

GREATER CAMBRIDGE LOCAL PLAN (GCLP) – FIRST PROPOSALS

REGULATION 18: PREFERRED OPTIONS

REPRESENTATIONS: MARTIN GRANT HOMES – LAND AT AMBROSE WAY, IMPINGTON

REST OF THE RURAL AREA - GENERAL COMMENTS

1. Section 2.6 of the First Proposals document states the Councils *"want our rural villages to continue to thrive and sustain their local services, but we don't want to encourage lots of new homes in places where car travel is the easiest or only way to get around. We therefore propose some development in and around villages that have good transport links and services"*
2. As set out in detail in our representations on Development Strategy, the approach put forward in the First Proposals document will not deliver the above stated aim. The proposed distribution of new growth and allocations via the GCLP is fundamentally flawed and will not deliver a varied, flexible and robust housing supply or see the benefits arising from sustainable development reaching established and sustainable rural settlements.
3. MGH objects to the use of the terminology, *"where car travel is the easiest or only way to get around"*. The use of the word *"easiest"* in this context is inappropriate and does not represent an objective or robust approach to determining the distribution of growth. The easiest or most convenient travel option available to a person will depend on the specific circumstances of that individual. In terms of promoting sustainable travel patterns, the distribution of development should be based on the quality and frequency of public transport connections serving a settlement; and the settlement's proximity to larger hubs or urban areas.
4. MGH are promoting 'Land at Ambrose Way, Impington' (HELAA Ref: 40392) for removal from the Green Belt and subsequent allocation for residential development. MGH welcomes the publication of the HELAA review which appraises the development potential of the site. However, MGH has noted a number of specific technical flaws in the published appraisal which should be remedied as the GCLP preparation continues.
5. To aid the preparation of these representations a Masterplan for the site has been prepared, along with a number of supporting Technical Notes. The Masterplan and

the Technical Notes are summarised and provided in the Site Promotion Document appended to these representations.

6. In light of our review of the HELAA appraisal and the Technical Notes we attach as a separate sheet a schedule of the HELAA inaccuracies and recommended amendments.

Site Details		New RAG Rating
Proposed housing units	177	N/A
Site Assessment		
Flood Risk	<p>The flood modelling work commissioned by MGH to date (please see the submitted Site Promotion Document and Technical Notes) shows that the Flood Map for Planning (FMP) and the associated Flood Zone 2 and 3 extents within the site are not representative of the flood risk at the site. Accordingly, the national scale modelling used to inform the FMP should not be relied on for the Ambrose Way site.</p> <p>The site-specific modelling outputs show reduced baseline extents that should be used to inform the FMP. The modelling has been submitted under an evidence-based review process to the Environment Agency to challenge the Flood Map for Planning. The baseline modelling undertaken show reduced areas Flood Zone 2 and 3.</p> <p>The comments in the HELAA should be updated to state that based on the revised modelling submitted as part of the flood map challenge the percentage of the site that should be assessed as being within Flood Zone 2 as 35% and for Flood Zone 3 would be 2%.</p> <p>The mitigation modelling submitted in support of these representations demonstrate that the development at Ambrose Way (as shown on the submitted Concept Plan) is deliverable with no downstream detriment.</p>	
Landscape and Townscape	<p>This criterion currently has a red RAG designation and from the HELAA commentary it is clear that the previously submitted Landscape and Visual Appraisal (LVA) has not been taken into account by the Councils. The HELAA RAG rating and associated commentary is flawed and is extremely high level in nature.</p> <p>The LVA confirms and evidences that there are no 'in principle' landscape and visual constraints that would preclude the development of the site for housing.</p>	

	<p>The location and nature of the site would mean that residential development would extend the settlement within logical limits, without resulting in encroachment to the wider countryside. The site has a very limited influence on the wider rural setting that could be further reduced through careful site design.</p>	
Historic Environment	<p>As evidenced and explained in the submitted Heritage Appraisal there are no built heritage constraints associated with the development of this site.</p> <p>The development of the site for housing would not see the villages of Histon and Impington merge.</p> <p>The HELAA states that any development could result in 'potential harm' to the St Andrew's conservation. No explanation or evidence is provided to support this claim.</p> <p>The development of the site would have neutral impact on built heritage.</p>	
Archaeology	<p>The HELAA states that the site is located in a landscape of extensive prehistoric and Roman activity and that the route of the Roman road runs through the site.</p> <p>Historic Records do not show a Roman Road running through the site. At the planning application stage detailed site investigation would take place. Even if these investigations found any remains of Note it is highly unlikely that they would preclude the development of the site. Indeed, this demonstrated by the site's proximity to previously approved major development to the east and south.</p> <p>The development of the site would have neutral impact on archaeology. The submitted Heritage Appraisal explains that archaeology is not a constraint to development at the site.</p>	
Site Access	<p>Since the publication of the HELAA detailed plans showing a site access solution off Ambrose way have been submitted Cambridgeshire County Council: Highways (CCC). CCC have confirmed that there are no insurmountable issues to delivering a robust and safe site access in this location. This is explained and evidenced in the submitted 'Initial Transport Assessment'.</p>	
Transport and Roads	<p>The HELAA states that access to the highway is substandard with little opportunity for improvement at B1049 junction and that any development would need to deliver enhancements to off-site infrastructure to promote sustainable travel modes.</p>	

	<p>The submitted 'Initial Transport Assessment' demonstrates that there is significant potential for residents to travel to and from the site by sustainable modes. Any development could contribute towards the delivery of wider sustainable travel initiatives that have been muted in the village. Assisting in the delivery of such initiatives would promote sustainable travel to residents of the site and modal shift in the wider existing community.</p> <p>Capacity testing of the Ambrose Way / Mill Lane and B1049 Glebe Way / Mill Lane junction has been undertaken. This work has demonstrated that the junctions will operate within capacity; and as such should not be a barrier to developing the site. This capacity testing is provided in the submitted 'Initial Transport Assessment'.</p>	
Contamination and Ground Stability	<p>The HELAA states that the site has potential for historic contamination due to its agricultural use. This broad assumption on a matter which typically simple to mitigate against (should it prove there is contaminated land) should not form the basis for giving a site an Amber HELAA rating.</p> <p>This is an unknown but readily resolvable constraint which would be resolved at the planning application stage.</p>	
Further Constraints		
Strategic Highways Impact	<p>The submitted 'Initial Transport Assessment' demonstrates that impacts on the Strategic Route Network and specifically the A14 Histon Interchange are negligible. These minor impacts can be off set through the promotion of sustainable travel modes, leading to a nil detriment impact.</p>	
Green Belt	<p>The HELAA records that the site falls within parcels HI7 and HI8 as identified by the LUC Green Belt Study. This is incorrect as the site only forms part of HI8.</p> <p>The HELAA states Parcel HI8 has a Green Belt harm release rating of 'Very High', again this is incorrect. The site forms part of two areas with different 'harm' ratings in parcel HI8. The site is given a 'moderate high' and 'moderate' Green Belt harm release rating.</p> <p>Notwithstanding the inaccuracies between the LUC Study and HELAA forms, MGH has commissioned a Green Belt Appraisal (GBA) of the site which has been updated to address the LUC Study. The GBA is appended to these representations evidences that the release of the site would not undermine the integrity of the Cambridge Green Belt.</p>	Criteria not assigned a RAG rating in HELAA
Overall Suitability		

Development Potential		
Estimated DPH	35 dph	N/A
Estimated Units	177	N/A

7. Updated Call for Sites Forms have also been submitted to explain and evidence the latest technical work completed by MGH.
8. Providing that a rural settlement has strong sustainability credentials in terms of public transport links, employment opportunities, social infrastructure, shops and services it is abundantly possible to bring forward proportionate levels of new sustainable development. It is contended that bringing forward development at Rural Centres such as Histon & Impington is as sustainable as bringing forward growth at New Settlements which have a similar service provision / planned service provision. The service provision at Histon & Impington is set out in the submitted Site Promotion Document.
9. This set of representations has also demonstrated that the proposed GCLP Development Strategy is flawed in its approach to supporting economic/jobs growth, providing a flexible and varied housing supply and supporting the long-term vitality of established sustainable rural settlement. The representations have also confirmed that there is a compelling package of exceptional circumstances which justifies the focused release of land from the Green Belt.
10. In reviewing and amending the GLCP's overall housing need requirement, development strategy and the need for additional focused Green Belt releases it is strongly recommended that our client's site is allocated for residential development and the Green Belt boundary modified to facilitate this. The 'Land at Ambrose Way' is a suitable and deliverable site with very limited development constraints (which can be overcome through planning conditions and careful design) and is located at a settlement which is a designated Rural Centre and is an inherently sustainable location for new proportionate growth.