

# **Representations to Greater Cambridge Local Plan: First Proposals Consultation 2021**

Former Waste Water Treatment Works to West of A10, Hauxton

**On Behalf of Bridgemere Land Plc**

December 2021

# Contents

---

1.	Introduction	1
2.	Site Context of the Former Waste Water Treatment Works, Hauxton	3
3.	Policy S/RRA – Site H/2 – Bayer CropScience Site, Hauxton	5
4.	Representations to Other Policies within the Consultation Document	9
Appendix 1: Site Location Plan		15
Appendix 2: Site Assessment Pro-forma		16

---

**Client**

Bridgemere Land plc

**Our reference**

BRIC3009

December 2021

# 1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of Bridgemere Land Plc in respect of the Greater Cambridge Local Plan (GCLP) – First Proposals Consultation 2021. Bridgemere Land Plc have interests within the Local Plan area, owning the Former Bayer CropScience Waste Water Treatment Works (FWWTW) on the western side of the A10 at Hauxton (the ‘Site’). A Site Location Plan is contained at **Appendix 1**.
- 1.2 The Site was formerly used in conjunction with the Bayer CropScience Site located on the eastern side of the A10. The Bayer CropScience Site has now been remediated and developed as a mixed – use scheme, with only the employment parcel left to deliver.
- 1.3 When the Bayer CropScience Site became redundant, so too did the FWWTW. As such, it comprises a substantial area of disused infrastructure within the Green Belt, which is highly contaminated and designated as Part 2A contaminated land under the Environmental Protection Act 1990. This means that by reason of substances in, on or under the land it provides the means of identifying and remediating land that poses a significant risk to health or the environment.
- 1.4 Outline planning permission (S/2184/16/OL) was granted on 29 January 2021 for the removal of the existing structures on the Site, the remediation of contaminated land, and erection of 32 homes and associated infrastructure. These homes were concentrated on the previously developed land within the centre of the Site, maintaining a landscaped buffer around the periphery of the Site.
- 1.5 At the time of the 2020 Local Plan Issues and Options Consultation, the Site was not submitted as part of the Call for Sites submission, given the pending determination of the planning application. As such, through this Consultation, the opportunity is being taken to put the Site forward as a major development site within the Green Belt, together with representations on the wider emerging spatial strategy contained within the First Proposals Consultation Document.
- 1.6 In accordance with paragraph 11a of the National Planning Policy Framework (NPPF), Local Planning Authorities should positively seek opportunities to meet the housing and economic development needs of their area. The recommendations set out in these representations are offered to ensure that the emerging Local Plan has the flexibility and resilience to adapt to the authorities’ development needs. It also takes the opportunity through the emerging Local Plan to secure the redevelopment of the FWWTW Site so that it can be remediated and visually improved securing a wider environmental benefit for all. Furthermore, it aims to ensure the most efficient use of the land resource available in accordance with Section 11 of the NPPF.
- 1.7 Bridgemere Land Plc generally support the thrust of the emerging Local Plan, taken as a whole and what it is seeking to achieve. However, they advocate a number of positive changes to strengthen the overall soundness and deliverability of the emerging Plan. In order to significantly boost the supply of housing land which will support the needed levels of economic growth, the Plan needs to ensure that it identifies ‘deliverable’ housing and employment sites, in sustainable locations. These must be sufficient to

provide a continuous delivery of new housing and employment land over the Plan period where there is an identified need.

## 2. Site Context of the Former Waste Water Treatment Works, Hauxton

### Site Context

- 2.1 The Site is located to the west of Cambridge Road (A10) and to the north-west of Hauxton village. It is located on land opposite the Hauxton Meadows scheme, which occupies the former Bayer CropScience site. Hauxton Meadows is a mixed-use scheme and includes the nearest residential properties to the Site. To the north of Hauxton Meadows is Hauxton House which is accommodated by O2h Scitech Park. In earlier representations to the Local Plan, O2h Ventures also own the listed Hauxton Mill and are promoting this as the second phase of the Scitech Park.
- 2.2 The Site is accessed off the A10 with a section of the Site running alongside the access while the main element of the Site is separated from the A10 by the playing fields immediately to the east, outside the ownership of Bridgemere Land Plc. The Site area is 16.43 hectares and is generally flat. The Site is located outside of the settlement boundary of Hauxton and constitutes previously developed land within the Cambridge Green Belt.
- 2.3 The central portion of the Site accommodates the buildings and structures associated with the now redundant Waste Water Treatment Facility associated with the former Bayer CropScience site. This includes silos, domed tanks and effluent disposal plant located within an earth bund and tree belt. The height of some of these structures extend to 10.5 m. Lagoons have also previously been dug on the Site and since filled in and a c-shaped bund encloses the Site on its western side. This earth bund extends for 340 m along which the width ranges from 10 to 11 metres and the height is between 2 to 3 metres. There is also a redundant recreation building containing squash courts, which had limited public access and was predominantly for former workers of the Bayer CropScience Site.
- 2.4 The Site is bound to the north, west and south by agricultural land; while to the east Cambridge Road (the A10) separates the Site from the Bayer site. The River Cam flows adjacent to the northern boundary of the Site.
- 2.5 The ground levels across the Site fall to the north-west towards a small brook which follows the western boundary line. The River Cam follows the northern edge of the Site for roughly half of its length before turning north. Ground level ranges are consistently lower in the north as the land falls towards the River Cam. Ground level changes across the Site are relatively minor, generally increasing steadily from north to south, with a maximum change of between 7 and 8 metres from the northern boundary to the most southerly tip.
- 2.6 There are a number of trees, hedgerow trees and small tree clusters/copses of trees within the Site which have a visual screening function. Hedgerows form typical local field boundaries, and are present around the periphery of the Site. The perimeter hedgerows have an important visual screening function. The hedgerow along the eastern Site

boundary along the A10 was previously maintained to allow views into the recreation ground. This has continued and views into the recreation ground remain.

### **Surrounding Context**

- 2.7 Hauxton is located close to the administrative boundary between Cambridge City and South Cambridgeshire, which lies just to the north of J11 of the M11. The Site is 0.8 miles to the south west of Junction 11 of the M11 and 2.7 miles from the Cambridge Biomedical Campus, which includes Addenbrooke's and the Royal Papworth Hospitals.
- 2.8 Within close proximity to the Site, there are a number of emerging transport projects, which are being brought forward by the Greater Cambridge Partnership, which is the local delivery body for the City Deal, working in partnership with Cambridge City Council, South Cambridgeshire District Council and Cambridgeshire County Council. The following projects are identified to come forward:
- New Transport Hub (Park and Ride facility) to the west of J11 of the M11, which will provide improved pedestrian, cycle and public transport connections across the M11 and into Cambridge City and the Biomedical Campus;
  - Melbourn Greenway, which will be an off-road pedestrian and cycle route, which is identified immediately to the west of the FWWTW Site and will connect into the improved routes at the new Transport Hub to the north of the Site; and,
  - East-West Rail link between Oxford, Milton Keynes, Bedford and Cambridge, which is expected to pass to the south of Hauxton.
- 2.9 In addition to this a new railway station is proposed at Cambridge Biomedical Campus as part of the emerging East-West Rail link between Cambridge and Bedford, which will be situated on the Cambridge to London route.
- 2.10 Shelford railway station is located approximately 2.5 miles to the east of the Site and provides an hourly service between Cambridge and London (Liverpool Street). Foxton railway station lies 3 miles to the South, accessible via the bus service and on foot/cycle. It provides an hourly service between Cambridge and London (Kings Cross). Cambridge railway station provides 6 trains per hour to London and hourly services to Birmingham New Street and Norwich.
- 2.11 Hauxton has a range of services and facilities which are proportionate to its allocation as a Group Village, which is expanded upon in Section 4 below.
- 2.12 At **Appendix 2**, a draft Site Pro-Forma has been completed using the Council's site assessment template, which demonstrates that the Site is available, achievable and deliverable to bring forward housing and/or employment floorspace to meet local needs.
- 2.13 The location of the Site is in a highly sustainable location, which is identified for further transport improvements, which will provide stronger links between it, the City, the Biomedical Campus and further afield via the railway station at Shelford and the emerging station at the Biomedical Campus.

### 3. Policy S/RRA – Site H/2 – Bayer CropScience Site, Hauxton

3.1 The First Proposals Consultation Document contains Draft Policy S/RRA which comprises a small number of site allocations within the rural area. As part of this policy, Site H/2 is identified as the Bayer CropScience Site to the East of the A10 in Hauxton. It is proposed that the proposed policy direction for this site will be amended from the adopted 2018 Local Plan, to encompass only the employment areas of the Bayer CropScience site, which are still to be developed, the rest of the scheme now having been completed and occupied.

3.2 At this stage, the proposed policy direction is limited within the consultation document and therefore it is not clear whether the emerging policy will contain similar provisions within the supporting text, concerning the FWWTW site. Paragraph 7.13 of Policy H/2 in the adopted 2018 Local Plan sets out the following:

*Proposals for the redevelopment of the recreation buildings and waste water treatment facility on the western side of the A10 will be considered in the context of proposals that do not comprise inappropriate development within the Green Belt. As a planning objective it would be highly desirable to secure the removal of the incongruous industrial structures on the western part of the site. Particular consideration should be given to proposals that remove these structures and improve the visual appearance of the Green Belt through proposals that are consistent with Policy NH/9 and the NPPF (2012) paragraph 89.*

3.3 Whilst not contained within the specific wording of the policy, the identification that the remediation of the Site is a planning objective and that particular consideration should be given to proposals that remove the existing structures and improve the visual appearance of the Green Belt are of use in determining planning applications for the Site, including the recent permission for 32 homes on the Site.

3.4 During the determination of the planning application for 32 homes, it was apparent to all parties, the highly complex nature of the Site, which aside from its planning designations, has a significant number of environmental requirements to satisfy in order to remove the contamination from the Site. This unique set of circumstances ultimately informs the type and scale of development needed on the Site in order to see it remediated, the existing structures removed and an appropriate scheme found for the Site, which improves the visual appearance of the Green Belt. Such a scheme is highly likely to be for a greater quantity of homes than currently approved or alternatively an employment use to complement the Mill SciTech Park.

3.5 This would be in accordance with the objective of paragraph 145 of the NPPF, which ‘sets out that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, including looking for opportunities to improve damaged and derelict land’.

3.6 Furthermore, paragraph 119 of the NPPF sets out that ‘strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as

*much use as possible of previously-developed or 'brownfield land'*. This is a strategy which the Government have continued to advocate through recent briefings and the Autumn Budget 2021.

- 3.7 Taking this into account and given the unique circumstances of this Site, Bridgemere Land Plc are of the view that the Site requires more than a supporting paragraph within the emerging Local Plan, but a policy of its own, in order to fully realise the development potential of this Site. Therefore, the Site has been put forward as a Major Development Site within the Green Belt as part of the Call for Sites Consultation 2021.
- 3.8 The extant planning permission demonstrates that it is possible for a scheme to come forward on this land within the Green Belt, utilising the Previously Developed Land. However, given the complexities of the Site, specifically around the extent of remediation required, it is vital to include a site specific policy within the emerging Local Plan, which recognises the complete development potential of this Site for delivery of housing, employment or a mixture of both and to support its delivery, which Bridgemere Land Plc consider to be greater than currently approved.
- 3.9 The Green Belt Assessment (2021) undertaken by LUC on behalf of Greater Cambridge places the Site into Parcel HX12. Within its assessment, it identifies that the parcel makes limited or no contribution to the preservation of Cambridge as a compact, dynamic city and that it makes a relatively limited contribution to maintaining and enhancing the quality of Cambridge's setting and preventing communities from merging with one another, in this context, Hauxton and Haslingfield.
- 3.10 Notwithstanding this, the assessment identifies that the release of the land as an expansion to Hauxton would not be favourable, given the presence of the A10 as a strong separating feature between the settlement of Hauxton and parcels of Green Belt to the west, including Parcel HX12. As such, the suggestion is to not release the land from the Green Belt, but to identify it as a development site within the Green Belt, taking into account national and local Green Belt policy, but also recognising that the Site does have a very special set of specific circumstances, which need to be considered as a whole in order to bring forward this Site and see it improved for the benefit of all. Bridgemere Land Plc consider that these specific circumstances of the Site which include the ability of a scheme to remediate the contamination on Site and making the most efficient use of the previously development land resource available, requires a scheme of greater scale than currently approved and that working collaboratively with the local planning authority and key stakeholders this can be achieved on the Site.
- 3.11 To facilitate this, a site specific policy should be included in the emerging Local Plan and to assist the Council, such a draft policy for the Site could include:

***A. Proposals for the re-development of the Former Waste Water Treatment Works, Hauxton as previously developed land within the Green Belt will be permitted where the re-development:***

*a. contributes towards local housing needs and/or provides new jobs;*

*b. removes the existing incongruous industrial structures on the western part of the Site;*



- c. would not have significantly greater impact on the openness of the Green Belt;*
- d. where the scheme delivers significant environmental benefits including remediation of the Site and that these benefits are recognised as very special circumstances that should be given great weight in the planning balance and consideration of harm;*
- e. improves the visual appearance of the Green Belt through a comprehensive landscaping strategy;*
- f. where possible, seeks to connect to existing and/or emerging sustainable transport schemes linking to existing villages and the City of Cambridge; and,*
- g. contributes to the authorities' sustainable development principles as set out in other policies in the Plan.*

***B. The Council will assess the proposed re-development scheme based on the following:***

- a. the very special circumstances of the re-development scheme and ensuring that site specific benefits are given great weight against any assessment of harm to the Green Belt;*
- b. the visual impact of the development would not cause substantial harm to the Green Belt, when taking account of the existing built form, the context of the Site, the significant environmental and/or employment/housing benefits and the notable features, including new transport projects within the vicinity;*
- c. the activities / use of the new development compared to the existing/established use;*
- d. the contribution of the development to remediate the Site so that it diminishes the risk to human health and the environment and provides a safe and habitable/working environment for the end users; and*
- e. taking into account other policies within the Plan when taken as a whole.*

**Wider Green Belt Context**

3.12 As part of the consideration for this Site, one needs to recognise that there are a number of emerging local transport schemes in close proximity to the Site, as outlined in paragraph 2.8 above, which will alter the visual context of the Site, but also bring with them considerable improvements to sustainable connections between the Site and the City. These schemes are being brought forward by the Greater Cambridgeshire Partnership in conjunction with Cambridgeshire County Council and the East West Railway Company and have funding and approval to move forward to construction, subject to obtaining the relevant consents. All are located in the Green Belt:

- (a) A new travel hub on land to the west of junction 11 of the M11, to the north of the FWWTW and west of the A10. This travel hub will provide 2,150 car parking

spaces, 326 cycle parking spaces and associated coach parking, a new travel hub building, bridge across the M11 and associated highway infrastructure works to the M11 junction and dedicated busway into Cambridge. Whilst the planning application for that scheme still remains under determination by the County Council, the location of that site within the Green Belt to the proximate north-west of parcel HX12 is notable and will alter the appearance of this part of the Green Belt.

- (b) A number of Greenways have been approved linking villages on the periphery of Cambridge with the City and the Partnership are in the process of detailing these routes. Immediately to the west of the site, will be the junction for the Melbourn and Haslingfield Greenways, with their indicative route into the City Centre utilising land directly to the west of the Site. This Greenway will link into the new travel hub to the north, providing onward routes for pedestrian and cyclists over the M11 and into Cambridge. As a shared use path, it is expected that it will be approximately 3 m in width, potentially with some level of lighting, and will certainly form a new distinctive western edge to the FWWTW Site.

3.13 The above are important factors to consider and ones that could equally be harnessed for the benefit of a future scheme on the Site.

3.14 Whilst the Site is seen to be separated from the core settlement of Hauxton, the above context demonstrates that to the west of the A10 a sustainable transport corridor is highly likely to come forward, which places this previously developed site in an ideal location to provide a scheme which can contribute towards meeting local housing and/or employment needs in a highly sustainable location and a rapidly-changing context, which makes it very unique and readily deliverable.

## 4. Representations to Other Policies within the Consultation Document

4.1 Within this section, responses are provided on behalf of Bridgemere Land Plc to the Local Plan: First Proposals Consultation Document, including the suggested policy directions set out by the Council. These comments are provided in the context of the land interest at the Former Bayer CropScience Waste Water Treatment Works, Hauxton (FWWTW).

### Policy S/JH: New Jobs and Homes

4.2 The Council states that the emerging Local Plan will meet the following objectively assessed needs for development in the period 2020-2041:

- 58,500 jobs; and,
- 44,400 homes.

4.3 The housing figure equates to an average of 2,114 homes per annum, with a suggestion that this will meet an objectively assessed housing need for 2,111 homes per annum that has been rounded upwards in deriving the total figure. It is noted that the Plan seeks to provide for approximately 10% more homes than are calculated as being needed, a total of around 48,840 homes.

4.4 In justifying a housing need figure above the standard method, the First Proposals cite evidence assembled in the following two studies, with the higher need predicated on supporting anticipated economic growth within Greater Cambridge:

- Greater Cambridge Local Plan: Housing and Employment Relationships (November 2020), GL Hearn; and,
- Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020), GL Hearn, SQW and Cambridge Econometrics.

4.5 The latter of these two studies presents two alternative forecasts of potential economic growth over the Plan period:

- A **Central Scenario** under which 58,400 new jobs would be created, claimed to represent the *'most likely outcome taking into account long term historic patterns of employment'* with the Housing and Employment Relationships study also describing it as *'a business as usual growth scenario'*;
- A **Higher Scenario** under which 78,700 new jobs would be created, with this *'higher outcome placing greater weight on fast growth in the recent past, particularly in key sectors'* and the Housing and Employment Relationships study describing it as *'a plausible but more aspirational growth outcome'*.

4.6 The Housing and Employment Relationships study concludes that housing provision in line with the standard method will not support either of these economic growth scenarios. It estimates the housing need associated with supporting both as follows:

- Central scenario – 41,900 to 44,310 homes (1,996-2,110dpa) with the range reflecting alternative commuting assumptions, the upper end assuming that there is a 1:1 or balanced commuting ratio for new jobs and the lower end assuming continued in-commuting
  - Higher scenario – 53,500 to 56,490 homes (2,549-2,690dpa) with the range again reflecting alternative commuting assumptions
- 4.7 The emerging Local Plan is proposing to deliver 44,400 homes, which supports 58,500 new jobs, aligning with the Central Scenario for growth in the District over the Plan period.
- 4.8 As set out in the Council’s Topic Paper on the Development Strategy (September 2021) at Section 5.3, the evidence base has identified that Greater Cambridge is a centre of excellence and a world leading economy of international importance. Whilst the focus is within the knowledge-based economy, other types of industry provide a wide diversification of jobs and services in Greater Cambridge, including education, retail, leisure, tourism and agriculture, all of which are highly important. This together with the important strategic position of Greater Cambridge within the Oxford-Cambridge Arc means that there is significant opportunity to plan for the higher jobs scenario of 78,700 new jobs, which in turn needs to be supported by a higher housing requirement of between 53,500 – 56,490 new homes to ensure that an appropriate level of market and affordable homes can be delivered within the Plan period.
- 4.9 Whilst Bridgemere Land Plc support the approach that the Council have taken in setting a housing figure higher than the Standard Method, it is their view that the Council should be more ambitious in planning for what has been presented as a reasonable and higher forecast of employment growth over the Plan period.

**Policy S/DS: Development Strategy**

- 4.10 The proposed development strategy for Greater Cambridge directs the vast majority of growth to the Cambridge Urban Area, the edge of Cambridge and new settlements. Only a very small level of growth is directed to the Rest of the Rural Area. Of the allocations proposed, the majority of these are existing commitments (adopted allocations, sites with planning permission etc.). The Council are only proposing a need for an additional 11,640 homes to be allocated through the emerging Local Plan.
- 4.11 As part of their strategy, the Council have stated that their top priority is to reduce carbon emissions and to that end provide jobs and homes in close proximity to one another and major public transport routes. Some villages within South Cambridgeshire are in very close proximity to Cambridge; benefit from close proximity to employment opportunities; and are well placed in terms of existing and proposed public transport routes. Hauxton is such a settlement.
- 4.12 The allocation of the FWWTW for a greater quantum of housing and/or employment would help meet the needs of smaller settlements over the Plan period, providing greater variety in the types and location of development delivered and co-locating homes and jobs in close proximity to one another, reducing the need to travel.

- 4.13 With respect to the delivery of housing, it is important to highlight that the NPPF is clear in paragraph 69 that *'small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly'* and that local planning authorities should *'promote the development of a good mix of sites'*. It is considered that the Council strategy focuses on the delivery of very large sites with a much lesser number of small and medium allocations.
- 4.14 Furthermore, paragraph 79 of the NPPF is clear that in order to *'promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.'* By delivering more housing and/or employment floorspace in settlements such as Hauxton, development will continue to support local services and facilities, supporting their retention and growth.
- 4.15 In respect of delivering employment provision, paragraph 85 of the NPPF is clear that *'planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport'*. Whilst the Site is presently beyond the settlement boundary, opportunities close to the Site will significantly improve the public transport and sustainable modes of transport options to access the Site, not just from the City but from the surrounding settlements too. These same opportunities will also significantly change the Site setting and will place it instead, within a dynamic transport and growth corridor, linking directly to the City Centre and the Cambridge Biomedical Campus.
- 4.16 Paragraph 85 of the NPPF goes on to say that *'the use of previously developed land, and sites that are physically well-related to existing settlements should be encouraged where opportunities exist.'* Bridgemere Land Plc consider that their Site at Hauxton represents such an opportunity and that it will also provide the opportunity to remediate a highly contaminated Site, which will have wider environmental and/or employment and housing benefits.
- 4.17 Bridgemere Land Plc are therefore of the view that the Council should look to deliver a greater number of smaller and medium allocations to ensure that there is a supply of housing that can be built out sooner within the Plan period, but that the FWWTW site is also highly suited to deliver employment floorspace, or a mixture of the two. The Site in Hauxton comes with environmental constraints which will need to be addressed in full and would constitute an environment benefit to the wider area. It could be remediated and developed within the first half of the Plan period.

#### **Policy S/SH: Settlement Hierarchy**

- 4.18 Under this policy the Council set out a settlement hierarchy as follows:
- (i) Cambridge
  - (ii) Town
  - (iii) Rural Centre

(iv) Minor Rural Centre

(v) Group Village

(vi) Infill Village

4.19 This hierarchy is essentially the same as the adopted hierarchy in the South Cambridgeshire Local Plan (2018), with the addition of Cambridge and Town to recognise the bringing together of the two authorities for planning purposes.

4.20 Within the First Proposals, Hauxton is identified as a Group Village, which is again the same as adopted policy. Notwithstanding the existing and forthcoming transport links, this suggests that Hauxton is towards the bottom of the hierarchy.

4.21 Hauxton benefits from a number of services and facilities commensurate with a village of its size. These include a pre-school, primary school, places of worship, a community swimming pool, a village hall with an extensive range of classes and sports activities available and recreational facilities including sports pitches and playgrounds.

4.22 Within the Council's Development Strategy Topic Paper (September 2021), an audit of each settlement has been undertaken to inform the location of each settlement within the hierarchy. Bridgemere Land Plc would suggest that this is reviewed, because it identifies that Hauxton does not have a nursery/day care. Hauxton does have a pre-school which provides an important facility for local residents. Furthermore, it is unclear how the provision of a primary school is taken into consideration within the methodology, given that it is not included in Appendix 5, but Appendix 3 of the paper. As such, no points appear to be given to this important facility in the scoring system.

4.23 A very important consideration is the proximity of Hauxton to Cambridge. Housing, employment or a mixture in Hauxton would help facilitate a shift away from car use, and certainly reduce any journey times by car. Hauxton is highly accessible and is linked to the edge of Cambridge by footways, which as already outlined are set to be significantly improved for pedestrians and cyclists. Bus services serve the village linking it to Cambridge, along with nearby settlements. The closest railway station is Shelford Station, which is 2.5 miles from Hauxton and offers services to London.

4.24 It is highlighted that despite Hauxton's very close proximity to Cambridge, no sites are proposed for allocation within the village. The Former Waste Water Treatment Works at Hauxton would therefore offer the opportunity for a site that benefits from many sustainable travel opportunities owing to its proximity to Cambridge.

#### **Policy S/SB: Settlement Boundaries**

4.25 In line with their promotion of the Former Waste Water Treatment Works at Hauxton, and in light of significant forthcoming infrastructure projects, Bridgemere Land Plc advocate that the Site should be included within the settlement boundary of Hauxton for the provision of either a significantly increased quantity of housing, employment or a mixture of both.

## Rest of the Rural Area

### Policy S/RRA: Site Allocations in Rest of the Rural Area

- 4.26 This policy is considered to only illustrate further the lack of distribution in housing and employment sites across villages within South Cambridgeshire. The vast majority of proposed allocations are carried forward, with only 3 new residential allocations and a single new mixed use allocation. These sites are in Melbourn, Caldecote and Oakington. The latter two of these both being Group Villages like Hauxton. The residential allocations propose a total of 104 homes and the mixed use allocation 120 homes. These are considered to be small additional contributions to housing allocations in the entirety of the rural area.
- 4.27 Furthermore, whilst land has been allocated for employment uses, specifically research and development facilities, these are at established sites such as the Genome Campus, Babarham Institute and Cambridge Biomedical Campus to strengthen existing clusters. However, as identified in the Council's own employment evidence base, Greater Cambridge has a diverse range of employment sectors and in order to ensure that existing settlements benefit from jobs in close proximity to their homes to reduce the need to commute into Cambridge and further afield, consideration of new employment allocations within and close to existing settlements should be examined further as part of the next stage of the Local Plan. The FWWTW site provides an opportunity for consolidating the employment opportunities that have been created by the adjacent Mill SciTech Park on the eastern side of the A10.
- 4.28 If the Councils are of the view that new housing and employment uses will come forward through windfall sites, then Bridgemere Land Plc consider that this is highly unlikely. The settlements in South Cambridgeshire have tight settlement boundaries and the availability of land within these boundaries for future housing and employment development is limited. This is evident given the exceptionally high demand for land for development in the district. Indeed the risk may be that small sites come forward for 2 or 3 houses at a time, given the size of plots, which will increase the overall population of existing settlements, but without the means to secure funding to improve local services and facilities. As such, the Council should be taking a more comprehensive approach, whereby housing and employment allocations are identified at this stage to deliver much needed homes and jobs in a planned manner, alongside funding for important local infrastructure.
- 4.29 The Greater Cambridge Local Plan Development Strategy Options – Summary Report (November 2020) sets out work undertaken to assess further whether the spatial choices set out in the Greater Cambridge Local Plan: First Conversation consultation were indeed reasonable.
- 4.30 Consequently, eight choices were taken forward for testing as strategic options, which included:

*'Spatial Option 5: Focus on Dispersal: Villages - this approach would spread new homes and jobs out to the villages.'*

- 4.31 The document sets out that such distribution would *'result in multiple smaller sites that are likely to be deliverable in the short to medium term; this would also meet the NPPF requirement to allocate a percentage of small sites.'*
- 4.32 It was however considered to be the worst for carbon emissions with the worst transport links. However, this is a generalised statement and does not recognise the different attributes of individual settlements. Key to a sustainable scheme is accessibility. Hauxton is in close proximity to Cambridge, the largest settlement in the Greater Cambridge area and the location of the major employment, retail and leisure opportunities. Cambridge is readily accessible from Hauxton (and vice versa) by bicycle, bus or via Park and Ride, and by car would only be subject to very short journeys. It is also at the confluence of several forthcoming transport initiatives, which will place the Site within a dynamic and highly sustainable transport corridor.
- 4.33 It is therefore considered that the conclusion reached in the evidence base is not representative of Hauxton, and that the Council should give further consideration to the delivery of housing and employment in this location.



## **Appendix 1: Site Location Plan**



Rev	Date	Status and Description	Drawn	Approved
	19/05/16	Proposed	AC	AB

**NOTE:**  
 1. Dimensions given in brackets.  
 2. All setting out levels and dimensions to be agreed on site.  
 3. Standard versions of all materials must be checked on site before being used.  
 4. This is a preliminary plan and is subject to change without notice.  
 5. Order of construction and setting out to be agreed on site.  
 6. This drawing is copyright of the author and may not be reproduced in whole or part without written authority.  
 7. All dimensions are in millimeters unless otherwise stated.



**Planit - IE LLP**  
 38 Bowling Green Lane London EC1A 3DF  
 020 7362 8876  
 1 Blackfriars - 3rd Floor WC4E 3DF

Project	WWTW Hauxton Site				
Client	Harrow Estates				
Drawn	Location Plan				
Drawn	PL1246-1-AB-002-0				
Scale	1:2000@A3	Date	19/05/16	Drawn	AC
Status	for planning	Rev	-	Checked	AB

## Appendix 2: Site Assessment Pro-forma

Criteria	Response
Site Area (Hectares)	16.43
Parish or Ward	Hauxton
Greenfield or Previously Developed Land	Greenfield and Previously Developed Land
Category of Site	Dispersal: Villages
Category of Settlement	Within or adjacent to Group Village
Current or Last Use	Waste Water Treatment Works
Proposed Development	Either housing or employment (Use Class E)
Proposed Employment floorspace (m2)	250,000 sq ft
Proposed Housing Units	C.120 units

Suitable	
Issue	Comment
Adopted Development Plan Policies	Outside Development Framework for Hauxton Significant area of previously developed land within the Cambridge Green Belt
Flood Risk	<p>The Site is predominantly located in Flood Zone 1, specifically the areas of previously developed land.</p> <p>A small area on the northern boundary of the Site is within Flood Zones 2 and 3.</p> <p>There is the ability for a scheme to come forward which does not seek development within the areas of the Site that are at higher risk of flooding.</p> <p>Surface Water Flooding: Low and can be mitigated as demonstrated by the extant planning permission.</p>
Landscape and Townscape	<p>NCA 87 East Anglian Chalk District Area The Chalklands</p> <p>Landscape Character Assessment (2021) Landscape Character Area – 3D: Cam and Granta Tributaries Lowland Farmlands</p> <p>The Site is located to the western side of the A10 outside the settlement boundary for Hauxton. The Site contains a number of substantial redundant buildings, tanks and structures associated with the former use as a waste water treatment plant. A significant and engineered earth bund is present in the western part of the site and there is some tree and landscape coverage throughout the site.</p> <p>From the east and the A10 the site is contained and concealed from view by the access road and sports ground.</p>

	<p>Views from the west are visible, but the removal of the existing industrial structures would improve the visual appearance of the site.</p> <p>The extant planning permission demonstrates that landscape mitigation measures can be incorporated into a future scheme which would reduce any perceivable harm to the character of the landscape and create an overall enhancement, given the existing poor appearance of the site.</p> <p>Furthermore, as identified in the written representations, the site is in a rapidly changing context with a number of forthcoming transport links set to alter the appearance of the area, which need to be recognised in any assessment of the Site.</p>
Biodiversity and Geodiversity	<p>The Site is not within any designated wildlife area.</p> <p>As part of the extant planning permission, the biodiversity of the Site was considered to have limited value given the previous use of the Site, but that there was an opportunity for enhancement as part of any scheme, particularly where semi-natural habitats are present.</p> <p>No TPOs present on the Site.</p>
Open Space/Green Infrastructure	<p>Within 50 m of an Outdoor Sports Facility - Adjacent to Hauxton Sports Ground.</p> <p>Site is not on a protected open space designation.</p>
Historic Environment	<p>The Site is more than 100 m from both a Conservation Area and a listed asset.</p> <p>Development of the Site would not have a detrimental impact on any designated or non-designated heritage assets.</p>
Archaeology	<p>The County Archaeologist noted that the Site lies in an area of high archaeological potential but given the extent of disturbance caused by the lagoons in the 1950's, 1960's and 2000's there is no requirement for further archaeological investigation of the Site.</p>
Accessibility to Services and Facilities	<p>Distance to Primary School: Greater than 1,000m  Distance to Secondary School: Greater than 2,000m  Distance to Healthcare Service: Greater than 2,000m  Distance to City, District or Rural Centre: Greater than 720m and Less than or Equal to 2,000m  Distance to Local, Neighbourhood or Minor Rural Centre: Greater than 720m and Less than or Equal to 2,000m  Distance to Employment Opportunities: Less than or Equal to 1,000m  Distance to Public Transport: Greater than 450m and Less than or Equal to 1,000m  Distance to Rapid Public Transport: Less than or Equal to 1,800m</p>

	<p>Distance to proposed Rapid Public Transport: Less than or Equal to 1,000m Distance to Cycle Network: Less than or Equal to 800m</p> <p>Good accessibility to key local services, transport, and employment opportunities, which is proposed to improve further with forthcoming transport initiatives, which will link this Site to neighbouring settlements and the City of Cambridge in a highly sustainable manner.</p> <p>Proposed development would not require delivery of accompanying key services.</p>
Site Access	The Site has an existing vehicular access which is capable of accommodating larger vehicles given its previous use and can be improved as part of any scheme brought forward as demonstrated by the extant planning permission.
Transport and Roads	<p>Footways can be incorporated along the site access to provide direct access onto Cambridge Road (A10).</p> <p>Future improvements include the Greenway, which will be immediately to the west of the Site and provide pedestrian and cycle access to the proposed park and ride facility to the north and onward routes into the City Centre and Biomedical Campus as well as connections to neighbouring villages like Haslingfield.</p> <p>Any potential impact on the functioning of the trunk road and/or local roads could be reasonably mitigated as demonstrated by the extant planning permission and in the context of the forthcoming transport initiatives, which will place this Site in a dynamic and sustainable transport corridor.</p>
Noise, Vibration, Odour and Light Pollution	The extant planning permission demonstrates that the site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ light pollution.
Air Quality	Site does not lie within an AQMA. Minimal traffic impact on AQMA.
Contamination and Ground Stability	<p>Site is designated as Part 2A land under the Environmental Protection Act 1990.</p> <p>The extant planning permission demonstrates that this does not prevent development of the Site with the correct remediation strategy.</p>

<b>Further Constraints</b>	
<b>Issue</b>	<b>Comments</b>
Green Belt – Assessment of Harm of Green Belt Release	Parcel ID: HX12  Not anticipated that development would cause substantial harm to the Green Belt. Benefits of development are expected to outweigh any definition of harm and support the very special circumstances of this previously developed land within the Green Belt.

<b>Available</b>	
<b>Question</b>	<b>Response</b>
Is the site controlled by a developer or landowner who has expressed an intention to develop?	The Site is submitted by the landowner, who also obtained planning consent for 32 homes in 2021. They do intend to develop the site, but which to use the land resource more effectively and efficiently, given its previously developed nature and that it may be more appropriate for other types of development aside from housing, or a mixed use scheme.
Are there known legal or ownership impediments to development?	No
Is there planning permission to develop the site?	Yes, permission for 32 homes granted in January 2021 – Planning Reference S/2184/16/OL.
When will the site be available for development?	3 - 5 years

<b>Achievable</b>	
<b>Question</b>	<b>Response</b>
Is there a reasonable prospect that the site will be developed?	Yes, the landowner wishes to bring forward this site with a scheme that enables its remediation and delivery either as a housing and/or employment use. Given the high remediation costs, the site needs to be developed at an appropriate density to be economically viable.

**Turley Office**  
8 Quay Court  
Colliers Lane  
Stow-cum-Quy  
Cambridge  
CB25 9AU

T 01223 810990