

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

Land West of South Road, Impington, Cambridgeshire

Prepared by Strutt & Parker on behalf of NIAB Trust

December 2021

| Site Name:      | Land West of South Road, Impington,<br>Cambridgeshire              |
|-----------------|--|
| Client Name:    | NIAB Trust   |
| Type of Report: | Greater Cambridge Local Plan: First Proposals<br>Consultation 2021 |
| Prepared by:    | Jack Millar  |
| Checked by:     | Adam Davies  |
| Date:           | December 2021  |

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Appendix A: Housing and Employment Land Availability Assessment, Site Reference: 40232;

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 West of South Road, Impington as part of the Greater Cambridge First Proposals Consultation 2021.
- 1.2 In September 2021 Greater Cambridge Shared Planning Service (GCSPS) published the Greater Cambridge HELAA, which provided an initial assessment of the sites put forward for allocation as part of the Call for Sites consultation within Greater Cambridge.
- 1.3 Since the Call for Sites and Issues and Options consultations feedback received has been considered and changes have been made to the Land West of South Road site. Previously the site covered an area of approximately 20.62 hectares and was considered to be suitable to deliver a development including 450 dwellings. However, following feedback received at the First Proposals the decision has been taken to greatly reduce the area of the site and quantum of potential development. The revised site is approximately 5.2 hectares in area, and can accommodate 78 dwellings.
- 1.4 It is noted that the NIAB Trust has also put forward two other sites at Park Farm (Villa Road and Redgate Road).
- 1.5 This representation provides a response to the 'First Proposals' Consultations. The representation 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 Assessment for the site.
- 1.6 The HELAA excludes the Land West of South Road from allocation for 3 main reasons:
  - a) In relation to Landscape and Townscape: "The site is isolated from the main part of the village and is outside the village framework. Any development of the site would have a negative landscape impact because of the extensive views from the north west and south".
  - b) In relation to Site Access: "The proposed site does not to have a direct link to the adopted public highway" and there is "No possibility of creating a safe access".
  - c) In relation to Strategic Highway Impact: "Within Highways England Zone 3 A14 CNB.

    No capacity for growth. Sites would need to ensure no net increase in vehicles trips on the Strategic Road Network".

- 1.7 A Prospective Site Feasibility Study, prepared by pHp architects has been produced to support this representation (Appendix B). As set out in the study, in relation to Landscape and Townscape, the site would be smaller, and would be read as part of the existing village. The smaller site would also have less of a negative landscape impact as it would be well aligned with the existing western edge of Impington. Additionally, the density of the dwellings has been greatly reduced, increasing the openness of the site, and reducing landscape harm. In relation to Site Access, as shown on page 7 of the study, a safe site access could easily be provided to South Road/Mill Road where there is an existing field access to the north of the existing Green Space. A large additional area of green space could be provided directly to the south of the South Road Green Space to compensate for land required for the widening of the access link. In relation to Strategic Highway Impact, the number of dwellings proposed has been greatly reduced, minimising any potential harm. 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 considered that the revised site addresses many of the issues previously raised, and that several of the assessment criterions used to assess the site 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 on the landscape or road network, and as such that the site should be put forward for allocation. Further analysis of this is set out within section 7 of this report.
- 1.8 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 with demand for increased jobs within the Greater Cambridge 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. However, a significant proportion of this growth is made up of existing allocations within the current Local Plans.
- 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; it generally exceeds it. This is in particular due to 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. Therefore, a more ambitious growth strategy should be prepared.
- 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 centre for housing and employment growth.
- 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. Consistent with this strategy, it is considered to be very important that some growth is delivered in villages. National policy is clear within paragraph 79 of the NPPF that planning policies should identify opportunities for villages to grow and thrive, especially where they will support local services.
- 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. Histon and Impington is on the Cambridge Busway and as such is located along a key public transport link into Cambridge, and also nearby towns of St Ives and Huntingdon within Huntingdonshire District. The Busway provides a service every 7 minutes, providing residents and employees with a reliable and sustainable option for travel. A potential new stop on the busway is currently being considered within Histon and Impington, within close proximity to land owned by our client, this is supported by the Histon and Impington Neighbourhood Plan and would further encourage a shift away from car use, towards more sustainable modes of transport for both existing and future employees and residents.
- 3.3 The release of Land West of South Road, Impington 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 Histon and Impington 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.
- 3.4 The encouragement of the use of public transport, cycling and walking in and around the South Cambridgeshire District and City of Cambridge would assist in addressing a key and fundamental issue, congestion. New development should aim to address this problem which would also be compliant with the key issue of Climate Change, a big theme underlying the new Local Plan. This new link has the potential to reduce pressure on the Strategic Road Network which currently does not have capacity to accommodate any new growth in the area.

- 3.5 In addition, Impington (and Histon), benefit from being sustainable settlements in their own right. Histon and Impington are identified in the current South Cambridgeshire Local Plan as a Rural Centre (Policy S/8) and are described as 'the largest, most sustainable villages of the District.' Due to this, there is no strategic constraint on the amount of development land for housing within their development frameworks. They benefit from both primary and secondary education facilities and a large range of services, including shops, pubs, restaurants and community facilities.
- 3.6 For the above reasons, it is considered that additional growth within Impington would be consistent with the objectives of the Local Plan, which seeks to minimise car travel.

- 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 Impington 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 Growth should be focused in villages, such as Impington, which benefit from having a range of services and sustainable transport links to Cambridge City Centre. As stated above, Histon and Impington are identified in the current South Cambridgeshire Local Plan as a Rural Centre (Policy S/8) and are described as 'the largest, most sustainable villages of the District.'
- 5.2 It is considered very important that the Local Plan makes provision for a proportion of growth to be delivered from villages. 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 Impington.
- 5.3 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:

"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).

- 5.4 It is not clear why the Shared Planning Service have deviated from a clear recommendation provided by the Planning Inspectorate.
- 5.5 However, it is also important to acknowledge the employment sites/areas in Impington 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 larger villages as part of new allocations to allow them to thrive and remain vibrant. NIAB Trust are fully committed, to engagement with the GCSPS and Histon & Impington Parish Council regarding the mix and type of housing to be delivered on Land West of South Road, Impington. 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 West of South Road, Impington should be allocated for development and would be a sound allocation as part of the emerging Local Plan. The Land West of South Road, Impington 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 or the road network.

#### Response to HELAA

- 7.2 The key concerns raised in the HELAA towards the site's allocation relate to Landscape and Townscape, Site Access and Strategic Highway Impact. It has been clearly demonstrated in the Prospective Site Feasibility Study, produced by pHp architects and this representation that these key concerns have been addressed.
- 7.3 The Prospective Site Feasibility Study clearly shows how a reduced sight size would minimise any harm to the landscape by its close association to the existing settlement and continuation of the existing form of the western edge of the village. Additionally the low-density housing shown within the study would also help to maintain openness and views across the site. Additionally, it has been demonstrated that a feasible and safe site access to South Road/Mill Road can be delivered. In terms of impact on the Strategic Highway Network is considered that a pedestrian/cycleway route linking to the existing A14 Crossover would easily offset any additional vehicle movements associated with the site.
- 7.4 Unless officers are able to demonstrate otherwise, the site allocation has resolved the key concerns with the site and as such the site is suitable for development.
- 7.5 A detailed review of the HELAA assessment in respect of the Land West of South Road, Impington site is set out below.

#### Site Assessment Summary

| Criteria   | Outcome |
|------------|---------|
| Suitable   | Red     |
| Available  | Green   |
| Achievable | Green   |

7.6 It is considered that the findings of the HELAA Report in relation to this site were on the whole positive. The HELAA Report found the site was both available and achievable. It was accepted that the development could be made available in the next 6-10 years and can also be completed within 11-15 years. Given the revisions to the size of the site, it is considered that these timescales could be reduced. The HELAA Report did find that the site was not suitable, however, it is considered that the reasons given for this outcome can be addressed as explained below.

#### Site Assessment

| Issue                             | Assessment | Response   | Amended<br>Assessment |
|-----------------------------------|------------|--|-----------------------|
| Adopted Development Plan Policies | Amber      | The site abuts Histon and Impington's Development Framework. The Development Framework for Impington has remained relatively unaltered since the Adopted Proposals Map Published January 2010, with only a small alteration in relation to a site for 25 dwellings (H/1 (d)). This tight Development Framework has artificially constrained development in a village from growth even though it has a good range of services and facilities to support it. It is considered that the site would form a logical extension to Impington, resulting in a site that is well related to the existing village, and that would not create amenity issues for existing residential properties. | Green                 |
|                                   |            | In addition, villages within the Local Plan 2018 have been categorised dependant on their 'sustainability'. Histon and Impington are categorised as a 'Rural Centre' (Policy S/8) which are considered the most sustainable villages in the district with good access to a secondary school, employment and various  |                       |

| Issue         | Assessment | Response                             | Amended    |
|---------------|------------|--------------------------------------|------------|
|               |            |                                      | Assessment |
|               |            | services and facilities in addition  |            |
|               |            | to good transport services.          |            |
|               |            |                                      |            |
|               |            | Depending on the Council's           |            |
|               |            | development strategy the site        |            |
|               |            | could be used to deliver large       |            |
|               |            | scale development or                 |            |
|               |            | alternatively a smaller scale        |            |
|               |            | scheme in line with the Histon       |            |
|               |            | and Impington Neighbourhood          |            |
|               |            | Plan which has aspirations for       |            |
|               |            | sites of 50 units or less.           |            |
|               |            | The new Local Plan should be         |            |
|               |            | more flexible at focussing           |            |
|               |            | development at the edge of the       |            |
|               |            | village boundaries, particularly     |            |
|               |            | those that rank higher in terms of   |            |
|               |            | sustainability such as the Rural     |            |
|               |            | Centres (Policy S/8 of the current   |            |
|               |            | Local Plan). Proposals such as       |            |
|               |            | those at our client's site at Land   |            |
|               |            | west of South Road, Impington        |            |
|               |            | should be supported.                 |            |
| Flood Risk    | Amber      | The revised site lies wholly within  | Green      |
| - Isour Mon   |            | Flood Zone 1.                        |            |
| Landscape and | Red        | The site is well related to the      | Amber      |
| Townscape     |            | existing settlement. As shown in     |            |
|               |            | the attached Prospective Site        |            |
|               |            | Feasibility Study, the significantly |            |
|               |            | reduced site would align with the    |            |
|               |            | existing western edge of             |            |
|               |            | Impington, minimising any            |            |
|               |            | negative landscape or townscape      |            |
|               |            | impact. Additionally, the density    |            |
|               |            | of built development on the site     |            |
|               |            | has been greatly reduced, again      |            |
|               |            | minimising any negative              |            |
|               |            | landscape impact. Significant        |            |
|               |            | planting along the north and         |            |
|               |            | western edges of the site            |            |
|               |            | combined with long existing          |            |
|               |            | gardens would minimise any           |            |
|               |            | impact on existing visual            |            |
|               |            | residential amenity.                 |            |

| Issue                         | Assessment | Response  | Amended<br>Assessment |
|-------------------------------|------------|---|-----------------------|
|                               |            | Any development would respect the Local Character and Landscape Character of the area. For example, in relation to the nearby H/1 (d) site, the adopted South Cambridgeshire District Council Local Plan required the 'creation of a significant landscape buffer along the boundary of the site where it adjoins or could be seen from open countryside to provide a soft green village edge'. A similar approach could be adopted at this site, which would provide a much gentler transition between the open countryside and the built-form of Impington than is currently the case.  It is considered that a sympathetic approach to the site, including appropriate densities and design, would result in an excellent development which would enhance the character of the area and minimise any negative landscape impact in relation to views from the north west and south. |                       |
| Biodiversity and Geodiversity | Amber      | The Histon Road is located approximately 0.75km to the south of the site across the A14. The SSSI is designated for its geological importance. It is considered that the increased visitor pressure associated with 78 new dwellings would not be significant, and if necessary mitigation could be provided.  Any development would look to retain Habitats of Principle Importance/priority habitat of high ecological value, and the   | Green                 |

| Issue            | Assessment | Response                             | Amended    |
|------------------|------------|--------------------------------------|------------|
|                  |            |                                      | Assessment |
|                  |            | proposed development would           |            |
|                  |            | ensure a net gain in biodiversity    |            |
|                  |            | on site.                             |            |
|                  |            | A                                    |            |
|                  |            | As acknowledged, any impact on       |            |
|                  |            | designated sites, or those with a    |            |
|                  |            | regional or local protection could   |            |
|                  |            | be reasonably mitigated or           |            |
|                  |            | compensated.                         |            |
|                  |            | For the above reasons it is          |            |
|                  |            | considered that the site cannot be   |            |
|                  |            | considered unsuitable for reasons    |            |
|                  |            | of biodiversity or geodiversity.     |            |
| Open             | Green      | The site would provide open          | _          |
| Space/Green      |            | space to serve the new and wider     |            |
| Infrastructure   |            | local community.                     |            |
| Historic         | Green      | It was acknowledged that the site    | -          |
| Environment      |            | would have no impact on any          |            |
|                  |            | designated or non-designated         |            |
|                  |            | heritage assets.                     |            |
| Archaeology      | Amber      | The presence of Cropmarks of         | Green      |
|                  |            | Iron Age and Roman Settlement        |            |
|                  |            | in the area are considered to be     |            |
|                  |            | matters which can be dealt with at   |            |
|                  |            | the application stage. As this site  |            |
|                  |            | is limited in size and would only    |            |
|                  |            | be delivering up to 78 dwellings,    |            |
|                  |            | any delays associated with           |            |
|                  |            | archaeology would be unlikely to     |            |
|                  |            | be significant and would not         |            |
|                  |            | undermine the overarching            |            |
|                  |            | housing delivery strategy.           |            |
| Accessibility to | Green      | As acknowledged, the site has        | -          |
| Services and     |            | great access to key local            |            |
| Facilities       |            | services, community facilities,      |            |
|                  |            | transport links and employment       |            |
|                  |            | opportunities. The development       |            |
|                  |            | of the site would therefore not      |            |
|                  |            | require the delivery of              |            |
|                  |            | accompanying key services. For       |            |
|                  |            | these reasons it is considered       |            |
|                  |            | that the location of the site should |            |
|                  |            | weigh strongly in favour of its      |            |
|                  |            | allocation.                          |            |

| Issue               | Assessment | Response  | Amended<br>Assessment |
|---------------------|------------|---|-----------------------|
| Site Access         | Red        | As shown on page 7 of the Prospective Site Feasibility Study, a safe site access could easily be provided to South Road/Mill Road. It is considered that this access would appropriately cater for 78 dwellings. A large additional area of green space could be provided directly to the south of the South Road Green Space to compensate for land required to widen the existing the access link.  | Green                 |
|                     |            | A further detailed design and a Transport Assessment would be provided as part of any future planning application. An assessment of Red in this context is therefore considered unjustified and on the evidence provided should be made Green.  |                       |
| Transport and Roads | Amber      | As acknowledged, the site is located in an extremely sustainable location, with great access to services, reducing the need to travel by private vehicle. 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. It should also be noted that the quantum of development at this site has been greatly reduced, again minimising any potential impact on the transport network. | Green                 |
|                     |            | Any application would demonstrate a highly sustainable mode share, and would include capacity assessments at important local junctions.   |                       |

| Issue   | Assessment | Response   | Amended<br>Assessment |
|---|------------|--|-----------------------|
|   |            | As acknowledged, any potential impact on the 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.  |                       |
| Noise, Vibration,<br>Odour and Light<br>Pollution | Amber      | As acknowledged, road traffic noise from nearby roads could be considered and mitigated at detail design stage.  | Green                 |
| Air Quality                                       | Amber      | The revised site would no longer be within the SCDC AQMA. The site has also been greatly reduced in size, so would be less likely to impact the AQMA. Additionally the potential for the creation of a cycleway/footway would again increase opportunities for sustainable travel and reduce traffic impact on the AQMA. | Green                 |
| Contamination<br>and Ground<br>Stability          | Amber      | The site has been in agricultural use. If any contamination is detected this could be suitably dealt with following the grant of planning permission.  | Green                 |

## **Further Constraints**

| Issue           | Assessment | Response                          | Amendment  |
|-----------------|------------|-----------------------------------|------------|
|                 |            |                                   | Assessment |
| Constraints to  | -          | No issues identified.             | -          |
| development     |            |                                   |            |
| Strategic       | Red        | The number of dwellings           | Amber      |
| Highways Impact |            | proposed has been greatly         |            |
|                 |            | reduced, minimising any potential |            |
|                 |            | harm. Additionally a new          |            |
|                 |            | pedestrian/cycleway link over the |            |
|                 |            | existing A14 crossover would      |            |
|                 |            | provide a sustainable transport   |            |

| Issue         | Assessment | Response   | Amendment  |
|---------------|------------|--|------------|
|               |            |  | Assessment |
|               |            | link which could even reduce                                     |            |
|               |            | overall pressure on the  |            |
|               |            | Strategic Road Network.  |            |
|               |            | Furthermore, 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.   |            |
|               |            | Any application would  |            |
|               |            | demonstrate a highly sustainable                                 |            |
|               |            | mode share, and would include                                    |            |
|               |            | capacity assessments at  |            |
|               |            | important local junctions. Any                                   |            |
|               |            | potential impact on the functioning                              |            |
|               |            | of trunk roads and/or local roads                                |            |
|               |            | could be reasonably mitigated.                                   |            |
|               |            | Contributions arising from any                                   |            |
|               |            | development could be used to<br>help improve transport and roads |            |
|               |            | in the area.   |            |
| Employment    | -          | No issues identified.  | -          |
| Green Belt -  | -          | No assessment has been made in                                   | -          |
| Assessment of |            | relation to the suitability of                                   |            |

| Issue                         | Assessment | Response  | Amendment<br>Assessment |
|-------------------------------|------------|---|-------------------------|
| Harm of Green<br>Belt Release |            | releasing the site from the Green Belt. However, the HELAA does indicate a low level of harm associated with the release of Parcel ID HI17 (which does not make up part of the site, but is located to its east), and a high/very high degree of harm to HI18 (which roughly aligns with  | ASSESSMENT              |
|                               |            | the previously submitted site area), and a very high degree of harm to HI19 (to the west of the site). It is noted that the revised site correlates more closely to map area 2 of parcel HI18 which has been assessed to have a high rather than very high degree of harm (as opposed to map area 1). It is considered that development of the revised site would not result                        |                         |
|                               |            | in a high degree of harm to the Green Belt as it will be in line with the existing edge of the settlement to the north, and would be of low density maintaining openness. A moderate level of harm is considered more appropriate.  |                         |
|                               |            | Although the release of this land from the Green Belt has not been flagged as making it unsuitable for allocation, the following comments are made:   |                         |
|                               |            | 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 |                         |

| Issue | Assessment | Response  | Amendment  |
|-------|------------|---|------------|
|       |            | economy and its international                                       | Assessment |
|       |            | 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 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.   |            |
|       |            | 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.                                  |            |
|       |            | Paragraph 142 of the NPPF   |            |
|       |            | indicates that Green Belt release                                   |            |
|       |            | should be targeted at sustainable                                   |            |
|       |            | locations well served by public                                     |            |
|       |            | transport such as Histon and  |            |

| Issue | Assessment | Response   | Amendment<br>Assessment |
|-------|------------|--|-------------------------|
|       |            | Impington, which benefits from the guided busway. 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. |                         |
|       |            | We therefore conclude that the new local plan should take the opportunity to review the Green Belt boundaries around Park Farm and allocate all these additional development sites.  |                         |

#### 8. CONCLUSION

- 8.1 This representation has been prepared by Strutt & Parker, on behalf of NIAB Trust to support the allocation of a housing site for up to 78 dwellings and associated landscaping. The promotion of the site has sought to clearly respond to the HELAA Assessment of the site.
- 8.2 The site has a number of favourable attributes that would demonstrate it is a sound allocation for housing growth, within the emerging Local Plan:
  - It is located in a sustainable location in terms of its proximity to the village core and employment areas;
  - The site has the potential to provide a pedestrian/cycle link encouraging sustainable travel;
  - Impington is a very sustainable village to accommodate further growth and already has a range of services, community facilities such as excellent education opportunities;
  - Housing development on the site would provide an economic boost to the
    existing facilities and businesses, provide an increased range of housing
    including affordable housing, and has the opportunity to provide biodiversity
    enhancements and create a softer edge to the village;
  - NIAB Trust are flexible as to the quantum of development, and can tailor this to local or countywide needs;
  - NIAB Trust own a significant area of land in the area, and will be able to bring forward a coordinated development which is sympathetic to the landscape character of the area:
  - The site is being put forward for residential development, with a substantial proportion of the site proposed as open space;
  - The site is unconstrained and fully deliverable in planning terms;
  - 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 their vision for the site.
- 8.3 In light of the above, it there therefore considered that Land West of South Road, Impington provides an excellent location for development and would be a sound allocation as part of the emerging Local Plan.