

## Land to the east of Ditton Lane, Fen Ditton (HELAA site 40217)

As set out in our comments on Policies S/DS and H/SH, we do not consider that sufficient sites are identified to meet the objectively assessed housing need within the Plan period, predominantly due to the uncertainty surrounding the anticipated delivery rates and timescales for a number of the proposed allocations.

The land to the east of Ditton Lane, Fen Ditton (Site Reference: 40217) was assessed as an Edge of Cambridge: Green Belt site, although not selected for allocation. The site has been promoted by Scott Properties through the Plan process to date for specialist accommodation for older people, on a small part of the northern area of the site, with the southern half of the site proposed as open space and landscaping.

The site received a 'red' score within the HELAA in respect of suitability, on Townscape and Landscape grounds. Within this part of the assessment, the site is described as 'an important green separation between Cambridge and the village of Fen Ditton. Development of this site would have an adverse effect on the landscape character for the setting of both Cambridge and Fen Ditton and contribute to their amalgamation. It is considered that there are no options for even limited development on this site.'

We dispute this conclusion. Firstly, limited development of the site would not result in the amalgamation of Cambridge and Fen Ditton, as demonstrated both within the Call for Sites submission and the accompanying Masterplan Concept Layout. The proposals for the site include development of a northern section only, extending to approximately 1.6ha, which would leave the majority of the site open, retaining the separation between the two areas, and providing considerable biodiversity and recreational benefits.

Further, development in the northern area of the site as identified within the Masterplan Concept Layout would not result in an adverse effect on the landscape character. This area is closely related to the existing residential development along Ditton Lane and High Ditch Road, with existing and planned landscaping acting as a considerable buffer to provide effective visual screening from the wider area.

We are unsure therefore, how it can be concluded that there are no options for limited development on the site. For the above reasons, we consider that the site should have received an 'amber' score for suitability, recognising that very few sites, including those proposed for allocation, received a 'green' for suitability within the HELAA. There are a number of other elements within the site's assessment which we believe have been unreasonably scored 'amber'.

We are unclear why sites have been assessed against their compliance with existing policy, particularly when the reason for this process is to produce a new Plan which will supersede existing policy.

We consider that scoring sites 'amber' due to being outside of the Development Framework is unnecessary; the purpose of the plan is to identify additional sites for allocation, and it has been established through the initial work undertaken that this will need to include sites outside of existing settlement boundaries.

The site receives an 'amber' score for Flood Risk due to the identified small risk of surface water flooding in a small area within the south-eastern corner of the site. However, as detailed within the site's submission to the Call for Sites and Issues and Options consultation, and the Masterplan Concept Layout accompanying these representations, this area is proposed for landscaping and open space, therefore there would be no development within this area, and as such the site should have received a 'green' score.

The site scores 'amber' in relation to Historic Environment. This erroneously states that the site is within a Conservation Area. We would refer to the Fen Ditton Conservation Area (Draft Council policy (Ref: DCV 0029) (2005) as well as the South Cambridge Adopted Policies Map, neither of which show the site within the Conservation Area. The conclusions state that 'development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset, but the impact could be reasonably mitigated.'

The nearest listed asset is noted as being within 100m. There are three Grade II listed buildings along High Ditch Road to the north of the site, however, these buildings are clearly visually separated from the site by considerable existing landscaping to the boundaries of these properties, therefore we agree that any impact on the heritage assets could be reasonably mitigated. As such, and given the site is not located within the Conservation Area, the score should be 'green'.

We question why the site received an 'amber' score for site access, despite stating that the proposed site is acceptable in principle subject to detailed design. An Access Drawing was submitted in support of the site to the Issues and Options Consultation and accompanies this submission, which shows that a safe and suitable access could be achieved from Ditton Lane. As such, we consider that there are no potential access constraints and therefore this score should be 'green'.

The site scores 'amber' in respect of transport and roads, despite concluding that any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated. The assessment also states that passenger transport, walking and cycling links and links to the public transport corridor should be considered. It is detailed with the assessment of accessibility to services and facilities that the site has good accessibility to key local services, transport and employment opportunities, which includes public transport less than 450m from the site. The site could provide connectivity into the existing public rights of way network immediately surrounding

the site, which includes a cycle path to the south. This provides alternative and sustainable methods of transport and provides ease of access into the surrounding areas, including the public transport network thereby reducing the reliance on the car. As such, the site's score should be 'green'.

In relation to noise, vibration, odour and light pollution, the site scores 'amber' with the assessment concluding that the site will be affected by road noise from nearby main roads. We question how a definitive conclusion on this has been reached in the absence of any noise studies having been undertaken on the site. Given that built form on the site would be focused within the northernmost part of the site, adjacent to existing residential development along Ditton Lane and High Ditch Road, with additional landscaping to the south, there would be limited risk of road traffic noise affecting the site. As such, we consider this should be 'green'.

The Strategic Highways Impact assessment identifies the site as being within Highways England Zone 3 – A14 Cambridge Northern Bypass, which has no capacity for growth. Annex 2 to the HELAA Report confirms that:

'This assessment was based upon the capacity of junctions, as these are the pinch points on the road network which causes traffic congestion. A catchment area or zone was agreed with Highways England, as shown on the map below. These zones are drawn around each junction on the strategic road network to reflect the catchment area or roads which feed into those junctions.'

The site is located on the very southern edge of Zone 3, and on the border with Zones 1 and 4; Cambridge and the A14 East, both of which have a 'green' RAG score, and capacity for growth. The arbitrary approach taken fails to recognise that sites located within the outer proximities of the Zones may actually relate better in transport terms to the adjacent Zones, which have capacity for growth.

We consider that reassessment of the land east of Ditton Lane, Fen Ditton (Site Reference: 40217) shows that it represents a suitable, available and achievable site for development, and as acknowledged within the HELAA, it benefits from close proximity to a number of key services and facilities, as well as public transport links, owing to its location on the edge of Cambridge. It is also closely located to the land north of Newmarket Road, which alongside new homes will deliver community facilities and a food store, in addition to a number of additional cycleways and footways, which run along the southern boundary of the land east of Ditton Lane, and connect into the existing public right of way through the eastern part of the site.

The land east of Ditton Lane (Site Reference: 40217) falls within Parcel FD7 within the Green Belt Assessment. The majority of the area within which built form is proposed falls within an area assessed to have a 'moderate high' rating for release from the Green Belt, one of only three parcels within Fen Ditton assessed as such, the lowest of the harm ratings within the settlement. The remainder of parcel FD7,

the majority of which is proposed as open space, is assessed as having a 'high' harm rating, although this parcel is combined with a parcel of land to the west of Ditton Lane. We question why the assessment fails to recognise the presence of Ditton Lane, which clearly separates the two areas both physically and visually, owing to the presence of mature trees to both sides of Ditton Lane. Neither parcel is visible from Ditton Lane, therefore there is no relationship between the two areas, which the assessment fails to recognise.

Parcel FD7's contribution to the three Cambridge Green Belt purposes is assessed to be 'moderate', with the impact on the contribution of adjacent Green Belt assessed as being 'minor-moderate' (for the west and southern parts) and 'minor' for the northern part. As such, we question how the assessment could arrive at a conclusion that the overall harm of Green Belt release would be 'high' in the absence of any assessment of harm being greater than moderate. As such, the harm rating should be amended to 'moderate' to reflect the conclusions of the assessment, which would make it the most suitable parcel within Fen Ditton for release from the Green Belt.

Further, we dispute the accuracy of the conclusions that the release of land within only the north-eastern part of this parcel would still result in the removal of the settlement gap between Fen Ditton and Cambridge (Barnwell). Whilst this is true if development of the entirety of this parcel were to occur, development of part of this area would enable the separation to be maintained, which the assessment fails to recognise. The Masterplan Concept Layout accompanying this submission shows how development of the land east of Ditton Lane could be achieved whilst maintaining a sizeable area of openness to the south, therefore resulting in no merging of Fen Ditton and Cambridge (Barnwell).