIELD ROAL New residential development has generous back gardens, which protect the privacy and amenity of existing properties on Silverdale Avenue and accommodate the recommended drainage and ecological offsets to the existing watercourse

PETER'S

ROAD

Potential pedestrian connection to Silverdale Avenue

Proposed attentuation basin provides opportunities for a permanent wetland feature and bio-diversity enhancements, refer to MEC report

Proposed natural green space is overlooked by neighbouring dwellings and provides opportunities for informal recreation. This area could accommodate new landscape treatments and bio-diversity enhancements linking into the wider green network

0m 20 40

The proposed play space has a 20m offset from neighbouring dwellings, which overlook the space and provide natural surveillance

PENDRICK CLOSE

Potential for additional new planting to screen pumping station from view

Proposed pumping station with 15m offset to development, refer to MEC report

SILVERDALECLOSE

Application Boundary	3.46 ha
Net Developable Area @ 30dph equates to 70 dwellings	2.36 ha
Open Spaces and Planting	1.10 ha



project title Silverdale Close, Coton, Cambridgeshire

drawing title **Concept Masterplan**

date drawing number edp4413_d007a checked PW scale

08 APRIL 2019 drawn by RA 1:2000 @ A3

QA JTF

the environmental dimension partnership

info@edp-uk.co.uk www.edp-uk.co.uk Cirencester 01285 740427 Cardiff 029 21671900 Shrewsbury 01939 211190

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Plan

Plan EDP 1Environmental Planning Context and Considerations
(edp4413_d004b 08 April 2019 GY/TR)

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Site Boundary

Range Rings (at 1km intervals)

Landscape and Access



Country Parks

• • Public Rights of Way



Flood Zone

Ancient Woodland

Heritage

Grade I Listed Building



Grade II* Listed Building

Grade II Listed Building



Registered Parks and Gardens

Planning

Green Belt

client

Martin Grant Homes

project title

Silverdale Close, Coton, Cambridgeshire

drawing title

Plan EDP 1: Environmental Planning Context and Considerations

08 APRIL 2019 date drawing number edp4413_d004b Refer to scale bar scale

drawn by GY checked TR QA LB



the environmental dimension partnership

info@edp-uk.co.uk www.edp-uk.co.uk ster 01285 740427 Cardiff 02921 671900 Shrewsbury 01939 211190 Ci



e environmental mension partnership CARDIFF 02921 671900

CHELTENHAM 01242 903110

CIRENCESTER 01285 740427

SHREWSBURY 01939 211190

info@edp-uk.co.uk www.edp-uk.co.uk





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