

Greater Cambridge Local Plan Preferred Options Representation: Appendix 3- Lichfields' HELAA Site Assessment Update

Issue	GC / LDL Assessment	GC Comments	LDL Assessment
Adopted Development Plan Policies	Amber	Outside Development Framework Within 200m of Green Belt	Lichfields identifies that the site is located approximately 400m from the settlement of Bar Hill, on the north side of the new Junction 25 of the A14. It has excellent strategic accessibility and is also close to the major new residential development areas of Northstowe and Waterbeach. Site is located outside the South Cambridgeshire Local Plan 2018 Development Framework (Policy S/7) and the Green Belt (Policy S/4). Policy E/11 states that large scale warehousing and distribution centres will not be permitted in the district.
	Amber		We agree that Amber is an appropriate assessment score based on the current Development Plan and is consistent with GC's approach scoring to the adjacent Land at Hazlewell Farm HELAA Site Assessment (ref.52680).
Flood Risk	Amber	Flood zone: Partly in FZ 2 (19%) Partly in FZ 3 (16%) Surface water flooding: 2% lies in a 1 in 30-year event. 6% lies in a 1 in 100-year event. 21% lies in a 1 in 1000-year event.	LDL seek a development allocation across 100ha of the GC Assessment Site (107.48ha) as the LDL excludes Slate Hall Farm, (the 'Site'). MJM Consulting Engineers identify that 13.3% of the Site is in FZ 3 (not 16% identified by GC) and 16.8% is within FZ 2 (not the 19% identified by GC) according the EA Flood Map. Moreover, detailed site specific hydraulic modelling undertaken by RSK demonstrates that the
			area of the Site within FZ 3 is only 0.44% and FZ 2 is 2.72%. Both of these areas are very much less than the areas taken from the EA flood maps which by their nature are more general and non-site specific.
	Green		The minimal area of the site in FZ's 2 and 3 is located adjacent to Oakington Brook which would not be built on as part of the proposed development.
	G. CCII		MJM Consulting Engineers therefore conclude that the assessment score should be Green.

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Landscape and Townscape	Red	Cambridgeshire Claylands District Character Area: Fen Edge. The Site is generally typical of this characteristic, though recently damaged/ altered due to highways improvements to A14. Landscape Character Assessment (2021) Landscape Character Area- 2A: Longstanton Fen Edge Claylands The site has experience considerable change due to the nearby A14 upgrade works. The landscape character of this area has undergone disruption and is degraded due to the intrusion of a major transport route.	
Biodiversity and Geodiversity	Amber	required (unless residential). Hedgerows, woodland, mature trees and watercourses may qualify as priority habitat/Habitats of Principal Importance and support protected/notable species. Otherwise likely to be of low ecological value (arable). Buildings and mature trees may support roosting bats (if suitable). Records	FPCR, supported by a Phase 1 Habitat Survey, Desktop Survey and Protected Species Survey (wintering birds, ground tree assessment for bats & badger survey) and Biodiversity Net Gain calculation spreadsheet, identify that no statutory or non-statutory sites of nature conservation importance lie within 5km, 2km or 1km of the site. There are a number of protected/notable species records that fall within the site boundary including badger, otter, water vole, common lizard and barbastelle bat among others. None of the on-site habitats are listed as a Priority Habitat by The Cambridgeshire and Peterborough Biodiversity Action Group. The proposal allocation would be capable of achieving a c.12% biodiversity net gain on site (using DEFRA 3.0), retaining the majority of existing habitats of greater ecological value, with a

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			significant area (30ha) of new habitats. Further work is being completed to identify the best method to deliver an addition 8% increase to deliver a 20% net gain.
	Amber		FPCR therefore conclude that the assessment score should be Amber.
Open Space/ Green	Green	Any impact of the proposed development could	No Technical Report has been prepared as the GC Assessment score was Green.
Infrastructure	Green	be reasonably mitigated or compensated.	
Historic Environment	Amber	detrimental impact on a designated or non- designated heritage asset or the setting of a	RPS identify there are no designated or non-designated built heritage assets within the site. One designated built heritage asset lies within 1km (situated a short distance to the southwest), the Grade II listed structure: "Milestone about 100 yards south east of turn to Bar Hill"- a 19th century cast iron triangular milestone (NHLE Entry number 1127302). RPS find that, notwithstanding the current uncertainty over its condition following the recent A14 Improvement works, the significance of this asset does not rely on the Site and determines that the asset is not sensitive to effects from future development within the Site.
			Within a wider buffer zone of 1km to 2km, there are 33 further designated built heritage assets: thirty-one Listed Buildings - generally located within the historic village cores of Lolworth, Dry Drayton, Oakington & Longstanton, and two Conservation Areas - in Oakington and Longstanton. RPS find that, whilst development within the Site may be distantly visible (more than 1.5km away) from the southeast part of Longstanton Conservation Area or from some of the Listed Buildings, this is not assessed as causing any harm to their heritage significance or to the contribution setting makes to this significance. Any potential impact on the wider setting of these heritage assets can be mitigated by landscaping and design measures.
	Green		RPS therefore conclude that the assessment score should be Green.
Archaeology	Amber	detrimental impact to archaeology. Further	
		Extensive settlement of Iron Age and Roman date known in the area.	Mesolithic and Roman period remains – located in the eastern third of the site.

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			RPS conclude that the site has a moderate to high potential for the presence of further Mesolithic & Neolithic archaeological remains; a low potential for major Bronze Age remains; a high potential for Iron Age and/or Roman rural remains; a low potential for Saxon period archaeology; and a low potential for Medieval and later evidence other than cultivation remains None of the identified assets would preclude allocation of the Site for major development or would prevent its future development.
	Amber		RPS therefore conclude that the assessment score should be Amber.
Accessibility to Services and Facilities	Amber	1,000m	For the HELAA transport assessment criteria , Vectos identify that the accessibility of the site was considered by non-car travel. A range of categories were considered which are generally more applicable to housing sites (including proximity to health, primary and secondary schools as well as proximity to local, city or district centres).
		720m and Less than or Equal to 2,000m	Vectos consider that a different set of metrics would be appropriate for employment sites as it is difficult to see how under this assessment any employment site could achieve a green score. Criteria could include proximity to existing and emerging populations, providing opportunity for travel to work by active modes of travel.
		or Equal to 2,000m	For the Site Assessment (notwithstanding previous commentary on the assessment criteria), there are two areas where Vectos disagree with the scoring; distance to the cycle network and public transport.
		450m and less than or Equal to 1,000m	In terms of cycling, there is a cycle route running along the southern boundary of the site on the A1307, towards Northstowe and Bar Hill and through the site along the Bridleway. As such a Green score would be applicable with distances less than 800m. The HELAA scores this as Red
			Public transport is scored as Amber suggesting distances of between 450m and 1,000m. However, it is understood that bus services travel along the A1307. Introducing a bus stop here would ensure the site falls within 450m of a bus stop and public transport, allowing a Green score to be provided.
	Assessment criteria not relevant to	transport, and employment opportunities Proposed development would require	Finally, it is stated that the 'Proposed development would require accompanying local centre / employment provision, primary school and community centre'. Clearly, such facilities are not required for the intended employment use.

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	employment sites.	provision, primary school and community centre	Vectos therefore conclude that with proper consideration of criteria that are relevant to employment sites, the site would achieve a higher score.
Site Access	Amber	subject to detailed design. The Local Planning	The site was provided an Amber score meaning there are potential access constraints, but these could be overcome through the development of the scheme. Vectos identify that it is not clear what constraints may have been identified or what, for this or any site, would enable a Green score.
		subject to detailed design. The Local Planning Authority will need to consult with the Highway	Vectos assume that full agreement of the access proposals from the highway authority would be required to enable a Green score to be provided. This would mean a preliminary design to be agreed and passed through a Stage 1 Road Safety Audit. It would also require a Transport Assessment to ensure capacity is suitable. Without the full agreement, the only way a Green score might be achieved is where a site is existing, will not be intensified in terms of its use and access is suitable. Clearly for site promoted through the Local Plan this is entirely unlikely.
			Vectos agrees with the further commentary for the site which states that 'The proposed site is acceptable in principle subject to detailed design'.
			Vectos, however, disagree with the statement 'The Local Planning Authority will need to consult with the Highway Agency, as National Highway Authority, in respect to the proposed site'. It is not relevant and should be removed as National Highways will not be concerned with the access arrangement in detail as it will be a local highway authority matter.
			It is also noted that adjacent sites such as Land to the south of the A14 Services, Boxworth does not have such statements attributed to its assessment despite relying almost entirely of vehicle movements taking place via the Strategic Road Network.
	Amber		Without a clear understanding of how sites might achieve a Green score, Vectos consider the Amber score to be appropriate.
Transport and Roads	Red		The site was provided a Red score meaning that the conclusion for this criteria was that the 'Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated'.

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			Vectos find that there is little detail provided to determine how the conclusion was reached. The comments provided state that the site is 'Remote from any adjacent settlement, sustainability issues (currently proposed for B2/B8) which is possibly more acceptable'.
			The above statement is clearly incorrect. The existing Bar Hill settlement is within 1km of the site (measured from centre to centre, note the closest boarders are within 350 metres) and the emerging community at Northstowe with 10,000 homes will be largely within 1 to 2km of the site. Given such distances, Vectos completely disagree with the statement that the site is remote from settlement, rather it is accessible to existing and future communities.
			The comments also state that a Transport Assessment and Travel Plan is required which if the reference relates to a future planning application is agreed but also applicable to all promotion sites.
			Given the identified capacity on the local road network which has been recently improved and the accessibility of the site, both of which the HELAA assesses positively elsewhere, it cannot be reasonably concluded that the site 'would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated'.
	Amber		Further evidence of this can be drawn by making a comparison against the scoring for the site at Land to the south of the A14 Services, Boxworth. Unlike Bar Hill, Junction 25, the site is scored as Amber and 'No comment' is set out in the wider commentary. The reason for the distinction between the two sites is entirely unclear.
	Allibei		Vectos therefore conclude that the assessment score should be Amber.
Noise, Vibration, Odour and Light Pollution	Amber	healthy internal and external environments in regard to noise / vibration/ odour/ Light	To determine baseline conditions, Sharsp Redmore has undertaken a noise survey to determine existing ambient (LAeqT) and background (LA90,T) against which the development will be assessed. Measurements were carried out at multiple locations on and around the site at locations representative of the nearest noise sensitive receptors (NSR) to the site. Existing noise levels are characterised by road traffic on the A14 and local road network. At night activity on the local roads reduce and noise from the A14 dominates. Full details of the survey are included in Appendix A to the note and summarised in Table 1 below.

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	Assessment							
			TABLE 1: Survey Results					
			Location	Day time (0700 – 2300 hrs)		Night time (2300 – 0700 hrs)		
				L _{AeqT}	L _{A90,T}	L _{AeqT}	L _{A90T}	
			NSR1	66 – 68 dB	53 – 58 dB	56 dB	41 dB	
			NSR2	50 – 56 dB	48 – 55 dB	46 – 55 dB	42 – 54 dB	
			NSR3	57 – 71 dB	49 – 58 dB	47 – 66 dB	44 – 56 dB	
			NSR4	46 – 47 dB	41 – 46 dB	41 – 42 dB	39 – 40 dB	
			NSR5	54 – 69 dB	50 – 58 dB	51 – 60 dB	44 – 57 dB	
	Green		noise from f from units. C	ixed mechanical p Operational vibration	lant serving the un on is not considere	nits, service yard ac ed, as this will have	·	
Air Quality	Sharps Redmore therefore conclude that the assessment score shality Amber Partially in AQMA. Will require inherent / Redmore Environmental air quality consultants, identify that the S							i+hin
	Gran	intrinsic designed in AQ mitigation.	/ Redmore Environmental air quality consultants, identify that the Site is partially located within an Air Quality Management Area ('AQMA)', which is described as follows: "An area along the A14 between Bar Hill and Milton. Note, although PM10 is also a relevant pollutant within this AQMA and was included in 2008, the modelled PM10 boundary is smaller and inside the NO2 boundary, so the NO2 boundary is the adopted one." Monitoring data provided in South Cambridgeshire District Council's 2021 Annual Status Report indicates pollutant concentrations within the AQMA have been below relevant Air Quality Objectives ('AQO') of less than 40μg/m3 of NO2 and PM10. 2014. As such, SCDC intend to the revoke the AQMA in the near future. Observations by DEFRA for the two national grid references for the application site shows that NO2 pollutant concentrations of 9.7-11.4μg/m3 and PM10 pollutant concentrations of 17.1-18.3μg/m3, clearly well below AQO.					
	Green		-				ore should be Green.	
Contamination and Ground Stability	Amber	Potential for historic contamination, conditions required.	carried out v the proposed sensitive use	which conclusively	show that the site the site is principal	should be assessed	ne site have already as Green, especially ndustrial use which is	y since

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13300	Assessment	de comments	LDE ASSESSMENT	
	Assessment		 Preliminary Risk Assessment (Feb 20): Site has remained undeveloped throughout its history with the exception of localised tree planting and the construction of hardstanding access routes. Therefore, there is no known previous development on the site which might have caused a contamination risk. Infiltration test trial pits (Feb 20). Relatively consistent natural ground conditions across the Site with typically 1.5-2.0m of loose-dense sandy clays and gravels overlying firm to stiff Kimmeridge Clay. No imported fill materials were encountered nor any signs of soil or groundwater contamination. Borehole testing of deeper ground conditions (Sept/Oct 20): The ground conditions encountered were very similar to those in the previous trial pits in 2. above with again no imported fill material encountered nor any signs of soil or groundwater contamination. Borehole testing of groundwater (Sept 21): Ten boreholes to 5.0m depth were sunk across the site for the purposes of ground water monitoring over a period of at least 12 months. Again, the soil and ground water conditions were very similar to the previous investigations with no indications of imported fill materials nor any signs of soil or ground water contamination. 	
	Green		MJM Environmental Consulting Engineers therefore conclude that the assessment score should be Green.	
Further Constrai	nts			
Constraints to development	-	Agricultural Land Classification: 74% Grade 2; 26% Grade 3 Watercourse crosses the site Public Right of Way is on or crosses the site	We understand that the original Land Classification Survey for the site found that c.26% of the site was Grade 2 and 74% was Grade 3. Therefore, the Grade 2 and Grade 3 scores are the wrong way round in the HELAA.	
Strategic Highways Impact	Amber	Within Highways England Zone 2 - A14 West Limited capacity for growth	Vectos identify that the site was provided an Amber score due to its location within Highways England Zone 2 - A14 West and meaning there is considered to be limited capacity for growth. It is unclear what models or data was used in order to determine the relative capacity of the Strategic Road Network across the area. The Zone within which the site is located suggests some, albeit limited capacity for growth. Whilst the conclusion is somewhat surprising given the recent improvements to the A14 in this area and Junction 25, this allows a later assessment to confirm the suitability of the site and proposals and this therefore considered suitable.	

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Issue	GC / LDL	GC Comments	LDL Assessment			
	Assessment					
	Amber		Vectos therefore conclude that the Amber score is appropriate given that further assessment			
			work is required.			
Employment	-	-				
Green Belt-	-	Parcel ID:-				
Assessment of						
Harm of Green						
Belt Release						