

13 December 2021
488554/JBWPQQF/AM



Greater Cambridge Planning

Andy Moffat
E: andy.moffat@savills.com
DL: +44 (0) 1223 347 046

Unex House
132-134 Hills Road
Cambridge CB2 8PA
T: +44 (0) 1223 347 000
F: +44 (0) 1223 347 111
savills.com

Dear Sirs

LAND TO THE SOUTH OF VILLA ROAD, IMPINGTON

Savills (UK) Ltd is instructed by Cirrus Impington Ltd to submit an amendment to an existing site submission. The site was previously put forward by Kings Gate Management Company (Cambridge) Ltd (Form ID: 40041) and as part of a larger proposal including land to the south also by Kings Gate Management Company (Cambridge) Ltd (Form ID: 40239). Kings Gate Management Company (Cambridge) Limited, acting as the management company on behalf of the owners of the site, appointed Cirrus Impington Limited to promote the site for residential development.

This amendment/additional information to the previous submission follows and includes additional technical work undertaken to respond to the Housing and Economic Land Availability Assessment (HELAA) conclusions and to refine the proposals. In particular, the technical work considers the flood risk and Landscape and Townscape issues as well as providing a vision for the development of up to 120 dwellings on the site (rather than the up to 50 dwellings previously proposed) as well as outlining the sustainability opportunities and credentials.

In summary:

- Flood modelling undertaken (and accepted by the LLFA) has shown that the eastern part of the site where development is proposed is outside the modelled 1 in 100 Year + 65% Climate Change Flood Extent (and is not at the risk of flooding as indicated on the Flood Maps for Planning);
- The existing development on the northeastern side of Villa Road provides an abrupt edge to the village. The proposed development would integrate the site and the existing edge of the settlement with planting that softens and partially screen views to proposed and existing buildings;
- The eastern part of the site could be released from Green Belt without diminishing the performance of Green Belt purposes by the remainder of the parcel and adjoining Green Belt land, resulting in minimal harm to the Green Belt;
- The site is exceptionally well-located to a range of existing sustainable travel options and destinations;
- The prospective developer is in advanced discussions exploring a partnership with Etopia Homes (who have the knowledge but also the partnerships) to actually deliver net zero homes on the site;
- We strongly support the statement in the Councils' Development Strategy Topic paper that "Our (*the Councils*)' evidence suggests that housing in the rest of the rural area outside the southern cluster can help support delivery of a range of smaller sites within the area, and support the vitality of our villages". We also welcome the Councils' recognition that some villages in the Green Belt have the best access, which may constitute exceptional circumstances to release sites from the Green Belt; and
- To conclude, the additional information now submitted demonstrates that there are no technical/flooding reasons why development of the site should not be supported, the Landscape/Townscape and Green Belt impacts of the development are less than hitherto identified by

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

Savills (UK) Limited. Chartered Surveyors. Regulated by RICS. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



the Councils and the site is exceptionally well-located to a range of existing sustainable travel options and destinations which together provide the exceptional circumstances required for Green Belt release.

Flood Risk

Whilst the site is indicated to be at risk of flooding as indicated on the Flood Maps for Planning, flood modelling has been undertaken to better classify both the fluvial and surface water flood risks posed to the site. A fluvial flood model has shown that the site remains largely unimpacted by fluvial flood events with updated allowances for climate change. The modelled outputs show the eastern part of the site remains fully within Flood Zone 1 whilst a small part of the western side of the site is within Flood Zone 3. A 'Summary of Flood Risk and Drainage Matters – Technical Note' is submitted as part of this submission.

The nature of the catchment is best represented by the above modelling study as opposed to the surface water flood modelling methodology particularly because the broad scale modelling does not take into account the culverts to the north of the site.

The Lead Local Flood Authority have been consulted and have accepted this modelling.

With regards surface water drainage it is proposed the site will drain wholly via controlled outfall to the above watercourse (with attenuation features placed beyond the flood zone), therefore flows in the local drainage network will not be significantly affected as runoff will be restricted to as near to greenfield runoff rates as practicable. Indicative attenuation basin sizes and locations have been provided to demonstrate required land take. Foul drainage in the local area has been assessed and connections appear to be available in close proximity to the site.

Landscape and Townscape, and Green Belt

The HELAA indicates that "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". The 'Technical Note on landscape, Visual and Green Belt Matters' (and MapBook) produced by LDA Design and submitted as part of this submission demonstrates that "To the northwest and west within 1km of the site, linear vegetation along the Cambridgeshire Guided Busway (see Viewpoint 3), field boundary vegetation and woodland blocks within the arable landscape (see Viewpoint 4), mature trees belts and hedgerow trees along Girton's eastern edge (see Viewpoint 5) and vegetation along roadsides (such as New Road and Oakington Road) all screen views towards Histon and Impington and the site. From further afield to the northwest, the layering effect of vegetation within the landscape, in combination with the level terrain, prevent views towards the site (see viewpoint 7)". From the south, "the site is visible in the context of houses at the south-western edge of Impington and larger buildings associated with the NIAB facility and employment area to the north of the busway. There is an opportunity to integrate the site and the existing edge of the settlement with planting that softens and partially screens views to proposed and existing buildings, avoiding an abrupt edge but allowing glimpses of built form to maintain a settled rural character".

The site is within parcel HI18 as referenced in the Greater Cambridge Green Belt Assessment (GCGBA) (LUC, August 2021). The 'Technical Note on landscape, Visual and Green Belt Matters' agrees with the conclusions in that Assessment that the parcel has a Relatively Limited contribution in relation to Green Belt purpose 2 (Maintain and enhance the quality of its setting). The Technical Note assesses the parcel as having a Limited contribution to Green Belt purpose 1 (Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre) rather than the Moderate conclusion in the GCGBA, and as having a Relatively Limited contribution to Green Belt purpose 3 (Prevent communities in the environs of Cambridge from merging into one another and with the city) rather than the Relatively Significant conclusion in the GCGBA.

The GCGBA overstates the contribution made by the parcel to Green Belt purposes, which results in an exaggerated assessment of harm. Being at the northern end of the parcel, framed by the existing village on two sides, the site is the least sensitive part of the parcel in Green Belt terms. Adopting the landscape strategy proposed in the 'Technical Note on landscape, Visual and Green Belt Matters', the main part of the site could

be released from Green Belt without diminishing the performance of Green Belt purposes by the remainder of the parcel and adjoining Green Belt land, resulting in minimal harm to the Green Belt.

Accessibility

Paragraph 142 of the NPPF states that “Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport.”

The First proposals include a proposed allocation S/RRA/MF Land at Mansel Farm, Station Road, Oakington with the document stating that that the “Site (is) in very close proximity to Cambridgeshire Guided Busway stop, providing excellent public transport access to Northstowe and Cambridge and enhancing the approach to the stop for pedestrians, providing the exceptional circumstances required for Green Belt release”. As the table below demonstrates, the site is exceptionally well-located to a range of existing sustainable travel options and destinations which as detailed below (with routes shown on the maps included as an Appendix) would provide the exceptional circumstances required for Green Belt release.

| | |
|---|---|
| Public Transport | |
| Histon & Impington Busway Stops (Services A, B and C) | 7 min walk / 2 min cycle |
| Pepsy Terrace bus stop (Service Citi 8) | 5 min walk |
| Cambridge North Rail Station | 15 min cycle / 7 min walk + 7 min bus journey |
| Education | |
| Impington Village College | 5 min cycle |
| Employment | |
| Vision Park | 10 min walk / 2 min cycle |
| Cambridge Science Park | 8 min cycle / 7 min walk + 4 min bus journey |
| St John’s Innovation Park | 14 min cycle |
| City Centre | |
| City Centre (Grand Arcade) | 17 min cycle |

Sustainability credentials

Cirrus Impington Ltd is in advanced discussions exploring a partnership with Etopia Homes to develop the site. As demonstrated by the ‘Delivering Net Zero Carbon’ note submitted as part of this submission, Etopia not only have the knowledge but also the partnerships to deliver net zero homes on the site.

Spatial Strategy

We strongly support the statement in the Councils’ Development Strategy Topic paper that “Our (the Councils’) evidence suggests that housing in the rest of the rural area outside the southern cluster can help support delivery of a range of smaller sites within the area, and support the vitality of our villages”. The approach to identifying new rural allocations (Key criteria and Relative factors) is supported. This does make it critical that the ratings in the Housing and Employment Land Availability Assessment (HELAA) are robust. Based on the information above and accompanying this letter, the ratings for Flood Risk and Landscape and Townscape need to be reassessed. The recognition that some villages in the Green Belt have the best access, which may constitute exceptional circumstances to release sites from the Green Belt reflects the policy in the NPPF (paragraph 142) that when “...reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account”, and is also welcomed. There are no new allocations in Histon and Impington in the new Local Plan, with only the small allocation for 25 dwellings on land north of Impington Road being carried forward from the South Cambridgeshire Local Plan. It is incumbent on the Councils to include additional small/medium sized sites in villages to deliver on these conclusions, particularly in defined Rural Centres such as Histon and Impington, and on sites which are exceptionally well-located to a range of existing sustainable travel options such as this.

The Councils' Housing Delivery Study for Greater Cambridge (October 2021) projects a 5.15 year supply in the 5 years following adoption – assumed in the study to be 2025-2030. This is close to the required 5 year supply and relies in part on delivery on a small number of large sites. It would be prudent to reduce the risk of failing to be able to demonstrate a 5 year housing land supply in the future by making proactive provision for a larger buffer than the minimum 10% as part of this Plan (and with the HBF advocating a 20% buffer), and thereby seeking to avoid planning by appeal in the future. This site, which would be delivered in that 5 year period, would help mitigate that risk in a location which this submission has demonstrated is exceptionally well-located to a range of existing sustainable travel options and destinations.

We trust that the amended and additional information will enable the Councils to include the allocation of the site at the next stage of the Local Plan.

If there is any further information and/or clarification that we can usefully provide to assist your consideration of these proposals, please do not hesitate to contact the undersigned in the first instance. We would also welcome the opportunity to meet with Greater Cambridge Planning to discuss further the opportunities that this site can present.

Yours faithfully



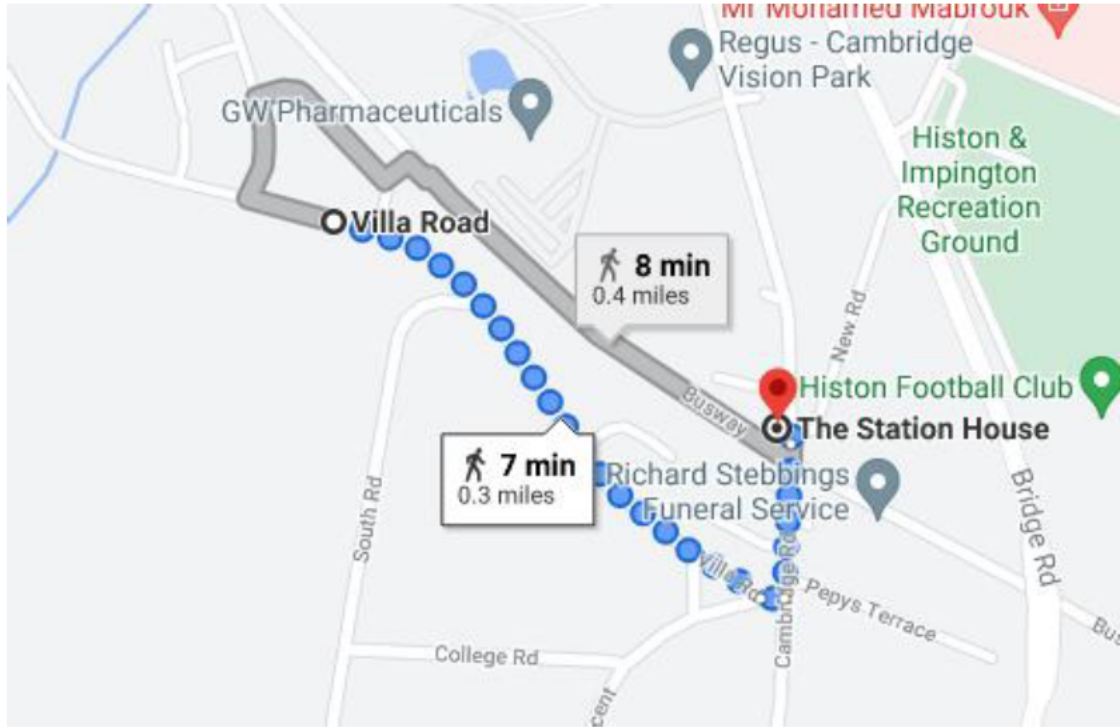
Andy Moffat BA(Hons) MPhil MRTPI
Head of Department

Accompanying documents:

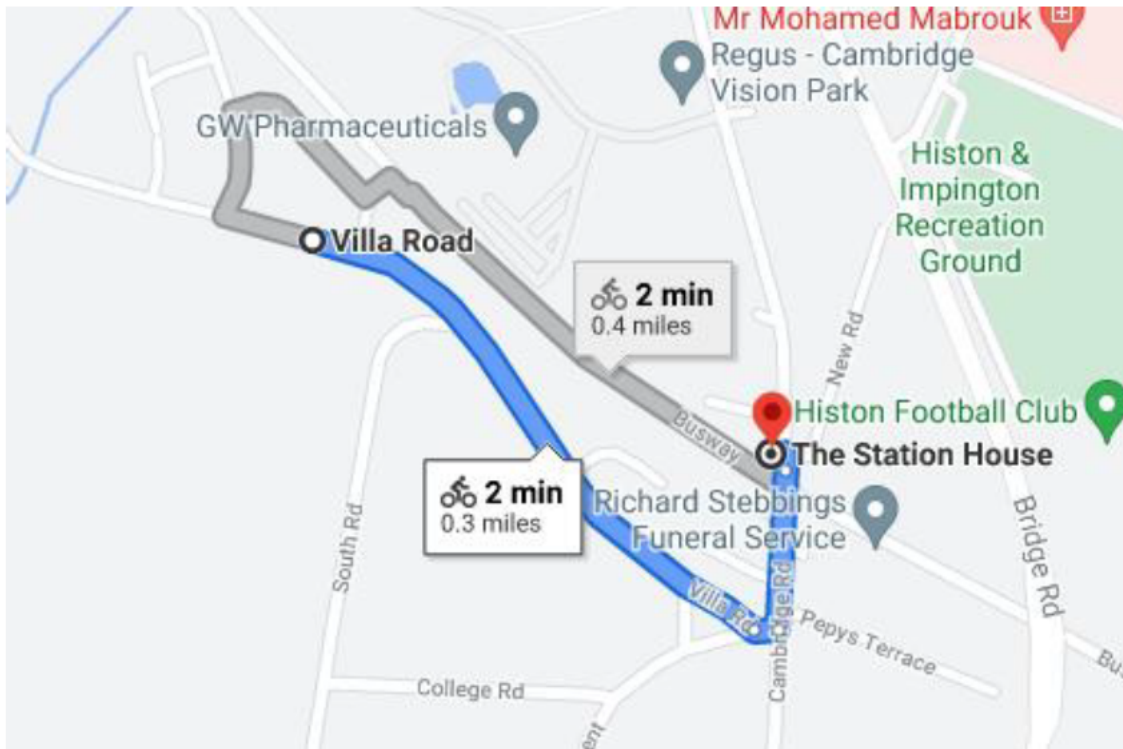
- *Ecological Appraisal*
- *Summary of Flood Risk and Drainage Matters – Technical Note*
- *Technical Note on Landscape, Visual and Green Belt Matters (and MapBook)*
- *Initial Access Appraisal*
- *Vision Document*
- *Delivering Net Zero Carbon note*

Appendix

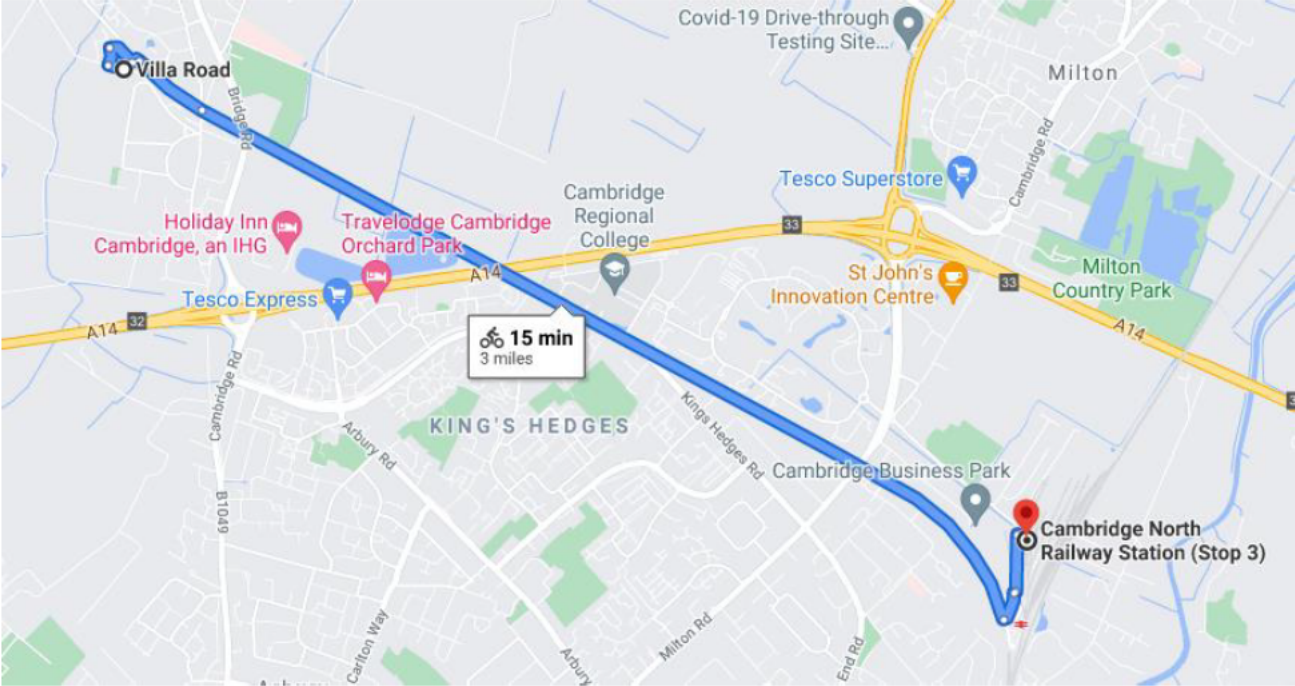
Site to/from Guided Bus Stops (walking)



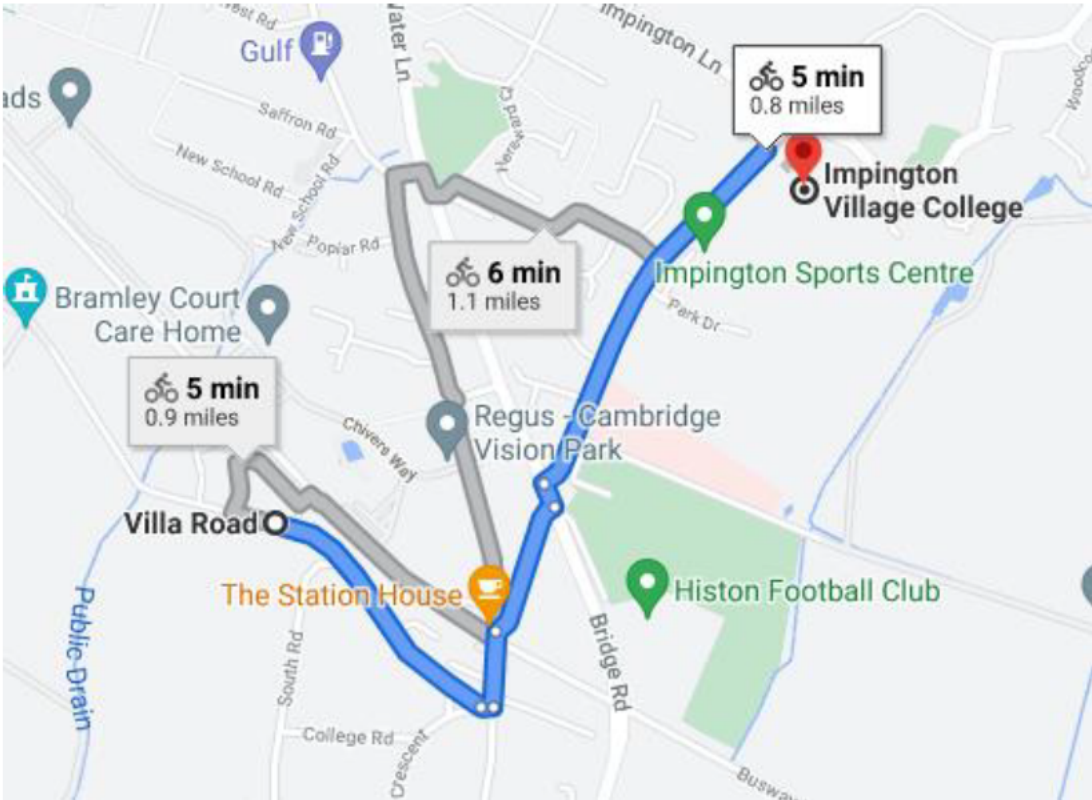
Site to/from Guided Bus Stops (cycling)



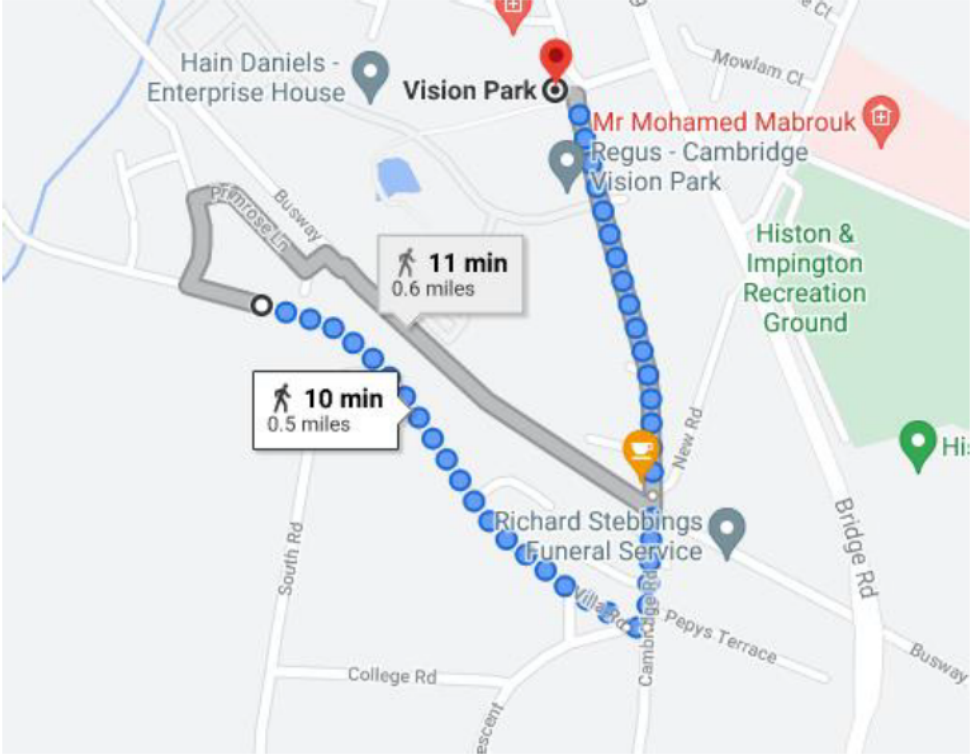
Site to/from Cambridge North Rail Station (cycling)



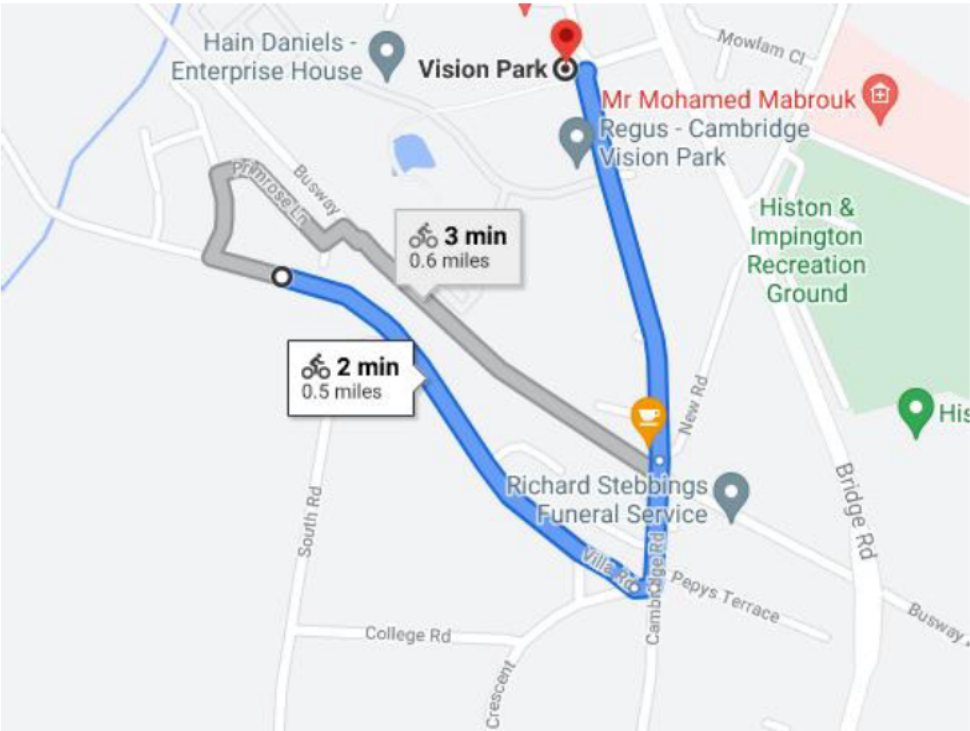
Site to/from Impington Village College (cycling)



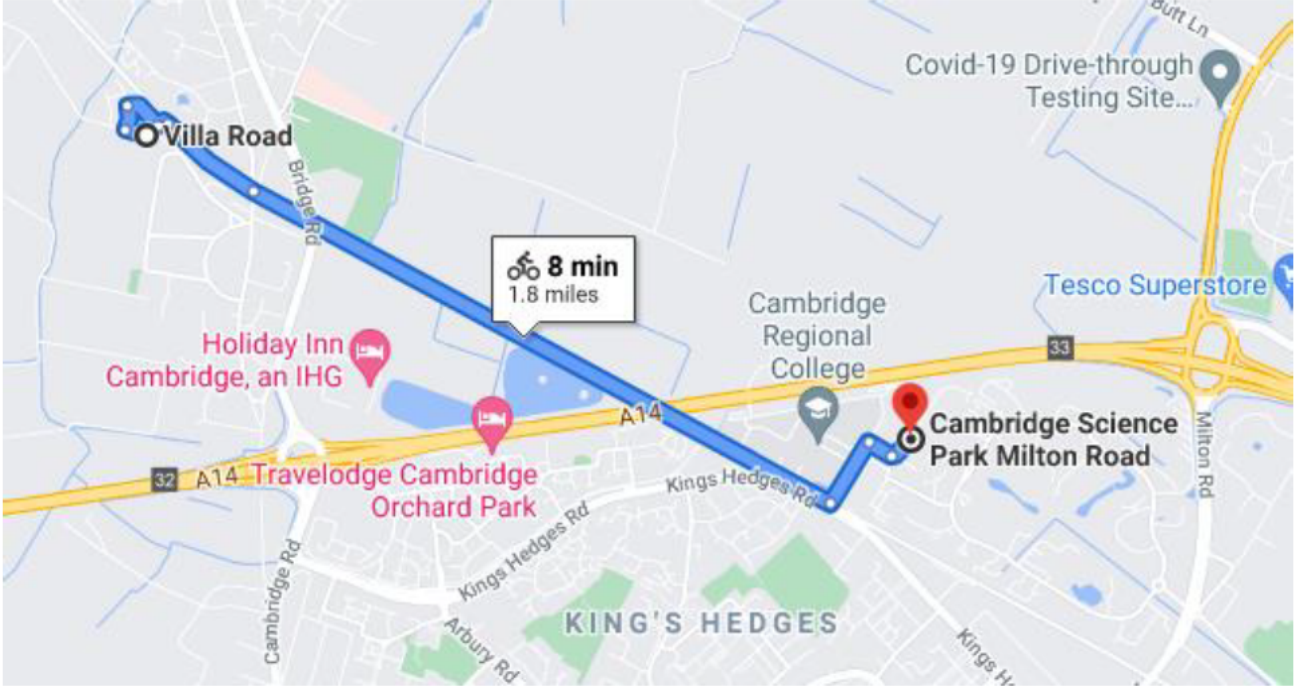
Site to/from Vision Park Business and R&D park (walking)



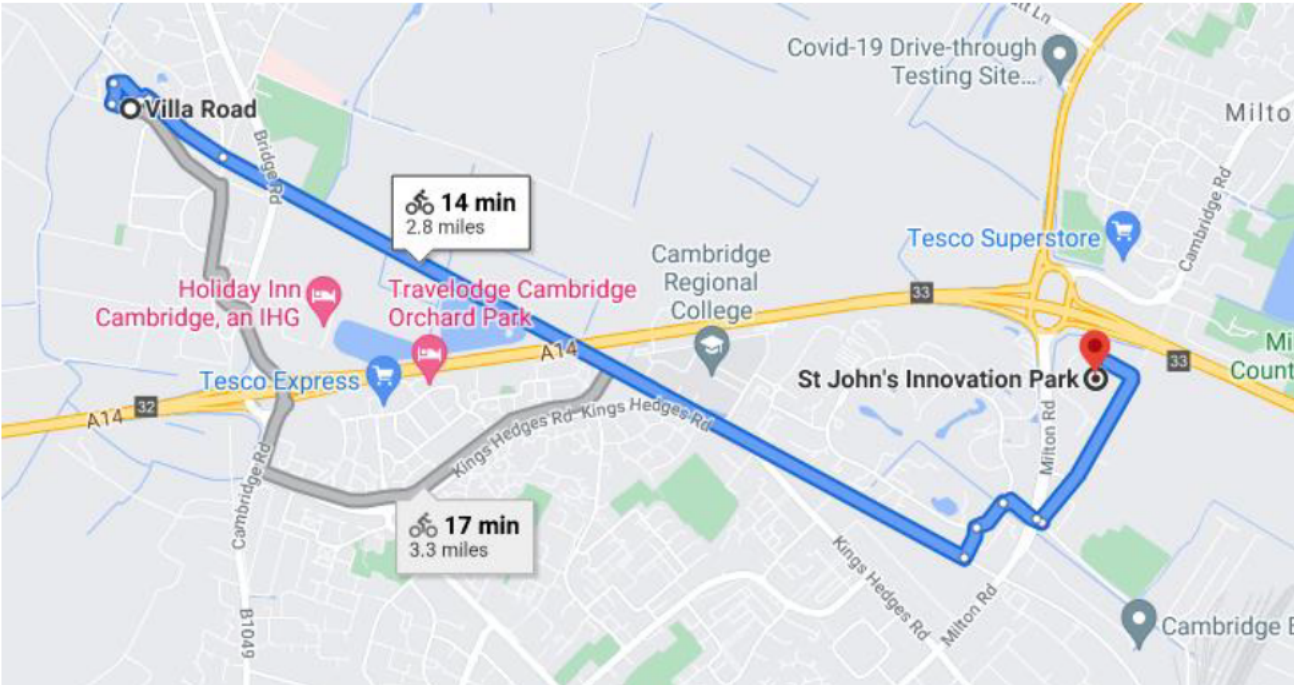
Site to/from Vision Park Business and R&D park (cycling)



Site to/from Cambridge Science Park (cycling)



Site to/from St John's Innovation Park (cycling)



Site to/from Central Cambridge (cycling)

