

RESPONSE TO THE GREATER CAMBRIDGESHIRE SHARED PLANNING 'CALL FOR SITES (MARCH 2025)' CONSULTATION

Site Location:	Land South of Butt Lane, West of the A10, Milton
Site Promoter:	Turnstone Estates Ltd.
JDI no:	40365
Date:	7th March 2025

1. These representations look to update Carter Jonas' previous submission (July 2022) for JDI no. 40365 for the proposed commercial development of 'Land off Butt Lane, Milton'. Those representations were made on behalf of the landowner, the Church of England – Diocese of Ely ('the Landowner'), and concerned a red line site area that is now being enlarged.
2. The Landowner has requested these updated representations are submitted jointly by the Landowner and Turnstone Estates Limited ('the Promoters'), via Carter Jonas LLP as its planning advisor.
3. An update to the July 2022 submission is made on the grounds that *'there are other material changes to the site'*, namely:
 - a. an enlargement of the original site boundary, from 13.80ha to 20.87ha, which now includes the existing Milton Park and Ride site. An updated Site Plan is provided in **Appendix 1**;
 - b. the significant strategic infrastructure interventions that are being considered / progressed, which would dramatically improve sustainable non-motorised and public transport travel opportunities between Waterbeach New Town, the Site, Cambridge and the surrounding villages. These connections are illustrated within a Vision document for the Site ('the Vision'), which is provided within **Appendix 2**. The transport interventions are described later in this response.
 - c. Relevant considerations taken by officers / local members of South Cambridgeshire District Council ('SCDC') in March 2021 concerning planning approval for a detailed planning application (20/04010/FUL) involving the provision of the Cambridgeshire Southern Police Station, on behalf of Cambridgeshire Constabulary. Construction work began in January 2025 and is anticipated to be complete by the end of 2025. The site (3.44ha) for this new police station lies within the Site described in Appendix 1, and has been accounted for in how it might relate to other land uses within the Vision in Appendix 2. Relevant assessment for application 20/04010/FUL, and how it might apply to other areas of the Site and the proposed uses outlined in the Vision, are described later in this response.
 - d. The unmet, identified, industrial and storage needs (of 40,000 – 60,000m²) in and around the city (source: Greater Cambridge Employment and Housing Evidence Update, 2023), further compounded by the displacement of industrial, storage and other similar sui generis uses from existing Cambridge locations (that is expected to increase the total demand to 149,164m²), such as Cowley Road Industrial Estate and Clifton Road Industrial Park, to facilitate the delivery of the (draft) North East Cambridge Area Action Plan ('NEC AAP') and Cambridge Local Plan policy M2 requirements. This is described later in this response.

4. Whilst it is noted that this Call for Sites ('CfS') consultation does not seek to hear opinions on the updated National Planning Policy Framework 2024 ('NPPF'), it is nonetheless relevant to note (for the promotion of the Site) that the NPPF has now introduced a more liberal approach to the consideration of 'inappropriate development' in the Green Belt, including a new definition of 'Grey Belt' land, and that national Planning Practice Guidance has been recently published to guide decision-making and local plan assessment for such sites.
5. For the reasons explained later in this response, it is considered that the Site should be regarded as Grey Belt land and that the proposed development should not be regarded as 'inappropriate development', subject to the satisfaction of there being an unmet need for the proposed uses outlined in the Vision.

TRANSPORT INTERVENTIONS IN THE WATERBEACH TO CAMBRIDGE A10 CORRIDOR

6. **Waterbeach to Cambridge (W2C) guided busway, park and ride, and cycle track:** a decision was taken in February 2025 by the Greater Cambridge Partnership (GCP) to submit an application for a Transport and Works Act Order to the Secretary of State for the Waterbeach to Cambridge (W2C) Transport Scheme. This will include a new high quality guided busway, bus priority improvements, a new Park and Ride / Travel hub, new high-quality cycling and walking facilities making use of the emergency and access track required for the new guided busway. The dedicated guided busway will run for approximately 6.5km between Waterbeach New Town and north Cambridge, via Landbeach and Milton Park and Ride. The travel hub is intended to accommodate up to 1600 vehicles. The proposed route of the W2C proposal is shown in **Appendix 3**.
7. **A10 bridge crossing between Waterbeach and Landbeach:** a planning application was submitted in September 2024 for the construction of a bridge across the A10, together with a shared use route for non-motorised users between Waterbeach barracks and Green End. A proposed plan and elevation for the Mere Way A10 bridge crossing is provided in **Appendix 4**. The delivery of the works will provide the point of connection between the Waterbeach Barracks site and further works to be delivered within the adopted highway by Cambridgeshire County Council in order to create the remaining elements of the Mere Way Cycle Route which will connect the Waterbeach Barracks site to North East Cambridge. It is expected that a pedestrian / cycle route will be established between the bridge and the proposed new station at Waterbeach New Town.
8. **A10 pedestrian and cycleway improvements:** a plan showing the intended pedestrian and cycleway improvements along the A10 (between Waterbeach and Milton) is provide in **Appendix 5**.

GREEN BELT ASSESSMENT OF 20/04010/FUL AND RELEVANCE TO THE SITE

9. The relevant technical reports, consultee responses and committee report ('CR') used in the determination of the new Cambridgeshire Southern Police Station has been reviewed to consider whether conclusions reached in the evaluation process could be applied to the Site and the proposed development outlined in the Vision. The following has been identified as relevant:
 - a. Para. 69 of the CR stated that *'Site B (the site proposed) was recognised as being of relatively low value in green belt terms because of the impact of adjoining uses, notably the raised area of landfill and its associated tree belt, the waste recycling facility and park and ride*. Furthermore, Para. 72 of the CR stated that *'the submitted Green Belt Assessment concludes that the proposed site 'is the least sensitive due to its location next to the landfill site and context provided by the Milton Park & Ride. It's landscape and visual characteristic, and context also play a significant role in lowering the sense of openness one would associate with the open countryside around Cambridge'. Officers agreed with this assessment*.
 - b. Para. 81 of the CR stated that *'as the site is located within the countryside and the Green Belt, the visual impact of the proposal on the surrounding landscape is a key material consideration. A*

Landscape and Visual Impact Assessment (LVIA) has been undertaken and submitted with the application. This has been assessed by the Landscape Officer. The site is located directly to the south of the Park and Ride, with the proposed building being sited close to the boundary. The building would be seen in the context of the landfill and the Park and Ride when viewed from the A10

- c. *The Landscape Officer agrees with the applicant that following appropriate landscape mitigation works the site is capable of accommodating a development without resulting in material harm to the surrounding countryside's landscape character and views from the wider and local area. The scheme proposes to retain the majority of the boundary vegetation, other than access requirements and also seeks to provide new boundary tree and hedge planting to integrate the development into the landscape. This additional planting will help ensure that views would be controlled and screened, and to help further reduce limited landscape character and visual effects particularly from the A10.*
 - d. *Para 84 of the CR stated that 'the Landscape officer confirms that if the landscape principles outlined in sections 7 & 8 of LVIA are secured, then the development would have a limited effect upon the rural character and openness of the Green Belt in compliance with policy NH/8. Conditions regarding further landscape detail and management are recommended in line with the Landscape Officer's request'.*
 - e. *Para 91 of the CR stated that 'the proposed building would be of a two storey scale with an attached single storey custody suite. When viewed from across the approach road and from the A10, the building would maintain a low and articulated profile. The visual impact would be lessened when viewed from the North and East because of the elevated landfill site adjacent. The scale of the building would be further mitigated by existing and proposed planting which would soften and limit views'*
10. It is considered that similar conclusions would be drawn on Green Belt harm and Landscape / Visual Impact for the Site and the proposed development outlined in the Vision. As illustrated in **Appendix 6** the Site lies adjacent to a landfill site and waste recycling centre that are both characterised by raised land levels, thereby helping to contain the Site from views from the south and west. All of the modelled views for the accompanying LVIA for 20/04010/FUL were from the east along the A10 and short/medium distance views from the north.
11. The presence of the new police station buildings and car park would effectively create an open, undeveloped parcel of land between itself and the raised landfill site that would significantly reduce any potential landscape and visual impact.

GREATER CAMBRIDGE GREEN BELT ASSESSMENT 2021 AND RELEVANCE TO THE SITE

12. It is relevant to note that the Greater Cambridge Green Belt Assessment, jointly commissioned by Cambridge City Council and South Cambridgeshire District Council, considered the Site as part of a much larger **102.44ha** 'assessment parcel' that extended from the northern edge of the landfill site, extending along the A10 beyond the northern edge of Milton, up to the Mwanaka fresh farm foods shop site. Whilst it's overall assessment of potential Green Belt harm was scored 'Very High', we consider that a more granular assessment of the individual parcel of the Site would conclude it would be significantly less harmful, as reflected in the assessment of 20/04010/FUL.
13. As outlined later in the 'Grey Belt' section, we have only considered references to Purposes on preventing unrestricted sprawl, coalescence of towns, and the setting/special character of historic towns, below.
14. The individual parcel assessment MI1 noted that:
- a. *'the A10 transport corridor and thick tree line is a strong boundary feature creating separation between the parcel and Milton to the east'.*
 - b. *'land containing Milton Park and Ride increases urbanising visual influence of land within the parcel to the south'.*

- c. *'only a small area to the south contains development (Milton Park and Ride) that weakens rural character. Land contributes to the rural landscape setting experienced when approaching the wider city along the A10 from the north. Overall, the parcel makes a moderate contribution to Cambridge Purpose 2'.* Given that the majority part of the parcel (excluding the Site) was assessed as having a strong rural character, and that the Site weakens this rural character, we would expect an individual assessment of the Site would conclude it offers a 'Limited' contribution to this purpose.
15. It is considered that the Site does not strongly contribute to these purposes given the existing and consented development located within it (i.e. park and ride and police station), strong physical features that would contain development (i.e. Butt lane, A10, Thirteenth Public Drain and tree belts associated with Milton landfill) and other attributes, which will be subject to a full site-based Green Belt Assessment. This will also demonstrate that development within the Site would not fundamentally undermine all purposes of the remaining wider Green Belt land.

FUTURE PARK AND RIDE PROVISION

16. The Vision considers the potential redevelopment of the existing Milton Park and Ride (P&R) site for additional commercial uses, together with ancillary retail (shop /café) and leisure (hotel) uses that cater for employees and visitors on the park.
17. Whilst there are no current plans to close the Milton P&R site, it is considered to be a realistic possibility in the future given the likely creation of a new P&R site (1,600 spaces) at Landbeach/Waterbeach 2.5 miles, and another P&R site at Scotland Farm, Dry Drayton (2,000 spaces). The Milton P&R site has capacity for 800 spaces and there is anecdotal evidence to suggest that this site is currently under-utilised, which is only likely to worsen with a new P&R facility along the A10.
18. The site would constitute previously-developed land (brownfield) and would represent a good opportunity for redevelopment as part of a comprehensive scheme that incorporates the new police station and land between this and the landfill site.

INDUSTRIAL / STORAGE DEMAND AND ACCOMMODATION FOR DISPLACED INDUSTRIAL USES IN CAMBRIDGE

19. The Greater Cambridge Employment and Housing Evidence Update ('GCEHEU') was produced by Iceni in Jan 2023 to support the emerging Greater Cambridge Local Plan. This explains that industrial demand has risen considerably in recent years, but supply has failed to keep pace. The document cites a Bidwells report from 2022 which states that the 'notable lack of available space is posing a significant challenge for occupiers in Cambridgeshire.
20. Para 2.87 states that 'vacancy is well below acceptable levels' and suggests that there is only 10,000sqm of existing industrial supply most of which is poor quality. Demand is reported to be high, with 'additional demand from those being displaced from the City due to a combination of being squeezed out by rising rents and competition for units as well as a reduction in space due to losses to other uses'.
21. There are several sites within the Cambridge which currently provide key industrial floorspace but are earmarked for comprehensive redevelopment:
- a. **Clifton Road Area** (Policy M2) comprising a 4-hectare site of 52 unit trade counter units in addition to a Royal Mail sorting office on c. 1.5 hectares.
 - b. **NEC AAP**: Closer to Milton is North-East Cambridge (Policy S/ NEC, draft NEC AAP) which seeks create a new city district. Cowley Road Industrial Estate ('CRIE') and Nuffield Road Industrial Estate

(‘NRIE’) both form part of the NEC AAP that is primarily concerned with the creation of a residential-led mixed use new district for this part of Cambridge, placing 8,350 new homes and new retail, leisure, education, commercial, civic and community uses on the waste water treatment works, industrial estates, council depot and golf driving range, and increasing office and research & development floorspace on the surrounding various science, business and research parks. Whilst the intention of the NEC AAP is to try and retain as many of the existing industrial occupiers of the CRIE and NRIE, the likelihood is that there will be some/many that are non-conforming to the neighbouring uses and are then subsequently required to relocate. There will be some/many with a particular need to be within or close to Cambridge.

- c. A Commercial Advice and Relocation Strategy (2021) was commissioned jointly by Cambridge City Council and South Cambridgeshire District Council. Given the age of this evidence base, many of the figures have since been superseded by the GCEHEU, but some of its conclusions are provided below:
 - i. ***‘it is also probable that some businesses will be unable to adapt and eventually be displaced elsewhere*** [our emphasis]. *This is likely to particularly impact those who require significant yard space to operate and are unable to adapt to a more intensified layout’.*
 - ii. *‘the impact of housing demand on land value and rental prices in Cambridge leading to the movement of industrial uses out of the city. However, it goes on to point out that at a certain point this becomes inefficient with customers and employees having to travel too far (or not travelling at all) to businesses outside of the city. As a result, it states, some industrial locations should be protected in the city to support the economic needs and diversity of employment opportunities. Release of these sites, it states, should be assessed on a site-by-site basis however **in reality there are a limited number of industrial areas remaining. It is equally important that new units are available in South Cambridgeshire and where these have been brought forward in accessible locations, they have proven popular*** [our emphasis]. *The growth in e-commerce will further increase the need for smaller scale warehousing opportunities (final mile centres)’.*
 - iii. *‘shortfalls of industrial and storage and distribution space for Greater Cambridge’.*
 - iv. *“The intensification of floorspace in the new industrial area may also lead to a small number of additional units becoming available. **However, the Councils are not looking to North East Cambridge as a suitable location to increase supply, rather the emerging Greater Cambridge Local Plan will look to meet the shortfall*** [our emphasis]. *This should include allocations that support general industrial floorspace in order to facilitate traditional industries as well as supporting advanced industries that require operational activities not suited to residential areas’.*
- d. Furthermore, with significant densification happening in the NEC AAP boundary for life science accommodation, there will be a reduction in floorspace suitable for mid-tech occupiers at affordable rents.

GREY BELT

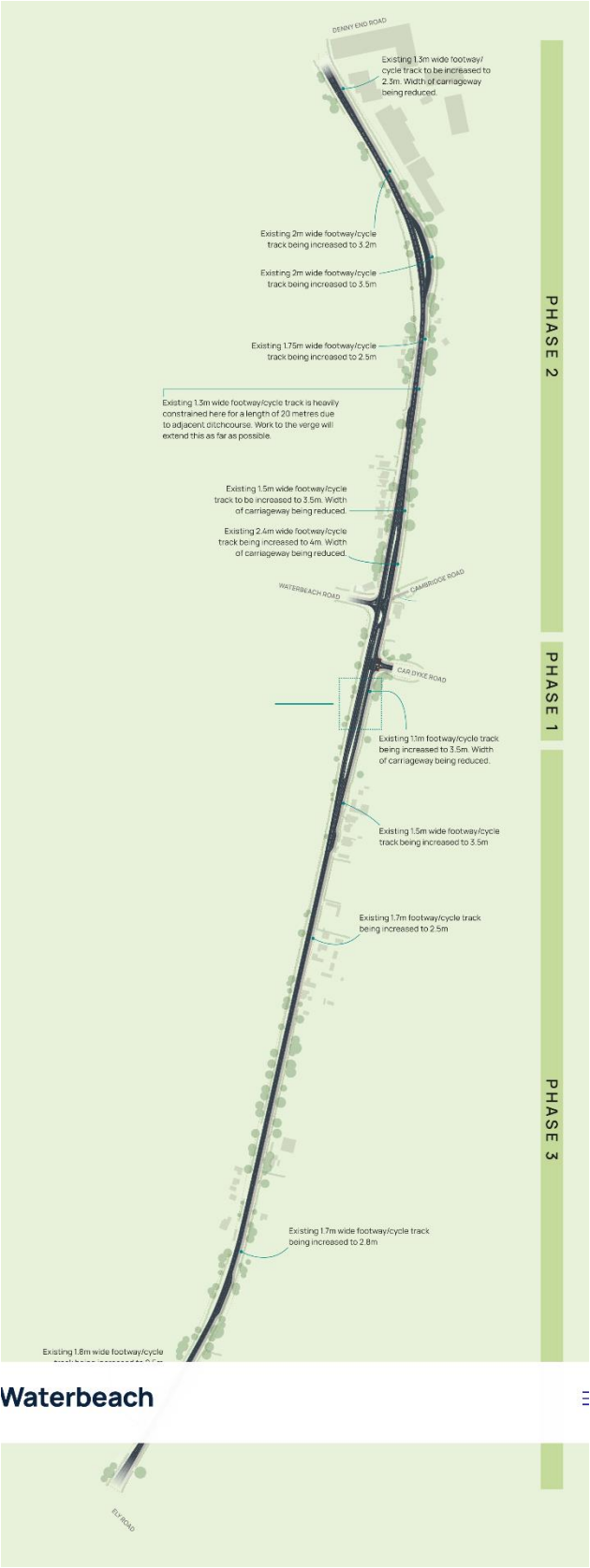
22. It is considered that the NPPF (December 2024) definition of Grey Belt (together with the 27 February 2025 update on Planning Practice Guidance (*assessing Grey Belt*), should now be applied to the Site, on the basis that it is ‘other land that does not strongly contribute to’ (1) preventing unrestricted sprawl of large built-up areas; (2) prevent neighbouring town coalescence; (3) preserving the setting and special character of historic towns):

- a. **Unrestricted sprawl:** paragraph: 005 Reference ID: 64-005-20250225 of the Green Belt PPG states that '*villages should not be considered large built-up areas*'. Accordingly, the village of Milton would not be applicable to the consideration of unrestricted sprawl.
 - b. **Coalescence:** paragraph: 005 Reference ID: 64-005-20250225 of the Green Belt PPG states that this '*relates to the merging of towns, not villages.*'. Accordingly, the village of Milton would not be applicable to the consideration of coalescence.
 - c. **Setting/special character of historic towns:** paragraph: 005 Reference ID: 64-005-20250225 of the Green Belt PPG states that this purpose only applies to historic towns, not villages. The only historic town in the Plan area (GCLP) is Cambridge. It is worth noting that the Green Belt Assessment that accompanied 20/04010/FUL, concluded that '*according to the LDA Design Study (2015), Parcel B does not fall within the area from where views of Cambridge may be gained. The site visit confirmed that there is no inter-visibility with any of the landmarks or features that would indicate the presence or location of Cambridge historic core. The elevated profile of the landfill site and the associated belt of trees prevents from gaining any views towards Impington. When Parcel B is visible it is seen in isolation and without any landscape or heritage context, one would recognise as forming part of the setting to Cambridge. The relative contribution of Parcel B to this purpose of the Green Belt policy is low (1)*'. It would also be noted that the effect of NEC AAP proposals will further reduce any potential effects of development on the Site with the setting/special character of Cambridge.
23. Furthermore, in terms of footnote 7 of the NPPF, the Site is not a defined habitat site, SSSI, Local Green Space, National Landscape, National Park, Heritage Coast, irreplaceable habitat, designated heritage asset, or an area at risk of flooding or coastal change.
24. The Site should therefore be regarded as Grey Belt.
25. Development of the Site (17.53ha i.e. 20.87ha minus 3.34ha for police station site; of which a large proportion would be for landscaping, public open space, BNG, drainage attenuation) would not undermine the purposes of the remaining Green Belt across the plan area.
26. The Site is in a sustainable location:
- a. lying within 500m of the NEC AAP boundary, which will accommodate a new residential-led mixed use district of 8,350 new homes, new schools, retail and leisure, civic and community uses, Cambridge Science Park, St John's Innovation Park, Cambridge Business Park, CB4 commercial, Cambridge North station and Cambridge Busway
 - b. lying adjacent to the new W2C busway and cycleway
 - c. with access to Milton High Street (<700m) via the pedestrian bridge over the A10
 - d. with access (500m) to the enhanced Mere Way pedestrian and cycle route
27. As a non-residential use, the proposed development on the Site would not need to satisfy the 'Golden Rules' for Green Belt development.
28. In summary, it is considered that the Site should be categorised as Grey Belt and would not constitute Inappropriate Development in the Green Belt.
29. It is therefore advocated that the Site would be appropriate for allocation in the Greater Cambridge Local Plan for the commercial-led development (B2, B8, E(g)(ii, iii) uses other similar sui generis uses, and supporting ancillary uses).

APPENDIX 1 – THE SITE (RED LINED BOUNDARY)

APPENDIX 2 – THE VISION DOCUMENT FOR THE SITE

APPENDIX 5 – A10 CYCLE AND PEDESTRIAN IMPROVEMENT WORKS



APPENDIX 6 – TOPOGRAPHICAL PLAN FROM 20/04010/FUL APPLICATION

