

Land at Boxworth End, Swavesey

Axis Land Partnership Limited Representation to
the Greater Cambridge Local Plan 'First Proposals'
(Regulation 18: Preferred Options 2021).

December 2021

AXIS
LAND PARTNERSHIPS

1.0 Introduction

These representations are submitted on behalf of our client, Axis Land Partnerships (Axis). Axis, on behalf of the landowners, are promoting land at Boxworth End in the village of Swavesey (also known as Land adjoining 107 Boxworth End, Swavesey) for the development of c. 70 new market and affordable housing, alongside the provision of site access, open space, biodiversity and landscape enhancements.

Axis have promoted this site throughout the Greater Cambridge Local Plan (GCLP) process, and it was first submitted for consideration as part of the initial Call for Sites consultation in 2019. The site was also promoted as part of the Issues and Options consultation in February 2020. This included the submission of a Vision Document and concept masterplan prepared by Mosaic (February 2020) which demonstrates how development of the site could respond to the various opportunities and constraints presented, including retaining features of ecological importance across the site, retaining and enhancing existing planting and landscape buffers around the site edge and retaining gaps through the site to the wider rural area to reflect the existing character of the village and identified countryside gaps. The Vision Document is enclosed again for reference (Appendix 1).

The structure of these representations responds to two key policies in the First Proposals Plan:

- **2.0 - Policy S/DS** – Comments on Development Strategy (Page 2)
- **3.0 - Policy S/RRA** - Comments on development strategy for the Rest of Rural Area (Page 13)
- **4.0 - Policy S/RRA** – Site specific comments in relation to land at Boxworth End, Swavesey (Page 16)

The proposed site is considered a sustainable and appropriate location for new development on the edge of Swavesey village, a defined minor rural centre, with access to existing amenities and facilities to help integrate new residents into the existing community. The site also benefits from existing public transport accessibility as well as pedestrian and cycle infrastructure to connect to the main village centre to the north, as well as to employment opportunities to the south of the site and further afield. The site is located to the south-east of the main village centre and unlike a number of other sites currently being promoted in Swavesey, is relatively well contained and bound by existing residential use to the west and north and an existing farmstead to the south. This means the built development proposed on the site aligns with the extent of existing development surrounding, thus limiting any encroachment into the open countryside.

Overall, the development of the site provides opportunity to deliver a mix of housing to suit a range of occupiers and to provide genuine choice in the local housing market. The site is not subject to any environmental, landscape or historic designations and is considered to be entirely suitable for development and would form a sustainable new residential allocation that is located outside of the Green Belt. The site would be well integrated through landscaping and connectivity to Swavesey village and importantly, would help to ensure the Council can plan to deliver enough housing to meet the identified need, in a variety of locations and across the Plan period.

2.0 Policy S/DS – Development Strategy

2.1. Housing Delivery

The First Proposals Plan identifies that the Councils have an objectively assessed need for 44,400 homes during the plan period (2020-2041), linked with the expected future level of jobs and noting the strategic position of Greater Cambridge at the heart of several economic corridors, most notably the Oxford-Cambridge Arc. These housing targets are based on the ‘medium+’ growth level option tested in the preparation of the First Proposals Plan. The Strategy Topic Paper (September 2021) states:

“the final Housing Delivery Study (October 2021) has confirmed that the medium+ growth level option is deliverable in relation to housing delivery. The Study concludes that the medium+ growth level option performs similarly to the previously assessed ‘medium’ requirement but slightly better in that it better-matches housing supply against jobs. The Study notes that to ensure the Councils are able to demonstrate a five-year supply from plan adoption and pass the Housing Delivery Test, new allocations would need to provide supply in the mid-latter part of the plan period, as the beginning of the plan period is largely met by existing commitments”.

The First Proposals Plan seeks to provide an overall 10% buffer over the plan housing target, resulting in target of 48,840 homes to be provided. This over delivery is intended to build in flexibility and resilience of supply as per the recommendations of the final Housing Delivery Study (October 2021), which states:

“The housing delivery assumptions in this report still show that in order to optimise housing delivery, demonstrate a five-year housing land supply and maintain delivery across the plan period, it will be necessary to gap-fill the ‘troughs’ in the housing trajectory with additional sources of supply. This should be underpinned by cautious but realistic lead-in times and build-out rates, and an ‘over-allocation’ of land against the eventual housing requirement (we recommend at least a 10% buffer) in order to ensure that any unforeseen delays to delivering individual site allocations during the plan period, or changes to market conditions, do not result in under-delivery that would threaten the five year housing land supply or performance against the Housing Delivery Test”.

We note that the 10% buffer is the minimum recommended in the Study. The First Proposals Plan suggests the Councils have a current housing supply forecast of 37,2000 homes (including from adopted allocations, extant planning permissions and windfall sites allowance). This in turn means the Plan identifies a need for an additional 11,640 homes during the Plan period. Currently the Plan identifies sites that would eventually deliver 11,596 homes, resulting in an overall housing supply of 48,794 dwellings, which exceeds the OAN but just falls short of the Plan’s overall target when allowing the 10% buffer. The Council need to ensure they are planning for the minimum number of homes required and building in resilience and flexibility to the Plan, as required by national policy.

In order to meet the housing need identified, the First Proposals Plan and the preferred spatial strategy is heavily reliant on the delivery of a small number of key strategic sites.

These strategic allocations include:

- North East Cambridge – 3,900 homes (34% of additional housing need)
- Cambridge East (Airport) – 2,850 (24% of additional housing need)
- Cambourne – 1,950 homes (17% of additional housing need)

These three sites provide 75% of the overall amount of additional housing (11,640 homes) proposed in the First Proposals Plan and all rely on highly complex delivery factors outside of the control of the Councils, including two instances which rely on the outcome of Nationally Significant Infrastructure Projects Development Consent Order process. In all instances there are uncertainties and constraints regarding the overall deliverability and the timescales for which these sites would come forward to deliver new housing, including whether this would be within the Plan period.

Furthermore, the housing trajectory set out in the First Proposals Plan does not assume ‘cautious but realistic lead in times’ in relation to these new strategic site allocations, as suggested in the Housing Delivery Study (October 2021). The Plan assumes significantly more ambitious and unrealistic lead in times than those recommended in the Study, and in the Greater Cambridge Local Plan Strategic Spatial Options for Testing – Methodology November 2020 – Appendix 6. The Housing Delivery Study (2021) assumptions for lead-in times of strategic sites are that they take 8-9 years from allocation to delivering first completions, on the basis that some form of supplementary guidance is required such as a masterplan, design guide/code, Area Action Plan or Supplementary Planning Document. Notwithstanding this, reduced lead in times of 2-3 years have been applied by the Councils to these three strategic sites within the housing trajectory. This means the combined authorities would either have to employ significantly more resource to provide development brief level of detail into the plan making process, or abandon the requirement for this level of detail altogether, which is unrealistic and would fail to meet the Great Places objective of the First Proposals Plan. The Plan also fails to apply recommended build out rate assumptions, as identified in the Housing Delivery Study and Strategy Topic paper.

We discuss our concerns regarding the delivery of these strategic site allocations below.

Land at North East Cambridge

Development of this site and its total capacity to deliver new housing is reliant on the relocation of the existing Milton Waste Water Treatment Plant. It is currently proposed that a Development Consent Order (DCO) application should be undertaken to enable the relocation, with indicative timescales for this to be submitted in 2023. This is likely to mean that the outcome of the DCO process will not be confirmed until late 2024/5.

It is also proposed that an Area Action Plan (AAP) be prepared jointly by the Councils in order to establish the development area, site capacity, viability, timescales and phasing of development. As acknowledged in the Housing Delivery Study (October 2021), timescales for preparation of the AAP are likely to be dependent on the progress of the GCLP, as well on the DCO examination in respect of the waste water treatment relocation in order to be able to demonstrate that the development proposed on the site could be delivered. It is intended that preparation of the AAP will begin shortly and will proceed through Reg 18 consultation. However, the Housing Delivery Study (October 2021) states:

“It is therefore anticipated that the AAP process would then pause until the outcome of the DCO is known. If successful, the Councils would then proceed with the publication of the Proposed Submission AAP for the making of representations (Regulation 19), following which the AAP would progress to Submission and Examination”.

Having regard to the DCO timescales above, it is envisaged the AAP would not be issued for final consultation until after the DCO has concluded and would then not likely be submitted for examination until 2025.

In the housing trajectory, the Councils have assumed that delivery will start in 2030/31, soon after the Water Treatment Plant has been relocated. However, the assumed build out rates are also well in excess of the build out rate assumption of the Housing Delivery Study, which anticipates a peak of 100 units per year delivery on sites of the scale deliverable at the Chesterton Sidings parcel. For the remainder of the site the Councils have assumed that delivery will start in 2030/31. This lead-in time assumption is 3 years shorter than Housing Delivery Study assumptions.

The Housing Delivery Study – Interim Findings and Spatial Options Commentary notes that there is a risk to rely on delivery from North East Cambridge during the middle part of the plan period, given uncertainties surrounding the relocation of the wastewater treatment works.

The known complicating factors around plan making, and reliance on third party planning processes and Trip Budget uncertainties make reliance on the North East Cambridge site delivering significant housing number of this site by 2030/31 unrealistic.

The Housing Delivery Study (October 2021) considers this allocation of this site and anticipate housing delivery should be kept under review, should the relocation proposals not transpire as envisaged.

Cambridge East (Cambridge Airport)

The Councils are proposing the allocation of the safeguarded land at Cambridge Airport. However, development on the site is subject to continued evidence from Marshall of its commitment to relocate the Airport related uses and demonstrate the availability and deliverability of the site.

The Councils have assumed that Cambridge East will start delivering in 2031/2032 after Marshalls have relocated the airport uses to Cranfield Airport. The First Proposals Plan states:

“It (Marshalls) advises that it has a signed option agreement at Cranfield Airport, Bedford and that there would be no commercial, planning, technical or regulatory impediment to a move to Cranfield and vacant possession is anticipated by 2030. This gives a reasonable level of confidence at this early stage in the plan process that the site is likely to come forward in time to help meet development needs in the plan period as well as beyond”.

However, in a press release update from October 2021 Marshall CEO Kathy Jenkins states:

“Whilst we are disappointed that we haven’t been able to make either Duxford or Wyton work for us we believe, given the obvious synergies between our Aerospace business and Cranfield, that it is a very compelling option.

“As such, we will shortly begin the process of preparing an outline planning application, with submission planned in Autumn 2022 in order give us further confidence that we have a deliverable site should we wish to relocate to Cranfield.

This statement implies that both planning and technical issues are yet to be resolved, and require an application to be prepared, supported by the relevant technical information, to provide confidence regarding deliverability of the relocation. The CEO goes on to state...

“...like so many businesses, Covid-19 has changed a lot of things for us and this, coupled with recent announcements in relation to the early withdrawal of the RAF’s C-130 fleet, means we are not yet in a position to make a final decision about a choice of new home for our Aerospace or Land Systems businesses.”

While these uses do not directly relate to the operation of the airspace operations, it highlights the general uncertainty in the industry and potential uncertainty related to the commercial elements of the relocation.

This uncertainty is reflected in The Housing Delivery Study – Interim Findings and Spatial Options Commentary stated the following for the spatial options within which Cambridge Airport was a component of the supply:

“There may be a risk to relying on housing delivery from Cambridge Airport during the middle of the plan period, notwithstanding that Marshall recently confirmed to the Councils its commitment to relocate and seeks to demonstrate the availability and deliverability of the site, whilst being keen to stress that no final decisions have yet been made... The position should be kept under review during the plan making process as appropriate.”

Furthermore, even if the relocation is agreed, it is anticipated that an AAP or similar supporting policy framework document would be required to be in place before any application could come forward, in accordance with the Council’s usual practice. The First Proposals Plan states:

“development on the safeguarded land will only occur once the site becomes available and following a review of both the adopted plans and the Cambridge East Area Action Plan”.

The Housing Delivery Study (October 2021) considers that first completions would be in 2033/34 ramping up to 350dpa from 2036/37 onwards, on the assumption that an additional SPD or AAP is required after the site is allocated. The preparation, consultation and adoption of any supporting policy document would add to the overall lead in time before any works would commence on site and the delivery of housing would begin. The Housing Delivery Study (October 2021) considers this position should be kept under review.

The Councils’ Preferred Options trajectory has a 2-year shorter lead-in time with first completions in 2031/32 and 350dpa from 2035/36 onwards which is considered to be unrealistic.

Cambourne

The allocation refers to Cambourne as a broad location for longer term strategic scale growth and expansion. No site area has yet been defined for the new settlement at Cambourne as this is reliant on the East West Rail scheme that will include a station at Cambourne. This will drive the delivery of the new settlement to ensure it is sustainably located and accessible

by good public transport and is a critical relationship. Without the delivery of the East West Rail project it is unlikely that significant growth in this location could be supported.

The nature of the opportunity for growth brings with it significant risks. The growth is predicated on delivery of a major infrastructure project, outside the control of the Councils.

This is recognised in the Housing Delivery Strategy which states:

“Growth around Cambourne is reliant upon delivery of a new East West Rail railway station and the Cambourne to Cambridge Public Transport Scheme, for which there is uncertainty about when they will be delivered.”

and

“Given the ongoing work to progress the East West Rail project, there remains uncertainty about the potential location of an East West Rail station, and therefore the location and scale of growth for an expanded Cambourne”.

The Councils have placed themselves in a similar situation as the North East Cambridge site, where they are reliant on the delivery of a major infrastructure project and outcome of a DCO process before they can confidently demonstrate that the development proposed on the site could be delivered.

Notwithstanding the identified uncertainty, the Councils are proposing the allocation of 1,950 additional homes at Cambourne and consider the new station at Cambourne will be operational from 2030 and have then assumed that as a broad location it will start delivering homes in 2032/2033. This timeframe assumes that the Councils will either not require a further supplementary guidance document after an allocation is made in the new Local Plan or that this will be prepared alongside the final stages of the Local Plan and adopted around the same time.

However, the Housing Delivery Study (October 2021) considers completions are more likely to start being delivered from 2033/34. This is on the assumption that an additional SPD or AAP is required after the site is allocated in the new Local Plan, and before a planning application can be determined.

If the Councils have assumed that no further plan making process is required, then that approach would be at odds with their own justification for inclusion of Cambourne as strategic location for growth in the Plan. The First Proposals document justifies the Councils approach with reference to national planning policy, which allows for longer term growth in plans to be identified as broad locations, where the exact quantity, locations and design will be defined through future plan reviews. This implies that there will be some form of further plan making process required to appropriately identify the ‘exact quantity, locations and design’ of the additional growth opportunity at Cambourne. This would add to the lead in times for the site coming forward for development.

The Housing Delivery Study (October 2021) also acknowledged the complexities with regarding the delivery of this site and considers the lead-in times and build-out rates should be kept under review should the East West Rail proposals not transpire as envisaged.

Summary

The Housing Delivery Study (October 2021) and wider supporting evidence base, is clear that there is a level of uncertainty with the overall capacity and deliverability of all of these

strategic sites during the Plan period which need to be kept ‘under review’. Noting this uncertainty, we consider that it is not appropriate for the Plan to be so heavily reliant on these sites and that additional allocations are needed to ensure the Plan is robust and flexible, providing for sufficient new homes throughout the Plan period. This will ensure the Plan has been positively prepared in accordance with Paragraph 35 of the NPPF. Without these sites coming forward within the timeframe anticipated or delivering on the capacity identified, the Council will be unable to meet its housing needs by 2041.

The reliance on unrealistic lead in times and build out rates which are quicker than those reflected in the evidence base, alongside general uncertainty and complexities associated with the delivery of these strategic sites, means that the Council fail to allocate sufficient homes to provide a reliable supply of sites over the Plan period. Even applying these unrealistic delivery lead in times and build rates, the last 5 years of the plan only delivers on average a 4.7% housing buffer with a heavy reliance on very large complex sites delivering at the maximum build out rates. Applying the recommended lead in times and build out rates as identified in the Housing Delivery Study (October 2021) report, the GCLP allocates sites that would only achieve 47,444 units by 2041. This only secures an overall delivery buffer of 7% over the plan period, and a 4.2% buffer in the last 5 years of the plan.

It is considered that further allocations in the middle period of the plan are required to ‘smooth’ the housing trajectory and secure a suitable range of sites to allow a robust supply of homes to 2041. Inclusion of land at Boxworth End, Swavesey as a new development allocation would provide a vital contribution and deliverable solution to secure a robust housing supply. The site is suitable, available and deliverable and would make an important contribution to the delivery of housing towards the middle of the plan period, where the trajectory currently falls short of the 10% buffer. The site is outside of the Green Belt and would not require an exceptional circumstance case to be prepared to justify its inclusion in the Plan.

We would also note that similar concerns have been raised by Inspectors at other Local Plan examinations in respect of the reliance on large strategic sites with complex and uncertain delivery timescales. In January 2020, during the examination of the Uttlesford District Local Plan a number of concerns were raised in respect of the reliance on three new garden community allocations for a significant number of homes during the plan period. Development of this scale and timing on three large sites which depend on the delivery of new public transport infrastructure to achieve sustainable development, was considered to be highly aspirational and ambitious. It was also considered that the allocation of more small and medium sized sites is necessary to deliver homes in the short and medium term, provide certainty and diversity of housing choice. There was also concern raised by the Inspector that a lack of delivery on other sites in the District would adversely affect the vitality and viability of services in existing towns and villages. The draft Plan was ultimately withdrawn by the Council in April 2020 and the Council are currently preparing a new local plan. We consider that the points raised here are of relevance to the First Proposals Plan and that a more robust approach is needed to deliver a Local Plan which can be found sound.

2.2. Growth Strategy

As part of the previous GCLP First Conversation consultation, the Councils considered a number of spatial options for growth across Greater Cambridge. The First Proposals

Development Strategy is said to draw upon an analysis of the evidence, sustainability and consultation feedback as well as detailed evidence of site-specific opportunities and constraints (Development Strategy Topic Paper). However, our client is concerned that at present there is insufficient clarity as to how the conclusions of this analysis has directly informed the choice of preferred option, and ultimately the First Proposals development strategy. In particular, there seems to be a gap in the explanation as to why the components of the First Proposal development strategy (which reflects the Spatial Option 9 Preferred Strategy) have been taken forward, and why other Spatial Options have been discounted and/or why only certain elements of other Spatial Options are considered suitable for taking forward.

The Development Strategy Options – Summary Report (November 2020), along with the Development Strategy Options Supplement (contained as Appendix 1G to the Development Strategy Topic Paper) does provide a summary of the outcomes from the evidence base testing and Sustainability Appraisal of the Spatial Options. However, this does not provide an explanation as to why the Preferred Strategy was formed on the basis of the evidence base testing that had been carried out by that point. It appears that the Preferred Option (Spatial Option 9), along with the alternative blended strategy (Spatial Option 10), appear as standalone options without reference to the previous options. Indeed, in the final, ‘Key Findings and Issues’ chapter of the Development Strategy Options – Summary Report it is explicitly stated that:

‘the final section draws out some overarching findings, issues and themes with regard to the testing and assessment of the spatial and growth level options in the proceeding section. These are presented neutrally, without overlaying any value judgements about the performance of the various options. This will avoid prejudging the outcomes of the stakeholder engagement and subsequent work undertaken by the Councils to determine a preferred development strategy, once the evidence base is finalised’.

Furthermore, Appendix E to the Sustainability Appraisal (‘Council’s justification for selecting sites to take forward for allocation and discounting alternatives’) ostensibly provides the justification for the preferred spatial strategy, however this also does not explain why the preferred spatial strategy is considered to be the best performing option when compared to other spatial options, nor does it give reasons for why other spatial options have been discounted. Instead, it only presents the components of the Preferred Strategy, including specific locations for development, and provides high level justification for this, without specific reference to the Sustainability Appraisal and evidence base findings.

It is not clear how the Council have concluded that the preferred strategy is an appropriate response from the evidence provided. SA Appendix E appears to suggest that Cambourne has been taken forward as part of the preferred strategy approach under Spatial Option 8 ‘Expanding a growth area around transport nodes’; paragraph E.21 states that

“the preferred development strategy identifies Cambourne as a broad location for future development, in association with the opportunities provided by East West Rail and in particular the proposed new railway station’.

This is despite the fact that as is reported in the Development Strategy Options – Summary Report ‘this option performs relatively poorly within the plan period, as it is unlikely that the full infrastructure to support development will be provided’.

The Development Strategy Options – Summary Report also cautions that:

“there is a substantial amount of uncertainty about when [the East West railway station and Cambridge Autonomous Metro] will be delivered and the ranking of this option is dependent on delivery of those links. It is also noted that growth outside of Cambourne (i.e., in the villages) may put pressure on local services and facilities and have greater car dependency”.

Given the risks that have been identified through the Sustainability Appraisal and evidence base testing process, there needs to be far more robust justification as to why expansion of Cambourne has been included as a key part of the development strategy, clearly linking this justification to the assessment findings. It is also noted that the First Proposals plan actually presents Policy S/CB: Cambourne under the New Settlements source of supply, which further confuses the degree to which the Sustainability Appraisal and evidence based testing work has directly informed the choice of First Proposals development strategy, as ‘New Settlements’ was assessed as a different spatial option to ‘Expanding a growth area around transport nodes’.

Greater clarity and transparency is therefore required to explain the basis on which the Preferred Strategy option was developed. As currently presented, it appears that the Councils have made assumptions about the performance of the preferred strategy in isolation from the evidence testing and results of the Sustainability Appraisal. Our objection in this regard is that there seems to be an element of pre-determination in the inclusion of the preferred ‘core strategic sites’ that have been taken forward into the preferred strategy (namely North East Cambridge, Cambridge Airport, and in particular, extension to Cambourne), which does not necessarily reflect the outcomes of the spatial option assessment through the Sustainability Appraisal and evidence base and may not therefore represent the best performing growth areas or most sustainable and available locations for new development. Several principal sites have been selected prematurely, when the selection is supposed to be informed by the chosen strategy. The Councils fail to demonstrate that the conclusions of assessment of the spatial options have led the determination of the best performing strategy for the First Proposals document. Instead, there is the very strong suspicion that a spatial strategy has instead been retrofitted to suit a series of pre-chosen sites.

2.3. Windfall Sites

As part of the overall housing supply, the Councils make an allowance for windfall sites for residential development coming through speculative planning applications. The Councils expect about 5,300 homes to be built during the plan period on windfall sites.

The Development Strategy Topic Paper states:

“The windfall allowance refers to an anticipated level of housing delivery from sites that are not yet known about, but which we expect will continue to be delivered based on historical completions and our continuation of policies within the Local Plan for windfall sites within Cambridge and our towns and villages. The windfall allowance is expected from our evidence to deliver 5,345 homes, which will be on a mix of sizes of sites, but will typically include a significant element of small sites”.

In previous consultation documents, the Councils were reliant on a lower windfall housing allowance. The Greater Cambridge housing trajectory (April 2021) was planning for a total

windfall allowance of 4,220 dwellings across the plan period. However, the Housing Delivery Study (September 2021) considers that there is evidence to justify an increased allowance for windfall sites based on historic completions, with delivery of 533 dwellings a year on average between 2006-2020. The Housing Delivery Study (September 2021) states:

“the Councils current windfall allowance of 350 dwellings a year is an under estimate, and instead recommends that 425-450 dwellings a year is an appropriate estimate (185-195 dwellings a year for Cambridge and 240-255 dwellings a year for South Cambridgeshire). Following the same principles as applied to the windfall allowance in the Greater Cambridge housing trajectory (April 2021), and using the lower estimate for each area, 5,345 dwellings are anticipated from the windfall allowance in 2020-2041”.

Whilst windfall delivery rates within the area have been consistently high in the past, these are a finite resource and the high delivery of windfall developments in recent years will have diminished the supply of available sites. It is important to consider whether delivery would remain as strong over the remainder of the plan period, noting that there is no allowance for windfall delivery in the first five years of the housing trajectory.

There are several constraints to the deliverability of windfall sites, noting that they must be considered against the development plan framework and relevant policies and cannot include Green Belt sites. There is likely to be a finite resource of land within existing urban areas and noting both the previous delivery of windfall permissions and the proposed reliance on new greenfield and Green Belt sites and extensions to the existing urban area in the First Proposals Plan, it is likely that there is limited availability of these sites. It is therefore uncertain whether the past rates of windfall delivery would be sustained up to 2041.

This is important as we note that whilst the Development Strategy Topic Paper states that there will be an allowance for windfall development within the ‘Rest of Rural Area’, this would be an allowance for homes on unallocated land which would need to be consistent with policy requirements in the Plan.

This is extremely limiting in terms of where windfall sites can come forward and the scale of development that would be allowed, making it difficult for the Councils to achieve the overall delivery expected from windfall sites and therefore impacting on overall housing delivery during the plan period. The requirement for windfall sites to comply with the policy requirements in the Plan is challenging in respect of the location of new development. There will be limited brownfield sites within the defined settlement boundaries of villages in the ‘Rest of Rural Area’. We note that the majority of the sites being promoted in the GCLP and assessed in the HELAA comprise greenfield sites on the edge of these more rural villages, including other sites being promoted in Swavesey. The majority of other land being promoted in Swavesey typically comprises more open agricultural sites which are not bound by existing development, and which would appear out of keeping with existing built form of the village. On the other hand, land east of Boxworth End is a contained site with strong landscape buffers which can be retained and aligns with the extend of existing built development to the north, west and south.

The GCLP consultation document also includes draft Policy S/SH (Settlement Hierarchy) which sets out the scale of development that would be permitted in different categories of

villages across Greater Cambridge. Swavesey is classed as a Minor Rural Centre and Policy S/SH sets an “*indicative maximum scheme size of 30 dwellings*”.

We consider that it is overly restrictive to seek to limit the scale of development that comes forward on windfall sites. Whilst we note draft Policy S/SH suggests this is an “indicative” maximum size, the capacity of each site should be established through a design-led approach and consideration of each sites specific opportunity and constraints. This would align with the Council’s own approach in allocating some development within villages already and the GCLP First Proposal documents states “*We have taken a design-led approach to identifying housing capacity at these sites*”.

Indeed, the policy seeks to set maximum scheme sizes based on the settlement hierarchy but not an overall maximum for each settlement type. This could result in piecemeal delivery and have the effect of restricting the delivery of windfall sites across the area.

Restricting the number of homes that can come forward in these locations will impact on the overall deliverability and viability of these more rural locations and in turn could impact on the delivery of affordable housing. The smaller and less viable the schemes coming forward in the rural area, the less windfall sites can contribute towards supplying a mix and choice of housing, including affordable housing.

Given this uncertainty around the capacity of windfall sites and the rate they are expected to come forwards, this emphasises a need to pursue additional allocations for housing, in order to ensure the Council can meet the identified housing need in a variety of locations.

We also note that the delivery of windfall sites is proposed to be linked to the preparation of neighbourhood plans. Within the GCLP Draft Policy S/JH (New Jobs and Homes) will set out the approach to identifying neighbourhood plan housing targets for existing or new designated neighbourhood areas. The Plan states:

“These targets will not form part of the homes figure to be met by new allocations. Instead, the proposed approach would apportion a share of the housing windfall figures (considering Cambridge and South Cambridgeshire separately) according to the neighbourhood area’s share of the relevant district’s total population”.

However, the current preparation and adoption of neighbourhood plans within Greater Cambridge has been slow. Within South Cambridge only 4 neighbourhood plans have currently been adopted. Of the remaining designated neighbourhoods, only 4 have progressed works and carried out some formal consultation. This means 11 neighbourhoods have not progressed or formally consulted on any neighbourhood plan proposal, including the village of Swavesey. Within the City of Cambridge there is only one defined neighbourhood area, South Newnham for which no neighbourhood plan is adopted but work has progressed on initial proposals.

We note that none of the adopted neighbourhood plans make any meaningful allocation for new housing sites. For example, Foxton Neighbourhood Plan identifies a site for development of 6 dwellings and the Cottenham Neighbourhood Plan does not allocate new sites for housing but relies on sites for which planning permission has been granted. It is therefore not considered to be a reliable or robust strategy to rely on the delivery of housing numbers from the windfall allowance through the neighbourhood plan process, particularly

noting the progress of neighbourhood plans generally and the uncertainty around the adoption of these plans and the timescales for their delivery.

The Council must commit to preparing a Site Allocations DPD, or similar, within a specified period of the adoption of the Plan in the event that Neighbourhood Plans are not made. Without such a mechanism, it cannot rely on apportioning housing numbers to neighbourhood areas as a means of meeting its minimum housing requirement.

2.4. Summary

The overarching development strategy for Greater Cambridge is to direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live. We consider that the allocation and development of land at Boxworth End, Swavesey accords with these principles. The development has easy access to public transport and will be designed to provide and connect to pedestrian and cycle infrastructure to promote active travel. The site is well located to access the existing services and facilities within Swavesey village minor rural centre. The concept development proposals for the site show how significant areas of open space and landscaping have been retained and the provision of green infrastructure including use of SUDS and landscape corridor have been integral to the emerging masterplan.

We consider it is appropriate and necessary to allocate this site for development, noting the potential to deliver new housing in a sustainable location, to help ensure the Council meet the housing need identified within a realistic timeframe and to ensure the plan is robust and flexible to deliver housing across the plan period and in a variety of locations to respond to different needs and provide choice in the housing market and the provision of affordable housing in more rural areas.

This is important to ensure the Plan is sound, when considering the current reliance on a number of large strategic sites for which there is uncertainty in respect of their overall capacity and timescales for delivery of housing.

3.0 Policy S/RRA - Rest of Rural Area

The previous spatial options considered and consulted upon included a 'Dispersal: Villages' option which sought to spread new homes and jobs out to the villages surrounding Cambridge. The Sustainability Appraisal indicated that the Dispersal: Villages spatial option performed relatively well against the various SA Objectives, including the same as the Preferred Option for a number of objectives (SA objectives 1, 3, 9, 10 and 14).

In addition, the Development Strategy Topic Paper indicates that the Dispersal: Villages spatial option was broadly supported by the public via the response to the First Conversation consultation, where it was the fourth most popular location. As set out in the Development Strategy Topic Paper, further consultation undertaken by the Councils also noted the opportunities associated with growth to existing villages include:

- The benefits of development for sustaining villages and schools and enhancing amenities including shops, healthcare provision and community facilities; and
- The need to provide affordable homes suitable for elderly and younger residents to continue living in villages.

The development of land at Boxworth End, Swavesey that is being promoted by Axis could deliver on both of these opportunities. The development would deliver c. 70 high quality market and affordable dwellings, including a mix of smaller and larger homes to suit a range of occupiers, from first time buyers and young families to older residents and those looking to downsize. Development in the location proposed, on the edge of Swavesey village, would also provide an additional population that would help to sustain existing local services and facilities and that would be sustainably located to promote the use of sustainable and active travel methods to access these amenities. Unlike all the other land being promoted in Swavesey, this site comprises a contained agricultural field that is already bound by existing development on three sides meaning that any further development forms a natural and small extension to the village boundary, and would not strictly result in further encroachment into open countryside. The majority of the site comprises open grazing land which is generally of limited ecological value. Features of ecological value, such as the existing pond and woodland will be retained and enhanced.

In terms of the preferred growth strategy set out in the First Proposals Plan, the Councils have proceeded with a blended strategy, considered to "meet a variety of needs and respond to the opportunities provided by the sources of land supply". The Councils propose to focus a small number of new sites and allocations principally:

- within the Cambridge urban area;
- edge of Cambridge, outside of Green Belt;
- edge of Cambridge, Green Belt;
- new settlements;
- some development in the defined 'Rural Southern Cluster' (between the M11 and the A1307); and
- limited development in the 'Rest of the Rural Area'.

The land being promoted by Axis, comprising land east of Boxworth End, Swavesey, falls within the 'Rest of Rural Area' as defined by the Council. This follows the Dispersal: Villages option previously considered.

Our client's site is not currently allocated for development in the consultation document. However, the defined wider 'Rest of Rural Area', under Policy S/RRA, does comprise the allocation of a small number of new sites for housing and employment at villages that have good public transport access. This includes two new employment allocations proposed within close proximity of Swavesey village including land at Buckingham Business Park (Site BBP) and land to the south of A14 Services (Site SAS), both allocated to provide new industrial and warehousing use. This provides direct employment opportunity for Swavesey village, within easy commuting distance on foot, by bike or by bus.

Under Policy S/RRA there are only four sites allocated to provide new housing:

- **Moor Lane, Melbourn** – capacity for 20 homes.
- **Land at Highfields** – capacity for 64 homes, based on lapsed planning permission so some uncertainty with regards to deliverability.
- **Mansel Farm** – capacity for 20 homes. The site is located in the green belt but in close proximity to Cambridgeshire Guided Busway stop which provides the exceptional circumstances for the sites release.
- **Land west of Cambridge Road, Melbourn** – capacity to provide 2.5ha employment land, albeit the deliverability of the employment site is yet to be confirmed, as well as capacity for 120 homes within a minor rural centre.

In total, these allocations provide for only 224 dwellings during the plan period. This equates to 2% of the additional housing need (11,640 dwellings) identified in the Plan.

We support that the 'Dispersal: Villages' option and the allocation of sustainable sites within or on the edge of villages and adjoining the settlement boundaries of villages within the rest of the rural area should form part of the overall development strategy. As above, we consider that the Plan needs to provide greater flexibility and resilience in its housing allocations, to ensure the Councils can meet the identified housing need at all stages of the plan period. It is therefore appropriate to allocate further small-medium size sites in sustainable locations to ensure consistent delivery across the plan period by not concentrating all development in a specific area or an over reliance on large strategic sites.

The allocation of land east of Boxworth Road comprises an appropriate and sustainable approach, noting the ability of the site to connect to existing public transport and active travel routes, make use of existing services and employment opportunities in and around Swavesey minor rural centre and provide a mix of housing for the local market. This approach is supported under Paragraph 79 of the NPPF, which requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services.

Paragraph 69 of the NPPF acknowledges the role that small and medium sized sites can make towards meeting the housing requirements, and that these can often be built-out relatively quickly.

We also note the recommendations of the report prepared by Lichfields, on behalf of the Land Promoters and Developers Federation and the Home Builders Federation – 'Feeding

the Pipeline: Assessing how many permissions are needed for housebuilders to increase the supply of homes' (November 2021). The report seeks to explore how the delivery target for new homes (300,000 net additional homes per annum across England) could be achieved at a national level, including the important role that implementable planning permissions on medium to large sites of 50-250+ homes can play in order to meet the targets overall. The report concludes:

*"To meet ambitions for 300,000 net additional homes per annum, the country will need to increase delivery by 59,200 homes per annum. **This in turn illustratively necessitates between 474 to 1,385 additional implementable planning permissions on medium to large sites (50-250+ homes) making their way into the housebuilding sector**".*

"This represents each district in England granting planning permission for the following, over and above what they usually would:

- a) 4-5 additional and new medium size sites each year or 4-5 additional and new large size sites which will deliver over the next five or more years; or*
- b) One or two additional and new medium size sites each year or one or two additional and new large size sites which will deliver over the next five or more years plus 12 or 13 new smaller sites each year".*

It is therefore considered that small and medium sized sites can make a significant contribution towards the housing need in Greater Cambridge during the plan period, and can help to fill the 'gaps' in the housing trajectory where housing provision falls short of the identified need and 10% buffer.

4.0 Policy S/RRA – Land adjoining 107 Boxworth End, Swavesey

On behalf of our client, Axis Land Partnerships, we are promoting 'Land East of Boxworth End, Swavesey' for development. The site now forms part of the wider 'Rest of Rural Area' defined in the GCLP First Proposals Plan and is not currently allocated for development.

The site has been promoted throughout the Local Plan process and was assessed by the Council in the Housing and Employment Land Availability Assessment (HELAA, September 2021) under site ref. 40042. The HELAA (Appendix 2) concludes that the site is not currently developable and has therefore been discounted as a potential allocation. The detailed site assessment is provided in HELAA Appendix 4(c).

It is important to note that the Council already agree in the HELAA that the site is Achievable (likely to be viable and deliverable) and Available (likely to be deliverable within 0-5 years of the Plan period). However, the Council conclude the site is not entirely suitable for development, having been assessed as scoring 'Red' against only one of the key criteria used in the assessment methodology. The HELAA states:

"Sites were deemed to be unsuitable if they were assessed as 'Red' against any of the criteria used".

However, we consider that the Council's assessment of the site is not accurate and that the concerns raised resulting in a 'Red' score in relation to 'Site Access' have not been fully considered and could be appropriately addressed and mitigated. As such, the 'Red' scores should at least be 'Amber' and the site would be suitable for development. We provide detailed comments on the findings of the HELAA below. Our comments should be read alongside the various supporting technical information that has been prepared and is submitted with our representations to the Plan, as referenced below.

Red Scores

Site Access

The HELAA assessment only identifies one red score in relation to land east of Boxworth End, Swavesey (Site Ref. 40042). This relates to the 'Site Access' and the HELAA states:

"If over 100 dwellings two points of access are required to accord with the advice of the Cambridgeshire Fire and Rescue".

However, current proposals for the site seek to deliver c. 70 residential dwellings in total, as demonstrated in the Vision Document (Feb 2020) prepared and submitted in response to the Issue and Options consultation in early 2020 and enclosed again as part of these representations (Appendix 1). A site capacity of c. 70 dwellings is considered to be appropriate and has been informed having regard to the site context and wider opportunities and constraints, including the need to maintain existing vegetation and strengthen the planted buffers around the site boundaries, the need to protect and enhance biodiversity and existing features with ecological potential, the need to provide open space for play and recreation and maintain views to the wider open countryside, and the need to avoid areas of flood risk and allow space for SUDS for surface water mitigation and management on site. The Vision Document presents a masterplan that delivers on all these elements, thus

resulting in capacity for c.70 dwellings. Accordingly, provision is made for a single site access from Boxworth End, in the south-west corner of the site. This follows an existing point of access into the site and a break in the existing residential frontage along Boxworth Road.

For c.70 dwellings it is considered that a single point of access would be acceptable to Cambridgeshire Fire and Rescue and would be designed to accommodate access for emergency vehicles.

Some initial work has been carried out by Stantec in respect of the transport strategy for this site, including initial design for a single access onto Boxworth End prepared in accordance with highways design guidance. The initial advice from Stantec concludes that

“it is considered that the site is deliverable, accords with national and local transport policy guidance, and that therefore there are no transport nor highways reasons why Land East of Boxworth End, Swavesey should not be allocated for residential development in the Greater Cambridge Local Plan”.

Having reviewed the HELAA, we note that other sites that score ‘Red’ in relation to ‘Site Access’ are consistent in the requirement to provide for two points of access where there is considered to be capacity for over 100 dwellings. However, further commentary is added in the HELAA in relation to all of these other sites to state “No possibility of creating a safe access”. This additional critique is not included in the assessment of land adjoining 107 Boxworth End (Site Ref. 40042) which suggests the Council do not consider that there is not a suitable solution or site access arrangement that could be designed for this site. The existing connection to Boxworth Road provides a natural entrance to the site, and whilst would result in the loss of some trees in this location, it is considered that substantial replanting across the site would help to mitigate the impacts of this.

There is also a general point about consistency in the scoring approach in the HELAA. There are instances where other sites scored ‘Amber’ for Site Access, despite similar comments being made and the requirement from Cambs Fire and Rescue for two points of access if developing over 100 dwellings, (e.g. Land north of Church Street, Little Shelford, Site Ref: 51137 and Land west of New Farm, Station Road, Longstanton, Site Ref: 40016).

We consider that appropriate access to the land east of Boxworth End, Swavesey can be provided, particularly noting the capacity of the site of c. 70 dwellings in total. Initial work has already been undertaken to design the site access arrangements (Appendix 2) and would be subject to further discussion and agreement with the Council once an application is submitted for the development of the site. It is therefore considered the proposed site access is acceptable in principle, subject to detailed design. This would remove any ‘Red’ score in relation to the site (Site Ref. 40042) and land east of Boxworth End, Swavesey would be considered suitable for development.

Amber Scores

Flood Risk

The HELAA considers that the entirety of land east of Boxworth End, Swavesey (Site Ref. 40042) is located in Flood Zone 1, considered to be appropriate for all types of development. This is agreed.

An initial Flood Risk and Drainage Appraisal has been prepared by Stantec to further understand the risk from flooding. There is an ordinary watercourse which runs along part of the southern site boundary and along the western site boundary and the south-west corner of the site is at a low, medium and high risk of surface water flooding. Additional surface water modelling is therefore required to quantify the potential depth of floodwaters across the site and would be provided with any future planning application. However the initial assessment suggests the existing channel is potentially large enough to contain the flow associated with these flood events.

The emerging masterplan, presented in the Feb 2020 Vision Document, also takes into account the flood risk associated with all dwellings located in an area at low risk of surface water flooding. Appropriate easements will be applied to the watercourse at the site to ensure it remains free from development and future maintenance access can be retained. The site has the potential to support a range of sustainable measures to manage and control surface water run-off, with the view to deliver an integrated Sustainable Drainage System (SuDS). These features will be fully joined up with ecology/habitat areas, green infrastructure, and public open space. Rather than creating simple functional 'drainage features', this integrated approach will contribute to habitat creation and enhance biodiversity, provide multi-functional amenity space, and preserve water quality. This is in line with national and local guidance.

The Stantec report concludes "This site presents an opportunity to deliver strategic growth without causing a detriment to flood risk".

Landscape and Townscape

The HELAA considers that land east of Boxworth End, Swavesey (Site Ref. 40042) is well contained but its eastern boundary is sensitive to wide panoramic views. The emerging masterplan, set out in the Vision Document (Feb 2020), seeks to maintain views through the site and leave appropriate rural gaps between areas of proposed development in order to facilitate views through the site and help to ensure connection with the open countryside to the east, which in turn helps to maintain the rural character of the village. The proposed rural gaps and views designed into the masterplan also reflect the key views identified in the adopted Swavesey Village Design Guide (2010).

The HELAA also highlights that access to the highway would result in the loss of many trees. Axis instructed a Tree Survey to be carried out in November 2019. This concluded that a number of trees would need to be removed to create the new access albeit the majority of the trees to be felled are Category C, with a few Category B trees. There are no Category A trees proposed to be removed and remaining trees and RPA's would be protected. The existing mature hedgerows around the site boundaries will be retained and enhanced where possible.

It is also important to note that when looking at the HELAA results for the other sites in Swavesey currently being promoted for development, all but one of the other proposed residential allocations in the village score red against 'Landscape and Townscape'. Land south of Fen Drayton Road (site ref. 40434) scores Amber, however we note there are other constraints to development of this site including restrictive covenant for agricultural use and concerns in relation to site access.

Concerns were raised in relation to the majority of other promoted land parcels in Swavesey as these sites would result in encroachment outside of the linear village form and into the

open countryside, isolated development away from existing residential dwellings and the loss of Important Countryside Frontages within the village which help to break up the built development and retain views into the countryside. No such concerns are raised in respect of the land east of Boxworth Road (site ref. 40042) which is already bound by existing development along the majority of the northern, western and southern boundaries of the site. Development of the site would not result in encroachment into the open countryside beyond the extent of existing development. Furthermore, development of the site would provide an enhanced landscape buffer along the eastern boundary of the site to strengthen the relationship with the wider open countryside.

In relation land east of Boxworth End, the HELAA comments, “the site is well contained but its eastern boundary is sensitive to wide panoramic views”. Within the Swavesey Village Design Guide (2010) the site is not identified as forming part of protected community green space or Important Views, does not comprise any landmark buildings and is located outside of the conservation area boundary. The Design Guide does highlight a series of valued landscape gaps or views between the adjacent houses on Boxworth End. As discussed below, these views have been considered in the development of the masterplan vision for the site and the layout of development considered to allow gaps and views through the site into the open countryside to the east.

The enclosed vision document (Feb 2020) demonstrates how the emerging masterplan has developed as a result of a landscape-led approach that will set development within a mature and attractive landscape setting, offering an idyllic character that will contribute to placemaking and retain and enhance high quality landscape features. Landscape corridors will be designed into the scheme to connect the existing pond and woodland to the wider landscape and provide an attractive outlook for new homes and enhancing the existing green space network in Swavesey. The proposals seek to retain rural character of the village through the creation of attractive natural and semi-natural landscape and connectivity to the wider rural landscape, in accordance with the priorities of the Swavesey Village Design Guide (2010) which includes “maintain the characteristic rural landscapes of the village, connections with open countryside along the main road, important rural views and glimpses”. This approach also aligns with the key themes promoted in the Greater Cambridge Local Plan, including:

- **Wellbeing and social inclusion:** Help people in Greater Cambridge to lead healthier and happier lives, ensuring that everyone benefits from the development of new homes and jobs
- **Biodiversity and green spaces:** Increase and improve our network of habitats for wildlife, and green spaces for people, ensuring that development leaves the natural environment better than it was before.
- **Great places:** Sustain the unique character of Cambridge and South Cambridgeshire, and complement it with beautiful and distinctive development, creating a place where people want to live, work and play.

Biodiversity and Geodiversity

The HELAA assess land east of Boxworth End, Swavesey (Site Ref. 40042) as ‘Amber’ in relation to biodiversity and geodiversity impacts, with detailed comments provided as follows:

“all residential developments will require an assessment of potential recreational impacts on nearby SSSIs. Developments resulting in discharge to ground or surface water of greater than 20m³ per day would require consultation with Natural England. Habitat in south-west corner of site including wetland and woodland may qualify as Habitats of Principal Importance/be of high ecological value and support protected and notable species. Boundary hedgerows and trees may also qualify as Habitats of Principal Importance/be of high ecological value. Great crested newt may be likely to be present as pond on-site and GCN records within 250m. Applications may find provision of a net gain in biodiversity of a minimum of 10% difficult within their red line boundaries and may need to find offsite compensation. Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated”.

The site is not subject to any statutory or local environmental or landscape designations and there are no nationally designated sites within 2km and no internationally designated sites within 5km of the site. The Overhall Grove SSSI is located approx. 5km to the south of the site and the Berry Fen SSSI and Ouse Washes SSSI are located approx. 7km to the north of the site. The site falls within the SSSI Risk Assessment Zone and therefore consultation with Natural England would be required in respect of new housing developments and will require an assessment of any additional recreational pressure on relevant SSSIs and measures to mitigate adverse impact. The site is well separated from the nearest SSSI and there is not likely to be any recreational pressures on these assets. We note that most of the rural South Cambridge area falls within an SSSI Risk Assessment Zone and therefore this is not a unique constraint to the development of land east of Boxworth End. At the local level, Swavesey Meadows County Wildlife Site is located approx. 1.8km north of the site.

An extended Phase 1 Habitat survey was completed on the site in November 2019. Some further survey work is recommended and the existing pond was considered to have potential for reptiles and Great Crested Newts. A Preliminary Ecological Appraisal (PEA) was also completed in Feb 2020. The PEA confirms that the site is dominated by improved grassland which is of low ecological value and there are no designated sites of wildlife value in the site boundary. Ecological value of the site is limited to the woodland, hedgerow and pond habitat, all of which are largely retained as part of the emerging development proposals. The hedgerow surrounding the site is considered to be a Priority Habitat and any impact on this habitat should be mitigated for on-site or compensated off site. Further surveys will need to be undertaken for a small number of protected species as part of the more detailed consideration of the proposed development. It is not expected that any of these protected species would preclude development, noting the extensive amount of habitat and landscaping that would be retained or enhanced on site.

There is a small area of woodland located at the site entrance, where works are required to facilitate the new access into the site from Boxworth End. An initial Tree Survey was completed in November 2019 which surveyed the trees within this area of woodland in the south-west corner of the site. A number of trees would need to be removed to create the new access albeit the majority of the trees to be felled are Category C, with a few Category B trees. There are no Category A trees proposed to be removed and remaining trees and Root Protection Areas would be protected. The existing mature hedgerows around the site boundaries will be retained and enhanced where possible. As above, the masterplan has also been designed to be landscape-led with significant new planting within the site.

The HELAA recognises that achieving 10% Biodiversity Net Gain on site may be difficult, noting the existing habitat. This comment is made in relation to all of the site assessments and therefore this is not a unique constraint to the development of this site.

Draft Policy BG/BG seeks to introduce a requirement for 20% biodiversity net gain. This exceeds the mandatory 10% minimum biodiversity net gain soon to be implemented by the Environment Bill. This will be difficult to achieve on small sites, particularly those comprising green field sites that are needed to come forward to deliver new housing and infrastructure. An off-site net gain solution should therefore be clearly allowed for by the relevant Local Plan Policy. Draft Policy BG/BG states *“Biodiversity net gain should be delivered on-site where possible, recognising that for smaller developments in particular, more significant and long-lasting biodiversity enhancements may be achieved via contributions towards off-site, larger scale projects. Where it is agreed that off-site habitat measures would bring greater biodiversity benefits than on-site measures, these must be consistent with the strategic aims of the Greater Cambridge green infrastructure network strategic initiatives (see BG3)”*. This approach is supported and it is considered that there needs to be a strategic offsetting mechanism put in place which would allow for new green infrastructure and biodiversity habitats to be strategically planned, in order to provide greater benefit than the provision of uncoordinated new habitats across a range of new small developments.

Overall, it is considered that the development of this site would not have any adverse impact on sites with regional or local protection, being largely self-contained and noting the habitats sought to be retained and enhanced. The vision for the development of this site is landscaped and will help to create a place where people thrive and where nature is embedded, existing features protected, and new habitats are created for wildlife to flourish.

Archaeology

Land east of Boxworth End, Swavesey (Site Ref. 40042) is not subject to any historical or archaeological designations.

The HELAA suggests the site has the potential to contain prehistoric and Roman archaeological remains. Prior to any works on site appropriate archaeological survey work and trial trenching would need to be completed onsite to understand the presence and significance of any remains however at this stage this should not preclude development on the site. Any application for development on the site would also be accompanied by an Archaeological Appraisal.

Accessibility

The HELAA considers land east of Boxworth End, Swavesey (Site Ref. 40042) has ‘adequate’ accessibility to local services and facilities.

The site is located on the boundary of Swavesey village, a minor rural centre, which provides a number of amenities and facilities, including a primary school, college and sports centre, post office, doctors surgery, village shops and public houses. Whilst the site is located towards the southern end of the village, it is within walking or cycling distance for many people, with existing pedestrian infrastructure in place along the main roads leading towards the village centre to the north.

The site also benefits from access to public transport, including two bus stops located on Boxworth End, approx. 200m north of the proposed site access, which are served by the Citi

5 service every 2 hours during weekdays, linking the site with Bar Hill and Cambridge City Centre. The site is also about 1.4 miles south of the Swavesey stop for the Cambridgeshire Guided Bus, which provides fast and frequent services to Cambridge Science Park and Cambridge City Centre, along with St Ives. This is within a reasonable cycling distance of the site, and there is covered cycle parking available at the CGB stop. The site therefore has good public transport accessibility with Cambridge City Centre and the key employment location of the Cambridge Northern Fringe.

The site therefore benefits from reasonable and sustainable access to a number of existing amenities and services both within Swavesey village but also in the surrounding area.

Noise, Vibration, Odour and Light Pollution

Land east of Boxworth End, Swavesey (Site Ref. 40042) scores 'Amber' in relation to impacts of noise, vibration, odour and light pollution and the HELAA concludes *"the site is capable of being developed to provide healthy internal and external environments ... after careful site layout, design and mitigation"*.

The site is not located adjacent to any sources of noise, vibration or odour pollution. The site is set back from the main highways and bound by residential development to the north, south and west and open countryside to the east. The proposed residential use of the site is in keeping with the existing character of the surrounding area.

Development of the site would need to demonstrate that there would not be any light pollution on adjacent open countryside, albeit this would not be significant noting the use and scale of development proposed. An appropriate landscape buffer with enhanced planting would be provided along the eastern boundary of the site which will help to screen the development proposed and reduce any impacts on the surrounding area.

Contamination and Ground Stability

The HELAA notes the previous agricultural use of the land and suggests there is some potential for historic contamination, with conditions required. However, it is not considered that there would be any significant contamination on the site or that couldn't be addressed through appropriate scope of works.

Prior to any works commencing on site, the relevant ground condition surveys would be completed and findings shared, including the need for any remediation or validation works. This could be secured by way of an appropriately worded planning condition.

Green Scores

Within the HELAA land east of Boxworth End, Swavesey (Site Ref. 40042) achieves four 'Green' scores and is one of the better performing sites currently being promoted within the Swavesey minor rural centre area.

Open Space / Green Infrastructure

The site is not subject to any specific landscape or open space designations. The HELAA identifies that the site is located within 50m of Important Countryside Frontage, albeit does not form part of this.

As shown in the concept masterplan, the site can be developed to deliver a significant amount of new open space providing a variety of function, including for both nature and recreational use as well as the provision of formal and natural play.

The existing landscape features create an opportunity to create new public open space and consolidate the character of the proposed development. New houses will front into the new public open space created for the new and existing community. At the same time, the development is designed to retain two of the identified rural gaps and views at Swavesey Village Design Guide between properties and along roads. These connections with open countryside help to maintain the rural character of the village.

The site also has the potential to support a range of sustainable measures to manage and control surface water run-off, with the view to deliver an integrated Sustainable Drainage System. These features will be fully joined up with ecology/habitat areas, green infrastructure, and public open space.

Historic Environment

The site is not located within a conservation area and does not comprise any statutorily or locally listed buildings. However, the HELAA notes the site is located within 100m of a listed asset but concludes “Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact”.

The closest listed building to the site is Grade II listed barn on the farm complex to the south of the site. Any application for development of the site will be accompanied by a Heritage Impact Assessment to understand the impact of the developing on the setting of this designated asset. The concept masterplan shows how the southern boundary will largely comprise the site access and entrance, with retained and enhances planted buffer. It is not considered the development would harm the significance of the listed building.

Transport and Roads

In relation to transport and highways impacts, the HELAA states “Sustainable links required, walking, cycling connections and potential for bus stop provision”. No concerns are raised in relation to transport and highways.

The site is sustainably located on the edge of Swavesey village which is defined as a minor rural centre and which provides access to a number of services and amenities. Most of the village is within a one mile walk of the Site, and there is also good pedestrian and cycle connection with Buckingham Business Park to the south of the site. The location of the site provides opportunities for local residents to meet many of their day-to-day needs by non-car mode.

An initial transport strategy has been prepared by Stantec and is enclosed (Appendix 3). The strategy notes that the site has good accessibility to key destinations by sustainable modes of travel, with footway provision through Swavesey providing pedestrian access to the village centre to the north.

Highways England are also completing some improvement works between Milton and Ellington, including a new local access road that will run parallel between the Swavesey junction at the Buckingham Business Park and Huntingdon Road in Cambridge. This will have a high-quality pedestrian and cycle route alongside it which would be an extension of

the existing shared footway / cycleway along Bucking Way Road, south of Swavesey. This means there would be a continuous shared footway / cycleway between the Site and key destinations including Bar Hill Business Park, Eddington and Cambridge City Centre, considered to be within reasonable distance for regular cyclists.

It is therefore considered that sustainable and active travel links can be provided and encouraged, and the site is well located to link to and improve existing cycle and pedestrian connections.

Air Quality

The site is not located within an Air Quality Management Area and is not located close to any main sources of air pollution and is set back from the main highways.

Given the scale of development proposed it is not considered the site would give rise to unacceptable air quality impacts and any application for development of the site would be accompanied by an Air Quality Impact Assessment, including an assessment of traffic related air quality impacts, to ensure appropriate mitigation is provided as required. The incorporation of sustainable transport measures to reduce development related traffic generation will also be utilised to reduce vehicle emissions generally and promote active travel. The site is also well located to with access to frequent public transport opportunities.

Conclusion

The overarching vision for land east of Boxworth End, Swavesey is to create a small, sustainable extension to the village, already defined as a minor rural centre, and provides a unique opportunity to create a place where nature is embedded, existing features protected, and new habitats are created for wildlife to flourish.

Having addressed the HELAA comments above, it is not considered that there are constraints which should preclude development of the site. The concept masterplan presented in the vision document has been designed to take into account the relevant opportunities and constraints and mitigate any impacts as required through careful design, layout and landscaping.

The site has the potential to deliver sustainable development in accordance with the three dimensions of sustainable development identified at paragraph 8 of the NPPF:

Economic Benefits

- New jobs will be created through the construction phase of the development, both directly and through supply chains;
- New residents will help to sustain existing services and facilities within the minor rural centre of Swavesey village;
- The development is likely to generate CIL and Section 106 contributions towards improving local infrastructure; and
- Additional revenue will be generated through the New Homes Bonus, Council Tax payments etc.

Social Benefits

- The potential to deliver approximately 70 market and affordable new homes to assist Greater Cambridge in meeting its housing needs;

- The potential to deliver a range of dwelling sizes, type and tenure to meet locally identified housing need and creating a mixed and sustainable community;
- The site is designed to connect into the existing village with active and green travel links to help foster social interaction and sense of community;
- The site is well connected in terms of public transport, with direct access to a range of locations and their associated services and facilities; and
- There is potential to create a range of high quality accessible open spaces, to provide a variety of functions (recreation, travel, play etc) which encourages active and healthy lifestyles and promotes health and wellbeing.

Environmental Benefits

- The site is well located to promote pedestrian, cycle and public transport trips, thus reducing carbon emissions;
- The majority of the existing tree and hedgerow planting around the periphery of the site can be retained, as well as opportunity to retain and enhance existing landscape and wildlife corridor through the site;
- The site contains some features of ecological value including an existing small wood and a pond to enhance biodiversity. Both are unusual features in Swavesey and the masterplan demonstrates how they can be retained as part of any development;
- The site is well contained within the landscape and the approach has been to retain and enhance existing natural features where possible including the retention of trees and hedgerows to provide mature planting with aesthetic value that helps to mitigate the visual impact of the development;
- The site also offers the opportunity to provide a landscape corridor and gaps through the site connecting to the countryside to the east. These landscape corridors provide conduits for local wildlife and safe and attractive routes for pedestrians and cyclists; and
- Significant additional tree planting can be incorporated throughout the site which will also contribute towards biodiversity enhancement.

Overall, the proposed allocation of land at Boxworth End, Swavesey aligns with the requirements of the NPPF to promote a sustainable pattern of development that seeks to meet the development needs of their area, align growth and infrastructure, and improve the environment and mitigate climate change.

Appendices

Appendix 1 – Issues and Options Vision Document (Mosaic, 2020)

Appendix 2 – Proposed Site Access Design (Stantec, 2020)

Appendix 3 – Transport Strategy Note (Stantec, 2020)