

GREATER CAMBRIDGE LOCAL PLAN (GCLP) – FIRST PROPOSALS

REGULATION 18: PREFERRED OPTIONS

REPRESENTATIONS: Mr K.B. Tebbit Ltd

These representations are made on behalf of Mr K.B. Tebbit Ltd and relate to the promotion of HELAA sites Ref: 40383 – Land north east of Hurdleditch Road, Orwell and Ref: 40378 – Land to the south west of Hurdleditch Road, Orwell.

1. Our client is promoting two parcels of land for residential development at Orwell, South Cambridgeshire. The sites were both previously promoted through the March 2019 and February 2020 consultation stages associated with the preparation of the GCLP. The two sites are referenced in the HELAA as follows: Land to the north east of Hurdleditch Road, Orwell (Ref: 40383) and Land to the south west of Hurdleditch Road, Orwell (Ref: 40378).
2. Our client welcomes the publication of the HELAA review which appraises the development potential of the site. However, our client has noted a number of specific technical flaws in the published appraisals which should be remedied as the GCLP preparation continues.
3. As set out in our previous representations masterplanning and technical work has been prepared to support the promotion of both sites for residential development. This work very much remains valid and robust. At this time, we are now also able to provide further technical evidence to support the promotion of the Site 40383. Please find attached to these representations the following documents:
 - a. Transport – Technical Note (Cannon Consulting Engineers)
 - b. Flood Risk Assessment (Cannon Consulting Engineers)
 - c. Preliminary Ecological Assessment (James Blake Associates)
4. In light of our review of the HELAA appraisal and our client’s site specific technical work we attach as a separate sheet a schedule of the HELAA inaccuracies and recommended amendments.

Land to the northeast of Hurdleditch Road, Orwell (Ref: 40383)

Site Assessment		New RAG Rating
Flood Risk	<p>A Flood Risk Assessment supports these representations which confirms residential development can come forward at the site without giving rise to a significant or unmanageable flood risk (on or off site).</p> <p>New homes will not need to be located in the flood zones associated with adjacent brook.</p>	
Landscape & Townscape	The HELAA states that the development of the site would essentially see development in the countryside which is disconnected from the village and any other development.	

	<p>This statement is incorrect as the site is adjacent to and connects into the new development completed by Croudace Homes, to the south. The site would be connected to the village and the local highway network. Furthermore, land to the west of the site has been transferred to the Parish Council and will be the site of a new village Recreation Ground.</p> <p>The successful appeal at Land at Hurdleditch Road, Orwell, Cambridgeshire SG8 5QG (APP/W0530/W/16/3157596) confirmed that the landscape impact of developing the same parcel of land was 'only modest'. The Inspector also recognised that this modest impact could also be addressed through new planting along site boundaries.</p> <p>It is contended that given the new development in the area and the potential new recreation ground, to the west, development of the site would have a limited impact that could be satisfactorily mitigated.</p>	
<p>Biodiversity and Geodiversity</p>	<p>A Preliminary Ecological Appraisal supports these representations and confirms that subject, to incorporating mitigation measures (secured by planning condition) the site can come forward for development with minimal impact on local ecology. The Appraisal also concludes that the ecological value of the site could increase through the implementation of a sensitive landscaping scheme as part of the proposals.</p> <p>Any impact on designated sites such as Orwell Clunch Pit SSSI can be successfully mitigated through making financial contributions (secured by S106). Indeed this was confirmed via the above reference appeal process.</p>	
<p>Accessibility to Services and Facilities</p>	<p>It is unreasonable to discount any development at the site due to inadequate accessibility to key local services, transport and employment services. Orwell is a designated Group Village in recognition of its size and established service provision.</p> <p>As set out in our representations on the Settlement Hierarchy it is clear Orwell possesses a range of shops and services which can be reached via sustainable modes of transport. The</p>	

	<p>village is served by a direct bus link to Cambridge and is located in close proximity to railway stations and park & ride connections which provide links to major centres. Orwell is an established sustainable settlement capable of accommodating proportionate levels of new housing growth to assist in preparation of a balanced and varied housing supply which in turn will support the economic growth of Greater Cambridge.</p> <p>The land immediately to the south of this site was granted planning permission for 49 dwellings in 2017. In the appeal decision the Inspector outlined the village service provision (which remains largely the same today) and concluded that the village possessed a reasonable level of facilities which provide residents with the opportunity for some day to day needs to be met without needing to travel by car.</p> <p>Group Villages such as Orwell need proportionate and sustainable levels of housing growth to safeguard the vitality of existing services. It is also noted that Site 40378 has been assigned an amber rating on this criteria.</p>	
Site Access	<p>The HELAA assessment concludes that the site is acceptable from an access perspective, but then proceeds to assign an amber RAG rating. This looks like an error.</p> <p>Supporting these representations is a Transport Note which includes an Access Drawing which demonstrates that a robust and technically compliant access can be delivered.</p>	
Transport and Roads	<p>The HELAA assessment assigns the site an amber rating for impact on roads. The delivery of 5-10 new dwellings will not have a negligible impact on traffic flows in the local area. The submitted Transport Note explains that any development would be acceptable from an impact perspective.</p>	
Noise, Vibration, Odour and Light Pollution	<p>The HELAA states that "<i>The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation.</i>" In light of this assessment it can only be concluded that the amber RAG rating is an error. This rating should be green.</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>	

Overall Suitability

Land to the south west of Hurdleditch Road, Orwell (Ref: 40378)

Site Assessment		New RAG Rating
Flood Risk	<p>The site is wholly within Flood Zone 1 and as such it is at a very low risk from flooding from rivers. The HELAA assigns an amber RAG rating on the basis that 2% of the site area is subject to a 1 in 30 and 1 in 100 year flood risk event; and 5% of the site area is subject to a 1 in 1,000 year flood risk event.</p> <p>This level of flood risk can be mitigated against at the planning and design stage. Given the small % of the site affected by these risks and the ability for mitigation to come forward it is considered unreasonable to assign an amber RAG rating.</p>	
Archaeology	<p>The HELAA assigns amber rating on the basis that "<i>Iron Age archaeology has been assigned to the east</i>". Land to the east of the site is the site of residential development. It is also noted that Site 40383 received a green RAG rating. This assessment seems to be a simple error.</p>	
Site Access	<p>The HELAA assessment concludes that the site is acceptable from an access perspective, but then proceeds to assign an amber RAG rating. This looks like an error.</p>	
Noise, Vibration, Odour and Light Pollution	<p>The HELAA states that "<i>The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation.</i>" In light of this assessment it can only be concluded that the amber RAG rating is an error. This rating should be green.</p>	
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Overall Suitability		

5. This set of representations has demonstrated that the proposed GCLP Development

Strategy is flawed in its approach to supporting economic growth, providing a robust housing supply and supporting the long-term vitality of established sustainable rural settlements.

6. In reviewing and amending the GLCP's overall housing need requirement and development strategy it is strongly recommended that our client's sites are allocated for residential development. Both of our client's site are suitable and deliverable with only very limited development constraints (which can be overcome through planning conditions and careful design). The sites are located at a settlement which has been found to be a sustainable location for residential development by a Planning Inspector at Appeal in 2017.