

South Cambridgeshire Hall  
Cambourne Business Park  
Cambourne  
Cambridge  
CB23 6EA

Date: 30<sup>th</sup> January 2025  
Our Ref: 1159

Dear Sir/Madam,

### **Site 40509 – Land South of Babraham Road - Amendment and additional information**

We are extremely disappointed to see that site 40509 remains unallocated within the emerging Local Plan and strongly believe that this is unreasonable, unjustified and fails to be in accordance with the aims of your own Local Plan.

We have undertaken a review of the HELAA in the document library which confirms that there are clear and identifiable discrepancies between some of the allocated sites and the assessment undertaken for 40509. These are shown in our summary table and set out in more detail below.

These discrepancies clearly demonstrate that Site 40509's RAG assessment, sustainability credentials (both current and projected) and its capacity to mitigate landscape impact, as confirmed by the LPA, establish it as one of the most sustainable sites for housing delivery in the district.

While we maintain that the site should be allocated, particularly given that other Green Belt sites with significantly lower performance have been approved, we have addressed the LPA's concerns regarding Green Belt impact by reducing the red line boundary. The revised site area now aligns with the build lines of Site H/1:B (opposite) and Site H/1:C (adjacent), with the built form abutting the CSET transport hub to the east. This configuration effectively renders the site infill, surrounded by development on three sides. We consider that this adjustment resolves the LPA's outstanding concerns and allows this highly sustainable site to be released from the Green Belt for the delivery of up to 24 dwellings.

### **Accessibility**

Site OS030 (land south of Babraham Road, known as Site H/1:C) lies immediately adjacent to Site 40509 on Babraham Road, Sawston. Notwithstanding this relationship, Site 40509 is assessed as Amber for accessibility in 2025, with the comment that it has "adequate accessibility to key local services, transport, and employment opportunities." By contrast, the adjoining Site OS030 is assessed as Green, described as having "good accessibility to key local services, transport, and employment opportunities. Proposed development would not require delivery of accompanying key services."

Despite their shared location, the two sites are subject to materially different accessibility assessments and RAG scores. Furthermore, Site 40509 is immediately adjacent to a proposed CSET stop. CSET is identified as "critical infrastructure" within the Infrastructure Delivery Plan underpinning the Local Plan, and the delivery of allocations at Grange Farm and the Cambridge Biomedical Campus is reliant on CSET, as recently confirmed by Stephen Kelly. In this context, Site 40509 should be regarded as at least as sustainable as Site OS030. The award of an Amber rating

to Site 40509, while the adjacent Site OS030 receives a Green rating for accessibility, is not justified and represents an unreasonable inconsistency in the assessment process.

As an aside note, site [S/RSC/MF](#) on Hunts Road, Duxford is designated as Amber for accessibility (the same designation as site 40509) despite Duxford only being a group village and the opportunities for travel and access to amenities being significantly less than are possible within Sawston, a Rural Centre.

## Landscape

It is understood that the sole reason Site 40509 has not been taken forward is its location within the Green Belt and the Local Planning Authority's view that development would affect the openness of the Green Belt and the wider landscape.

The landscape assessment for H1:C (Site OS030) states that "the site is within the Development Framework Boundary abutting the Green Belt. The site is contained in the south east but otherwise has a very open, rural character. Residential development is appropriate here given the adjacent site use. The proposed number of units for new development must respond well to the local context and character such as the existing form and scale of similar development within the village. The character of the landscape setting should be respected and key views to and from the village retained."

By comparison, the landscape comments for Site 40509 note that "the site is outside of the Development Framework Boundary, and therefore in the countryside. Preservation of the rural countryside character is important and so boundary treatment will be important. The site has a very open character typical of the local landscape character. Development in this location must reflect density and pattern of the existing village and landscape mitigation is required." Notably, this assessment does not conclude that development would be unacceptable or that it would result in undue harm to the Green Belt.

Both sites received an Amber rating for landscape in the RAG assessment, indicating that development on either site would have a comparable landscape impact and that such impact is capable of mitigation through sensitive design. Despite this, Site OS030 is allocated while Site 40509 is not. This is notwithstanding the Council's own evidence confirming that development at Site 40509 could proceed without unacceptable landscape harm. The continued exclusion of Site 40509 on the basis of Green Belt designation alone fails to properly reflect its sustainability credentials, which indicate that it is more appropriate for development than some of the sites allocated within the Group Villages.

## Biodiversity and Geodiversity

Duxford Site S/RSC/MF, which is proposed to deliver 60 dwellings, has received a Green rating for biodiversity and geodiversity. The assessment states that the "application [is] unlikely to require Natural England consultation. There are no apparent priority habitats within the site; however, there are buildings, grasslands, hedges, and wooded boundaries on site that are likely to have ecological value. Applications may find provision of a 10% net gain in biodiversity difficult within their red line boundaries and may need to find off-site compensation to comply with up-coming national legislation and developing local policies."

By contrast, Site 40509, also proposed to deliver 60 dwellings, has been assessed as Amber. Its assessment notes that "all new housing developments will require assessment of increased visitor pressure on nearby SSSI, and any residential development above 50 outside of current urban area will require consultation with Natural England. There are no apparent priority habitats within the site;

however, there are grasslands, hedges, and wooded boundaries on site that are likely to have ecological value. Applications may find provision of a 10% net gain in biodiversity difficult within their red line boundaries and may need to find offsite compensation to comply with up-coming national legislation and developing local policies.”

Despite delivering the same number of dwellings, sharing comparable ecological features, and facing similar constraints in achieving on-site biodiversity net gain, the two sites have been assessed differently with one awarded a Green rating and subsequently being allocated and the other awarded an Amber rating and not being allocated.

We support the allocation of the Duxford site and do not seek its removal, recognising the importance of housing delivery in both Group Villages and Rural Centres. However, the disparity between these assessments indicates that they have not been applied equitably, and that Site 40509 has been omitted from allocation unreasonably.

### **Noise and Vibration**

Site S/RRA/H in Highfields, Caldecote is allocated for 65 dwellings and has received a Green rating for noise and vibration. The assessment states that “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.”

The same assessment wording is applied to Site 40509, stating that “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.” Despite this identical conclusion, Site 40509 has been awarded an Amber rating in the RAG assessment.

This inconsistency demonstrates that Site 40509 has not been assessed on an equitable basis. Given the identical findings, Site 40509 should have been awarded a Green rating and allocated in the same manner as the Highfields site.

### **RAG Scores**

An assessment comparing Site 40509 with Site OS276, an allocated Green Belt site under policy S/CBC, demonstrates that Site OS276 performs significantly worse in the RAG assessment. Site OS276 receives two ‘Red’ ratings, whereas Site 40509 receives none. Furthermore, Site 40509 achieves five Green ratings compared with only two for Site OS276.

While the LPA has previously justified the exclusion of Site 40509 on Green Belt grounds, it is wholly unjustified to allocate another Green Belt site that performs materially worse in sustainability and deliverability terms. This inconsistency undermines the rationale for site selection and the equitable application of assessment criteria.

### **Summary**

It is evident that Site 40509 has not been assessed equitably, receiving materially lower RAG ratings in at least two categories despite presenting the same conditions as comparable allocated sites and being assessed as equitable with other sites despite the other sites being allocated and site 40509 not being allocated. This approach appears to artificially lower the site’s credentials to justify its exclusion, which is wholly unacceptable. A fair assessment would demonstrate that Site 40509 represents a highly sustainable, and arguably, the most sustainable village location for housing over the plan period. Its exclusion on Green Belt grounds is unjustified, particularly as other Green Belt sites which perform significantly worse than the site in their RAG scores have been allocated.

The Council's own assessment confirms that the site can be developed without unacceptable landscape harm. A detailed Green Belt review indicates that the site does not contribute strongly to the purposes of the Green Belt:

- Purpose A – preventing unrestricted sprawl – not applicable to a village (NPPG)
- Purpose B – safeguarding neighbouring towns – not applicable (NPPG)
- Purpose D – preserving the setting of historic towns – not applicable (NPPG)

Footnote 7 of the NPPF further confirms there are no strong reasons to refuse development. Accordingly, the site should be considered Grey Belt.

In addition, the delivery of critical infrastructure, specifically CSET, would render the site effectively infill between two housing sites and a transport hub. Despite this, the site has been excluded solely because it falls within the Green Belt. The evidence shows that Site 40509 performs better, than other allocated sites and offers one of the most sustainable village locations for housing in the district. Whilst we have no issue with any of the allocated sites remaining allocated, the LPA's decision to prioritise less sustainable, less accessible sites outside the Green Belt is inconsistent with the Plan's objectives.

Finally, we have presented a smaller red line area which reflects the build line of existing housing development surrounding the site. With this in mind, we believe this reduced area and an equitable comparison with other allocated sites will conclude that site 40509 must be allocated to deliver sustainable housing delivery in villages within the district over the plan period.

We strongly urge the LPA to review its assessment, correct this error, and allocate Site 40509 to ensure housing is delivered in a sustainable and accessible location.

Yours faithfully,

