



# **GREATER CAMBRIDGE LOCAL PLAN: FIRST PROPOSALS CONSULTATION 2021**

## **Land East of Redgate Road, Girton**

Prepared by Strutt & Parker on behalf of NIAB Trust

December 2021

Site Name:	Land East of Redgate Road, Girton
Client Name:	NIAB Trust
Type of Report:	Greater Cambridge Local Plan: First Proposals Preferred Options Consultation 2021
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**Appendices**

Appendix A: Housing and Employment Land Availability Assessment, Site Reference: 40241;

Appendix B: Prospective Site Feasibility Study, produced by pHp architects;

## 1. INTRODUCTION

- 1.1 This representation has been prepared by Strutt & Parker on behalf of NIAB Trust to support the promotion of land to the East of Redgate Road, Girton as part of the Greater Cambridge First Proposals Consultation 2021.
- 1.2 In September 2021 Greater Cambridge Shared Planning Service published the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA), which provided an initial assessment of the sites put forward for consideration for allocation as part of the Call for Sites consultations within Greater Cambridge.
- 1.3 This representation provides a response to the 'First Proposals' Preferred Options Consultation and has been structured to respond to relevant questions as set out within the First Proposals Consultation. In addition, a detailed assessment is provided in respect of the HELAA Proforma for the site.
- 1.4 The HELAA excludes the land East of Redgate Road site from allocation primarily on the basis of landscape issues, notably that the proposed development would impact the rural character of the surrounding landscape.
- 1.5 The site covers an area of approximately 0.94ha and is able to accommodate 28 dwellings, associated access and landscaping. Additionally, there is an opportunity to provide a new pedestrian/cycleway link over the existing A14 crossover. This new link would provide a sustainable transport link which could even reduce overall pressure on the Strategic Road Network. It is noted that the NIAB Trust has also put forward two other sites at Park Farm (Villa Road and Land West of South Road).
- 1.6 It is considered that several of the assessment criteria, should be re-categorised. It has been demonstrated in the supporting information provided that the allocation of this site would not have a significant adverse impact and should be considered as a suitable, achievable and deliverable site for housing and should therefore be put forward for allocation in the emerging Local Plan.
- 1.7 In support of this report, the following document has been prepared;
  - Prospective Site Feasibility Study, produced by pHp architects.

**2. QUESTION: Do you agree that we should plan for an extra 550 homes per year, so that housing keeps up pressure with increased jobs in our area?**

- 2.1 We agree that it is very important that housing delivery keeps up for demand for increased jobs within the area.
- 2.2 As part of the preparation of the emerging Greater Cambridge Local Plan, the Shared Planning Service has identified a need for 2,321 dwellings to be built per year. A significant proportion of this growth is made up of existing allocations within the Local Plan.
- 2.3 The initial evidence base and spatial options assessment for the emerging Local Plan, set three growth options; 'minimum' (40,300 dwellings - based upon standard methodology); 'medium' (46,200 dwellings- based upon economic forecast based upon long term historic employment) and 'maximum' (67,700 dwellings – based upon fast economic growth in the recent past). In view of this, the housing delivery target of 44,400 new homes over the plan period alongside 58,500 new jobs would fall between the 'minimum' and 'medium' growth scenarios previously suggested.
- 2.4 The Development Strategy Topic Paper that accompanies this consultation acknowledges that the Greater Cambridge economy is dynamic and does not readily align with national or regional forecasts for job growth. In particular, it has a world-renowned life sciences cluster which has the potential to drive growth beyond typical regional or national rates. It is also acknowledged that in the recent past employment growth within the region has been significantly higher than predicted.
- 2.5 Accounting for the evidence set out within the Development Strategy Topic Paper, it is not clearly justified why only 44,400 new homes and 58,500 new jobs are proposed over the plan period. It is considered that this approach should be re-visited to increase both housing and employment allocations within the Local Plan. It is considered that the delivery of housing should be significantly increased, in line with the 'maximum' growth forecast, to align with economic growth within the recent past. The case for maximum growth forecast is further supported by significant transport investment within the area over the plan period. This includes schemes such as East-West Rail, Cambridge South Station and the delivery of a number of Rapid Transit Routes proposed by the Greater Cambridge Partnership.
- 2.6 The provision for lower growth scenarios does also not appear to be consistent with the Government's objectives for the Ox-Cam Arc as a focus for housing and employment growth with associated infrastructure.

2.7 Concern is also expressed in relation to the types of sites which have been allocated. Recently the St Albans Local Plan was withdrawn in November 2020 following a number of serious concerns raised by the Inspectors which included an overreliance on a small number of large strategic allocations (500 dwellings or more, or over 14 ha) at the expense of smaller scale subareas. The Inspectors noted that such sites, provide choice and flexibility in the housing market and secure affordable housing more immediately as advocated in national planning policy. The findings of the Inspector in 2020, in respect of the examination of the Uttlesford Local Plan were very similar and also resulted in their Local Plan being withdrawn.

2.8 The current GCSPS housing growth strategy is reliant on a handful of very large allocations to deliver the proposed proportion of the growth in predominantly urban areas. It is considered that it would be more sustainable to distribute a wider range of housing growth/allocations across the Greater Cambridge area, as this will provide sustainable benefits for the existing settlements and communities in terms of existing businesses, facilities, and give people greater choice over where to live. National planning policies recognises that rural communities need to be able to grow and thrive to avoid decline. The inclusion of smaller sites will also aid delivery and more competition in the housing market.

**3. QUESTION: Do you agree that new development should mainly focus on sites where car travel, and therefore emissions, can be minimised?**

- 3.1 Yes, in principle the proposal to focus development on sites where car travel can be minimised is supported. National policy is clear within paragraph 79 of the National Planning Policy Framework (NPPF) that planning policies should identify opportunities for villages to grow and thrive, especially where they will support local services. The updated NPPF (2021), also provides additional emphases on the suitability of providing significant extensions to villages, provided that they are well located and designed.
- 3.2 The CPIER report (2018), which is referenced as a key document within the evidence base provides a detailed analysis regarding the potential benefits of focusing growth along key transport corridors. The proposed Cambridge South Station proposes significant sustainable transport improvements between Cambridge and Meldreth Station, which is within walking distance to Melbourn.
- 3.3 The site at Redgate Road is located in a sustainable area, with the development not overly reliant on car travel, with many public transport options easily accessible. Girton is a Minor Rural Centre (as defined within the adopted Local Plan) which benefits from both Girton Glebe Primary School and Girton Nursey and Pre-School, and a large range of facilities, including shops, pubs, restaurants and community facilities.
- 3.4 The release of the site from the Green Belt would facilitate the creation of a cycleway/footway that could link into the Darwin Green development to the south, on the opposite side of the A14. It is proposed that as part of any development of the site, of any size, a cycleway/footway route connecting Girton to Cambridge to the south would be incorporated and provide an improved linkage over the A14 and directly to the existing cycle and pedestrian links within Cambridge. This would further encourage a shift away from car use and towards more sustainable modes of transport
- 3.5 It is considered that this limited additional growth within Girton would be consistent with the objectives of the Local Plan, which seeks to minimise car travel. The site would easily integrate into the existing built form of the settlement and relate to the housing development to the west.

**4. QUESTION: We feel that we should support the development of the Cambridge Biomedical Campus, with space for more healthcare facilities, research and housing. What housing, facilities or open spaces should be created around the campus?**

4.1 We strongly agree that supporting the development and further expansion of Cambridge Biomedical Campus should be one of the key principles of the new local plan. To support this objective, it is imperative that new housing growth is located in areas with sustainable transport links to the Campus.

4.2 The site is within half an hour cycling distance of the Campus and bus links are also available. It is considered important that substantial housing growth is provided in close proximity to the Biomedical Campus to support its growth and so it can be accessed by sustainable transport means. Therefore, growth in Girton would be consistent with one of the key objectives of the Local Plan, which seeks to minimise car travel by focusing growth on locations with good transport infrastructure.



**5. QUESTION: We think we should be very limited about the development we allow in villages, with only a few allocated sites in villages, with good public transport connections and local services. Which villages do you think should see new development of any kind?**

- 5.1 It is acknowledged that the proposed strategy focuses on locating new development in and around Cambridge City, growing existing new settlements and a small degree in the rural southern clusters. An extremely small number of small to medium sized allocations have been identified with very little new growth proposed in rural communities. This is likely to result in the proposed growth having little impact on housing affordability.
- 5.2 It is worth noting that recently the St Albans Local Plan was withdrawn in November 2020 following a number of serious concerns raised by the Inspectors which included an overreliance on a small number of large strategic allocations (500 dwellings or more, or over 14 ha) at the expense of smaller scale subareas. The Inspectors noted that such sites, provide choice and flexibility in the housing market and secure affordable housing more immediately as advocated in national planning policy. The findings of the Inspector in 2020, in respect of the examination of the Uttlesford Local Plan were very similar and also resulted in the local plan being withdrawn.
- 5.3 As set out above, the current approach to allocating only a very limited number of larger sites is not considered to be sound in its current form. In particular, it is considered that additional growth should be provided within the most sustainable villages, such as Girton.
- 5.4 It is considered that the provision for increasing the range of sites modestly to include smaller and medium sites in the rural area would provide significant benefits. For example, they could be delivered more quickly without requiring additional infrastructure, provide choice and flexibility in the housing market and securing affordable housing more immediately. This is a point recognised by the Inspector that examined the 2018 Local Plan for South Cambridgeshire as referenced within paragraph 31 of the report:
- 5.5 *“In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5-year HLS, until the Garden Communities begin to deliver housing. This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing”* (paragraph 114).

- 5.6 It is not clear why the Shared Planning Service have deviated from a clear recommendation provided by the Planning Inspectorate.
- 5.7 However, it is also important to acknowledge the employment sites/areas in Girton which will benefit from increased housing provision. The additional housing will allow people to live closer to work thus reducing car travel and increase employment opportunities. Additional housing would also contribute towards the local economy through spending on local provisions.

**6. QUESTION: What housing, jobs, facilities or open spaces do you think should be provided in and around these villages?**

- 6.1 It is important that a range of housing, jobs and facilities are provided within villages as part of new allocations to allow them to thrive and remain vibrant. NIAB Trust are responsible for the promotion of the land East of Redgate Road, Girton, and have a track record of delivering high quality developments. NIAB Trust are fully committed, to engagement with the GCSPS and Girton Parish Council regarding the mix and type of housing to be delivered on land East of Redgate Road, Girton. The site also has the potential to provide open space to serve the new and wider local community and would trigger contributions towards improvements towards local facilities.

**7. QUESTION: Are there any sites which you think should be developed for housing or business use, which we haven't got on our map so far?**

- 7.1 Yes, Land East of Redgate Road, Girton should be allocated for development and would be a sound allocation as part of the emerging Local Plan. The Land East of Redgate Road, Girton site was promoted originally at Call for Sites stage. We have also demonstrated that the site could be delivered without any adverse impacts on landscape.

## 8. RESPONSE TO HELAA ASSESSMENT

8.1 The key concerns raised in the HELAA in respect of the site’s potential allocation relate to Strategic Highways Impact associated with the A14 and Landscape and Townscape concerns. The issues identified ‘green’ were:

- Biodiversity;
- Open Space / Green Infrastructure;
- Historic Environment;
- Air Quality; and
- Contamination and Ground Stability.

8.2 A detailed review of the HELAA assessment in respect of the Land East of Redgate Road, Girton is set out below.

### Site Assessment Summary

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

Issue	Assessment	Response	Amended Assessment
Adopted Development Plan Policies	Amber	The site abuts Girton’s Development Framework. Residential development borders the site to its south and west. It is considered that the site would form a logical extension to Girton, resulting in a site that is well related to the existing village edge.	Green
Flood Risk	Amber	The issue of Flood Risk has been identified as Amber in the site assessment, despite being located wholly in Flood Zone 1, and at the lowest risk of surface water flooding; a 1 in 1,000-year event.	Green
Landscape and Townscape	Red	As outlined above, the Landscape and Townscape assessment is a Red issue in the HELAA on the grounds that the development of the site would have impacts on amenity views from the south-west of the	Amber

Issue	Assessment	Response	Amended Assessment
		<p>site and that development on the site would have a significant adverse impact to the rural landscape character. However, it is stated that a significantly reduced development with landscaping measures could be acceptable.</p> <p>The site is well related to the existing settlement, and would only extend towards the east a limited amount. It will align with the existing built part of the settlement to the south and the wooded area to the north, infilling a natural gap in this part of the village edge.</p> <p>As acknowledged, wide and local views are limited due to boundary planting and low-lying topography, so the impact of the development on views is considered to be minimal.</p> <p>It is therefore considered that a small scale, well designed development located adjacent to existing residential development would have an acceptable impact on the surrounding landscape.</p>	
Archaeology	Amber	<p>The presence of the nearby historic village core is noted, however the site is small scale and matters of archaeology can be dealt with at the application stage. As this site is limited in size and would only be delivering up to 28 dwellings, any delays associated with archaeology would be unlikely to be significant and would not undermine the overarching housing delivery strategy.</p>	Green
Accessibility to Services and Facilities	Amber	<p>Girton, is categorised as a Minor Rural Centre, categorised as having “a lower level of services, facilities and employment than Rural Centres, but a greater level than most other villages in South Cambridgeshire, and often perform a role in terms of providing services and facilities for a small rural hinterland.”</p> <p>The HELAA assessment states that the site has “adequate accessibility to key local services, transport, and employment opportunities”.</p>	Green

Issue	Assessment	Response	Amended Assessment
		<p>Further to this, according to the Adopted South Cambridgeshire Local Plan, Minor Rural Centre's are capable of supporting residential development up to an indicative maximum scheme size of 30 dwellings.</p> <p>Considering this, the issues of accessibility should be amended to <b>Green</b> on the basis that the site has convenient access to sufficient key local services and facilities.</p>	
Site Access	<b>Amber</b>	<p>The Site Access is identified as 'Amber' but is described as 'acceptable in principle, subject to detailed design' in the HELAA 2021.</p> <p>At this stage in the evaluation of sites submitted in the 2019 Call for Sites Consultation, 'acceptable in principle' is as positive as it can be as detailed access proposals are yet to be confirmed.</p> <p>The principle of the proposed access is established, and should therefore be categorised as <b>Green</b> until such time detailed access proposals are made available.</p>	<b>Green</b>
Transport and Roads	<b>Amber</b>	<p>Accounting for the scale of the development at only 28 dwellings, the additional traffic movements on the strategic road network will be negligible. With this in mind it is considered very unlikely that the development in this location would have any impact on the strategic road network. Any application would demonstrate a highly sustainable mode share, and would include capacity assessments at important local junctions.</p> <p>The potential for the creation of a cycleway/footway that could link into the Darwin Green development to the south, on the opposite side of the A14, would also increase sustainable travel in the area and reduce use of the road network.</p>	<b>Green</b>

Issue	Assessment	Response	Amended Assessment
		<p>Reference is made to this site being part of a 'cluster' of developments. It would be helpful if further clarification could be provided on this point.</p> <p>Considering the above, the site at Girton should be reassessed as <b>Green</b>.</p>	
Noise, Vibration, Odour and Light Pollution	<b>Amber</b>	<p>The assessment states that "<i>The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation.</i>"</p> <p>It is acknowledged, that the above issues can be addressed at detail design stage. It is therefore considered that this should not count against the allocation of the site.</p>	<b>Green</b>
Strategic Highways Impact	<b>Red</b>	<p>The assessment identifies issues of Strategic Highways Impact as <b>Red</b>, due to the apparent impact on the A14, with sites having to demonstrate '<i>no net increase in vehicle trips on the strategic road network</i>'.</p> <p>The approach and assessment of the site, in this regard, is not consistent with the scoring of the land which is situated within the North-East Cambridge Area Action Plan. The Cambridge North- East Action Plan establishes a vision for a new city district in North East Cambridge, comprising 182 hectares of brownfield land. The associated transport impact on the A14 would be vast. By contrast any transport impact associated with the site at Redgate Road would be relatively small. It follows that if Redgate Road is ruled out of allocation for Strategic Highways Impact, land covered by the Area Action Plan should also be ruled out. This approach clearly needs more thought, and a more holistic approach involving smaller and medium sites should be considered.</p> <p>Any application would demonstrate a highly sustainable mode share, and would include capacity assessments at important local junctions. Any potential impact on the</p>	<b>Amber</b>



Issue	Assessment	Response	Amended Assessment
		<p>functioning of trunk roads and/or local roads could be reasonably mitigated. Contributions arising from any development could be used to help improve transport and roads in the area.</p> <p>Considering the above, the site at Girton should be reassessed as <b>Amber</b>.</p>	
Green Belt - Assessment of Harm of Green Belt Release	-	<p>The release of this land from the Green Belt has not been flagged as making it unsuitable for allocation, however, the HELAA does indicate a high level of harm associated with the release of Parcel ID GI16 (which does not make up part of the site, but is located to its north), and a very high degree of harm to GI17 (which includes the site but also an extensive area to its east). As the site only makes up part of the GI17 parcel, it is considered that the assessment is only partially relevant. The site is well related to the existing settlement, and it is considered a rating of medium harm is more appropriate.</p> <p>Paragraph 140 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation and updating of plans. The preparation of the new Local Plan therefore represents an opportunity to review the Green Belt boundary. Greater Cambridge is an exceptional area, both in its contribution to the national economy and its international reputation. In order to sustain its natural growth in a sustainable way, a wholesale review of the Cambridge Green Belt should be undertaken. This should be a balanced review, not simply an assessment of the performance of various parcels of land against the purposes of Green Belt. It should be a challenging assessment balancing the scale of development required to support the growth necessary to deliver the Cambridgeshire and Peterborough vision of doubling the total economic output of the area over the next 25 years. To support this level of job growth around 2,900 homes will</p>	-

Issue	Assessment	Response	Amended Assessment
		<p>need to be built each year to deliver a total of 66,700 homes between 2017 – 2040. It is imperative both locally and at the national level that Cambridge maintains its international reputation and the blanket protection provided by existing outdated Green Belt policy only stifles sustainable growth.</p> <p>Cambridge as a city is exceptional and as such, a radical review of Green Belt policy is clearly justified to facilitate its growth. The tools available today to analyse and inform plan making decisions are highly sophisticated and should be used to undertake a challenging and balanced review of the existing Green Belt.</p> <p>Paragraph 142 of the NPPF indicates that Green Belt release should be targeted at sustainable locations well served by public transport such as Girton. It goes on to state that compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land should be included. NIAB Trust have extensive land holdings at Park Farm which would allow these objectives to be filled.</p> <p>We therefore conclude that the new local plan should take the opportunity to review the Green Belt boundaries around Girton and allocate this site for development.</p>	

## 9. CONCLUSION

9.1 This representation has been prepared by Strutt & Parker, on behalf NIAB Trust to support the allocation of a housing site for approximately 28 dwellings and associated landscaping at Redgate Road, Girton.

9.2 The site has a number of favourable attributes that would demonstrate it will be a sound allocation for housing growth, within the emerging Local Plan:

- It is located in a highly sustainable location, immediately adjacent to the Girton Development Boundary. The site is in an accessible location and sustainable location.
- The site has the potential to provide a pedestrian/cycle link encouraging sustainable travel.
- Girton is a sustainable Minor Service Centre, capable of accommodating medium scale residential growth. The site is located in close proximity to the local primary school and public transport.
- The site benefits from good access onto Redgate Road.
- The site is unconstrained and fully deliverable in planning terms. The site can come forward early in the plan period to meet housing needs.
- There will also be economic benefits through construction jobs, additional spending power from the construction phase and expenditure in the local economy from the new residents.
- Allowing Girton to grow in a planned way will add to village vitality and sustainability by providing additional support and customers for existing services and facilities.
- NIAB Trust are committed to detailed engagement with both Planning Officers and statutory and non-statutory consultees, including working closely with the local community in the evolution of the vision for the site.

9.3 In light of the above, it is therefore considered that the site East of Redgate Road, Girton provides an excellent location for development and would be a sound allocation as part of the emerging Local Plan.