

29th January 2026

South Cambridgeshire District Council
Planning Policy Team
South Cambridgeshire Hall
Cambourne Business Park
Cambridge
CB23 6EA

By email: localplan@greatercambridgeplanning.org

Dear Sirs

Greater Cambridge Local Plan for consultation (December 2025 – January 2026) – Regulation 18 Consultation

Land off Royston Road, Melbourn

1. On behalf of the landowners, this submission is made by SF Planning Ltd in response to the Draft Greater Cambridge Local Plan for consultation (Regulation 18), in relation to land off Royston Road, Melbourn.
2. The Site was previously promoted through the Greater Cambridge Call for Sites (May 2024). This submission is included at Annex A. This representation provides;
 - i) an updated position now that the draft Local Plan consultation has gone live;
 - ii) comments on the Council's HELAA assessment of the Site; and
 - iii) comparison with the sites in Melbourn proposed for allocation.

3. Updates to the proposals

- 3.1 Our client has now sought pre-application advice (ref – 25/50309/PRELV3) on a proposed scheme for up to 100 dwellings.
- 3.2 A number of comments arose from this, from both the Highway Authority and the shared planning service.

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- 3.3 In light of the pre-application advice comments, and the HELAA results (discussed further below) the scheme has been reconsidered, and a concept plan has been produced to accompany this submission (included in Appendix B).
- 3.4 The key aspects of the proposed scheme (as amended) are as follows:
- 100 dwellings at a net density of 30 dwellings per hectare
 - A direct link to the fully funded and part implemented Melbourn Greenway¹ sustainable travel improvement scheme, which passes just to the north of the site, plus connections to existing public rights of way
 - Development only in the part of the site best related to the settlement and which is well screened by trees (to be enhanced), (NB – the 2025 HELAA assessed the whole of the Client’s land holding, rather than just the parcel highlighted in red in figure 2)
 - Access will be enhanced with pedestrian and cycle connectivity and overlooking/surveillance over the street for improved safety
 - Anticipated two parking spaces per property, with 1 for each flat (this level of detail is not included on the concept plan)
 - a looser and lower-density style at the edges, with a clearer hierarchy and more gaps particularly along the western edge (again this level of detail is not shown on concept plan)
 - a green and blue infrastructure corridor running through the site.



Figure 1 – concept plan (full plan also included with this submission Annex D)

¹ <https://www.greatercambridge.org.uk/sustainable-transport-programme/active-travel-projects/greater-cambridge-greenways/melbourn-greenway>

- 3.5 It is important to note that the site is almost completely enclosed by mature planting meaning very limited visual impacts. Additional planting has been introduced on the western edge to contain the development and prevent encroachment into the more 'open' western part of the land ownership as can be seen on the concept plan.
- 3.6 It is considered that all of the above are achievable at the site in accordance with an appropriately drafted allocation policy, should the site be taken forward (see further below).
- 3.7 We continue to be of the view that the development would represent logical growth consistent with the pattern of development.
- 3.8 The site remains available and it is considered that housing development is achievable within the next 5 years.

4. Comments on the HELAA assessment

- 4.1 We welcome the conclusion in the 2025 HELAA that; *"Development of the site has some potential policy constraints, but these could be overcome through the planning application process."*
- 4.2 However, the assessment identifies a number of constraints, most notably in relation to landscape and heritage. A key purpose of this representation is to ensure the site is accurately assessed as it is intended to come forward, in line with the latest concept plan.
- 4.3 Notably, the Council had assessed as part of the 2025 HELAA the full extent of the site, as the full extent was put forward initially to the call for sites. The submission suggested that both the easternmost parcel and the full extent of the site should be assessed. It is unclear from the HELAA whether the easternmost parcel has been taken separately as well as the full site.
- 4.4 Our client is looking to develop only the easternmost parcel, as shown in orange on the aerial view at figure 2 below. It can be seen that this is well related to existing built form, with development on two sides and the Royston Road / Melbourn Greenway to the north and is surrounded by trees on three sides. Heritage assets are outside the proposed boundary.

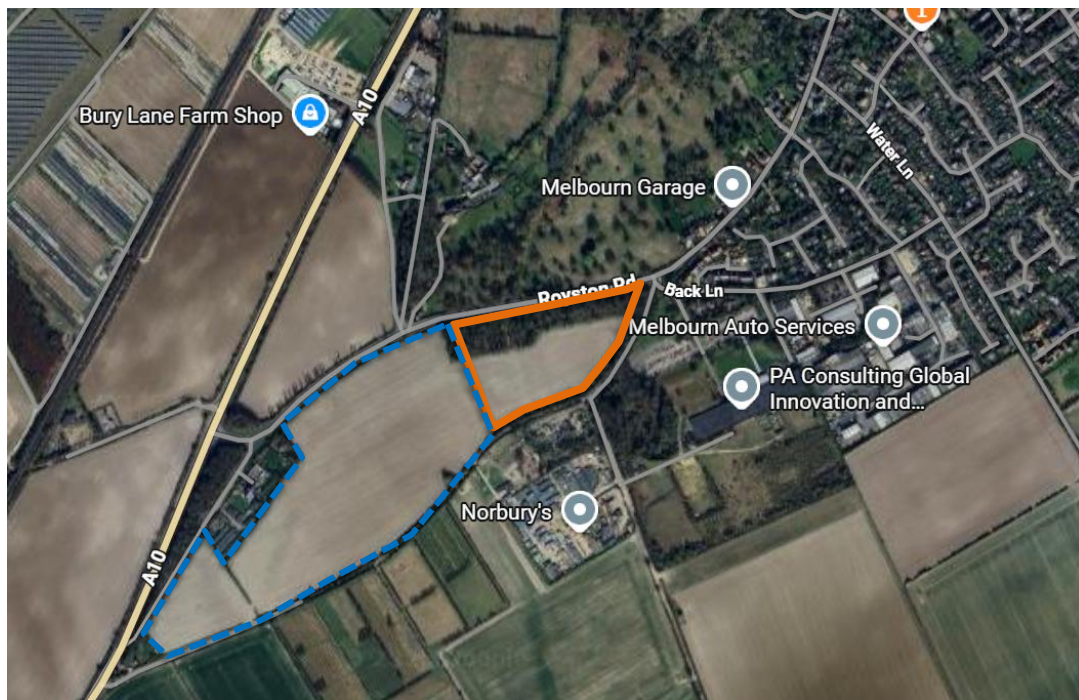


Figure 2 – google earth view showing the proposed development site edged orange and land within our client’s ownership approximately edged blue

4.5 This google streetview image at figure 3 below shows the edge of the tree line (which would form the western boundary of the site). It can be seen that the site then becomes very open to the west. Our client is not proposing to develop the ‘open’ portion. As such it is considered that landscape impact has been overstated. We ask that the Council assess the eastern portion as shown above.

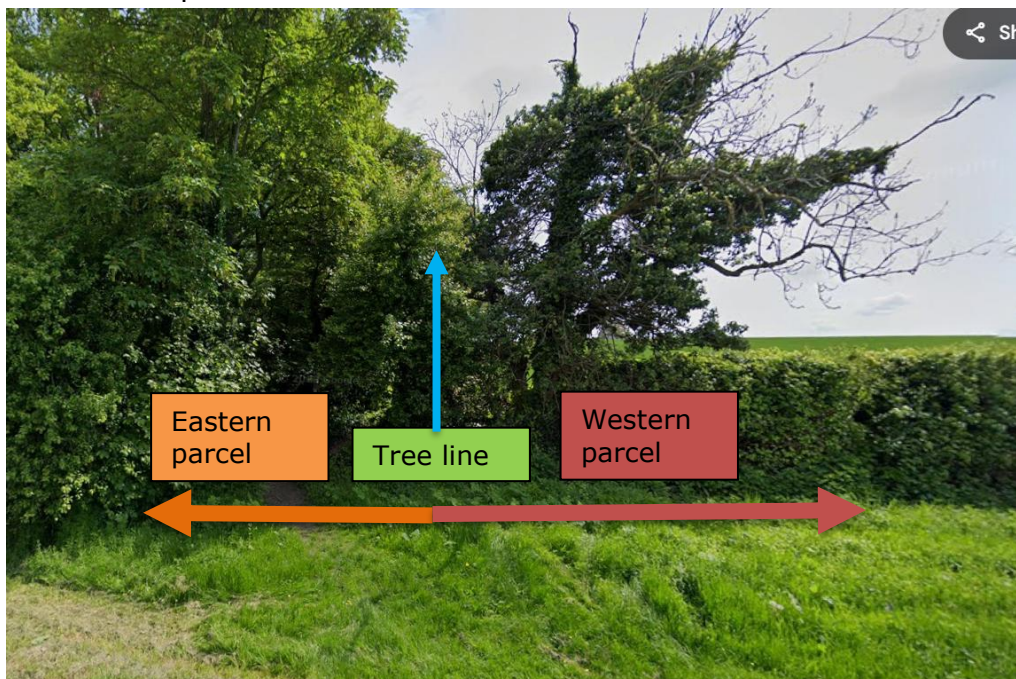


Figure 3 - Google streetview from Royston road showing the edge of the tree line and the more open western part of the land ownership not proposed for development.

4.6 It can be seen from both the images above that the site itself is almost completely enclosed by surrounding landscaping and there would be very

limited visual impacts especially with the inclusion of planting along the western edge as shown on the concept plan at figure 1 above. These impacts would mainly be from the public right of way along the western edge which we understand to be relatively infrequently used at present. Further planting as shown on the concept plan can mitigate this.

- 4.7 In relation to encroachment, as can be seen from the google earth image at figure 2, the site is not isolated or on its own outside the existing settlement, given the surrounding development. Once again with the development of just the eastern parcel of land and the emerging Melbourn Greenway route, it is considered that the proposals would be well related to existing built form. Accordingly, we believe these impacts have also been overstated within the HELAA results.
- 4.8 We welcome the conclusion that the impact on a designated site could be reasonably mitigated or compensated. Also, we welcome and agree with the conclusion that; *"Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated. The site is wholly outside an open space designation"*.
- 4.9 In terms of heritage impacts, the HELAA states; *"There are two scheduled monuments within the site. Development could negatively impact the setting of these heritage assets but could be mitigated through generous buffers, layout, design and landscaping."*
- 4.10 Given the conclusion about mitigation, it is considered that it would be more appropriate to give the site an Amber rating. In addition, the eastern portion of the site does not coincide with the scheduled monuments which are in the western part of the site. This should also reduce the impact rating to Amber, acknowledging that the scheme would need to take account of the setting of the scheduled monuments.

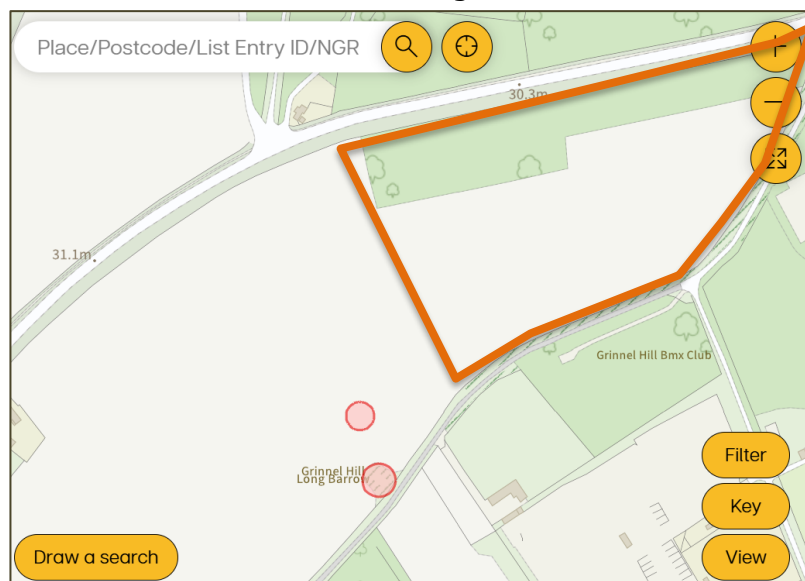


Figure 4 - Extract from historic England map with the scheduled monuments shown in red and approximate site boundary in orange

4.11 We disagree with the accessibility rating in the HELAA results (*"Inadequate accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services"*). The Government connectivity tool shows that the site is comparable to much of the surrounding area in the western part of Melbourn (see figure 5 below).

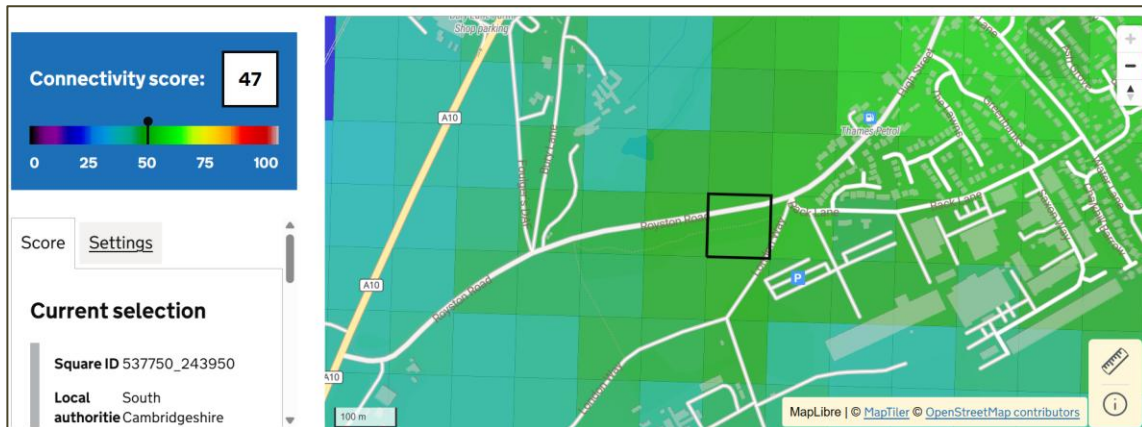


Figure 5 - Extract from connectivity tool showing the Royston road site score

4.12 The plan below shows that a number of services and facilities are accessible within walking distance of the site. Employment opportunities are very close to the site, to the west of the town centre. In addition, the train station at Meldreth is 1 mile away and will be linked to the site via the new greenway and connecting routes, as can be seen at figure 6 and Annex B. According to plans published in 2024, the Meldreth connection will run north along Station Road, crossing the A10 before reaching the station. Detailed greenway route plans from 2024 are included with this submission at Annex B.

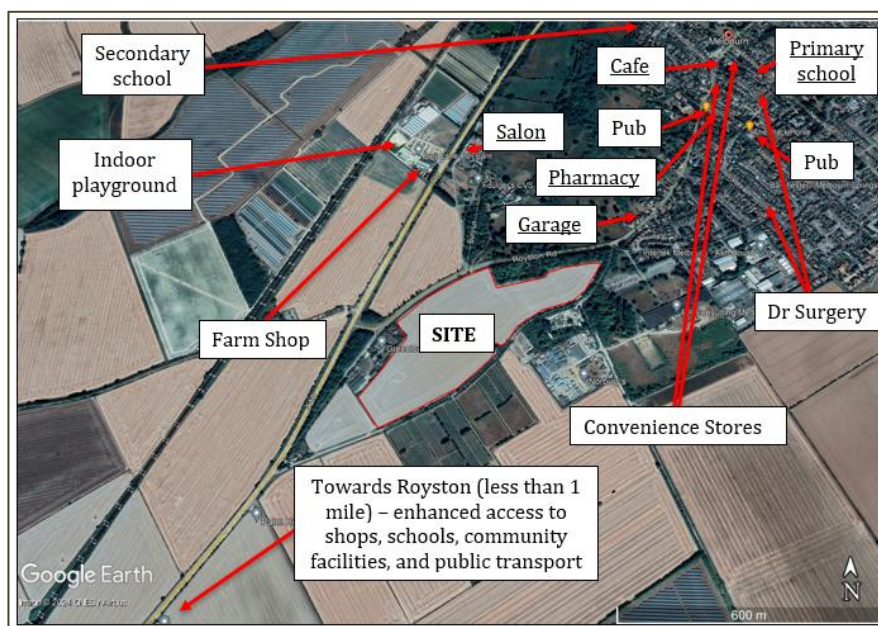


Figure 6 - Aerial image showing shops and services within maximum 1km of the site

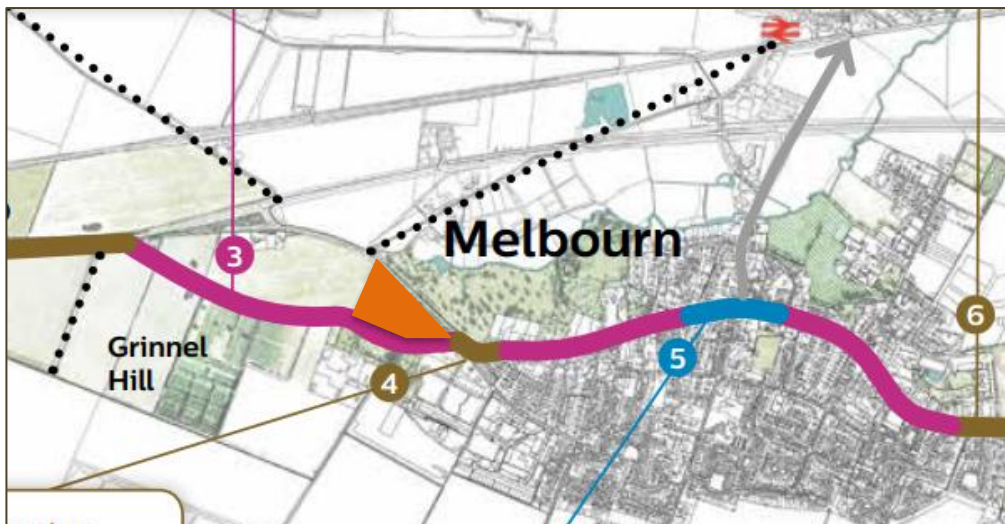


Figure 7 – extract from early greenway scheme consultation plan (pink route now amended) connections to Meldreth station in grey and existing public right of way shown with black dotted line running from the site. Site shown approximately in orange

- 4.13 One comment from officers was that; “A significant level of infrastructure will be required outside the site boundary to encourage more sustainable transport links. It is unclear whether these sustainable transport links can be achieved within the local available constraints”. The pre-application advice from the County Council confirmed that the greenway project is proceeding and therefore should be factored into the HELAA assessment for the site. The advice from the highway team is included at Annex C.
- 4.14 Accordingly, we consider that the HELAA should rate the site green for accessibility in line with ratings for similar sites (see below).
- 4.15 In terms of transport and highways, we agree that any potential impact on roads could reasonably be mitigated and that work would need to be done to reduce vehicle impact and encourage active travel. The proposals already incorporate active travel elements including potential upgrades to public rights of way. We also agree that detailed design can mitigate impacts in terms of noise, light pollution and air quality. It has been acknowledged the site does not lie within an Air Quality Management Area (AQMA). The HELAA also confirms that any potential contamination can be mitigated.
- 4.16 The table below shows the Council’s initial HELAA results next to our proposed amended RAG ratings in light of the information supplied with this representation. From this it can be seen that the site can be considered much more favourably than in the original assessment with all issues being either Amber or Green and all issues being capable of being addressed via a suitably designed and landscaped scheme accompanied by the appropriate technical reports.

Technical/Planning matter	Council HELAA RAG result	Proposed RAG result	Comment
Adopted policies			Development of the site has some potential policy constraints, but these could be overcome through the planning application process.
Flood risk			In flood zone 1
Landscape			More than very minor impact very unlikely given the revised site boundary. Any impacts can be mitigated
Biodiversity and geodiversity			Any impacts can be mitigated
Protected open space			The site is not covered by any protected open space designations
Historic environment and Archaeology			The scheduled monuments do not fall within the amended site boundary. Any impacts can be mitigated.
Accessibility			The site is within 15 minutes' walk of a wide range of services and facilities and 1 mile from the train station via a new active travel link which we understand is likely to be delivered before any development at the site is completed. The only way this could be more accessible is if it were even closer to all these facilities. However, 15 minutes' walk is generally considered reasonable.
Transport and Highways			Any impacts can be mitigated
Noise, Light pollution and Odour			Any impacts can be mitigated
Air Quality			Not within an AQMA
Contamination			As no studies have been carried out, we cannot assume the site will be 'green' however it is unlikely that there is severe historic contamination and believe it would be possible to remediate any issues

- 4.17 The concept plan demonstrates how development can be directed to appropriate areas, provide a landscape buffer (enhancing existing screening) and minimise impact on heritage assets.
- 4.18 In addition to the above in relation to suitability, we are confused as to why the site has been rated 'Amber' for availability when the landowner has indicated that it is available and there are no known legal concerns. No justification is included in the HELAA. This rating should therefore be changed to green. We agree that achievability should be green rated.
- 4.19 Overall, it is considered that the allocation of the Site provides a clear opportunity to deliver a well-planned and connected development which minimises landscape impacts and strengthens active travel accessibility in accordance with Local Plan objectives.

5. Comparison with other Melbourn sites

- 5.1 Two sites have been proposed for allocation in the draft plan. This section considers the merits of those sites against our client's land. Our conclusion is that the allocation of our client's land represents a suitable and sustainable alternative to those proposed for allocation and ask that the Council has further regard to its allocation in order to ensure the soundness and effectiveness of the plan.
- 5.2 One key point to draw out which is not easily captured via the HELAA process is the fact that our client's land represents an excellent opportunity to create a defined settlement edge. It also has material advantages in terms of delivering and enhancing connectivity in this part of Melbourn; being vision led as advocated in the NPPF.
- 5.3 The table below shows the RAG ratings for the two sites which have been proposed for allocation in Melbourn, as well as the proposed amended RAG ratings for our client's land discussed at section 4 above. To aid comparison, red is attributed a score of 1, amber a score of 2 and green a score of 3.

Topic	Land to the west of Cambridge Road (S/RRA/CR)	Client's site – Land off Royston Road	The Moor (S/RRA/ML)
Adopted policies	(2)	(2)	(2)
Flood risk	(2)	(3)	(2)
Landscape	(2)	(2)	(3)
Biodiversity and geodiversity	(2)	(2)	(2)

Protected open space	(3)*	(3)	(3)*
Historic environment and Archaeology	(3)	(2)	(3)
Accessibility	(3)	(3)	(2)
Transport and Highways	(2)	(2)	(3)
Noise, Light pollution and Odour	(2)	(2)	(2)
Air Quality	(2)	(3)	(3)
Contamination	(2)	(2)	(2)
Availability	(3)	(3)	(3)
Achievability	(3)	(3)	(3)
TOTAL SCORE	31	32	33

*Assumed as no rating is given, however the site is not known to be protected.

Land to the west of Cambridge Road

- 5.4 Land to the west of Cambridge Road scores lower than our client's site (when RAG ratings are amended as recommended at section 4 – the score would be 28 if the Council's original ratings were retained, a difference of only 3). Importantly the site scores more poorly in terms of both flood risk and air quality which would be the case even if the Council's original ratings were retained for our client's site.
- 5.5 The site performs very similarly in terms of accessibility and connectivity. We are unsure why our client's site was rated amber originally and this site has been rated green when it is further from the train station and is not on the greenway route. It is only a couple of minutes closer to most shops and services, but it is arguably not significant enough to have an impact on travel choice for residents. It is well related to employment land.
- 5.6 The Government connectivity tool gives the site a maximum score of 48 with most areas of the site scoring 44-46 and having a range of 30-48 as can be seen below at figure 8. This is comparable and arguably slightly less desirable than the land at Royston Road which scored 47 with a range between 45 and 47 (see above).



Figure 8 extract showing connectivity tool score for Cambridge Road site

- 5.7 Comparing the eastern part of our client’s site which is now being proposed for allocation (not including the western part), the land west of Cambridge Road is far more open and would be subject to greater landscape impacts if it were to host development.
- 5.8 Accordingly, there is limited justification for allocating this site in place of our client’s site and a case could be made for our client’s land being preferable in terms of landscape, air quality, flood risk and connectivity.

The Moor, Moor Lane

- 5.9 With the proposed amended RAG ratings for our client’s site, the Moor scores 1 point more. It is worth noting that it is more at risk of flooding than our client’s site.
- 5.10 In terms of accessibility, the site has been rated amber. It is not on the greenway route with easy access to the train station unlike our client’s site so in this sense it is less accessible. It is only a couple of minutes closer to town centre services and facilities, but it is arguably not significant enough to have an impact on travel choice for residents. The road to the site is not particularly wide and significant investment would need to be made to improve access to the site.
- 5.11 The Government connectivity tool gives the site a maximum score of 49 as can be seen at figure 9 below. Accessibility across the site ranges fairly widely between 40 and 49. This is comparable with the land at Royston Road which scored 47, with a range between 45 and 47 (see above).

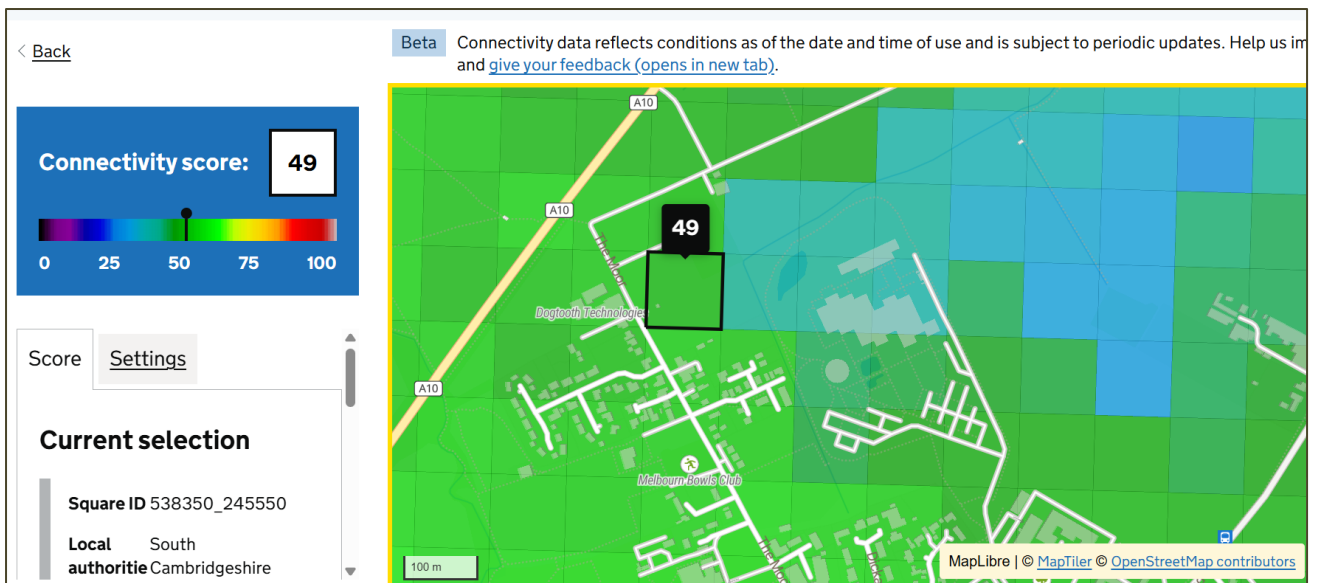


Figure 9 connectivity tool score for the Moor site

5.12 In terms of landscape impact, the Council has noted the strength of the green infrastructure earning the site a green rating. There is a significant amount of screening particularly along the northern edge. However, the screening looks far less significant than our client's land and would need to be reinforced.

Conclusion on site comparison

5.13 Land at the Moor has some shortcomings but it would appear that with suitable investment in access and attention to landscaping, there is a prospect of a sustainable functional small scale residential development. It would appear that the land to the west of Cambridge Road would be ideal for an employment allocation and our client's site should be allocated to provide dwellings in place of locating them at the Cambridge Road site. In our view, due to the active travel connections, flood risk and air quality concerns at land west of Cambridge Road, our client's site is more appropriate for residential development. Accordingly, all three sites should be allocated: Cambridge Road for employment, and the Moor and land at Royston Road for residential development.

6. Summary and conclusion

6.1 The information included with the representation shows that the site is suitable, available and achievable and should therefore be taken forward for allocation.

6.2 The site compares favourably against alternatives and is arguably preferable in terms of landscape, air quality and flood risk, as well as connectivity to planned active travel infrastructure.

6.3 Please contact me should you find it helpful to discuss the information

included in this submission.

Yours faithfully

Liz Shield **MRTPI**
SF Planning Ltd.

Annex A – Call for sites submission
Annex B – Melbourn Greenway route
Annex C – Highways Pre-app Response
Annex D – Concept Plan