IN THE MATTER OF GREAT CAMBRIDGESHIRE DRAFT LOCAL PLAN

BUNDLE OF EXPERTS REPORTS

SUBMITTED ON BEHALF ABINGTON PARISH COUNCIL

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Date: 25 September 2026

Greater Cambridge Shared Planning Team
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Sent via email

Dear Sirs,

Proposed Submission Greater Cambridge Local Plan (Regulation 19) Consultation

1.1 On behalf of our client Abington Parish Council ('APC') James Bailey Planning Ltd ('JBPL') submits this representation in response to the consultation on the Proposed Submission Greater Cambridge Local Plan (2024-2045) ('Plan').

1.2 This representation objects to Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm ('Grange Farm') and to Policy S/DS: Development Strategy, insofar as its reliance on new-settlement delivery, including Grange Farm, is not adequately justified or supported by a credible delivery programme. It cross-refers to, and should be read alongside, a number of supporting documents as set out below:

1. Covering Letter (and accompanying Reg 19 response form) by Richard Buxton Solicitors
2. Transport Appraisal prepared by John Russell Transport Planning
3. Heritage Report prepared by Dr Nicholas Doggett of Asset Heritage Consulting
4. Landscape Report prepared by Peter Leaver of Robert Davies John West
5. Water Risks Report prepared by GWP Consulting

1.3 The Plan will be subject to Examination under the National Planning Policy Framework (NPPF) 2024. In accordance with Paragraph 36 of the NPPF, Local Plans must meet the four tests of soundness, being: positively prepared; justified; effective and consistent with national policy.

1.4 APC objects to Policy S/GF and seeks deletion of the allocation. The evidence has not adequately demonstrated that the proposed 4,500-home settlement can accommodate the necessary environmental safeguards while delivering the infrastructure and services on which its sustainability depends. In particular, the identified landscape harm, unresolved heritage and capacity questions, and dependencies on CSET and its separate extension call into question both the justification for selecting this site and the forecast delivery of 2,550 homes by 2045. The objections below concern the adequacy of the evidence at plan-making stage. Our alternative requests for policy changes at the end of this representation are given without prejudice to that primary objection.

2. Site Selection and Sustainability Appraisal

2.1 This section focuses upon a review of various evidence base documents which inform the selection of Grange Farm as a new settlement. Principally these comprise: the Housing and Economic Land Availability Assessment ('HELAA', 2026); the Sustainability Appraisal ('SA', 2026); Development Strategy Topic Papers (2026); and Site Allocations Topic Paper (2026). We consider that there are marked inconsistencies and inaccuracies across this evidence, such that the Plan is not justified.

2.2 Upon review of the HELAA the initial question arises as to why Grange Farm (site ref. 116224) was taken further in the assessment process in the first place, when its overall suitability rating was scored as 'red'. As set out on page 40 of the HELAA, an 'Unsuitable' site is defined as follows: *"The site does not offer a suitable location for development for the proposed use and/or there are known significant constraints or impacts which cannot be mitigated."*

2.3 The HELAA goes on to explain that: *"Where sites have been taken forward despite being assessed as unsuitable, the reasons for this are addressed in the respective Development Strategy and Sites Topic Papers and the appropriate mitigation measures are identified in the site allocation policy."* However, those papers do not adequately explain how the identified significant impacts would be mitigated.

2.4 The site's overall 'red' suitability rating was informed by a 'red' rating for Landscape. A 'red' rating within the HELAA for landscape is defined as: *"Development of the site would have a significant negative impact which cannot be mitigated."* The conclusion on Landscape within the HELAA reads:

> *"Having considered the updated site boundary, the assessment rating remains red. Long views across the site from the south exist. Views from the A11 are buffered with some vegetation and the density of the buffer is variable. Development would alter the existing landscape character*

irreversibly and may result irreversible harm to the setting of Little Abington if constraint planning, green corridors and landscape buffer areas are not considered during the planning of the site."

2.5 This HELAA Assessment for Landscape, however, is not reflected accurately within the Sustainability Appraisal ('SA') (2026). Para. 5.563 of the SA states that: *"the site was also scored as 'Amber' in the HELAA in relation to potential landscape impacts."* Therefore, this is factually inaccurate and calls into question whether proper consideration has been given to the landscape impacts on the site.

2.6 The SA goes on to state that: *"Overall mixed minor positive and significant negative effects are therefore recorded in relation to SA objective 6: Landscape and townscape. The effects are partly uncertain given that the potential to achieve appropriate mitigation in relation to landscape character will depend partly on the design of any proposals for the site."* (SA, page 324).

2.7 The SA therefore appears to somewhat downplay the initial 'red' rating in the HELAA.

2.8 The appraisal also requires a consistent definition of the proposal being assessed. Appendix 6, paragraph 2.6 refers to 4,500 homes but retains a site area of 185 hectares. The current HELAA records site reference OS280 at 211.98 hectares, while Policy S/GF identifies a mixed-use developable area of 198.2 hectares and 35,000 square metres of employment floorspace. These figures may describe different boundaries or land categories, but their relationship should be explained. The Site Allocations Topic Paper records capacity testing and a reduction from 6,000 to 4,500 homes, and the SA expressly appraises OS280 and 4,500 homes.

2.9 The Development Strategy Topic Paper Appendix 6 ('Review of "new" new settlement opportunities', 2026) offers no justification for selecting Grange Farm as a preferable location on landscape grounds, where it is noted that paragraph 2.9 states: *"all reasonable alternative new settlement options, by virtue of their scale, have been assessed as having significant negative landscape and townscape impacts (and scored RED)".* The reader is therefore led to draw an inference that the landscape impact is justified because all reasonable alternatives for new settlements are equally 'red' in terms of landscape impacts, however, this does not address or justify a significant landscape impact which potentially cannot be mitigated.

2.10 The Grange Farm allocation is located predominantly within the Chalk Hills Landscape Character Type. The blanket assumption set out within the Development Strategy Topic Paper (Appendix 6) that all

new settlement options will have significant negative landscape impacts fails to take into consideration that some landscape types will be more susceptible to change from new settlement development than others.

2.11 Peter Leaver's assessment which accompanies this representation identifies particular difficulties associated with extending a settlement onto the elevated Chalk Hills. The Councils should explain how those differences were weighed against Grange Farm's claimed employment and transport advantages and why this remains an appropriate strategy after the necessary mitigation, capacity and delivery requirements are taken into account.

2.12 The susceptibility of the Chalk Hills landscape character was identified in an early evidence base report titled the 'Greater Cambridge Local Plan Strategic Spatial Options Assessment: Landscape & Townscape' (November 2020), which states that (emphasis applied):

> *"The capacity of different landscape types to accommodate new settlements will vary across the Greater Cambridge area subject to the vulnerability/susceptibility of their specific characteristics to this form of built development. In general terms, the Fens,* **River Valley and Chalk Hills are considered to be more vulnerable/susceptible to changes** *from new settlements than other landscape types within Greater Cambridge".*

2.13 A later Supplement Report, 'Greater Cambridge Local Plan Strategic Spatial Options Assessment: Landscape & Townscape Supplement Report' (July 2021), confirmed this position, when considering the landscape impacts of development within the Southern Cluster (which at the time was only being considered for circa 600 dwellings). The Chalk Hills are defined within the document as (emphasis applied):

> *"the distinctive, elevated and undeveloped hills and ridges, open, panoramic views across Greater Cambridge and beyond, scattered woodland including ancient woodland on summits and slopes, and the tranquil often* ***remote landscape character are inherent sensitivities of this landscape that are vulnerable to change."***

2.14 The Assessment goes on to state that:

"In general terms, ***the River Valley and Chalk Hills have sensitive landscape characteristics that are likely to be more vulnerable/susceptible to changes from development focussed on the southern cluster than the Lowland Claylands landscape type*** *within this part of Greater Cambridge. Key views experienced from the Gog Magog Chalk Hills that frame the landscape to the south of Cambridge are also sensitive to changes from development in this area."*

2.15 It is therefore clear that early evidence was informing the Councils that not all landscape impacts will be equal across all new settlement locations. It is also clear that the vulnerability of this landscape in the context of an introduction of a new settlement has not received due consideration. The Appraisal prepared by Peter Leaver sets out that there are a number of adverse effects on sensitive characteristics of the site which cannot be mitigated. Table 2 of his Landscape Appraisal assesses the site characteristics and sensitivities and their potential for mitigating effects. In short, those characteristics/sensitivities which cannot be mitigated comprise:

- A predominantly arable landscape with some permanent pasture and woodland on steeper slope
- A generally unpopulated landscape, interspersed with large farms, granges, halls and cottages
- Distinctive, elevated landscape that forms locally prominent hills and ridges that contrast with the surrounding, low lying landscape that is characteristic of Greater Cambridge
- Open, long distance, panoramic views across Greater Cambridge and beyond from this upland landscape.

2.16 It is therefore our opinion that the policy requirement within S/GF (paragraph 12) which requires all phases of masterplanning and design to: *"Ensure the development respects, protects and enhances the landscape within its rural setting, including surrounding chalk hills and woodlands"* cannot be delivered and that significant adverse effects on the landscape will remain. This likely landscape impact is further considered within Section 3 – Environmental Constraints, below.

2.17 In terms of the Historic Environment, the impacts in relation to Grange Farm were rated as 'Amber' within the HELAA. The HELAA Methodology defines 'Amber' as follows: "*Development of the site could have a detrimental impact on a designated or non-designated heritage asset or the setting of a designated or non-designated heritage asset, but the impact could be reasonably mitigated".* It is not

clear whether the HELAA assessment for Historic Environment was undertaken before or after the designation of the Barrow Cemetery as a scheduled monument (List Entry Number 1496546, 27 May 2026). It is clear, however, that the Development Topic Paper recognises the new designation (emphasis applied):

> *"Land at Grange Farm, east of A11 & north of A1307 would potentially impact two conservation areas to the west and south, a scheduled monument (Roman Road) along the north eastern boundary,* ***a newly designated scheduled monument (Barrows)*** *in the south of the sites, and The Grange farmstead (within the centre of the site) has potential for local heritage significance, but impacts could be reasonably mitigated". (Development Topic Paper – Appendix 6)*

2.18 The SA identifies uncertain effects in relation to Historic Environment and states that: *"The effects are partly uncertain given that the potential to achieve appropriate mitigation in relation to heritage will depend partly on the design of any proposals for the site."* As such, the Sustainability Appraisal, rates the site as having both 'minor positive' and 'minor negative' effects for Historic Environment.

2.19 The extent to which heritage harm can reasonably be mitigated has not been demonstrated. As Dr Doggett identifies, the promoter's June 2026 Heritage Report incorrectly treats the barrow cemetery as non-designated, notwithstanding its scheduling on 27 May 2026. Its assessment must therefore be reconsidered against the cemetery's designated status and national significance (Heritage Statement, paragraphs 2.8-2.9).

2.20 While the majority of the Councils' earlier evidence asserts that the heritage impacts can be reasonably mitigated, a more recent evidence document, the Councils' 'Heritage Impact Assessment' ('HIA', 2026) contradicts this, and concludes the following (emphasis applied):

> *"Through the local plan process this site is being tested as one potential option for a large-scale self-contained new settlement. Due to the proposed scale and density of development, following the application of suitable mitigation strategies****, the risk of significant residual harm remains high".***

2.21 The Councils' most recent conclusion therefore appears to be that even with the application of mitigation strategies there remains a high risk of significant residual harm, which undermines previous assessments that concluded that the impacts can be reasonably mitigated.

2.22 Dr Doggett's report concurs with the findings of the Councils' recent HIA and raises particular concerns in relation to the development's harmful impact to the setting of Worsted Street (Roman Road) which is a Scheduled Monument. The report explains that the Roman Road has always enjoyed a rural setting and this forms a fundamental part of how it is 'experienced' as a Scheduled Monument today as much as in the past. This is only heightened by the fact that it is a well-used public bridleway and the origins of it as a Roman road are clear for all to see and understand. The promoter's suggestion that additional interpretation would mitigate the impact is unconvincing. Interpretation is already provided, and further material would not remedy harm to the rural setting that contributes to the monument's significance. The suggested 'buffer' of open land to its south in the Councils' allocation plan is far from sufficient to preserve the significance of the road's setting as a scheduled monument and suggests that this matter has not been considered in sufficient detail. The development would need to be significantly scaled back away from the Roman Road to offer any meaningful mitigation.

2.23 There would also be an impact to the scheduled barrow cemetery and it is clear that the promoter's masterplan does not take into account the scheduled boundary since it was newly designated in 2026, as it does not provide an appropriate buffer between the boundary of the scheduled monument (shown in figure 1, below) and the extent of the proposed built form (shown in the Indicative Masterplan in figure 2, below). It also does not take into consideration the relationship with other Bronze Age barrows which the listing recognises although they are not included as part of the scheduling:

> *"Approximately 755m to the north-east of the site, geophysical survey recorded a further two ring ditches, interpreted as the remains of Bronze Age barrows (these are not included in the scheduling)."* (List Entry reference List Entry Number 1496546).

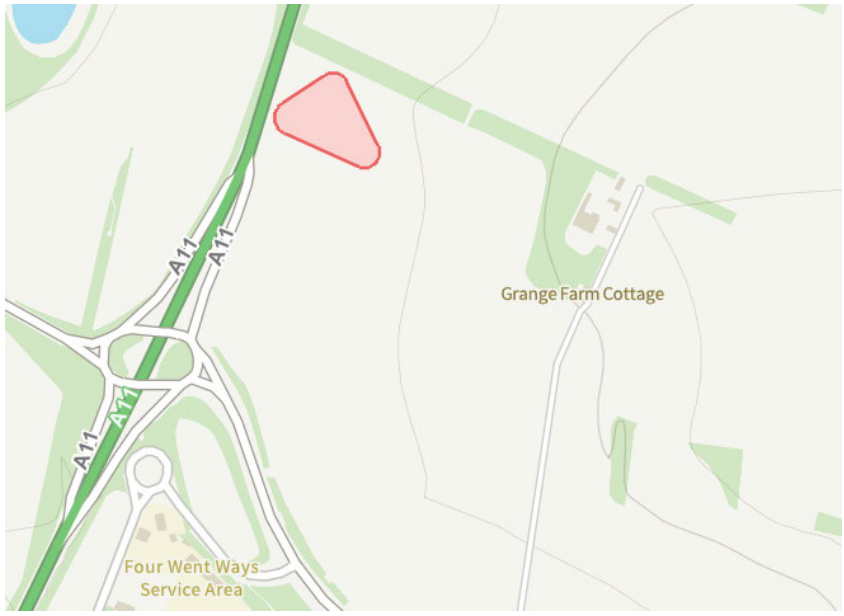


Figure 1: Extract from Historic England Listing



Figure 2: Extract from Vision Document

2.24 As the archaeological investigation work is not yet complete, further significant archaeological remains may be identified and could present a further constraint to the developable area of the site. Dr Doggett also highlights the promoter's acknowledgment that foundations, roads, drainage and attenuation basins could truncate or remove archaeological remains where they intersect them (Heritage Statement, paragraph 3.9).

2.25 The promoter's Heritage Statement suggests that the development offers significant benefits by preserving the barrows in situ, as they are currently being damaged by ploughing however

these barrows must now be considered in the context of their designation as a scheduled monument whereby not only the site itself, but also the setting of the designated asset must be considered alongside their potential links to the barrows to the north. Dr Doggett considers that the proposed cessation of ploughing carries little or no weight as a heritage benefit in light of the cemetery's scheduled status (Heritage Statement, paragraph 3.13).

Justification and Reasonable Alternatives

2.26 The 2026 HELAA assesses Grange Farm as 'unsuitable' overall because of its red landscape rating. That does not preclude allocation, but the HELAA methodology requires the decision to be justified in the relevant topic paper. Appendix 6 to the Development Strategy Topic Paper, 'Review of "new" new settlement opportunities', sets out the Councils' reasons for selecting the site. This section considers whether those reasons adequately address the HELAA findings and justify the allocation at the scale now proposed.

2.27 The Councils place considerable weight on Grange Farm's proximity to Granta Park and Babraham Research Campus. However, proximity alone does not establish that these destinations would be readily accessible on foot or by bicycle; the necessary connections must also be secured. Access to more distant employment and services by sustainable modes would depend heavily on the proposed transport improvements, including CSET and its extension into the site. These dependencies must be weighed when comparing Grange Farm with the reasonable alternatives, which were themselves selected partly for their proximity to high-quality public transport routes. Scotland Farm, for example, is proposed along the Cambourne to Cambridge transport corridor, for which the Transport and Works Act Order has already been granted.

2.28 One of the Councils' key reasons for allocating Grange Farm is that this site is unique due to its potential that it may have a future connection to the Cambridge Biomedical Campus, however as set out later within our representations this CSET link is far from certain to ever come forward. The Ashwell and Morden Garden Town proposal also offers potential rail access to the Cambridge Biomedical Campus via Cambridge South, subject to the relevant service and access arrangements. Therefore, Grange Farm is not wholly unique from this point of view.

> *"More specifically, Land at Grange Farm, east of A11 & north of A1307's location is within walking or cycling distance of established employment locations at Granta Park and Babraham Research Campus, and will be connected by the Cambridge South East transport scheme -*

providing public transport and active travel opportunities - to Cambridge Biomedical Campus, where a very significant number of jobs will be focused. ***None of the other reasonable alternative potential new settlements share this feature".***

2.29 When comparing Grange Farm to the other reasonable alternatives, Grange Farm also has far less potential to function as a self-contained settlement. Appendix 6 identifies a 387-hectare Scotland Farm (Dry Drayton) option with 6,200 homes and 100,000 square metres of employment floorspace; a separate 267-hectare option with 8,000 homes and no employment space; and an 895-hectare Ashwell and Morden option with 10,000 homes and 20,000 square metres of employment floorspace. In contrast, Grange Farm is constrained to a 4,500-dwelling proposal, having previously been reduced from the original proposal for 6,000 dwellings at Reg 18 stage.

2.30 The Councils' own evidence recognises the significant constraints to delivery which are far from resolved, including harmful environmental impacts which may significantly reduce the capacity of the site, as well as the full delivery of CSET which is still at an early stage in the consenting process with no identified date for delivery (or guarantee of consent).

"Notwithstanding the above benefits, large scale development at Grange Farm would have harmful environmental impacts, in particular on the Roman Road SSSI and Scheduled Ancient monument, which will require mitigation through careful master-planning. Successful delivery of Grange Farm would be reliant on full delivery of CSET plus a direct connection from CSET to the site".

2.31 We contend that the site selection evidence is not adequately justified and has not robustly reviewed the reasonable alternative options. If the environmental constraints are given true and proper consideration such that reasonable mitigation is applied, we contend that the capacity of the site would further reduce (see our arguments set out within Environmental Constraints in Section 3 below). This requires reassessment of whether the reduced capacity could support the infrastructure and services assumed in the allocation.

2.32 We consider that a full review is required to not only reconsider the reasonable alternatives for other new settlements compared to Grange Farm, but also whether another new or alternative settlement is even required to deliver the Councils' Development Strategy (Policy S/DS). The Strategy already relies heavily upon new-settlement delivery, which accounts for 44% of housing

growth within the plan period. However all but one of these new settlements will deliver a significant proportion of their housing *after* the plan period. Cambourne North, for example, is set to deliver only 2,550 homes within the plan period and 10,450 homes post plan period. Even Waterbeach New Town, which has both outline planning permission and reserved matters consents, is predicted to deliver 5,721 within the plan period and 5,254 post 2045. The question therefore must be asked, does Greater Cambridge really need another new settlement which is expected to deliver 2,550 homes within the plan period and subject to unresolved infrastructure dependencies, when the number of new settlements already allocated will still be delivering circa 20,000 homes after the plan period. An over-reliance on new settlements poses a significant risk to the Councils' ability to deliver its development strategy.

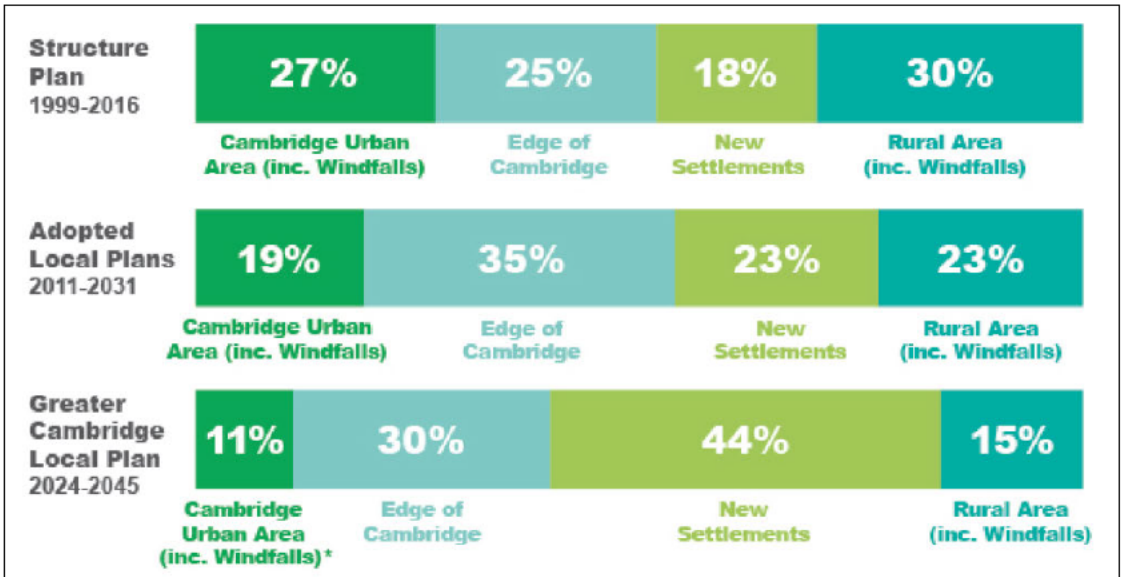


Figure 9: Distribution of growth in comparison to previous Local Plans

Extract from Greater Cambridge Proposed Submission Local Plan 2024-2045 (page 54)

2.33 Furthermore, the justification for the additional new settlement at Grange Farm should be tested against the contribution it can realistically make during the plan period. AECOM's 'Housing Delivery Study Addendum 2026 Update' (June 2026) identifies 2,550 completions at Grange Farm by 2045, with later delivery dependent on infrastructure and phasing. Its assessment also records overall plan headroom of 3,963 homes, or 8.2%, and notes that 74% of plan-period supply arises from completions and existing commitments. Removing Grange Farm's 2,550 homes would, on those unchanged figures alone, leave 1,413 homes of headroom, approximately 2.9% of the requirement.

2.34 The assumed contribution of 2,550 homes depends on first completions in 2034/35, with delivery increasing to 300 homes annually from 2039/40 and remaining at that level for the rest of the plan period. AECOM acknowledges that achieving this trajectory depends on the timely provision of the CSET extension or other measures for the early phases (Housing Delivery Study Addendum: 2026 Update, paragraphs 3.2.62–3.2.68). Aside from CSET, one of of those dependencies relates to water supply. Cambridge Water's programme relies on the Grafham Transfer from 2031/32 and the Fens Reservoir from 2036/37, with the interim Grafham supply available only until 2040 under the current arrangements (Cambridge Water's 'Final Water Resources Management Plan', 2024). The Councils must therefore establish how many homes can be served at each stage and how delivery would be affected if either water scheme, CSET or its extension is delayed. They must also substantiate the assumed build-out rate against delivery at comparable settlements and the infrastructure needed to sustain them (see comments on Cambourne North and Bourn Airfield, below). For example, a two-year delay to the presently assumed trajectory, with annual delivery rates otherwise unchanged, would reduce completions by 2045 from 2,550 to 1,950 homes. These dependencies therefore bear directly on the contribution Grange Farm can realistically make within the plan period. The Councils should test that contribution against credible infrastructure programmes and slower delivery scenarios, and demonstrate why the allocation is preferable to a realistic combination of other ways of meeting the plan-period requirement.

2.35 One option is to examine whether suitable existing allocations could accommodate more homes or deliver them sooner. This requires proportionate, site-specific testing of developable area, density, land uses, environmental constraints, infrastructure and phasing.

2.36 Cambourne North warrants particular examination. Its spatial framework proposes different densities across the site, including lower-density areas towards its perimeter. The Councils should explain whether those assumptions make the best use of suitable land and whether a revised, design-led capacity could deliver additional homes within the plan period.

2.37 Bourn Airfield should also be considered. It already benefits from outline planning permission for approximately 3,500 homes and would be served by the Cambourne to Cambridge busway. The Councils should test whether its capacity could be increased through an appropriate revision or extension to the existing allocation and whether those additional homes could be delivered by 2045, which would seem realistic and is on a more certain footing than Grange Farm.

2.38 Although the Plan is being examined under the transitional arrangements for the December 2024 NPPF, the August 2026 NPPF will be relevant to future planning applications. Its Policy L3(2)(b) supports making the best use of the development potential of land at the edge of existing built-up areas that will form part of a settlement. A review of Cambourne North's capacity now, or a future application informed by that policy, could therefore identify scope for more homes than the Plan currently assumes. The grant of the Transport and Works Act Order for the Cambourne to Cambridge busway strengthens the case for testing that possibility. The Councils should establish whether additional homes could be delivered there by 2045 and, together with other reasonable alternatives, remove the need to allocate Grange Farm altogether.

2.39 A second issue is the treatment of smaller sites. Paragraph 73(a) of the December 2024 NPPF expects authorities to identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless strong reasons are shown why that target cannot be achieved.

2.40 The Plan calculates the 10% benchmark as 4,807 homes, but identifies specific small sites for only 2,052 homes, approximately 4.3% of the housing requirement. Its forecast of 7,005 homes from small sites also relies on completions, existing commitments and future windfalls (Plan paragraphs 2.41-2.43). To justify identifying fewer sites, the Councils argue that further allocations would disperse growth across less sustainable rural locations, increase car use, potentially require Green Belt release and strain infrastructure. That assumes the additional sites would have to be selected in that way. The Councils have not demonstrated why suitable sites could not instead be identified in accessible locations, including outside the Green Belt. Their general objections to dispersed rural growth do not establish the strong reasons required by paragraph 73(a) of the December 2024 NPPF for falling short of the identified benchmark. Locations such as Caldecote, for example, should be considered on their actual accessibility and infrastructure prospects, rather than an assumption that all village growth has the same effects.

2.41 The Council's approach therefore also fails to recognise the affordable housing needs of existing village communities. South Cambridgeshire's own 'Affordable Housing Guide' (2024) identifies difficulties securing sufficient land for affordable homes in villages, alongside high house prices and limited availability of existing social housing. Accordingly, affordable provision at a new settlement elsewhere cannot be assumed to meet the needs of households seeking to remain in their own communities. In our view, a proportionate growth across suitable villages should be assessed for its ability to deliver

affordable homes where local needs arise, sustain services and help people remain close to family and employment. The Council's approach to minimise the use of smaller site allocations is therefore unsustainable and unjustified, and inconsistent with the NPPF. It is unsound as a result.

2.42 The Councils' concerns about car use and infrastructure should also be applied consistently in comparing alternatives with Grange Farm: a substantial new settlement whose forecast delivery relies on a further segregated transport connection. That comparison must account for the cumulative effects of smaller sites as well as their potential advantages in timing and delivery certainty.

2.43 The Councils should revisit whether more homes at existing allocations, earlier delivery at Cambourne North (or other existing or proposed larger settlements) and a better selection of small sites could together provide the 2,550 homes attributed to Grange Farm by 2045. The gap between the small-site benchmark and the homes on identified sites is 2,755 homes, larger than Grange Farm's projected contribution during the plan period. The Councils should test the available sites, their infrastructure needs and realistic delivery dates before concluding that Grange Farm is necessary. Without that work, the choice of Grange Farm is inadequately justified, as is the decision to identify fewer small sites than envisaged by paragraph 73(a) of the December 2024 NPPF.

2.44 These concerns also go directly to the soundness of policy S/DS. The Councils have not demonstrated that the proposed reliance on new settlements provides a justified and effective strategy when assessed against realistic delivery prospects and reasonable alternatives.

3. Environmental Constraints and Development Capacity

3.1 Section 2 identified that significant environmental constraints have been recognised as part of the site selection process. It is important that these matters are considered fully by the Councils rather than assuming that mitigation can solve the issue. This is because some of the constraints are so fundamental that they impact upon the site's capacity and ability to deliver the anticipated growth required. The three main environmental constraints considered within this section include Landscape; Heritage; Best and Most Versatile Agricultural Land; and Water Supply Risks.

Landscape

3.2 Section 2 of this report established that the site lies in a sensitive landscape, which is characterised by a pattern of development in wooded valley bottoms, with chalk hills left clear of development.

The development parcel of the allocation strays too far up the slope, it will be an uncharacteristic intrusion in the landscape whose effects go beyond those identified in the HELAA supporting information and cannot be mitigated.

3.3 Even where mitigation is possible, it may require substantial reductions in the developable area, with consequences for housing capacity and the provision of infrastructure and services. Table 2 of the Landscape Appraisal submitted as part of these representations sets out those landscape sensitivities which could potentially be mitigated but, in most cases, would involve scaling back the development to the lower field parcels, which significantly restricts the extent of developable area.

3.4 One example where development would need to be heavily restricted is the impact upon the SSSI (Worstead Street Roman Road, also a scheduled monument) which sits to the north of the allocation. The Landscape Appraisal identifies that this allocation will be visible from the Roman Road SSSI and will impinge on the setting of the Roman Road. There is a risk that because the proposal is so close to the Roman Road, informal access from the allocation will result in damage to the integrity of the hedgerow that is a key feature of the ancient track. Any possible mitigation here would involve restricting the development to the area further south; however, this reduces the developable area significantly.

3.5 To proceed with the allocation at Grange Farm would be at odds with the Councils' own Landscape Character Assessment which assessed the Chalk Hills landscape character type and area to be of strong character and in good condition. The Assessment notes that (emphasis applied):

> *"Landscapes of **strong character in good condition and therefore judged to be of high quality where emphasis should be on conservation of existing character and of particular features that contribute to this character**. The aim should be to continue the current landscape management regimes and adopt best practice approaches. Great care will need to be taken in the introduction of new characteristics."*

3.6 The introduction of a new settlement at Grange Farm means that the existing landscape character in this location will cease to exist. The scale is such that there is no mitigation that can ensure that the character is conserved. The management objectives set out within the Landscape Character Assessment therefore cannot be met. Policy GP/LC of the Local Plan requires that:

"All new development proposals must:

a. Protect, conserve and enhance the local landscape character as set out in the Greater Cambridge Landscape Character Assessment (2021) Part A and Part B or successor documents"

3.7 The local landscape character cannot be conserved, protected or enhanced as required by Policy GP/LC. For this reason, the site allocation is unsound.

Heritage

3.8 The submitted landscape and heritage evidence identifies closely related concerns about the loss of the site's rural character. Dr Doggett's Heritage Statement addresses harm not only to the scheduled Roman Road and barrow cemetery, but also to the Grade II listed Worsted Lodge Farmhouse and 8 Cambridge Road, Great and Little Abington Conservation Area, and the non-designated Grange Farmhouse. The agricultural surroundings contribute to the significance of these assets in different ways. Of particular importance are the rural backdrop to 8 Cambridge Road and the southern ridge of the allocation, which contributes positively to the conservation area's setting. Dr Doggett rejects the suggestion that new opportunities to view or appreciate the assets would adequately compensate for the loss of their existing rural surroundings (Heritage Statement, paragraphs 2.10-2.27 and 3.14-3.18).

3.9 The Heritage Report explains that the Roman Road asset has always enjoyed a rural setting and this forms a fundamental part of how it is 'experienced' as a Scheduled Monument today as much as in the past. This is only heightened by the fact that it is a well-used public bridleway and the origins of it as a Roman road are clear for all to see and understand. The suggestion within the promoter's heritage report that additional interpretation material can be provided for it is neither necessary nor desirable since there is already an interpretation panel located there. Moreover, additional interpretation would not offer any suitable mitigation for the development's impact. The suggested 'buffer' of open land to its south in the Councils' allocation plan is far from sufficient to preserve the significance of the road's setting as a scheduled monument.

3.10 Dr Doggett identifies the need for a considerably more extensive buffer beside the Roman Road than shown in the allocation diagram, together with a substantial open buffer behind 8 Cambridge Road (Heritage Statement, paragraphs 3.11 and 3.16). These requirements would

further constrain the developable area and must be reflected in any capacity assessment. His overall conclusion is that alterations to the allocation would not rectify the significant and irreversible heritage harm identified, providing a substantive heritage objection to the allocation itself (paragraphs 3.20 and 4.1-4.2).

3.11 These concerns also have direct implications for subsequent planning applications. Although the Plan is being examined against the December 2024 NPPF, future applications would need to address the national decision-making policies introduced in August 2026. Policy HE5(2)(c) expressly recognises that substantial harm arises where development would "seriously affect a key element of the asset's significance", including through changes to its setting. On the heritage evidence set out above, the contribution made by Worsted Street's rural surroundings is fundamental to its significance, and there is a serious risk that development at the scale envisaged would cross that threshold into substantial harm. In such circumstances, policy HE6(5) requires refusal unless its stringent exceptions are satisfied, while HE6(6) requires substantial harm to a scheduled monument to be wholly exceptional. Allocating the land would not remove those requirements. The Councils must therefore demonstrate that the proposed scale of development can realistically secure permission under that policy framework. If protecting the monument's significance requires development to be withdrawn substantially to the south, the resulting loss of developable land could materially reduce housing capacity and undermine the infrastructure and viability assumptions supporting the allocation. Those consequences must be addressed before the allocation is confirmed.

Best and Most Versatile ('BMV') Agricultural Land

3.12 Defra's recently published Predictive Agricultural Land Classification mapping indicates that almost the whole allocation is likely to comprise BMV agricultural land, predominantly Grade 2, with much of the remainder Grade 3a. Unlike the older provisional mapping, the new dataset distinguishes between Grade 3a, which is BMV, and Grade 3b, which is not. It provides an updated strategic indication of the quality of land at Grange Farm which must inform the allocation decision. Although predictive mapping cannot replace a detailed field survey, that limitation is a reason to investigate the likely loss properly, rather than leave it unresolved. Noting the recency of the new datasets (released in Spring 2026) the published assessments do not explain whether, or how, the updated mapping has informed site selection. There is no evidence that any site-specific soil quality survey has been undertaken.

3.13 The published assessments to date do not provide a consistent account of the land's agricultural quality. The HELAA records agricultural land classification as a "further constraint" and identifies OS280 as 24.43% Grade 2 and 75.57% undifferentiated Grade 3. The SA describes the site as mostly Grade 1 or Grade 2 and identifies significant negative effects against Objective 8: Efficient use of land. It also acknowledges that the loss of higher-quality soils is unlikely to be fully mitigated. These accounts require reconciliation against the current allocation boundary and the updated mapping.

3.14 Paragraph 187(b) of the December 2024 NPPF requires recognition of the economic and other benefits of BMV land. Paragraph 188 expects plans to allocate land with the least environmental or amenity value, where consistent with the Framework's other policies. Footnote 65 expressly favours poorer-quality agricultural land where significant development of agricultural land is demonstrated to be necessary. The Councils must therefore explain why development requiring this degree of agricultural loss is justified in preference to realistic alternatives affecting poorer-quality land. Recording a significant adverse effect in the SA does not, by itself, answer that question.

3.15 For an allocation of this scale, the Councils should provide a detailed ALC assessment establishing the extent and distribution of each grade, together with an assessment of the likely agricultural loss. That assessment should cover housing, employment, roads and other infrastructure, as well as any other proposed uses that would remove land from agricultural production. It should also consider whether any remaining retained land could continue to be farmed effectively. This evidence should inform a comparison with reasonable alternative sites and with reduced or revised forms of the allocation that could avoid or lessen the loss. Where poorer-quality alternatives are rejected, the reasons should be clearly explained.

3.16 The importance of undertaking this exercise during site selection was recently emphasised by the Inspectors examining the Central Lancashire Local Plan. In their post-hearings letter of 4 March 2026, paragraphs 23-24, they explained that the harm arising from agricultural land loss should already have been considered *before* a site is allocated. They also required the authorities to demonstrate whether poorer-quality land had been preferred through the site-selection process. The same issue arises here: an assessment deferred until a planning application cannot inform the earlier decision to select Grange Farm over competing locations.

3.17 The SA's reference to opportunities for food growing does not resolve that issue. Allotments and community growing spaces can provide benefits, but they do not replace the extent, versatility and productive capacity of agricultural land permanently lost to development. The Councils must demonstrate that the likely loss has been properly assessed and that the choice of this land is justified. Until they do so, the agricultural case for allocating Grange Farm remains incomplete and the allocation has not been shown to comply with the national policy preference for poorer-quality land.

3.18 This also brings into focus our concerns in relation to exploring densification of existing development options which could reduce the need for further development of BMV agricultural land.

Environmental Constraints Impact and Developable Area

3.19 The landscape and heritage impacts, together with the permanent loss of best and most versatile agricultural land, weigh strongly against the allocation. These concerns must also be considered together when assessing the site's capacity. The submitted landscape and heritage evidence identifies the need to pull development back from sensitive areas, particularly around the Roman Road and its rural setting. The Councils cannot rely upon such changes as mitigation without assessing their consequences for the developable area and the number of homes the site can accommodate.

3.20 Policy S/GF identifies indicative average densities of 30-40 dwellings per hectare at the site's edges and 50-60 dwellings per hectare towards its centre, with higher densities directed to the lowest topographical points. Those figures do not, in themselves, demonstrate that 4,500 homes can be accommodated satisfactorily. That requires a credible land-use budget and capacity assessment which account for the necessary landscape and heritage protection, alongside employment, schools, transport infrastructure, drainage and open space.

3.21 Nor can it simply be assumed that any reduction in the developable area can be offset by increasing densities elsewhere. The resulting height, scale, massing and distribution of development must be tested against the site's landscape character, visibility and heritage sensitivities. Locating development towards the centre of the site or on lower ground does not

establish that its effects would be acceptable. The evidence must demonstrate that the proposed housing capacity and the mitigation relied upon are compatible.

3.22 Reducing the scale of development would not, by itself, resolve the landscape objections identified in our Landscape Appraisal. It would also require the strategic and delivery case to be reconsidered. The Councils' review of new settlement opportunities applied a minimum threshold of 4,200 homes to support viable infrastructure and services, including sustainable transport. Grange Farm is proposed for only 300 homes more than that threshold. Any substantial reduction in capacity therefore raises a direct question about whether the settlement could still provide and fund the facilities and infrastructure upon which its claimed sustainability depends. The Councils have not demonstrated that the allocation can reconcile these competing requirements. This provides a further reason why it is not justified and should be deleted.

Water Resources, Supply and Groundwater Protection and Wastewater

3.23 GWP's assessment identifies significant uncertainties concerning both water supply and wastewater treatment and disposal. It does not conclude that these matters necessarily prevent development but recommends substantially clearer safeguards in the allocation policy. These uncertainties also require consideration when assessing the allocation's infrastructure costs, phasing and delivery.

3.24 The wastewater solution and therefore protections for the sensitive water environment remains unresolved. GWP identifies a difference between the Water Cycle Study's assumption that Grange Farm would be served by Sawston Water Recycling Centre and the promoter's subsequent proposal for on-site treatment and discharge to ground. The latter would involve infiltration into the Chalk Aquifer, which feeds the River Granta. Given the Principal Aquifer, groundwater Source Protection Zones and sensitive receptors, the Environment Agency's advice recorded in the promoter's evidence requires a Hydrogeological Risk Assessment. Policy S/GF should expressly require a deliverable wastewater strategy for each phase and the development as a whole, supported by the necessary assessment and modelling, with infrastructure operational before occupation and secure arrangements for its long-term management. GWP has proposed the requisite stringent wording for these policy requirements.

3.25 Water supply also presents a separate phasing risk. The Grafham Transfer is an interim resource, with longer-term supply expected from the Fens Reservoir. Both depend on infrastructure outside the developer's control. The present reference to conditions being "likely" to restrict first occupation does not adequately address the supply needed throughout the development's delivery. Policy S/GF should require demonstrated sustainable water-supply headroom for each phase and identify the infrastructure upon which that phase depends. Later phases cannot simply assume that the interim resource will remain available indefinitely if replacement supplies are delayed.

3.26 These matters also bear on the comparison of reasonable alternatives. The Councils should explain how groundwater vulnerability, sensitive receptors and the feasibility and cost of wastewater disposal informed site selection, and whether realistic alternatives could accommodate growth with reduced water-related risks and fewer infrastructure dependencies.

4. Transport Infrastructure and Viability

4.1 This section is supported by and should be read alongside the Transport Appraisal by John Russell Transport Planning (September 2026).

4.2 It is clear that the Councils consider that the success of Grange Farm as a new settlement rests upon the delivery of the Cambridge South East Transport Scheme (CSET). The Development Topic Paper (Appendix 6) expressly states that: "*Successful delivery of Grange Farm would be reliant on full delivery of CSET plus a direct connection from CSET to the site".*

4.3 Objective 6 of Policy S/GF states that:

> "*The new settlement will play a critical role in extending the Cambridge South East Transport (CSET) scheme, with a new segregated connection proposed which would also enable potential future extension of the proposed scheme to settlements further afield."*

4.4 The Greater Cambridge Local Plan Infrastructure Delivery Plan (IDP) (Reg 19) July 2026 sets out the infrastructure requirements associated with the growth proposed in the Local Plan, including costing, funding and prioritisation. As highlighted within the extract below, there are two pieces of strategic transport infrastructure associated with Grange Farm – namely CSET ***and*** the CSET

Extension; the latter being the fundamental separate infrastructure needed to connect the allocation directly to the proposed A11 Travel Hub and wider CSET corridor. Inevitably and unsurprisingly, this infrastructure is defined within the IDP as '**critical**', which is defined on page 26 of the IDP as: *"interventions/projects without which planned development will simply be unable to proceed".*

4.5 Policy S/GF 23(c)(iv) requires the segregated connection to support first occupation, but allows an alternative temporary public transport service where agreed through a detailed Transport Strategy and phasing plan. It also requires a trigger for completing the permanent link, based on the development capacity supported by that temporary arrangement. These safeguards are welcome, but leave fundamental questions unresolved: what interim service is feasible, how many homes it could support, how it would be funded and for how long, and whether the permanent connection could be delivered by the required trigger. Those matters bear directly on the allocation's capacity and housing trajectory and require evidence at the plan-making stage.

4.6 The IDP records CSET Phase 2 as funded. The CSET Statement of Case identifies approximately £161m of recoverable Homes England funding allocated towards construction, subject to the necessary consents, Full Business Case approval and completion of a Funding Agreement. This is a material funding commitment but does not establish that the scheme is ready for delivery. The Councils should therefore clarify the current status of those conditions, the adequacy of the allowance against updated costs, and the developer contributions required from Grange Farm. The CSET Inquiry process has only recently resumed with a Pre-Inquiry Meeting to be held in October 2026; no dates for the hearings themselves have been published. Policy S/GF 23(c) anticipates contributions towards both CSET Phase 2 and the separate extension into the allocation:

> *"Commensurate with the phasing of development, making financial contributions towards and, as appropriate, enabling the following transport measures…*
>
> *iii. The GCP Cambridge South East Transport (CSET) Phase 2 scheme which will provide a high quality public transport corridor and active travel route from the proposed A11 Travel Hub to the Cambridge Biomedical Campus, Cambridge city centre and the Linton and Sawston Greenways;*

iv. Extension of the CSET Phase 2 public transport corridor and services directly into the site via a segregated link from the proposed Travel Hub across the A11 into the site, to support the early phases of development. This must be in place to support first occupation of the site, unless it can be demonstrated by the applicant through a detailed Transport Strategy and phasing plan…."

Infrastructure Sub-typology	Project title	Description	Estimated Cost (£m)	Funded / Partly Funded/ Unfunded	Residual Gap (£m)	Anticipated Funding Source	Expected cost for developers (£m)	Lead Delivery Partner(s)	Prioritisation	Phasing				
										2024 - 2028/2029	2029/30 - 2033/34	2034/35 - 2039/40	2040/41 - 2044/45	After 2045
Transportation														
Strategic Transport	CSETS Phase 2	A new public transport and active travel corridor from the A11to the CBC. The proposals also include a new travel hub.	161	Funded	0	GCP City Deal		CCC submitted TWAO to DfT (on behalf of GCP)	Critical					
Strategic Transport	CSET Busway Extension-Grange Farm	An extension of the currently proposed CSET Phase 2 to the Grange Farm site. This would involve the extension of the busway to cross the A11 and A1307 in order to connect the site to the proposed A11 travel hub and to the wider corridor.	30	Funded	0	GCP City Deal		GCP	Critical					

Extract from Table 18-2 – Infrastructure Delivery Schedule, Infrastructure Delivery Plan (2026)

4.7 Table 5.1 of the Draft Interim Greater Cambridge Transport Strategy identifies GCP as the lead organisation for CSET and describes the extension to Grange Farm as "developer-led". The Councils should explain how these delivery responsibilities relate to the funding sources and developer contributions recorded elsewhere in the evidence.

Cambridge South East high-quality public transport corridor (including A11/A1307 travel hub)	**GCP**	A phased package of improvements to public transport, active travel and interchange in the south-east corridor, centred on a new segregated public transport route from the A11 corridor via Sawston and Great Shelford to Cambridge Biomedical Campus. This would be supported by a new A11/A1307 travel hub, complementary walking, wheeling and cycling links, and improved first- and last-mile access to key destinations including the Cambridge Biomedical Campus, Babraham Research Campus and Granta Park. Taken together, these measures would improve sustainable access from the south-eastern arc into Cambridge, strengthen interchange and network resilience, and support planned growth and major employment locations along the corridor.	2	2	3	2	1 / ?	**Local Plan**	I/ST, I/TH, I/ID, I/SI, S/NEC, S/CBC, S/BRC, S/GF			CCC, CPCA
Mass rapid transit extension to Grange Farm	**Developer -led**	An extension of the currently proposed CSET phase two to the Grange Farm site, providing a high-quality fully segregated public transport corridor connection across the A11/A1307 to serve the site, connect with the proposed A11 travel hub, and integrate with the wider south-eastern corridor including a possible stop for direct access to innovation and employment opportunities at Granta Park.	2 / ?	2 / ?	2 / ?	3 / ?	1 / ?	**Local Plan**	I/ST, I/TH, I/ID, I/SI, S/GF			CPCA, CGC, GCP, CCC

Extracts from Table 5.1: Greater Cambridge Transport Strategy Intervention Delivery Plan – Draft Interim Greater Cambridge Transport Strategy (June 2026)

4.8 Figure 3 of the 'Housing Trajectory for the Greater Cambridge Local Plan 2024-2045' anticipates the first 50 homes at Grange Farm in 2034/35. However, the IDP does not establish a coordinated programme demonstrating when CSET and the separate extension into the site would become operational. The extension's phasing remains unconfirmed. Given the allocation's dependence on these schemes, the Councils must explain how the assumed first completions relate to their delivery and identify the infrastructure and services that would be available to support those early occupations.

4.9 The evidence also does not establish a consistent programme linking the assumed first housing completions in 2034/35 with delivery of CSET and its extension into the site. The IDP's strategic transport table identifies CSET Phase 2 for delivery "By 2035", while the extension's phasing remains "TBC". The Councils must reconcile the infrastructure schedules with the housing trajectory and demonstrate the effect of realistic delays on annual completions. Until that work is provided, there is insufficient evidence to support reliance on the full 2,550 homes attributed to Grange Farm within the Plan period.

4.10 In addition, delivery of CSET would not, by itself, provide the direct connection upon which Grange Farm depends. The proposed route terminates at the A11 Travel Hub, with a separate extension required to cross the A11 and A1307 and serve the allocation. Although high-level feasibility work has been undertaken, the Transport Appraisal identifies unresolved questions concerning the extension's design, third-party land requirements, consenting route, cost and delivery programme. The Transport Appraisal also illustrates the practical complexity of the CSET extension, including a new bridge over the A11, signal-controlled junction works, a crossing of the A1307, third-party land and further consenting requirements. It considers that the necessary design, approvals, land acquisition and construction process could take 15-20 years. That assessment undermines the assumed first completions in 2034/35 and the 2,550 dwellings attributed to the site by 2045.

4.11 The Councils must demonstrate a realistic means of resolving those matters within the timescale assumed for housing delivery. Proximity to a proposed transport corridor is insufficient justification for the allocation where the essential connection to that corridor has not been shown to be deliverable when required.

4.12 The transport dependencies must also be tested against the allocation's viability. The Transport Appraisal identifies approximately £138m of transport infrastructure costs associated with the

allocation, excluding requirements for which no cost has been identified. Substantial elements are recorded as unfunded and dependent upon developer contributions, while the £30 million CSET extension is only partially funded. The Councils should therefore reconcile these costs with the contributions assumed from Grange Farm. The same assessment must account for the costs of wastewater treatment, discharge, monitoring and long-term management, together with the effects on development phasing and cash flow of any delay to the strategic water-supply infrastructure identified in GWP's assessment.

4.13 The Councils must demonstrate that CSET and the separate connection into Grange Farm have a realistic prospect of being delivered when required, and that the housing trajectory reflects their funding, consenting and construction programmes. The temporary public transport provision in Policy S/GF cannot substitute for that assessment or justify proceeding on the assumption that the permanent infrastructure will eventually follow. If either scheme is substantially delayed or does not proceed, the basis for allocating Grange Farm as a sustainable new settlement would be fundamentally undermined. Any smaller scheme would require a fresh assessment of its transport impacts, infrastructure requirements, viability and ability to deliver the Plan's strategic objectives. On the evidence presently available, the necessary delivery case has not been demonstrated and the allocation should be deleted.

Traffic and Network Capacity

4.14 In any event, the proposed active travel connections do not remove the need to demonstrate that a settlement of 4,500 homes, together with employment and supporting facilities, can be accommodated safely on the surrounding highway network. The Transport Appraisal identifies existing constraints relating to road and junction capacity, geometry, visibility and provision for pedestrians and cyclists. The assessment must address the additional traffic generated by the allocation against those conditions, including during the early phases when the proposed transport infrastructure and local facilities may not yet be available.

4.15 The Transport Appraisal identifies an apparent omission of detailed personal injury collision analysis from the Plan's transport evidence. The five-year collision records reproduced in Figures 3.4 and 3.5 show recorded injury collisions on both the principal routes and surrounding rural roads. These records require examination alongside traffic volumes, road characteristics and the distribution of additional development traffic to identify particular safety concerns and the

measures needed to address them. The Councils should demonstrate that this work has informed the allocation and its infrastructure requirements.

4.16 Although the Councils have undertaken strategic transport modelling, the Transport Appraisal raises substantive concerns about the assumptions underpinning the proposed trip budgets and their implications for delivery. Policy S/GF requires the development to remain within an agreed trip budget through a "monitor-and-manage" approach. However, that requirement does not itself demonstrate that the full allocation can be delivered within the budget. If the limit is reached before completion, further development may depend on additional mitigation or may have to be restricted. The Councils must explain how that risk has been assessed and how it affects the housing capacity and trajectory attributed to Grange Farm.

4.17 Compliance with a peak-hour trip budget is also insufficient to demonstrate that the allocation will achieve its wider sustainable transport objectives. Traffic may move outside the assessed peak hours without any reduction in overall car use or associated emissions. The evidence must therefore demonstrate that the proposed infrastructure, services and mix of uses can achieve the assumed modal shift and reduction in car dependency throughout the development's delivery.

4.18 The comparison in section 6 of the Transport Appraisal illustrates the sensitivity of the forecasts. For the 4,400-home scenario assessed, the promoter's forecasts identify 822 external car movements in the morning peak and 1,113 in the evening peak, against a trip budget of 1,114 vehicle movements in each period. Applying observed travel patterns from Cambourne produces materially higher estimates of 1,631 and 2,619 respectively. Cambourne is a comparator, rather than a prediction of precisely how Grange Farm would perform, but the scale of the difference requires a convincing explanation. The Councils must demonstrate why the lower forecasts are achievable, reconcile the assessed scenario with the proposed 4,500-home allocation, and test the consequences of lower sustainable mode shares or delayed infrastructure.

4.19 As the Transport Appraisal sets out, the same comparison illustrates the potential scale of daily traffic. Applied as a sensitivity test, observed Cambourne travel patterns would equate to approximately 21,000 external vehicle movements per day, compared with an existing flow of approximately 20,500 vehicles per day on the A1307 along the site frontage. This is not a prediction that traffic would necessarily double, but it demonstrates the importance of testing the A1307, the

proposed site access, the CSET crossing and Fourwentways as an integrated network, together with the potential for displacement onto surrounding rural roads.

4.20 Before the allocation is confirmed, proportionate but robust evidence must establish that its transport impacts can be satisfactorily addressed and that the necessary mitigation has a realistic prospect of delivery when required. This should include testing less favourable travel assumptions and infrastructure programmes, identifying the resulting highway and safety implications, and establishing the costs, funding and delivery arrangements for any additional measures. A draft Statement of Common Ground with National Highways has been published but it is unclear the extent to which any of the stated matters are agreed or otherwise. It is therefore equally unclear the extent to which Grange Farm has been considered by the national body in relation to the A11 crossing, junction capacity and cumulative impacts on the strategic road network. Matters fundamental to the site's capacity and suitability cannot simply be left for resolution after allocation.

4.21 Without that evidence, there remains a substantial risk that Grange Farm would generate materially more car traffic than assumed, increasing pressure on the surrounding rural roads and strategic junctions. If additional mitigation cannot be delivered, restrictions needed to contain those impacts could also prevent the allocation from delivering its anticipated housing and supporting facilities. The unresolved transport issues therefore call into question both the acceptability of the development and the reliability of its contribution to the Plan.

5. Failure to Demonstrate a Sustainable and Developable Settlement

5.1 Taken together, the evidence identifies fundamental weaknesses in the justification for allocating Grange Farm and in the assumptions supporting its capacity and delivery. The Councils have not demonstrated that the proposed settlement can accommodate the necessary environmental safeguards while providing the homes, infrastructure and services upon which its sustainability depends.

5.2 The Sustainable Settlement Sizes Study (LUC, 2020) recommended around 4,500 homes to support a sustainable new settlement, while recognising that smaller developments may be appropriate in particular circumstances. The Councils subsequently applied a minimum screening

threshold of 4,200 homes, informed by infrastructure and service requirements, including secondary education. These figures are not an absolute definition of a new settlement, but they underline the importance of demonstrating that Grange Farm can achieve sufficient scale to support its proposed facilities and infrastructure.

5.3 The submitted landscape and heritage evidence identifies constraints requiring development to be pulled back from sensitive areas, particularly around the Roman Road. Dr Doggett also concludes that alterations to the allocation would not resolve the overall heritage harm; the objection therefore extends beyond the consequences of mitigation for housing capacity. The consequences for housing capacity have not therefore been satisfactorily established, nor has it been demonstrated that a reduced scheme could support the infrastructure and services assumed in the allocation, or that increasing densities elsewhere would be environmentally acceptable. Reducing the development footprint would also leave the wider landscape objections identified in our evidence unresolved. The permanent loss of BMV agricultural land adds to the need for a properly evidenced comparison with reasonable alternatives.

5.4 Delivery also depends upon both CSET and its separate extension into the site. The conditional funding commitment for CSET does not resolve the outstanding questions concerning consent, the extension's delivery, or the timing and allocation of infrastructure costs. The policy's temporary public transport provisions and trip-budget controls do not themselves demonstrate that the full allocation can be delivered. The Councils must show how these dependencies can be reconciled with the housing trajectory and viability assumptions.

5.5 These matters concern the principle, scale and timing of development and cannot all be deferred to subsequent planning applications. In its present form, the allocation is not adequately justified and its effectiveness has not been demonstrated. The outstanding environmental and agricultural-land issues also prevent a satisfactory conclusion that the allocation is consistent with national policy.

5.6 **We therefore request deletion of Policy S/GF and its Policies Map allocation, and modification of Policy S/DS and the housing trajectory to remove reliance on Grange Farm.** The Councils should reassess the housing supply position, including the remaining headroom, and test whether any additional provision needed to achieve a sound and sufficiently flexible strategy can be secured through the reasonable alternatives identified in these representations.

5.7 Without prejudice to APC's primary objection and request for deletion, the amendments sought if the allocation is retained are set out overleaf.

Yours faithfully,

James Bailey Planning

Alternative position if the allocation is retained

Without withdrawing the primary request for deletion, APC seeks the following changes/modifications if the allocation is retained:

- Require an evidenced land-use budget and capacity assessment accounting for all necessary infrastructure and environmental safeguards. Amend the allocation's capacity, development boundary and housing trajectory to reflect the results.

- Specify the necessary landscape buffers, retained open land, building-height limits and long-term management arrangements to conserve the affected heritage assets and their settings. These must address both scheduled monuments, Worsted Lodge Farmhouse, 8 Cambridge Road, Great and Little Abington Conservation Area and Grange Farmhouse, including a substantially wider Roman Road buffer and substantial open land behind 8 Cambridge Road.

- Require CSET Phase 2 and the permanent segregated extension into Grange Farm, together with funded public transport services, to be operational before first occupation. Remove the exception allowing occupation in reliance on temporary public transport arrangements.

- Require a costed and funded transport infrastructure delivery strategy identifying the programme, triggers, delivery responsibilities and secured funding for all critical and essential off-site transport works, including active-travel connections across the A11 and A1307, wider walking and cycling improvements, bus improvements and priority measures, site access and necessary highway mitigation.

- Establish measurable trip-budget monitoring thresholds, funded corrective measures and enforceable occupation controls where necessary. Demonstrate that these controls are compatible with the housing capacity and trajectory assumed for the allocation.

- Strengthen the allocation policy to prohibit occupation of any phase until sufficient sustainable water supply capacity and the infrastructure needed to serve that phase are available, as confirmed by the Local Planning Authority in consultation with Cambridge Water and the Environment Agency. Require the phasing plan to identify reliance on the Grafham Transfer and, for later phases, the Fens Reservoir or an equivalent sustainable alternative, with enforceable occupation restrictions tied to their availability. [**we refer to the detailed development condition drafted by GWP**]

- Strengthen the allocation policy to require a deliverable wastewater strategy with the outline application/first application for planning permission. Any on-site discharge to ground must be supported by hydrogeological assessment and modelling demonstrating protection of the aquifer, public water supplies and River Granta, including under climate-change and treatment-failure scenarios, and a realistic prospect of obtaining the necessary permit. If this cannot be demonstrated, an off-site solution must be secured. Occupation must await

operational infrastructure with agreed ownership, management and monitoring arrangements. [**we refer to the detailed development condition drafted by GWP**]

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SUBMISSION ON LANDSCAPE MATTERS BY PETER LEAVER CMLI ON BEHALF OF RICHARD BUXTON SOLICITORS

Project: **LAND AT GRANGE FARM, LITTLE ABINGTON S/GF**

Client: Abington Parish Council

Ref: 2961

Status - Revision	Date Issued	Comments	Author	Checked
S3-P1	25/9/26	First Issue	PL	KMD

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1.0 INTRODUCTION

1.1 Introduction and Background

1.1.1 This report has been prepared by Peter Leaver, a chartered landscape architect. I hold a BA (hons) in landscape design and a postgraduate diploma in landscape architecture from Manchester Polytechnic. I was elected a member of the Landscape Institute in 1989. I worked from 1989 to 1997 for Bristol City Council, where my duties included preparing assessments of the landscape impact of planning applications for the City Council development control team. Between 1997 and 2025 I was a director of David Wilson Partnership Limited, working as a landscape architect for a wide range of public and private sector clients. I have prepared statements and given evidence at appeal in relation to a range of development types. I have prepared landscape character assessments as an evidence base in the preparation of policies on the Coast and Estuary Zone and Rural Gaps which now form part of the adopted North Devon and Torridge Local Plan. I led the work on a landscape sensitivity study for Copeland District Council, as part of the evidence base for the local plan review. Between 2010 and 2024 I advised the North Devon Coast AONB Partnership (Now the National Landscape) on landscape matters, for whom I have given written and oral evidence at appeal on landscape and visual matters. I have also prepared landscape and visual impact assessments for a range of development types, to support planning appeals, planning applications and HELAA submissions.

1.1.2 The evidence which I have prepared and provided in this report is true and is prepared with regard to the Landscape Institute technical and professional standards. I confirm that the opinions expressed are my true and professional opinions.

1.1.3 There are three principle interlinking issues identified in this report, summarised below:

- The unprecedented change to the landscape and settlement pattern of Greater Cambridge.
- Adverse effects on key landscape characteristics that cannot be mitigated on site;
- Inconsistency with other local plan policies and the NPPF.

1.1.4 **The landscape south and east of Cambridge is characterised by a pattern of development in valley bottoms and lower valley slopes, with chalk uplands left clear of development. The development parcel of the allocation strays well into these unsettled Chalk Hills. It represents an unprecedented and major departure from the existing landscape pattern of Greater Cambridge and from the plan area's settlement pattern.**

1.1.5 The landscape character assessment for greater Cambridge recognises that Chalk Hills, like the majority of the allocation site, are a distinctive, elevated landscape that forms locally prominent hills and ridges contrasting with the surrounding, low lying landscape. The Assessment describes the landscape as generally unpopulated, interspersed with only large farms, granges, halls and cottages. By contrast, settlement in the south east of Cambridge sits within the river valleys, lowland farmlands, and lower valley slopes. The elevated chalk hills form a setting for settlement in the landscape.

1.1.6 Within this context, the allocation would represent a step change in the pattern and texture of the landscape, disrupting the existing settlement pattern and the landscape setting for existing villages and other development. The effects of the change would go well beyond the local context

1.1.7 **The proposed allocation would cause adverse effects to key landscape characteristics and landscape sensitivities, particularly of the Chalk Hills landscape, as described in the Landscape Character Assessment. Development would not contribute to landscape management guidance for the area. Major adverse effects could not be mitigated by masterplanning. site layout or design.**

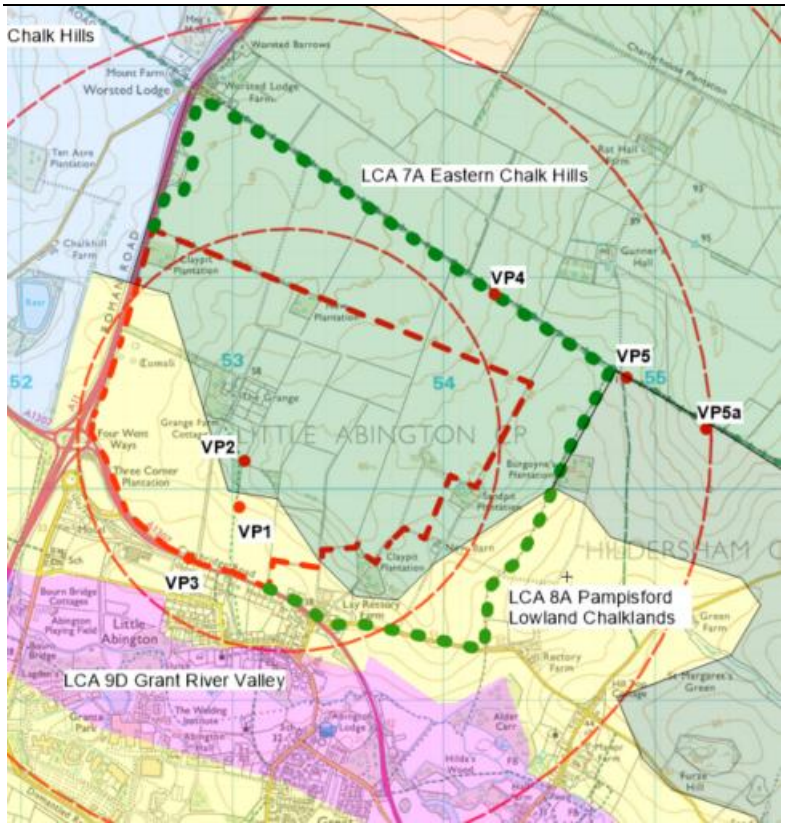


Figure 1 – Landscape Character Areas and Types

1.1.8 The site sits in two distinct landscape character areas and types, as described in the Greater Cambridge Landscape Character Assessment[1]. Many of the key characteristics of these character types are well represented locally and the site makes a valuable contribution to the rural character of the landscape. Sensitivities and characteristics of the landscape are highly sensitive to development and would be adversely affected by the allocation. The allocation policy, based on the New Settlement Assessment, considers that adverse effects can be mitigated during the masterplanning process, through attention to design and site layout.

1.1.9 While it is true that some adverse effects can be mitigated, adverse effects on the following high sensitivity characteristics within the Chalk Hills Landscape Character Type cannot be:

- A predominantly arable landscape with some permanent pasture and woodland on steeper slope

[1] Greater Cambridge Landscape Character Assessment 2021 parts A and B

- A generally unpopulated landscape, interspersed with large farms, granges, halls and cottages
- Distinctive, elevated landscape that forms locally prominent hills and ridges that contrast with the surrounding , low lying landscape that is characteristic of Greater Cambridge
- Open, long distance, panoramic views across Greater Cambridge and beyond from this upland landscape.

1.1.10 In my judgement, the policy requirement for a development that "respects, protects and enhances the landscape within its rural setting" cannot be delivered through masterplanning for the allocation. Significant adverse effects on Cambridgeshire Chalk Hills Landscape will remain.

1.1.11 **There is no evidence that during the decision making process, regard was given to the landscape and visual sensitivities of the site within its landscape and visual context. As a result, the allocation is inconsistent with other local plan policies and with the National Planning Policy Framework.**

1.1.12 The potential adverse effects to the Cambridgeshire Chalk Hills Landscape were identified in the evidence base underlying the Local Plan. The Strategic Spatial Options assessment identifies that the landscape type within which the majority of the allocation sits is more vulnerable and susceptible to development than other landscape types in Greater Cambridge. The HELAA assessment identified a red RAG rating in relation to potential landscape effects. These legitimate concerns have not been brought forward into the New Settlement Assessment, which identifies only harm to designated assets and consequently not into the proposed policy. .As noted elsewhere in this statement, adverse effects cannot be mitigated by masterplanning due to the nature of the receiving landscape and the scale of development proposed.

1.1.13 In my judgement, the safeguards for landscape character identified in policy allocation S/GF are not deliverable. The nature of the allocation's landscape context combined with the quantum of development mean that the policy is not compatible with its stated aims to respect, protect and enhance the landscape.

1.1.14 Development of the allocation would not be consistent with policy GP/LC. Development at the scale and location proposed in the allocation could not protect, conserve or enhance the local landscape character as set out in the Greater Cambridge Landscape Character Assessment.

2.0 Proposal

2.1.1 The strategic allocation proposal is as set out in draft Local Plan Policy S/GF and figure 68. The allocation is for a new settlement, that includes commercial, community, education, and transport infrastructure as well as housing.

2.1.2 The S/GF allocation is identified as being some 211ha (of which 198ha is identified as the developable area). S/GF is surrounded to the north and east by an environmental enhancement area (S/SEA/GF) whose purpose is to ensure separation from surrounding settlements and to maintain the developments rural setting.

2.2 Area, Scale and Density

2.2.1 At the core of the allocation is a proposal of 4,500 new homes at a density ranging from 20 dwellings per hectare (dph) on the upper edges of the site to 50 dph in the centre. At an estimated 2.4 people per dwelling, this would equate to a population of around 10,800. The allocation policy includes a requirement for 3.5ha of commercial and retail space, including B8 storage, which is often characterised by tall, large scale buildings. The policy wording draws attention to the need to ensure heights of taller buildings do not adversely impact sensitive views or the character of surrounding communities (S/GF para 13.c). There is no indication of a maximum height of building, nor is there any indication of where tall buildings might be located in the Indicative Spatial Framework (Policy S/GF figure 68).

2.2.2 Within the overall allocation area there are a number of other calls on land area. Of these the greatest in terms of land use is likely to be the requirement for accessible greenspace. Policy BG/EO requires 7ha of accessible greenspace per 1,000 population. The policy requires 3ha per 1,000 to be provided on site. This would equate to around 32 ha of the

allocation area – much of it necessarily contributing to the buffer zone on the south and east of the site and the buffer to the burial barrow ancient monument on site (The buffer to the Worsted Street Roman Road is included in sub policy S/SEA/GF, see below). Policy BG/EO and figure 111 identifies that accessible open space must be within easy walking distance of where people live, so it will be spread throughout the development, not concentrated in one place or all on the edges of the site. Space is also required for parking and a connection to the travel hub proposed west of the A11, cultural and community uses, commercial and retail (3.5ha) and a gypsy/traveller site. Other constraints are the presence of scheduled ancient monumentson site and just off site (requiring a non developed buffer), extant chalk and sand pits, and several blocks of woodland which are proposed to be retained and protected.

2.2.3 A buffer area is proposed in policy S/SEA/GF. The buffer is intended to "*ensure sufficient separation from neighbouring settlements and maintain a soft, green landscape to protect the development's rural setting. These areas will also be used to deliver other associated uses, including new habitats, biodiversity and informal open space"*. The policy is clear that, particularly in the northern area, it is not an area where informal recreation would be encouraged. The policy notes at 21:

> *21a .Manage recreational pressure on areas of sensitive ecology and habitat including the impacts on the SSSI. This includes a buffer of chalk grassland for habitat creation.*
>
> *21a v.Ensure that appropriate measures are implemented to* ***minimise recreational disturbance*** *and pressures on ecology at the SSSI along the Worstead Roman Road which is a Public Right of Way and a European Long Distance Route;* (highlight added)

2.2.4 In relation to the buffer, both Landgage Heritage and Asset Heritage Consulting in their Heritage reports identify the need for a buffer, to protect the appreciation of the scale and linear nature of the Roman Road. Asset Heritage Consulting raise concerns about the effectiveness of the buffer as proposed: "*In my view, this buffer would need to be considerably more extensive than that shown in Fig. 68 of the Council's Policy S/GF for the potential land allocation if this quality is to be maintained and enjoyed as is currently the*

case."[2]

2.2.5 The policy is clear: the purpose of the Strategic Enhancement Area is not to contribute greatly to the accessible open space requirement, but to provide a buffer to sensitive wildlife and heritage sites. The requirement for 3ha of accessible open space per 1,000 residents will require 32.4ha, and will have to be met within the developable area land budget..Policy S/GF is accompanied by an indicative spatial framework diagram, but there is no land budget calculation that expresses how the housing numbers, commercial uses, accessible open space, infrastructure and other spatial requirements will fit together within the allocation. There are sensitive heritage and wildlife designations, as well as the sensitive Chalk Hills landscape on site and in the surrounding area. The policy wording sets out a requirement for buffers and masterplanning to protect them, but there is no indication that there is enough space to provide mitigation when considered against the quantum of development proposed for the site.As a result, significant adverse effects (as outlined in the HELAA and described below) can be expected to the character of the Chalk Hills landscape.

[2] Asset Heritage Consulting para 3.11

3.0 Issue 1: Adverse Effects to Landscape Character

3.1.1 The allocation area is spread over 16 field parcels (identified for the purposes of this report - see Fig 2). Land use is predominantly arable, with areas of small woodland.

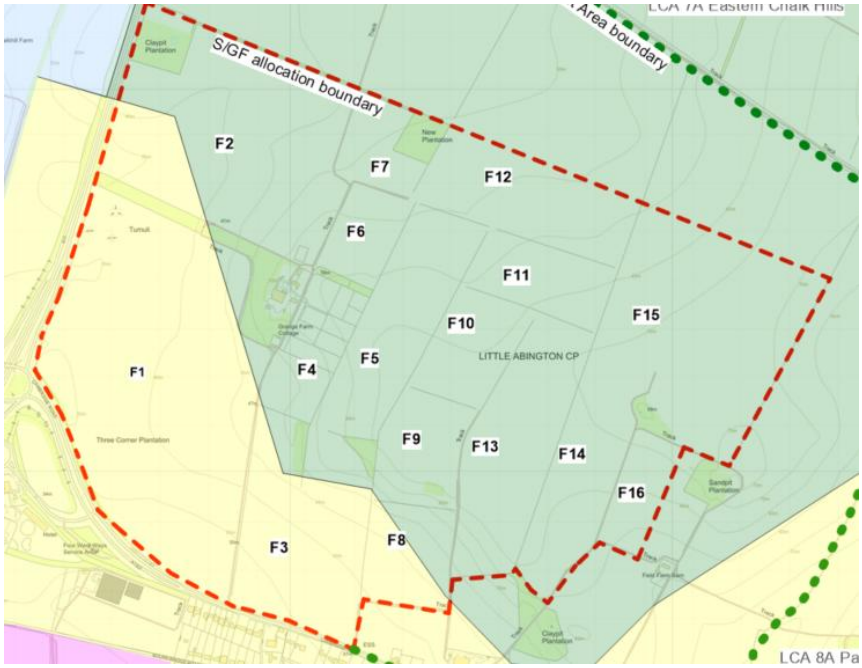


Figure 2 Field Parcel numbers

3.1.2 Policy GP/LC cites the 2021 Greater Cambridge Landscape Character Assessment (The Assessment), requiring that local landscape character as set out in the Greater Cambridge Landscape Character Assessment is protected, conserved and enhanced. The Assessment divides the greater Cambridge area into landscape character type (LCTs) and within them discrete Landscape character areas (LCAs). The allocation site falls across the boundary of two of these areas, as Figure 1 above

3.1.3 The Assessment describes the key characteristics of the landscape, evaluates key landscape sensitivities which provide a framework for informing landscape sensitivity assessments of potential changes from specific development types or land management practices[3].

[3] Greater Cambridge Landscape Character Assessment part A 4.2.3 p31.

3.1.4 Guidance on **landscape management**[4] falls into the categories of conserve, enhance or restore. Landscapes worthy of conservation are "Landscapes of **strong character in good condition and therefore judged to be of high quality where emphasis should be on conservation of existing character and of particular features that contribute to this character**. The aim should be to continue the current landscape management regimes and adopt best practice approaches. Great care will need to be taken in the introduction of new characteristics"

3.1.5 **Strength of character**[5] is connected to distinctiveness and landscape integrity. It is based on judgements about how distinct and recognisable the pattern of physical and cultural attributes is that defines the character of the landscape, and the sense of place that they evoke. Using professional judgement, strength of character is defined on a three-point scale of **weak**, **moderate** or **strong**, as evaluated within the character descriptions. Landscape condition is defined on a three-point scale of **poor**, **moderate** or **good**.

3.1.6 The Assessment goes on to recommend landscape management objectives and guidelines[6] Management objectives "represent different management strategies ranging from conservation of the current landscape in areas of strong character and good condition, to encouraging positive change in landscapes where the character is generally weaker and in poorer condition through enhancement, restoration or creation (para 4.3.2)" and the guidelines aim to "ensure that those landscape features and characteristics identified as making a particular contribution to Greater Cambridge's local distinctiveness and sense of place are appropriately protected, managed and enhanced." (para 4.4.2).

3.1.7 The Assessment makes it clear that neither objectives nor guidelines are meant to be prescriptive, but a noted shift is seen in that draft LP policy GP/LC provides for mandatory landscape protections, framed as "must" in policy terms:

[4] Greater Cambridge Landscape Character Assessment part A 4.3 p32
[5] Greater Cambridge Landscape Character Assessment part A 4.2 p31
[6] Greater Cambridge Landscape Character Assessment part A 4.3, 4.4, 4.5 pp32-35

> *"1 All new development proposals must: a. Protect, conserve and enhance the local landscape character as set out in the Greater Cambridge Landscape Character Assessment (2021) Part A and Part B or successor documents;[7]"*

3.1.8 In relation to the Development Management process, the Assessment notes (in relation to Greater Cambridge Councils):

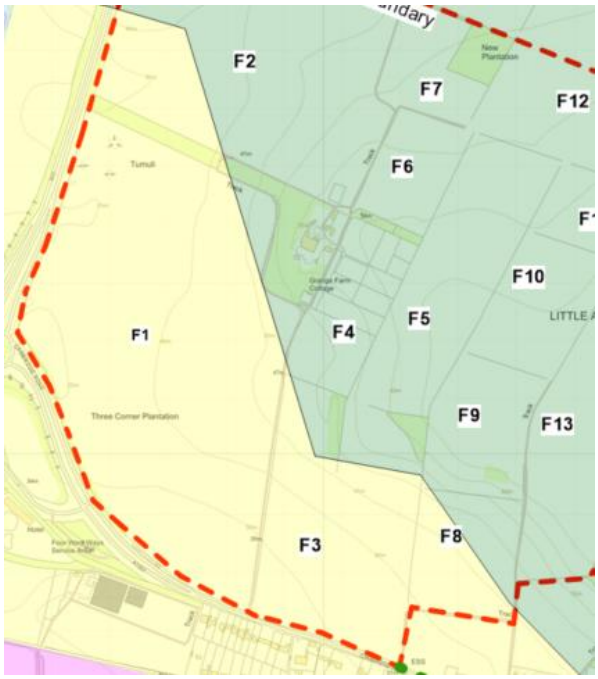
> *"As the local planning authorities, the Councils should use the relevant character information to assist in the development management process. Development assessed as having potential to have a significant adverse effect on valued characteristics may be a candidate for refusal or require planning conditions that ensure important features/qualities are not diminished.[8]"*

3.1.9 The Emerging Local Plan's express reference to the Greater Cambridge Landscape Character Assessment elevates the document beyond background evidence and incorporates its recommendations into the policy framework against which proposals must be assessed. Decision makers are therefore required to take the Assessment's landscape character analysis and associated recommendations into account when applying the policy. This includes consideration of the landscape character objectives, sensitivities and management guidance identified for the relevant character area. The Assessment provides the detailed evidence and guidance that informs the policy's objectives, and its recommendations should be given due weight in determining whether a proposal appropriately conserves, enhances and responds to local landscape character.

[7]Greater Cambridge Landscape Character Assessment part A 4.4.2 p33
[8] Greater Cambridge Landscape Character Assessment part A 4.5.1 p33

3.2 LCT8 (Lowland Chalklands) and LCA8A Pampisford Lowland Chalklands

3.2.1 The lower part of the site (F1, F3 parts of F2 and F8 as figure 2) are within LCT8 (Lowland Chalklands) and LCA8A Pampisford Lowland Chalklands.



Field Parcels in LCA 8A Pampisford Lowland Chalklands

3.2.2 The lower part of the site and the surrounding area to the south and west display many of the key characteristics of the LCA and LCT:

- Gently rolling landscape, occasionally dissected by small streams in shallow valleys
- Productive, predominantly arable landscape with limited woodland cover
- Vegetation cover comprises scattered copses and shelterbelts of deciduous woodland with occasional hawthorn hedge field/roadside boundaries
- The landscape is dominated by late enclosures, resulting in field patterns which are generally rectilinear and occasionally sinuous
- A wealth of historic and archaeological features including ancient routes, earthworks and Roman sites/features. These contribute to a strong sense of time depth.
- Settled rural landscape characterised by dispersed historic, nucleated villages on lower landform
- Generally strong rural character, locally interrupted by major roads cutting across the landscape
- Mature hedgerows, small blocks of woodland and shelterbelts combine with occasional lines roadside trees to create a visually enclosed, intimate character

- Scattered designed historic parkland features, including some modern developments of large science and technology research parks, in proximity to the River Cam and River Granta
- Settlement pattern of scattered small villages on elevated ground at the edges of the River Valleys

3.2.3 Key landscape sensitivities for the LCT include:

- Medium to large sized fields enclosed by hedges
- Strong sense of historic integrity, with several visible historic earthworks, routes and buildings
- Tranquil, often remote rural landscape away from major roadways and extended villages

3.2.4 Landscape sensitivities specific to the LCA are the well wooded visually enclosed landscape, with an intimate character and designed parkland features, neither of which are well represented on the allocation site within the LCT.

3.2.5 Landscape objectives for the LCA and LCT include:

- Conserve the tranquil and uninterrupted rural character
- Protect the sites and features of archaeological and historic interest
- Manage planting of new trees and woodland in order to conserve open views of the undulating chalkland and emphasise landforms whilst improving biodiversity

3.2.6 Guidelines for integrating development into the landscape include:

- Maintain the distinctive settlement pattern of the area and its local context
- Ensure any extensions to springline villages are located along the bottom of steeper slopes and along lanes
- Maintain the linear, or rectilinear form of the settlements
- Ensure density and pattern of new developments reflect that of existing villages and hamlets.

Sensitivity to Development and Landscape/Visual Effects

3.2.7 In considering the potential for landscape effects, I have assessed the contribution that the site makes to key characteristics of the landscape, the sensitivity of those characteristics to the scale, type and location of development proposed and the effect of the development on them. As part of this last stage, I have considered the potential for adverse effects to be

mitigated (as suggested in policy S/GF). The results of those assessments are set out in tables 1 and 2, by landscape character area. References to "VP" refer to the viewpoints in appendices 2 and 3 of this report.

Table 1Landscape Sensitivity and Effects, LCA8 / LCT8A

Characteristic	Contribution of Site	Sensitivity	Effect of Development
Gently rolling landscape, occasionally dissected by small streams in shallow valleys	Well represented in lower part of the site. VP1	Medium	Underlying ground form would remain, but would be disguised by development.
Productive, predominantly arable landscape with limited woodland cover	Well represented on site. None of the woodland blocks on site are in this LCT/LCA. VP1	High	Landcover highly susceptible to change from development.
Vegetation cover comprises scattered copses and shelterbelts of deciduous woodland with occasional hawthorn hedge field/roadside boundaries	Not well represented – roadside hedge mature with trees. Hedges between fields somewhat gappy or absent.	Low	
The landscape is dominated by late enclosures, resulting in field patterns which are generally rectilinear and occasionally sinuous	Well represented on site, rectilinear field pattern.VP1	Medium	Potential for development to respect existing field patterns. Can be partially mitigated through layout and design.
A wealth of historic and archaeological features including ancient routes, earthworks and Roman sites/features. These contribute to a strong sense of time depth.	Some representation on site. In this LCT on western edge.	High	Can be partially mitigated through layout and design.
Settled rural landscape characterised by dispersed historic, nucleated villages on lower landform	No settlement in the allocation, but lower part of the site is related to Little Abington settlement south of A1307. VP1, VP3	Medium	Development would have some context in the LCA locally, particularly in lower areas of the site. Effects cannot be fully mitigated through Layout and Design.
Generally strong rural character, locally interrupted by major roads cutting across the landscape	Strong rural character is well represented on site. The A11 and A1307 roads detract from rural character on the southern and western edge of the allocation within this LCA. VP3	Medium	Strong rural character already diluted by presence of roads and settlement. Effects cannot be fully mitigated through Layout and Design.
Mature hedgerows, small blocks of woodland and shelterbelts combine with occasional lines roadside trees to create a visually	. On the edge of the site and in Little Abington to the south, lines of trees and a well treed landscape contribute to a	Low	The spatial framework allows for a buffer along the A1307 which will partially mitigate effects of development on the

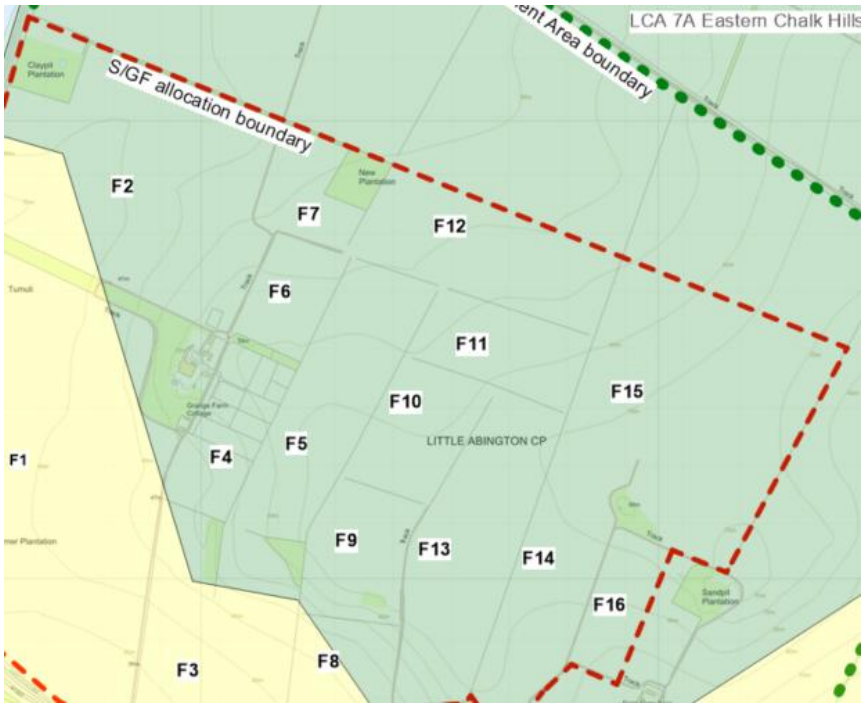
Characteristic	Contribution of Site	Sensitivity	Effect of Development
enclosed, intimate character	sense of enclosure that contrasts with the openness of the higher elevation land north of the A1307. VP3		roadside hedgerow. Some tree loss will be inevitable as a result of junction creation and road realignment.
Scattered designed historic parkland features, including some modern developments of large science and technology research parks, in proximity to the River Cam and River Granta	Not represented on site, but characteristic of the surrounding area (Babraham Campus, Granta Park, Pampisford Estate).	Low	
Settlement pattern of scattered small villages on elevated ground at the edges of the River Valleys	No settlement on site in the LCA, but this pattern is characteristic of Little Abington and Great Abington to the south. VP3	Low	Development on the lower areas would reflect settlement pattern in the LCA locally.

3.2.8 The lower part of the site within the Lowland Chalklands exhibits a mixed relationship with the key characteristics of the landscape character type and area. Several defining features are well represented, including the gently rolling landform, productive arable fields, rectilinear field pattern, and strong rural character. The most sensitive characteristics are those associated with the productive agricultural land cover and historic and archaeological features, both of which are highly susceptible to change from development.

3.2.9 Development would generally retain the underlying landform and could partially respect existing field patterns and heritage assets through careful layout and design. However, impacts on agricultural land cover and the area's rural character could not be fully mitigated.

3.3 LCT 7 Chalk Hills, LCA7A Eastern Chalk Hills

3.3.1 The majority of the allocation identified for development is within LCT 7 Chalk Hills, LCA7A Eastern Chalk Hills. (Most of F2, F3-F7, part of F8, F9 – F16 Figure 2).



Field Parcels in LCA 7A Eastern Chalk Hills

3.3.2 This part of the allocation is part of "an arc of prominent, elevated hills across the central and southern part of the (Landscape Character Assessment) Study Area. Chalk hills and scarps form distinctive rising landform beyond the Fen Edge Chalklands to the southeast of Cambridge." Key characteristics of the LCT represented on site are:

- Locally prominent, elevated chalk hills with localised steep-sided slopes and incised by dry valleys that create a rounded, rolling landform
- Free-draining landscape with dry valleys that contain small, seasonal watercourses
- A predominantly arable landscape with some permanent pasture and woodland on steeper slopes
- Tree cover comprises scattered woodland across the rising landform and concentrated around historic parkland or estates
- Various historic features including ancient routes, earthworks and hill forts
- A generally unpopulated landscape, interspersed with large farms, granges, halls and cottages

- A simple and tranquil landscape with long distance panoramic views

3.3.3 The LCA identifies that in the Eastern Chalk Hills area, a "combination of shelterbelts and rolling landform generally contain views visually, making this a smaller scale landscape than elsewhere in the Chalk Hills." The descriptions goes on to note that "Settlement is sparse, limited to isolated halls and farms. Farm buildings are low and generally well-integrated into the landscape. Overall, the LCA has a peaceful, remote and tranquil character."

3.3.4 **Landscape condition** is described as **good**. "The landscape of the Chalk Hills has been altered by relatively recent changes in agriculture, with some scattered pasture remaining between swathes of large arable fields. The farmed landscape is punctuated by scattered blocks of woodland that break up the skyline of the ridges of the upland landscape. The rural qualities and particularly the historic settlement pattern is largely intact." On site and in the locally surrounding area, the characteristics noted are well represented: scattered blocks of woodland, some of which are on the skyline, a strong rural character and a settlement pattern related to historic valley floor settlements.

3.3.5 The landscape is considered to have a **strong sense of character**: "The Chalk Hills is a relatively simple, uninterrupted and tranquil landscape with distinctive, long distance and often wide views across the lower lying landform of Greater Cambridge. There is some localised intrusion from major transport routes and expansion of settlement in adjoining LCTs that interrupt views in places. Overall, it is judged that the Chalk Hills LCT has a **strong** character." The elements that contribute to a strong sense of character are well represented on site and in the local area: simplicity of form and texture; remoteness, sense of time depth, openness that contribute to a sense of tranquillity[9]; long distance and wide open views. Localised intrusion is present on the western edge of the site, but eastwards the influence of the A11 and A1307 are minimal.

3.3.6 Landscape sensitivities relevant to the allocation are:

[9] See Appendix XX Definitions of Tranquillity

- Distinctive pattern of shelterbelts and ornamental roadside trees
- Distinctive, elevated landscape that forms locally prominent hills and ridges that contrast with the surrounding, low lying landscape that is characteristic of Greater Cambridge
- Open, long distance, panoramic views across Greater Cambridge and beyond from this upland landscape, with the additional sensitivity for the LCA: Small scale landscape, visually contained by landform, trees and shelterbelts
- Scattered woodland including ancient woodland on summits and slopes
- Network of historic routes and earthworks that contribute to the area's sense of place
- Wooded and undeveloped ridgelines are visually sensitive
- Tranquil, often remote rural landscape away from major roadways

3.3.7 The overall management objective for the Chalk Hills is to conserve the tranquil, generally uninterrupted character of the rural landscape. Guidance for integrating development into the landscape includes the following prescriptions relevant to the allocation:

- Maintain the distinctive settlement pattern of the area and its local context
- Ensure any extensions to springline villages are located along the bottom of steeper slopes and along lanes
- Maintain the linear, or rectilinear form of the settlements
- Ensure density and pattern of new developments reflect that of existing villages and hamlets
- Protect prominent hills and ridges and their skylines by avoiding locating tall structures including masts and wind turbines in visually prominent locations, and by using topography and the landscape's woodlands to reduce the visual impact

Sensitivity to Development and Landscape/Visual Effects

3.3.8 The sensitivity of the landscape and potential for mitigating effects on site are summarised in table 2:

Characteristics and Sensitivities	Contribution of site	Sensitivity	Effect of Development
Locally prominent, elevated chalk hills with localised steep-sided slopes and incised by dry valleys that create a rounded, rolling landform	Slopes are locally prominent, appearing as skyline in some views from the south (VP7, VP8,)	Medium	Mitigation possible by restricting development to the lower slopes (F1, F3, F4, F8).
Free-draining landscape with dry valleys that contain small, seasonal watercourses	Valleys off site, little representation on site.	Low	
A predominantly arable landscape with some	Characteristics well represented on site. VP2	High	Characteristics highly susceptible to change in landcover, from arable to

Characteristics and Sensitivities	Contribution of site	Sensitivity	Effect of Development
permanent pasture and woodland on steeper slopes			woodland. Cannot be mitigated through site layout and design. Potential to mitigate woodland loss through design and layout.
Tree cover comprises scattered woodland across the rising landform and concentrated around historic parkland or estates	Characteristics well represented on site, woodland on rising land in small woodland blocks.	Medium	Site layout can mitigate woodland loss, but character of isolated woodland blocks within arable farmland would be lost.
Various historic features including ancient routes, earthworks and hill forts	Worsted Street Roman Road just to the north of the allocation. Allocation identified for development within setting of the Roman Rd and on land sloping towards Worsted Street. (VP4, VP5, VP6). VP5a indicates landscape effects – from a break in the hedge on a high point on the Roman Rd.	High	Area identified for development falls towards the Roman Rd. Would constitute a major change in the character of the setting of the feature as noted in Asset Heritage Consulting report, . Mitigation possible by restricting development to area further south of existing boundary – i.e F1, F3,F4, F5, F8, F9F13 F14, F16
A generally unpopulated landscape, interspersed with large farms, granges, halls and cottages	Characteristic well represented on site (Grange Farm and Grange Farm cottages, New Barn are the only buildings on site). Characteristic well represented in the local area within the LCT/LCA surrounding the site. VP5	High	Development would be wholly uncharacteristic of the Chalk Hills around Cambridge. Would result in major change to character of the landscape. Cannot be mitigated through site layout and design.
A simple and tranquil landscape with long distance panoramic views	Presence of A11 reduces tranquillity towards the western edge of the site, but sense of tranquillity strong for much of area east and north of site. Occasional long distance views from Roam Rd and across landscape.(VP5, VP6, VP9)	High	Development would appear in panoramic views on chalk hills where development limited to isolated farmsteads. Would result in changes to content and character of views. Cannot be mitigated through site layout and design across allocation as presented. Mitigation possible through reduction in developable area of allocation.

Characteristics and Sensitivities	Contribution of site	Sensitivity	Effect of Development
Distinctive pattern of shelterbelts and ornamental roadside trees	Partly represented on site (Grange Farm shelterbelt)	Low	Mitigation possible in site layout.
Distinctive, elevated landscape that forms locally prominent hills and ridges that contrast with the surrounding, low lying landscape that is characteristic of Greater Cambridge	Characteristic well represented on site. In the local area, settlement is concentrated in the lower lying valley sides and valley bottoms, while the elevated landscape of prominent hills is unsettled.	High	Development would constitute a change to the pattern of settlement within the landscape to the south and east of Cambridge. Cannot be mitigated through site layout and design.
Open, long distance, panoramic views across Greater Cambridge and beyond from this upland landscape, with the additional sensitivity for the LCA: Small scale landscape, visually contained by landform, trees and shelterbelts	The upper, northern fields in the allocation appear in long distance views from the south (egVP8) and the west (eg VP9). Potential for views of development for the east (VP6) to appear on the skyline. Visual containment on lower parts of the site, otherwise exposed.	Medium - High	Development would appear in panoramic views on chalk hills where development limited to isolated farmsteads. Would result in changes to content and character of views. Cannot be mitigated through site layout and design.
Scattered woodland including ancient woodland on summits and slopes	Characteristic represented on site, woodland on rising land in small woodland blocks.	Medium	Site layout can mitigate woodland loss, but character of isolated woodland blocks within arable farmland would be lost.
Network of historic routes and earthworks that contribute to the area's sense of place	Worsted Roman Rd to the north contributes to sense of place and sense of time depth. Separation from settlement is important to its elevated character with occasional glimpsed views of high, unsettled landscape.	High	Adverse effects on setting from proposed allocation boundary. Mitigation in SEA by extensive woodland planting would jar with open character of landscape and panoramic views. Cannot be fully mitigated on proposed boundaries through site layout and design.
Wooded and undeveloped ridgelines are visually sensitive	Local ridgeline (F15, F16) runs through site. VP8	High	Cannot be mitigated through site layout and design, but could be mitigated by restricting development away from field parcels F15, F16.
Tranquil, often remote rural landscape away from major roadways	Tranquillity defined by qualities such as timelessness, wilderness, remoteness and peacefulness. Presence of A11	High	Development would have adverse effect on sense of tranquillity, as experienced from the Worsted Roman Rd (VPs 4,5,5a) and potentially

Characteristics and Sensitivities	Contribution of site	Sensitivity	Effect of Development
	reduces tranquillity towards the western edge of the site, but sense of tranquillity strong for much of area east and north of site. Occasional long distance views from Roam Rd and across landscape.(VP5, VP6, VP9)		other areas east of the site (VP6) . Cannot be mitigated through site layout and design across allocation as presented. Mitigation possible through reduction in developable area of allocation to move development away from F2,F6, F7, F11,F12, F15.

3.3.9 The upper, northern part the Site makes up the majority of the allocation and makes a substantial contribution to the key characteristics of the Chalk Hills Landscape Character Area. In particular, it exhibits characteristics identified as being of high sensitivity, notably the arable land cover, the generally undeveloped and sparsely settled nature of the landscape, the presence and setting of the Worsted Street Roman Road, the tranquil rural character, visually sensitive ridgelines and the open panoramic views that are experienced across the wider chalk uplands.

3.3.10 Development of the allocation as proposed would result in substantial change to a number of these highly sensitive characteristics. In particular, built development would introduce an urbanising influence into a landscape currently characterised by isolated farmsteads and an absence of settlement on elevated ground. The settlement pattern of Greater Cambridge and the character of views would be substantially altered. Development would affect the setting of the Worsted Street Roman Road and reduce the sense of tranquillity and remoteness experienced from the surrounding landscape.

3.3.11 While some effects could be reduced through a more limited development footprint than that proposed, careful layout, retention of woodland features and avoidance of the most sensitive field parcels and ridgelines, many of the principal effects, including those relating to settlement pattern, landscape character, panoramic views, tranquillity and heritage setting, could not be fully mitigated through design and layout measures alone. Overall, the Site exhibits a high degree of landscape sensitivity, with development across the allocation as presently defined giving rise to significant and, in several respects, unavoidable adverse

effects on the character and qualities of the Chalk Hills landscape.

3.4 Is the site part of a Valued Landscape?

3.4.1 This Local Plan is being submitted under the December 2024 NPPF[10]. .Paragraph 187 seeks to protect valued landscapes. While there is no absolute definition of a "valued landscape" within the NPPF, the Landscape Institute has published guidance on assessing landscape value, outside of national designations[11]. Table 1 of that document sets out a range of criteria against which landscape value can be assessed. Table 3 applies those criteria to the allocation site.

Table 3: Landscape value Criteria

Criteria	Assessment	Note
Natural Heritage	Medium	Presence of SSSI (Worsted Street Roman Rd) just off site. Presence of woodland priority habitat. LNRS map identifies the Roman Rd as an Area of Particular Importance for Biodiversity and New Plantation as an area of woodland that could become important for biodiversity.
Cultural Heritage	High	Scheduled monument (Worsted Street Roman Rd) and its setting. Iron Age burial mound scheduled ancient monument. LCA identifies historic features as characteristic of the landscape.
Landscape Condition	Good	LCA describes condition of LCA 8A as "good", noting arable fields, scattered woodland blocks, rural qualities and intact historic settlement pattern, all of which are well represented on site.
Associations	Low	None identified
Distinctiveness	High	Strong sense of place as upland chalk hills setting to Cambridge and settlements on valley floor (Abingtons, Linton). LCA assesses strength of character as Strong – noting simple uninterrupted landscape, tranquillity, long views, all of which are represented on site. A11 detracts on western edge of the site.
Recreational Opportunities	Medium	Little public access to site, but long distance European footpath route along Worsted Street Roman Rd, just off site (E2).
Perceptual (Scenic)	Medium-High	Landscape Character Assessment identifies Open, long distance, panoramic views, Wooded and undeveloped ridgelines that are visually sensitive.
Perceptual (Wildness and Tranquillity)	Medium - High	The Assessment identifies the Chak Hills as a tranquil, often remote rural landscape away from major roadways. These characteristics apply to the north eastern edge of the site, where the influence of the A11 is not so evident. Contributors to tranquillity evident in the north eastern end of the site.

[10] If the timetable slips, this section will be updated by reference to the 2026 NPPF prior to the examination.
[11] tgn-02-21-assessing-landscape-value-outside-national-designations.

Criteria	Assessment	Note
Functional	Low	The Worsted Street Roman Road is identified in the Heritage theme in the Greater Cambridge Green Infrastructure Strategy and the southern part of the site in the publicly accessible open space theme.

3.4.2 There are clearly high value elements and characteristics on the site that would be affected by the allocation, including the setting of the Roman Road and other scheduled ancient monuments, the distinctiveness of the chalk hills landscape, good landscape condition and perceptual qualities. In relation to the buffer to Worsted Street, Asset Heritage Consulting note: "*this buffer would need to be considerably more extensive than that shown in Fig. 68 of the Council's Policy S/GF for the potential land allocation if this quality (an appreciation of the scale and linear nature of the road) is to be maintained and enjoyed as is currently the case*." These attributes of a valued landscape are particularly evident on the northern and north eastern parts of the site.

3.5 Summary of Issue 1 Adverse Effects on Landscape Character

3.5.1 The allocation site sits in two landscape character areas and types, as described in the Greater Cambridge Landscape Character Assessment. Many of the key characteristics of these character types are well represented locally and the site makes a valuable contribution to the rural character of the landscape. Sensitivities and characteristics of the landscape are highly sensitive to development and would be adversely affected by the allocation. The allocation policy, based on the New Settlement Assessment, considers that adverse effects can be mitigated during the masterplanning process, through attention to design and site layout.

3.5.2 While it is true that some adverse effects can be mitigated, adverse effects on the following high sensitivity characteristics, particularly on the Chalk Hills landscape cannot be:

- A predominantly arable landscape with some permanent pasture and woodland on steeper slope

- A generally unpopulated landscape, interspersed with large farms, granges, halls and cottages
- Distinctive, elevated landscape that forms locally prominent hills and ridges that contrast with the surrounding, low lying landscape that is characteristic of Greater Cambridge
- Open, long distance, panoramic views across Greater Cambridge and beyond from this upland landscape.

3.5.3 In my judgement, the policy requirement for a development that "respects, protects and enhances the landscape within its rural setting" cannot be delivered through masterplanning of the allocation. Significant adverse effects on the landscape will remain.

4.0 Issue 2: Settlement Pattern and the Greater Cambridge Chalk Hills Landscape

4.1.1 The Landscape Character Assessment for Greater Cambridge recognises that LCT7 (Chalk Hills) comprise a distinctive, elevated landscape that forms locally prominent hills and ridges. The contrast with the surrounding, low lying landscape is a key characteristic of the landscape. The Chalk Hills are noted to be generally unpopulated landscape, interspersed with only large farms, granges, halls and cottages. By contrast, settlement in the south east of Cambridge sits within the river valleys, lowland farmlands, and lower valley slopes landscapes (typified by LCT3,8 and 9).

4.1.2 The prominent, unsettled character of the upland landscape can be seen in photographs from VP4, VP5, VP6, VP9 (appendix 1 of this document) and in the viewpoints 1 and 11 of the Landscape Technical Note submitted as part of the HELAA submission (site 115724).

4.1.3 The role of unsettled, elevated chalk hills forming a setting for settlement in the landscape is illustrated in VP7 and VP8 (appendix 1 of this document). In these views, from the south of the site, the rising chalk hills are clearly seen as a different landscape character to the valley bottoms and river valley, where development is concentrated.

4.1.4 The allocation, particularly land parcels F5 – F7, and F9 – F16, would be visible on these undeveloped upper slopes. Appendix 3 includes extracts of viewpoints (presented at A3

size), marked up with the approximate allocation boundaries. From these representative examples, it is apparent that the allocation would change the character of the undeveloped chalk hills. Characteristics relating to a rural, unpopulated character, open long distance views and arable land use would be affected. The nature of the allocation and the quantum of development required would make mitigation impossible over the large area affected.

4.1.5 The allocation would represent a step change in the pattern and texture of the landscape, disrupting the existing settlement pattern and the landscape setting for existing villages and other development. In contrast to the existing situation, settlement and settlement infrastructure would become a characteristic feature of the Chalk Hills landscape and, in the area north of Abington. would define landscape character.

4.1.6 The Vision for Greater Cambridge is set out at paragraphs 2.3 – 2.5 of the Local Plan. At 2.3 the Vision notes:

> ***2.3*** *Greater Cambridge in 2045 and beyond will be a place where* ***a big decrease in our climate and environmental impacts*** *comes with the continued flourishing of our internationally significant innovation economy, and a big increase in the quality of everyday life for all our communities. New development must: minimise carbon emissions and reliance on the private car create thriving neighbourhoods with the variety of jobs and homes and supporting infrastructure we need, increase our network of nature, wildlife and multi-functional green spaces, and* ***safeguard our unique, locally distinctive heritage and landscapes.*** (highlight added).

4.1.7 The 7 strategic priorities that flow from the vision include:

> *Great places:* ***Sustain the unique character and identities*** *of Cambridge and South Cambridgeshire, and complement it with well-designed and distinctive development, creating a place where people want to live, work, visit and play.* (highlight added).

4.1.8 Within this context, the proposal cannot be said to meet the overall Vision for the Local Plan. For a substantial part of the Plan area, an adverse environment impact would occur, a locally distinctive landscape would not be safeguarded and the unique character of the area would not be sustained.

5.0 Issue 3: Policy Conclusions

5.1 How did we get here?

5.1.1 The concerns and issues raised in this report are not outliers, many of them have been raised before in the technical and policy documents that have contributed to the emerging Local Plan.

5.1.2 In 2020, Chris Blandford Associates (CBA) reported on options for spatial development in Greater Cambridge[12]. For Option 4: Focus on New Settlements the report noted:

> *By focusing on the use of greenfield land to accommodate growth in new towns or villages, this option is likely to result in larger scale landscape changes that may harm distinctive local landscape characteristics/features that are particularly vulnerable to changes from built development, while limiting changes to existing settlements that may harm distinctive local townscape characteristics/features compared to other spatial options.*

5.1.3 The CBA report went on to identify that some landscape types were more susceptible to change from new settlement development than others:

> *The capacity of different landscape types to accommodate new settlements will vary across the Greater Cambridge area subject to the vulnerability/susceptibility of their specific characteristics to this form of built development. In general terms,* ***the Fens, River Valley and Chalk Hills are considered to be more vulnerable/susceptible to changes from new settlements than other landscape types*** *within Greater Cambridge.* (highlight added).

5.1.4 Despite this early work, the approach that is now being promoted through the Local Plan with allocation S/GF has disregarded the specific risks to the Chalk Hills Landscape identified by CBA. , The majority of the allocation is within the Chalk Hills landscape character type. My own assessment of the susceptibility to change as a result of allocation agrees with the CBA report.

5.1.5 Grange Farm has been submitted to the HELAA process in various iterations. The latest HELAA report is on the same boundaries as the allocation site (Site ID 116224). Published in 2026, the assessment notes in relation to landscape:

[12] Greater Cambridge Local Plan Strategic Spatial Options Assessment: Landscape & Townscape (November 2020)

Having considered the updated site boundary, the assessment rating remains red. Long views across the site from the south exist. Views from the A11 are buffered with some vegetation and the density of the buffer is variable.

Development would alter the existing landscape character irreversibly and may result irreversible harm to the setting of Little Abington if constraint planning, green corridors and landscape buffer areas are not considered during the planning of the site.

5.1.6 The RAG rating for the site in relation to landscape is Red (unfavourable). The assessors appear to have allowed for mitigation in coming to this rating, as noted above, my judgement is that mitigation is unlikely to be effective in relation to harm to the Chalk Hills.

5.1.7 Finally, Development Strategy Topic Paper, Appendix 8, review of sites[13], identifies the Grange Farm site as one of the New Settlements (p34) noting the potential for adverse impacts on "**designated** environmental and heritage assets" (highlight added). The text goes on to identify the SSSI and the Scheduled Monument. Concerns raised in other evidence about the effect of development on the intrinsic beauty and character of the undesignated countryside is not acknowledged.

5.1.8 As a result, in my judgement the safeguards for landscape character identified in policy S/GF are not deliverable. The nature of the allocation's Chalk Hills landscape combined with the quantum of development mean that the policy is not compatible with its stated aims to respect, protect and enhance this distinctive Cambridgeshire landscape.

5.2 Other policy considerations

Draft LP Policy GP/LC: Protection, conservation and enhancement of landscape character

5.2.1 The draft local plan has not identified local landscape designations (such as AGLVs), but in this policy, have adopted an approach to landscape protection, conservation and enhancement that is based on landscape character. It is worth considering the arguments for this approach that are made in the Greater Cambridge Landscape Character Assessment

[13] Development Strategy Topic Paper 2026 Appendix 8: Review of sites to inform identification of allocations at Proposed Submission stage

section 4.6 (pp35 – 36).. The draft local plan does, though, refer to The Assessment. Policy requires that:

> *"1 All new development proposals must:*
>
> *a. Protect, conserve and enhance the local landscape character as set out in the Greater Cambridge Landscape Character Assessment (2021) Part A and Part B or successor documents"*

The supporting text notes at 7.53:

> *"**7.53** The policy aims to ensure that the varied and distinctive landscape character is properly considered in planning decisions. Developments should respond positively to the local landscape character and take opportunities to enhance and reinforce the landscape character. Applicants should refer to the Greater Cambridge Landscape Character Assessment (2021) Part A and Part B which examined in detail the physical, human and cultural influences that have shaped the evolution and character of the landscape today. The assessment identified Landscape Character Areas, each with a distinct local identity and sense of place. Detailed information is provided about each character area, including **the condition of the landscape**, **key sensitivities** **and guidance on landscape management** **and integration of development into the landscape**. Applicants, particularly of major developments, are encouraged to enter into pre-application discussions with the local planning Authorities to ensure that landscape character is considered at an early stage in the design process."*

5.2.2 The Chalk Hill landscape character type and area is assessed by the Landscape Character Assessment to be of strong character and in good condition. The Assessment notes that: "Landscapes of **strong character in good condition and therefore judged to be of high quality where emphasis should be on conservation of existing character and of particular features that contribute to this character**. The aim should be to continue the current landscape management regimes and adopt best practice approaches. Great care will need to be taken in the introduction of new characteristics[14]"

5.2.3 The current arable farmland landscape management regimes on the site cannot be continued. Existing landscape character cannot be conserved, in my judgement, and new, uncharacteristic development will be introduced into the landscape on a very large scale. The management objectives for the landscape simply cannot be met as set out in the Greater Cambridge Landscape Character Assessment. As a result, local landscape character cannot

[14] Greater Cambridge Landscape Character Assessment part A 4.3 p32

be conserved, protected and enhanced as required by policy GP/LC.

December 2024 National Planning Policy Framework [15]

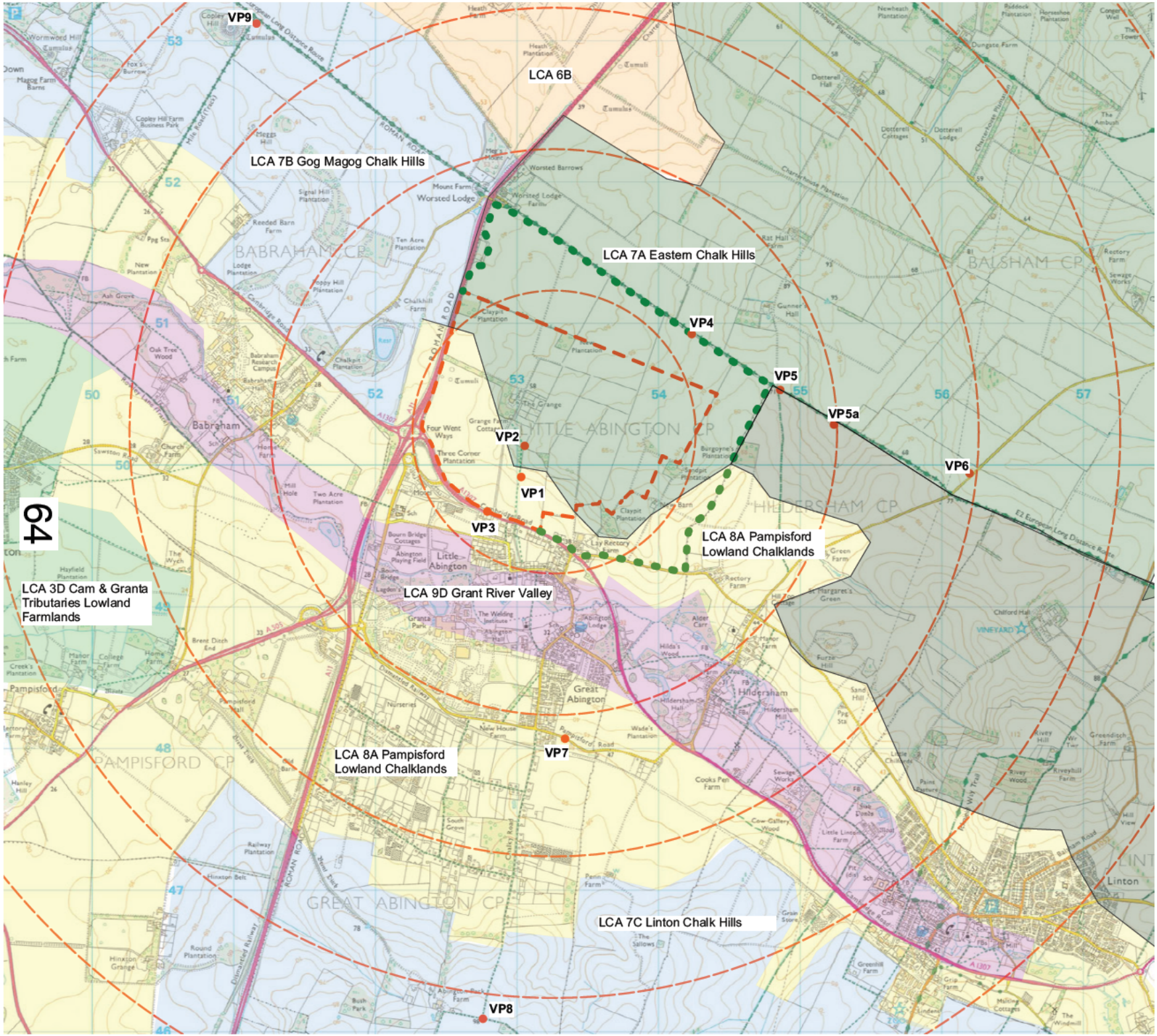
5.2.4 The northern and eastern parts of the allocation contain and contribute to high value characteristics and qualities of the landscape as that term is used in the 2024 NPPF. Allocation of these parts of the site would be inconsistent with NPPF para 188, which requires that plans should allocate land with the least environmental or amenity value.

5.2.5 Paragraph 187 of the 2024 NPPF requires policies to recognise the intrinsic character and beauty of the countryside and to protect and enhance valued landscapes. The site contains and influences many of the attributes of a valued landscape and contributes to the intrinsic character and beauty of the Greater Cambridge countryside. It's allocation would neither protect nor enhance these attributes.

Summary on Policy

5.2.6 In summary, the evidence from the Local Plan process, landscape assessments and national policy point to the same conclusion: the landscape safeguards embedded within Policy S/GF are not realistically deliverable. The scale of development proposed within this sensitive Chalk Hills landscape would result in unacceptable and irreversible harm to landscape character and would conflict with both emerging policy in the local plan and the overarching requirements of the NPPF.

[15] As noted above if the timetable for submission slips this section will be updated to the 2026 NPPF.



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RDJW Ltd viewpoints

Allocation S/GF boundary

Policy S/SEA/GF boundary

Rev	Date	Comment	CHK - APD
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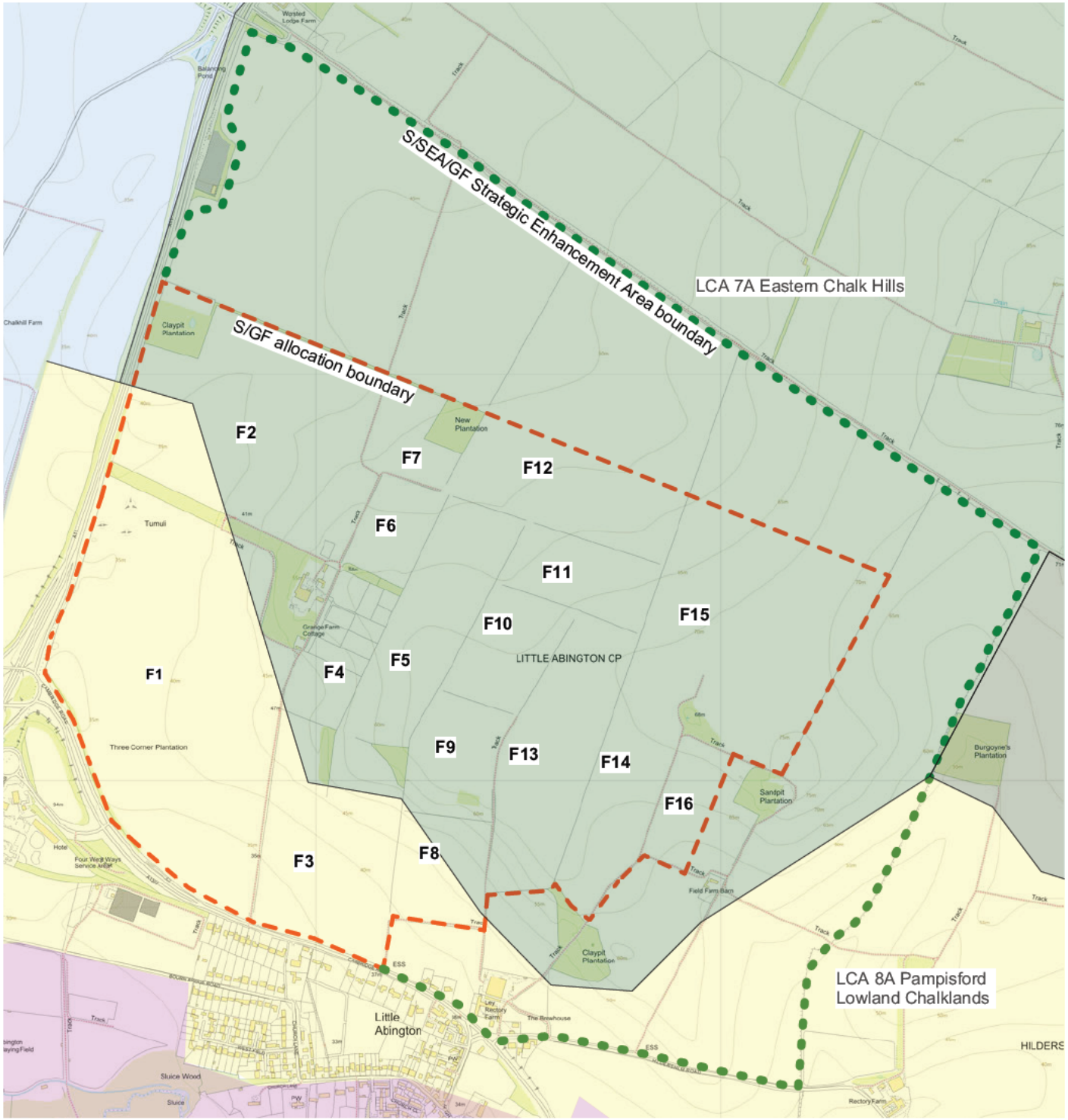
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PROJECT
Grange Farm, Little Abington

TITLE
Landscape Character

PURPOSE OF ISSUE		DRAWN BY	CHECKED BY
Draft		PL	KMD
PROJECT No	STATUS	REVISION	SCALE @ A3
2961	S3	P1	1:25,000

DRAWING NUMBER
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PROJECT
Grange Farm, Little Abington

TTLE
Landscape Character and Field Parcel identifiers

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Draft		PL	KMD
PROJECT No 2961	STATUS S3	REV S ON P1	SCALE @ A3 1:10,000

DRAW NG NUMBER
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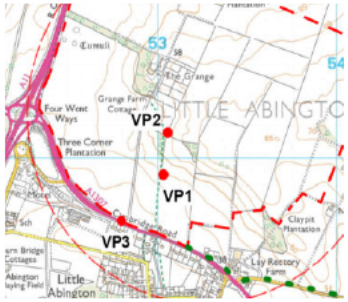




VP1 PROW F3

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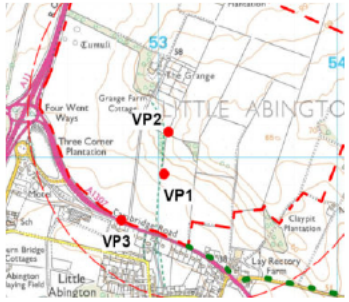
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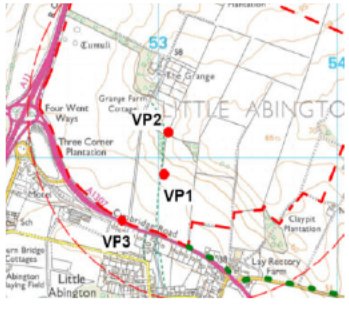


VP3 A1307 Proposed Entrance

Approx extent of Site

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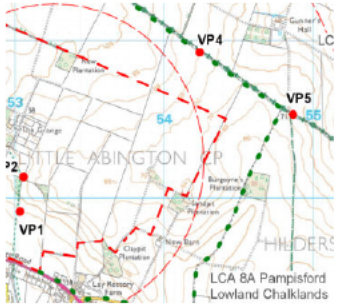
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VP4 Worsted Street Roman Rd



VP5 Worsted Street Roman Rd/PROW junction



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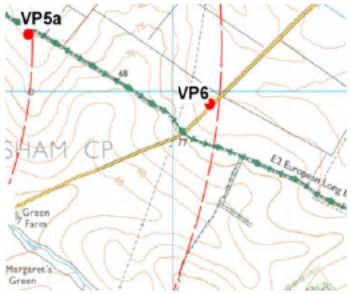
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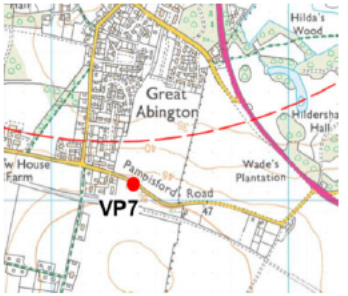


VP6 Hildersham Rd Parking Space



VP7 Pampisford Rd





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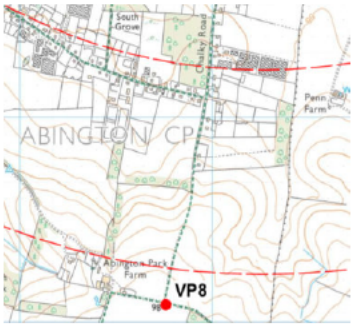
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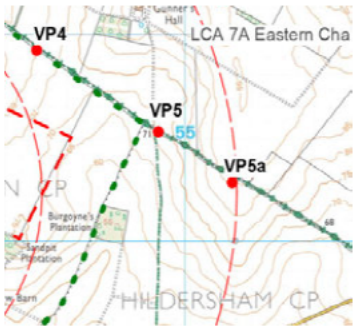


VP8 PROW Abington Park Farm



VP5a Worsted Street Roman Rd, gap in hedge





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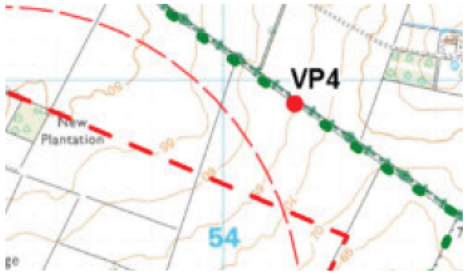
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VP4 Worsted Street Roman Rd

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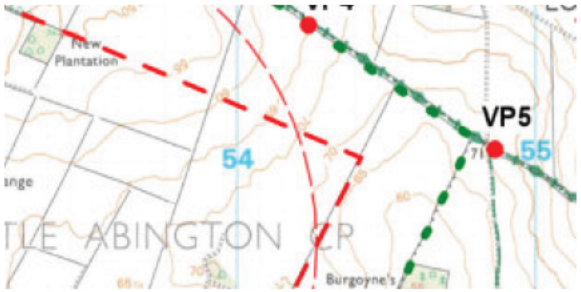
PROJECT
Land at Grange Farm

TITLE
A3 view, approx. visible extent of S/GF allocation highlighted

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VP5 Worsted Street Roman Rd/ PROW junction

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PROJECT
Land at Grange Farm

TITLE
A3 view, approx. visible extent of S/GF allocation highlighted

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VP5a Worsted Street Roman Rd - not from publicly accessible land

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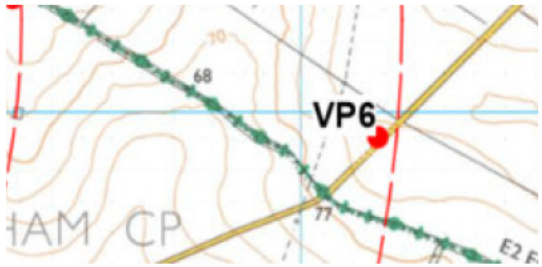
PROJECT
Land at Grange Farm

TITLE
A3 view, approx. visible extent of S/GF allocation highlighted

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VP6 Hildersham Rd Parking Space

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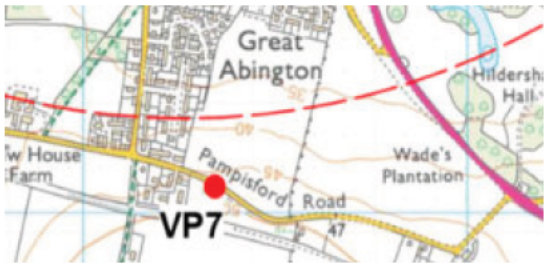
PROJECT
Land at Grange Farm

TITLE
A3 view, approx. visible extent of S/GF allocation highlighted

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VP7 Pampisford Rd

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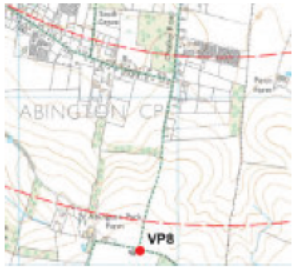
PROJECT
Land at Grange Farm

TITLE
A3 view, approx. visible extent of S/GF allocation highlighted

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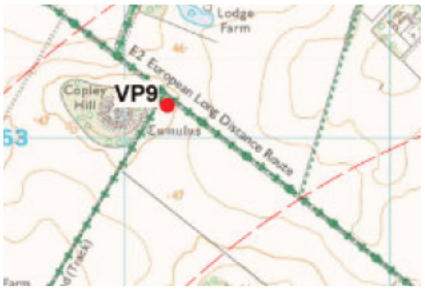
PROJECT
Land at Grange Farm

TITLE
A3 view, approx. visible extent of S/GF allocation highlighted

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JOHN RUSSELL TRANSPORT PLANNING

Transport Appraisal

Greater Cambridge Local Plan

Regulation 19 Consultation

On behalf of

Abington Parish Council

September 2026

Document Revision Control

Revision	Date	Prepared By
0	11/09/2026	JNR
1	20/09/2026	JNR
2	24/09/2026	JNR
3	25/09/2026	JNR

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1.0 INTRODUCTION

1.1 This appraisal is prepared in response to the Greater Cambridge Regulation 19 version Local Plan ('LP19') consultation and provides comments on the transport evidence base prepared in support of LP19. LP19 is being jointly promoted by South Cambridgeshire District Council and Cambridge City Council ("the Councils"). LP19 sets out the proposed spatial policies for Greater Cambridgeshire for the period 2024 - 2045 ("the Plan Period").

1.2 This appraisal provides general comments regarding the traffic modelling work undertaken by the Councils as a whole but focuses more detailed comments on the transport strategy elements being proposed to sustain draft allocation Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm (hereafter referred to as Grange Farm).

1.3 Policy S/GF of LP19 establishes a proposed 2,550 homes during the Plan Period with a further 1,950 after the Plan Period: a total of 4,500 new homes.

Appraisal Author

1.4 This appraisal is prepared by Mr John Russell who is a Director of JR Transport Planning Limited a consultancy that specialises in transport planning, traffic engineering and highway design. Mr Russell is a Chartered Transport Planner, being a Chartered Member of the Institute of Logistics and Transport (CMILT) and a Member of the Chartered Institution of Highways and Transportation (MCIHT) and holds an Honours Degree in Civil Engineering.

1.5 Mr Russell has 35 years' experience in traffic engineering and transport planning, having held senior roles at RPS (Technical Director), Royal Haskoning (Advisory Group Director for Transport, UK South), SCP (Regional Director, London), and Motion Consulting Ltd (Director).

1.6 Mr Russell provides advice on highway design, road safety, transport sustainability, and transport impact assessment to a wide range of development projects, including negotiating mitigation measures with statutory authorities.

1.7 The appraisal is prepared and given in accordance with the guidance of Mr Russell's professional institutions and the opinions expressed are his true and professional opinions.

Reference documents

1.8 This appraisal is based on the following evidence that has been made available by the Councils which comprises:

- Proposed Submission Greater Cambridge Local Plan.
- Greater Cambridge Local Plan, Infrastructure Delivery Plan (REG 19) JULY 2026.
- New Strategic Allocations Assessment, Transport Mitigation Measures prepared by WSP.
- Development Strategy Topic Paper Appendix 16: Trip budgets as part of development-related transport mitigation strategies.

- Transport Analysis and Evidence prepared by KMC on behalf of Pampisford Estate, promoters of Grange Farm.
- CSET Busway Extension - Grange Farm, Technical Note prepared by Mott MacDonald on behalf of the Councils.

Scope of Appraisal

1.9 This Appraisal considers the following matters:

- The Councils' compliance with national plan-making policy, particularly the requirements of the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance;
- The existing and planned transport context;
- The policy requirements of S/GF, the policy priority to infrastructure elements and their relationship with the IDP;
- The Councils' general approach to traffic forecasting assumptions and their 'Trip Budget' concept;
- Trip Forecasting for Grange Farm, the reasonable assumptions underpinning it and how this relates to Trip Budgets; and
- Deliverability of Infrastructure required to make S/GF acceptable in transport terms.

1.10 The conclusion of this appraisal is that the Plan is relying upon:

- critical infrastructure which is not yet demonstrated to be deliverable when required;
- substantial transport investment which remains unfunded or insufficiently accounted for;
- a highway network which could face a potentially transformational increase in traffic;
- assumptions about sustainable travel which appear difficult to reconcile with observed behaviour at Cambourne; and
- a Trip Budget which is substantially below the level of vehicle movements indicated by that real-world evidence.

1.11 These are not matters which can simply be left to a future planning application. They go directly to whether the allocation can be delivered in accordance with its own policy requirements.

1.12 The evidence therefore does not currently provide the necessary confidence that Grange Farm can be delivered at the proposed scale without relying upon infrastructure, funding and travel behaviour which have not yet been demonstrated to be deliverable.

1.13 Accordingly, the Inspector is respectfully requested to remove the Grange Farm allocation from the Plan. In the absence of robust evidence demonstrating that the necessary transport infrastructure, funding and network capacity can be secured and delivered within the Plan period, the allocation should not be relied upon to meet the Plan's housing requirement. If the Inspector considers that the identified deficiencies can be resolved, there should at minimum be clear, evidenced and enforceable measures

demonstrating how the necessary infrastructure and transport capacity will be secured before the allocation is relied upon for housing delivery.

2.0 RELEVANT TRANSPORT PLANNING POLICY AND GUIDANCE

2.1 It is understood that the Government's planning policies for England which are relevant to the draft Plan are set out in the National Planning Policy Framework ("the NPPF"), published in December 2024 and updated with minor technical corrections in February 2025. The NPPF highlights the need for close coordination between land-use planning and transport planning to support sustainable development.

2.2 Notwithstanding this, the Government published a revised version of the NPPF in August 2026 ("the 2026 NPPF"). Whilst it is understood that soundness of the Draft Plan will be tested against the 2024 NPPF, it is important to be aware of the policies of the 2026 NPPF because these are the policies against which future planning applications will be determined.

2.3 Specifically paragraph 109 of NPPF provides a clear guidance framework for developing spatial strategies which states:

Transport issues should be considered from the earliest stages of plan-making and development proposals, using a vision-led approach to identify transport solutions that deliver well-designed, sustainable and popular places. This should involve:

a) making transport considerations an important part of early engagement with local communities;

b) ensuring patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places;

c) understanding and addressing the potential impacts of development on transport networks;

d) realising opportunities from existing or proposed transport infrastructure, and changing transport technology and usage – for example in relation to the scale, location or density of development that can be accommodated;

e) identifying and pursuing opportunities to promote walking, cycling and public transport use; and

f) identifying, assessing and taking into account the environmental impacts of traffic and transport infrastructure – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains.

2.4 Further, more detailed guidance regarding transport evidence bases in plan making is provided in the Government's Planning Practice Guidance (PPG). This specifically states:

It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed ***to support the preparation*** *and/or review of that Plan.*

2.5 The PPG identifies key issues, which should be considered in developing a transport evidence base, include the need to:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms
- assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- highlight and promote opportunities to reduce the need for travel where appropriate
- identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate
- consider the cumulative impacts of existing and proposed development on transport networks
- assess the quality and capacity of transport infrastructure and its ability to meet forecast demands
- identify the short, medium and long-term transport proposals across all modes

2.6 The PPG provides the following guidance on when transport assessment work of the Local Plan should be undertaken, and the level of detail expected at each stage of preparation:

An assessment of the transport implications should be undertaken at a number of stages in the preparation of a Local Plan:

- *as part of the initial evidence base in terms of issues and opportunities*
- *as part of the options testing*
- *as part of the preparation of the final submission*

The last of these stages should highlight the scale of and priorities for investment requirements and support infrastructure spending plans. Like a sustainability appraisal, it will be an iterative process and become more refined and detailed as the process draws to a conclusion.

2.7 National planning policy and Planning Practice Guidance require transport to be integral to Local Plan site selection and supported by a robust, proportionate and iterative transport evidence base. This evidence should assess existing accessibility, forecast travel demand, cumulative network impacts, sustainable travel opportunities, infrastructure capacity and the scale, timing and priorities of required investment.

2.8 In the case of Grange Farm, these requirements are particularly relevant because as discussed below, the allocation's transport strategy relies on significant future infrastructure interventions which are not in the control of the Councils or the promoters of the Site, such as the Cambridge South East Transport (CSET) scheme and a connection to it.

2.9 The key issue is therefore not simply whether transport mitigation has been identified, but whether the evidence demonstrates that a sustainable and deliverable transport strategy can support the allocation at its proposed scale and phasing. This includes the credibility and timing of critical infrastructure, and the implications if it is delayed or does not come forward.

3.0 EXISTING AND PLANNED TRANSPORT CONTEXT

Location

3.1 The location of Grange farm is shown on the plan below:

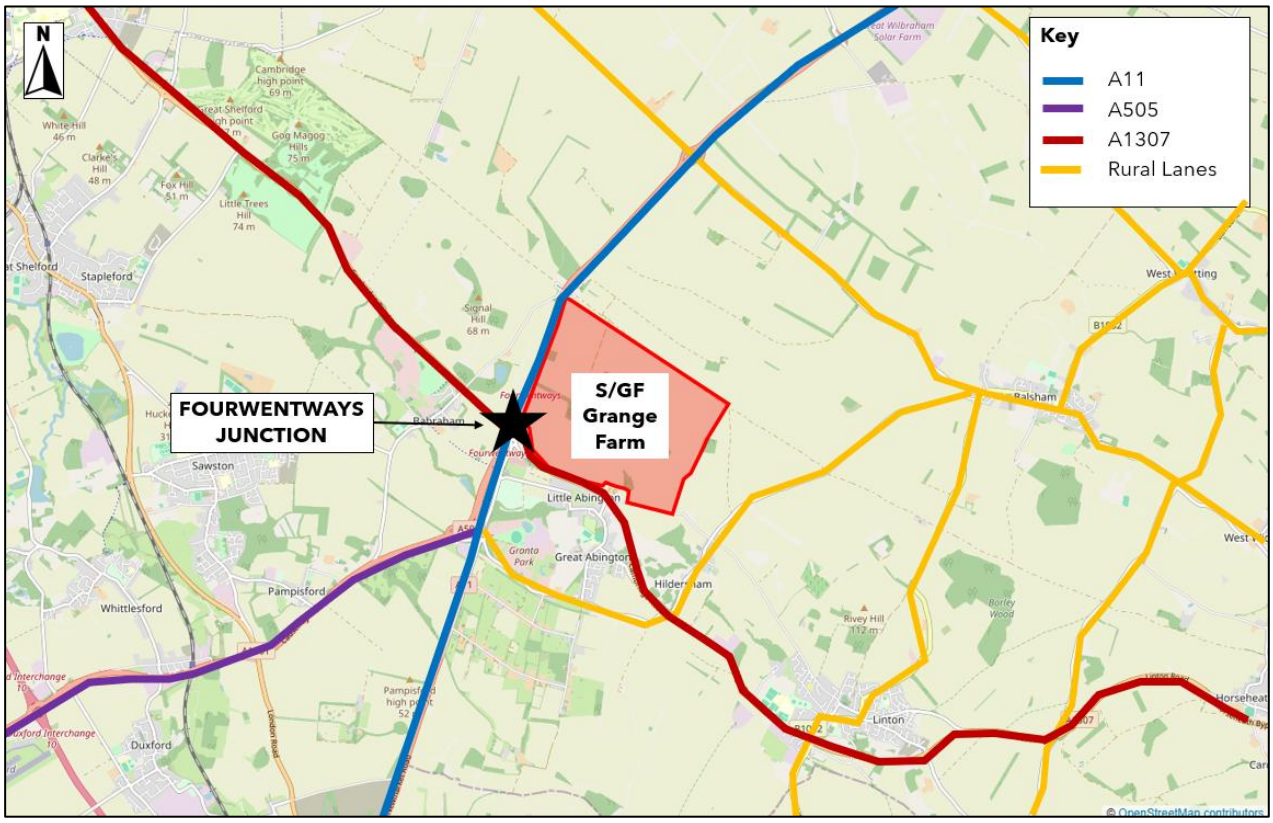


Figure 3.1: Location of Grange Farm

3.2 As illustrated above, Grange Farm is located within a rural countryside setting, remote from the main settlements with very limited access to day-to-day facilities and services.

Existing Travel Patterns

3.3 The 2021 Census journey-to-work data were collected during a period significantly affected by the Covid-19 pandemic and associated restrictions. In particular, the pandemic resulted in a substantial increase in home working, both as a consequence of Government requirements and changes in working practices. The 2021 Census data therefore do not necessarily provide a representative indication of longer-term travel patterns under normal conditions.

3.4 For this reason, the table below presents the 2011 Census journey-to-work mode share as a more representative pre-pandemic baseline for understanding established travel behaviour in the area.

Journey to Work Mode Choice	Percentage Mode Choice
Train / rail	2.4%
Bus, minibus or coach	5.3%
Taxi	0.0%
Motorcycle, scooter or moped	1.3%
Driving a car or van	77.4%
Passenger in a car or van	4.0%
Bicycle	4.1%
On foot	4.9%
Other method of travel to work	0.6%

Table 3.1: Census Journey To Work Mode Choice Data

3.5 The data demonstrate a strong reliance on the private car, with 77.4% of residents travelling to work as a car driver. A further 4.0% travel as a passenger in a car or van. Collectively, therefore, more than 80% of journey-to-work trips were undertaken by car.

3.6 It is also notable that 2.4% of residents identified train or rail as their principal mode of travel to work, despite the absence of a railway station within a reasonable walking distance of Grange Farm. This indicates that some residents are prepared to access rail services by other modes, although such journeys are necessarily dependent upon an additional connection to the rail network.

Existing Active Travel Opportunities

3.7 When considering active travel opportunities in relation to Grange farm, it is important to assess this in the context of functional trips–that is, journeys that must occur at specific times of day regardless of weather or other conditions, such as commuting to work, travelling to school, or attending medical appointments. These functional journeys are expected to represent the majority of trips generated by new development and therefore form the primary focus of the analysis below.

Walking

3.8 The Chartered Institution of Highways and Transportation (CIHT) 'Guidelines for Providing Journeys on Foot' (2000) suggests acceptable, desirable and preferred maximum walking distances ('acceptable' walking distances would vary between individuals). These walking distances are applied consistently when assessing the reasonable walking times whether a development is in a rural or an urban location.

3.9 The guidance identifies maximum walking distances of between 1,200m and 2,000m subject to journey purpose. This maximum 2km walk threshold is illustrated on the figure below measured from the approximate centre of Grange Farm.

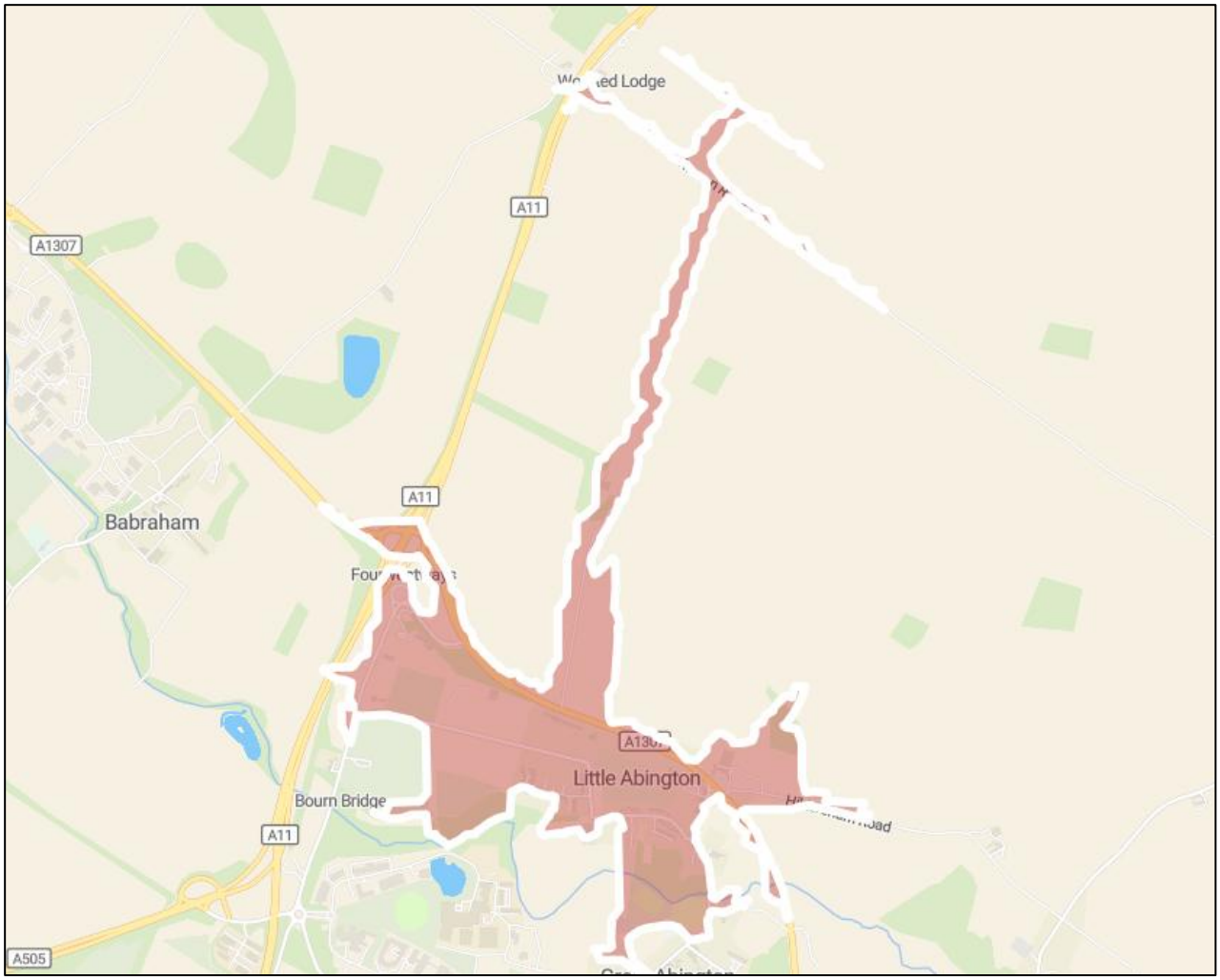


Figure 3.2: 2km Walk Catchment

3.10 Whilst the above catchment necessarily does not include all the streets within the development area, it nonetheless demonstrates that, there are very limited existing facilities and services located within the 2 km walking catchment of Grange Farm. Consequently, while walking may provide a realistic option for some trips within the proposed development itself, it cannot reasonably be expected to provide a practical alternative to the private car for the majority of functional journeys between the development and existing settlements and facilities.

Cycling

3.11 Local Transport Note 1/20 (LTN 1/20), Department for Transport, 2020 provides guidance on the design of cycle infrastructure. LTN1/20 is the government's current guidance on designing infrastructure for cyclists in order to encourage a greater uptake in cycling in accordance with the Government's adopted

policy *'Gear Change A bold vision for cycling and walking'* which was issued in July 2020. This was inspired by and endorsed by the then Prime Minister.

3.12 It is clear from the Government's currently adopted cycle policy and design guidance that the outcomes of cycle infrastructure interventions are to:

a) Create better streets for cycling and people
b) Put cycling and walking at the heart of transport, place-making, and health policy
c) Enable people to cycle and protect them when they cycle

3.13 With regards to design principles 'Gear Change A bold vision for cycling and walking' states that:

'In order to see the increases in cycling we want, the quality of cycling infrastructure installed on our roads must dramatically improve.'

and

'Cycling is or will become mass transit and must be treated as such. Routes must be designed for larger numbers of cyclists, for users of all abilities and disabilities.'

3.14 The design principles contained within LTN 1/20 therefore aim to deliver the Government's policy objective of encouraging a modal shift away from private car use towards cycling and walking.

3.15 A key change introduced by LTN 1/20 is its emphasis that cycling infrastructure should be designed to be accessible to most people, regardless of ability or confidence level.

3.16 In terms of travel distance, the guidance recognises that a 5 km journey is an achievable cycling distance for many trips, while an 8 km journey is considered a reasonable distance for a large proportion of cyclists. The 5 km (shown in red) and 8 km (shown in green) cycling catchments from Grange Farm are illustrated in Figure 3.3.

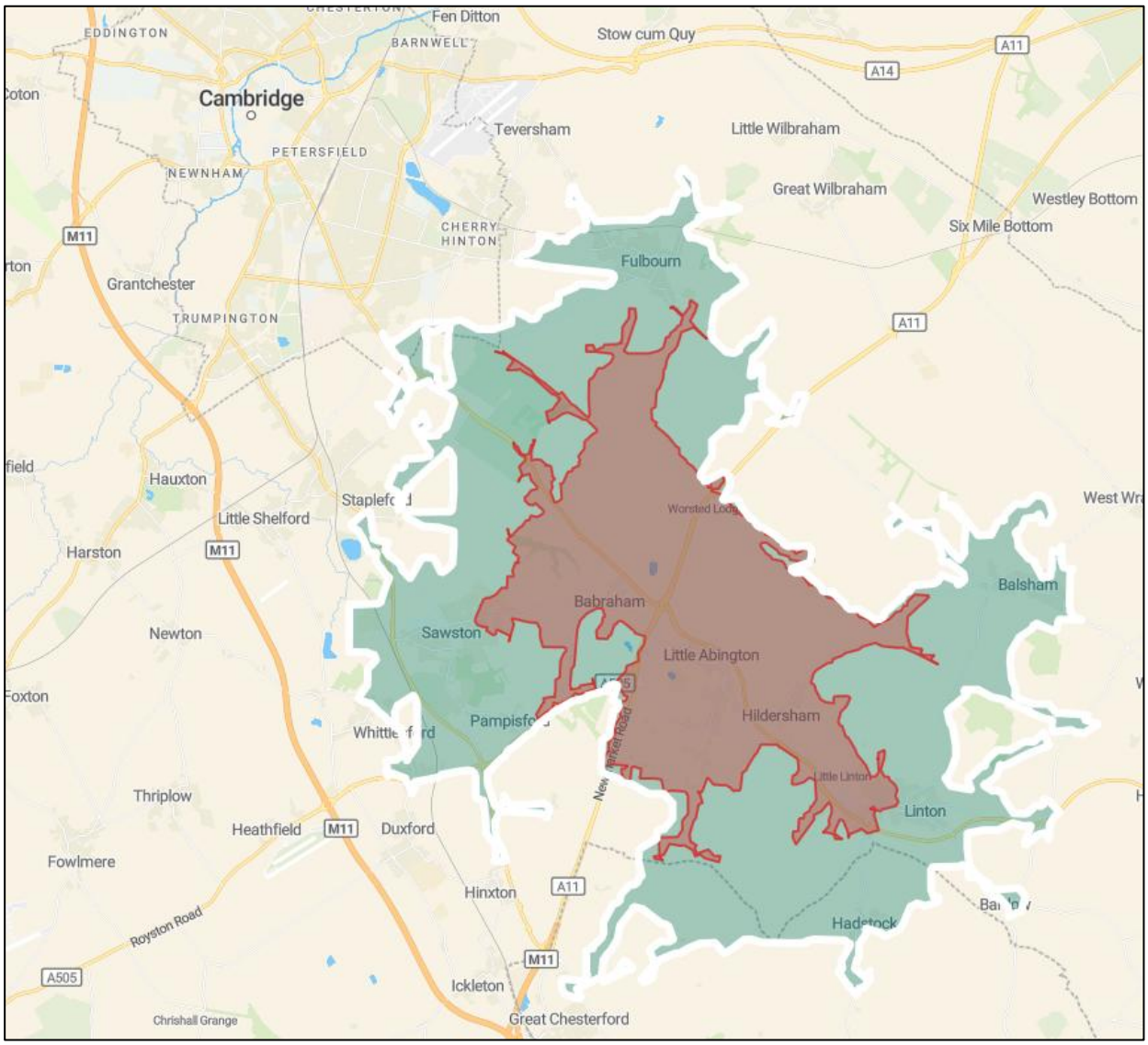


Figure 3.3: 5km and 8km Cycle Ride Catchment

3.17 The catchment analysis demonstrates that there are relatively few existing facilities and services within an 8 km cycling distance of Grange Farm. Cambridge railway station, for example, is approximately 12 km from the centre of Grange Farm, with Cambridge city centre located further beyond this distance.

3.18 Of particular note is that the A11 represents a significant physical and psychological barrier to cycling movements towards Cambridge, which represents the principal higher-order destination in the area. The alternative crossing to the north of the site, accessed via Worsted Street, is indirect in the context of the natural desire line towards Cambridge. It also requires cyclists to travel through open and isolated areas, including routes across open fields with limited natural surveillance. This may adversely affect users' perception of personal security and the attractiveness of the route, particularly during hours of darkness or poor weather.

3.19 The A1307 also presents challenges for cycling. Crossing the route is difficult in places, including locations where the highway operates as a short section of dual carriageway. Furthermore, opportunities for onward cycling movements are limited and there is no continuous cycling route along the A1307.

3.20 Taken together, these factors indicate that, notwithstanding the potential for cycling to serve some journeys, existing conditions and the absence of direct, safe and attractive routes mean that cycling to existing everyday destinations is unlikely to represent a practical alternative to the private car for the majority of functional journeys to and from Grange Farm. Significant investment in high-quality, direct and segregated active travel infrastructure would therefore be required to materially alter existing travel behaviour.

Existing Public Transport

3.21 Bus services currently operate along the A1307 to the south of Grange Farm. These services operate approximately every 30 minutes between Cambridge and Haverhill from Monday to Saturday, with an hourly service on Sundays.

3.22 There are no bus priority measures along the route between the Site and Cambridge, meaning that buses are subject to the same congestion as general traffic. As a result, car travel is likely to offer more convenient and reliable journey times for many users, undermining the attractiveness of bus travel as a sustainable alternative.

3.23 The existing bus service therefore provides a basic level of public transport provision. However, the Census data indicate that only 5.3% of residents currently travel to work by bus, demonstrating that bus use represents a relatively small proportion of existing journey-to-work trips despite the availability of a service along the A1307.

Existing Road Network

3.24 Figure 3.1 illustrates the principal road network serving the area. As can be seen, the network is heavily reliant upon a relatively small number of principal distributor routes, with a network of rural lanes extending northwards into the surrounding countryside.

3.25 The hierarchy, character and capacity of these routes are fundamental to understanding the transport and highway safety implications of the proposed scale of development at Grange Farm.

3.26 The principal highway routes serving the area comprise:

- A11 – a high-speed dual-carriageway providing two lanes in each direction and forming a key component of the strategic highway network.

- A505 – a high-speed, relatively high-volume single-carriageway route in the vicinity of Grange Farm, generally providing one lane in each direction. The A505 forms an important east-west connection between the A11 to the east and the A1 to the west, via Royston.
- A1307 – a principal route providing connections north-west towards Cambridge and south-east towards Haverhill. The route is generally single carriageway with one lane in each direction. Its standard varies considerably, with some recently improved sections constructed to a high standard alongside longer stretches that retain a more historic rural highway form, including side-road junctions and frontage access. Notwithstanding these variations, the route carries significant traffic flows, often at relatively high speeds. The most recently available traffic count data held by the Department for Transport (DfT)[1] states that the A1307 along the frontage of the Site accommodates circa 20,500 vehicle movements per day.

3.27 These routes provide the primary means of access to employment areas, education facilities, retail provision and the wider strategic highway network. They are therefore critical pieces of infrastructure and already accommodate substantial daily traffic flows.

3.28 The A11, A505 and A1307 converge at the Fourwentways junction, a grade-separated junction that forms a key node within the highway network. The junction is observed to experience congestion, queues and delays during peak periods and, at times, outside the traditional peak periods. The capacity and resilience of this junction will therefore be an important consideration when assessing the cumulative impact of significant additional development in the area.

3.29 In contrast, other roads in the vicinity of Grange Farm are characteristic of the rural environment in which they are located. They are generally narrow, lack continuous footways, contain constrained junction geometries, sharp bends and sections of restricted forward visibility, and include several features that would be considered substandard against modern highway design principles.

3.30 Many sections are not well suited to accommodating increases in traffic volumes or changes in traffic composition without potentially giving rise to highway capacity and road safety concerns.

Road Safety

3.31 A review of the LP19's transport evidence base documentation reveals that there is no personal injury accident records provided. Equally, there does not appear to be a detailed analysis of historic personal injury collisions to identify locations within the highway network that may currently be considered particularly sensitive from a road safety perspective.

3.32 This is an important omission when considering a development of the scale proposed at Grange Farm. Locations with an existing pattern of collisions, or with characteristics that make them particularly

[1] DfT Census Point 28828

sensitive to increases in traffic flows, should be identified so that appropriate mitigation can be considered as part of the transport strategy.

3.33 Recorded road collision data for the most recent five-year period for which publicly accessible data are available has been obtained from CrashMap, which draws upon recorded collision data from the Department for Transport. Extracts from the CrashMap data are provided below for the highway network to the south-east and north of Grange Farm. It should be noted that the data relate to recorded collisions and do not represent the total number of incidents occurring on the network. In particular, damage-only collisions are not included.

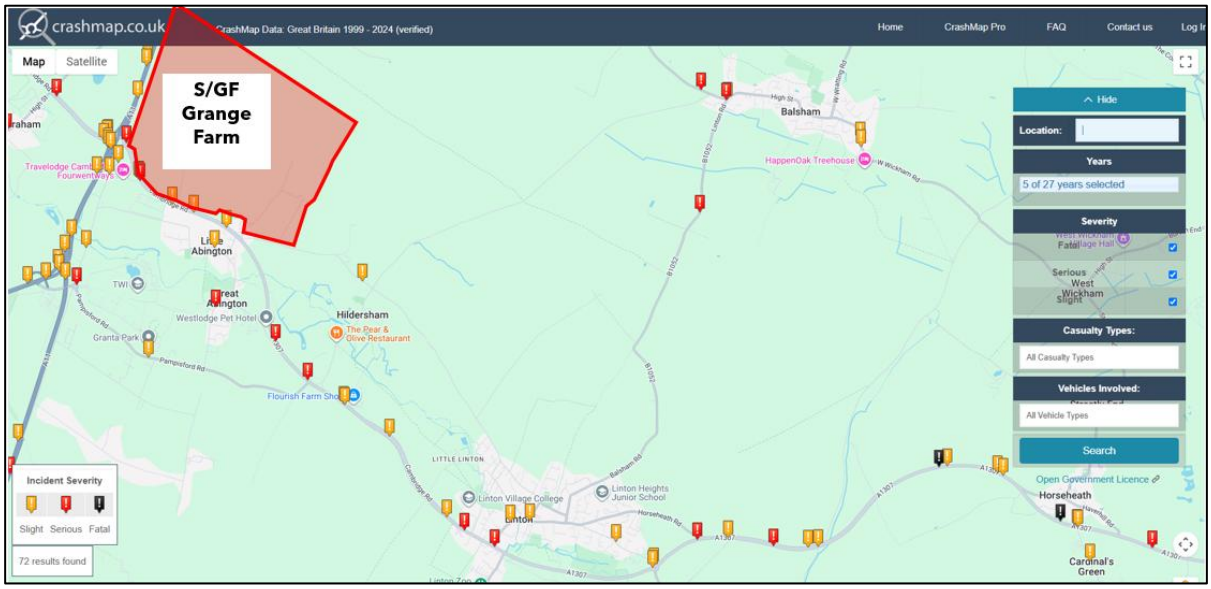


Figure 3.4: 5-Year Recorded Road Collision Data – South of Grange Farm

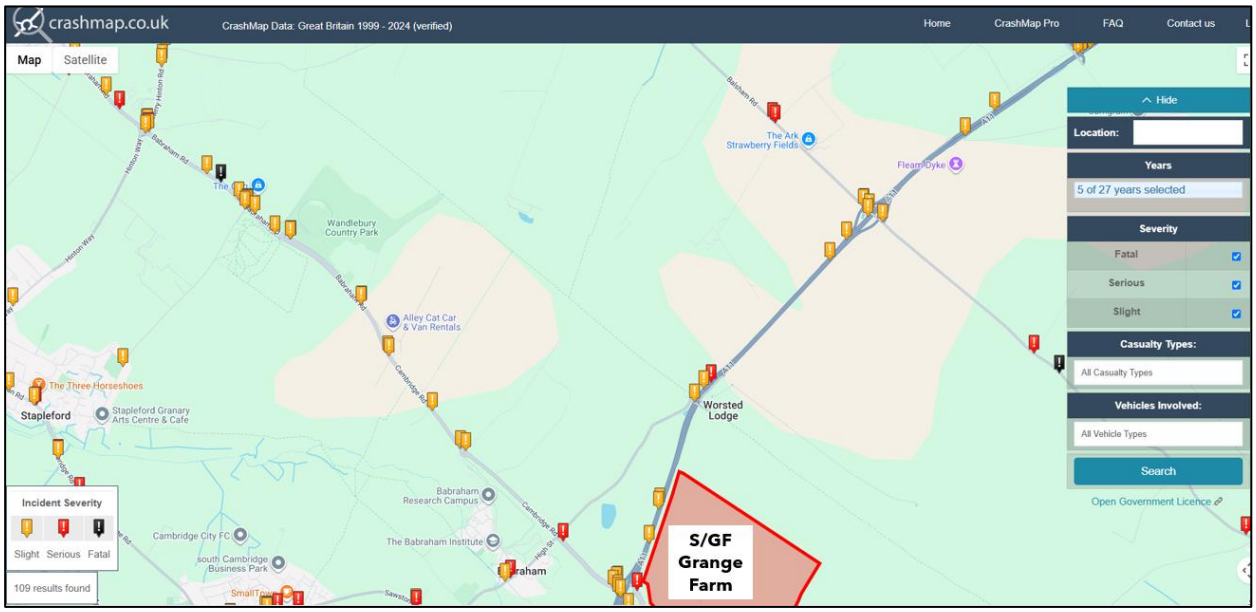


Figure 3.5: 5-Year Recorded Road Collision Data – North of Grange Farm

3.34 The figures above indicate that the principal highway routes serving the area have a notable history of recorded collisions. The yellow markers represent recorded collisions involving slight personal injury, while the red markers represent collisions involving more serious injury. Black markers represent recorded collisions involving a fatality.

3.35 While a greater number of recorded collisions might reasonably be expected on the principal routes as a consequence of their higher traffic volumes, the data also demonstrate that collisions are not confined to these routes. Recorded injury collisions are also present on the surrounding rural road network, despite these roads generally carrying lower traffic volumes.

3.36 The collision record should therefore not be regarded as an isolated or benign feature of the existing network. Rather, it provides evidence of an existing level of vulnerability, particularly given the constrained nature and characteristics of many of the surrounding rural roads.

3.37 The introduction of materially higher traffic flows associated with a development of the scale proposed at Grange Farm must therefore be assessed against an existing highway network that is already constrained in terms of capacity, geometry, active travel provision and road safety. Appropriate mitigation will be required to ensure that additional traffic can be accommodated without giving rise to unacceptable impacts on highway safety or network operation.

Planned Infrastructure

3.38 Cambridge South East Transport (CSET) is a planned busway connecting the Cambridge Biomedical campus on the southern edge of Cambridge to a planned new A11 travel hub located to the west of the A11, which would be approximately 2.1km walk from the centre of the Site. The figure below shows the indicative route of CSET.



Figure 3.6: Proposed CSET Route

3.39 CSET has been under development for a considerable period. The project began with community engagement and scheme development from around 2016/17 and subsequently progressed through a number of consultation exercises and route-development stages. Five formal rounds of detailed public consultation took place between 2016 and 2022, alongside environmental assessment, business-case development and consideration of the preferred route.

3.40 A Transport and Works Act Order application was submitted to the Department for Transport in January 2025. The Department subsequently considered the objections and representations received and the project has now reached the public inquiry stage. The current process therefore remains concerned with establishing whether the necessary statutory powers should be granted to enable the scheme to proceed. At the time of preparing this report, there was no certainty that the TWAO would be approved.

3.41 Looking forward, the estimated total cost of the scheme is approximately £161 million, based on Q4 2022 prices and including an allowance for risk. While Homes England confirmed in September 2025 that around £160 million of recoverable funding had been allocated to finance construction, that funding remains subject to the necessary consents being secured, Full Business Case approval and the completion of a Funding Agreement. The funding position therefore provides a basis for progressing the scheme, but does not remove the financial and delivery risks associated with a major infrastructure project of this scale. In particular it is noted that construction price inflation has risen sharply since 2022 so the scheme cost in current prices will be considerably higher than the £161 million estimate.

3.42 The project still needs to progress through the statutory process, satisfy the conditions associated with the proposed funding assuming that this will still be available if the scheme costs have risen materially, complete the necessary detailed design and procurement activities and ultimately construct and commission the infrastructure. There is consequently a distinction between funding being identified or allocated for the scheme and the infrastructure being physically delivered and available for use. At this stage, the timing of construction and the date on which the completed CSET scheme, including its walking and cycling facilities, will become operational remain unknown and dependent on the successful progression of these future stages.

3.43 The delivery of CSET therefore remains subject to a number of significant statutory, financial and construction-related risks. While funding has been identified, this is not equivalent to the scheme being consented, constructed and operational. Given the scale of the proposed development at Grange Farm and its reliance on the delivery of sustainable transport infrastructure, any significant delay to, or failure to deliver, CSET would have material implications for the allocation. In the absence of a deliverable alternative transport strategy, the failure to secure and deliver the scheme could fundamentally undermine the transport case for Grange Farm and place the deliverability of the allocation as a whole in question.

3.44 Importantly, the proposed CSET scheme terminates on the western side of the A11 dual carriageway, at the location referred to as the 'A11 Travel Hub'. It does not therefore directly serve Grange Farm. The scheme's proximity to the allocation should not be conflated with effective connectivity: without a further connection providing safe, direct and convenient access between Grange Farm and CSET, the scheme would not, in itself, resolve the Site's strategic accessibility constraints. This raises a fundamental question as to whether the additional infrastructure needed to connect the allocation to CSET is itself identified, funded and deliverable within a timescale that aligns with the proposed development.

Existing and Planned Transport Infrastructure Summary

3.45 Grange Farm is located in a rural countryside setting, remote from established settlements and with limited access to day-to-day facilities and services. The available Census data indicate a strong reliance on the private car, with over 80% of residents travelling to work as a driver or passenger. This provides

an important context for assessing the likely travel patterns associated with a development of this scale, particularly given the limited opportunities for existing sustainable travel modes. The transport implications of the allocation are therefore closely linked to the delivery of new sustainable transport infrastructure, rather than simply the availability of existing services.

3.46 Walking and cycling are unlikely to provide practical alternatives to the private car for most journeys to existing settlements and facilities. Few destinations lie within a reasonable walking or cycling distance, while the A11 and A1307 present significant barriers to direct, safe and attractive cycling routes. Although substantial investment in high-quality active travel infrastructure could improve conditions, the existing network does not currently provide the connectivity needed to support a material shift away from car use for everyday journeys neither do the distances people would need to travel.

3.47 Existing bus services along the A1307 provide a basic level of public transport provision, but their attractiveness is constrained by the absence of bus priority measures between the Site and Cambridge. Buses are therefore exposed to the same congestion as general traffic, which makes car travel more convenient and reliable. The relatively low existing bus mode share is indicative that the presence of a service alone does not necessarily translate into significant public transport use.

3.48 The existing paucity of genuine sustainable travel choices places critical importance on the timely delivery of the proposed CSET infrastructure and equally on the connections to CSET which are required to make it genuinely accessible from Grange Farm.

3.49 The surrounding highway network is similarly constrained. The A11, A505 and A1307 are the principal routes serving the area and converge at Fourwentways, which already experiences congestion, queuing and delay. Beyond these routes, the rural road network includes narrow carriageways, constrained junctions, limited visibility and an absence of continuous footways. The recorded collision data indicate that there is a high number of injury collisions occurring on both the principal routes and the surrounding rural roads. The Plan's transport evidence base appears to be lacking the detailed collision analysis needed to understand these existing, potentially severe, constraints.

3.50 The consequences of a significant uplift in traffic volumes are therefore a strategic concern. A substantial increase in car-based trips would intensify congestion, queuing and delays at Fourwentways and along the principal routes, while increasing pressure on rural roads that are poorly suited to accommodating materially higher traffic flows. The scale of additional traffic would exacerbate road safety risks, particularly where queues, constrained geometry and limited visibility interact. Importantly, the potential for queues to extend towards the A11 mainline is a particular concern.

3.51 Against this background, the critical reliance on CSET introduces an additional element of uncertainty into the transport strategy for Grange Farm. The delivery of CSET remains subject to significant statutory,

financial and construction-related risks, and the identification of funding should not be equated with the scheme being consented, constructed and operational.

3.52 Given the scale of the Site and the existing limitations of the transport network, any significant delay to, or failure to deliver CSET would fundamentally undermine the transport sustainability of Grange Farm.

3.53 There is also an important distinction between the proximity of CSET to Grange Farm and its ability to provide effective connectivity for the Site. The proposed CSET scheme terminates on the western side of the A11 dual carriageway at the location referred to as the 'A11 Travel Hub' and does not therefore directly serve Grange Farm. Its proximity to the allocation should not be conflated with genuine accessibility. Without a further connection providing safe, direct and convenient access between Grange Farm and CSET, the CSET scheme would not, in itself, resolve the Site's inherently poor connectivity. The additional infrastructure required to connect the allocation to CSET therefore represents a further critical dependency.

3.54 Taken together, these factors demonstrate that the transport implications of Grange Farm cannot be considered solely in terms of a theoretical availability of future sustainable transport infrastructure. The existing high level of car dependency, severely limited active travel connectivity, limited and constrained public transport provision and existing highway congestion mean that the allocation is critically dependent on the successful and timely delivery of the proposed transport interventions. Unless CSET and the necessary connections to it are demonstrably deliverable and operational in time to serve the development, the Site would be unable to provide meaningful and genuine sustainable transport choices. This would result in significant additional development traffic being placed on an already congested and constrained highway network, with severe impacts on congestion, network resilience and road safety.

4.0 S/GF POLICY REQUIREMENTS

4.1 The benefits of a comprehensive masterplan at a single, strategic site in reducing the impacts of development on the existing transport network compared to a similar quantum of development scattered over several ad hoc sites, are well established. The integration of a balanced mix of everyday land uses alongside residential development, connected through a robust and sustainable movement framework, can, if done properly, make a significant contribution to:

- Retaining a proportion of new trips entirely within the development area, thereby avoiding additional pressure on the existing highway network; and
- Increasing the proportion of trips per dwelling undertaken by sustainable modes of transport. By locating everyday facilities in close proximity to residential areas, connected by appropriate supporting infrastructure, residents are more likely to choose sustainable modes of travel, particularly active travel modes.

4.2 While this approach has considerable potential to limit the number of journeys undertaken by private motor vehicles on the surrounding highway network, it is important to recognise that comprehensive master planning requires a development scale sufficient to sustain the proposed mix of land uses.

4.3 In the case of the Site, the draft allocation would establish a new town of around 11,000 people together with a range of everyday destinations which, whilst serving the Site's residents, would attract trips from outside the Site in their own right. As a consequence, the potential residual increase in vehicular traffic still has the potential to be substantial and, if not appropriately mitigated, would give rise to significant adverse environmental effects at a local level, as well as material operational impacts on the existing highway network.

4.4 In recognition of this potential significant residual travel demand to and from the Site, policy S/GF requires the following:

Movement

Deliver a comprehensive movement and connectivity network across the whole site that actively encourages and prioritises active travel and public transport providing connections across the site and to nearby villages and employment sites, and to key destinations within Cambridge, supported by residential, school and workplace travel planning. This outcome must be delivered by:

a. Ensuring the design of the site:

i. Prioritises walking, wheeling, cycling and public transport movements and provides a legible high quality street network;

ii. Focuses the movement network on the key areas of activity within the settlement, ensuring these are highly accessible by non-private modes;

iii. *Integrates direct, safe, and efficient public transport routes, ensuring that all development is located within reasonable walking distance of mobility hubs served by high quality public transport;*

iv. *Promotes low car ownership, including through remote parking approaches such as rural car barns at the edge of parcels or plots;*

v. *Integrates secure, covered and conveniently located cycling parking throughout the settlement at mobility hubs, workplaces and public spaces.*

b. *Setting aside land for and/or directly delivering at least the following physical transport measures within the site*

i. *Mobility Hubs / bus stops within 400m for all site occupants;*

ii. *A last mile logistics hub to enable delivery of goods from the distribution centre and supports the trip budget in reducing the number of trips through the development;*

iii. *Internal and local connections to the Linton Greenway, Byway 4/1 and Worsted Lodge access road.*

c. *Commensurate with the phasing of development, making financial contributions towards and, as appropriate, enabling the following transport measures:*

i. *High quality segregated active travel connections across the A1307 and A11 and along Newmarket Road to connect the site with Granta Park and the CSET Phase 2 Travel Hub and active travel path, to support the early phases of development;*

ii. *Improvements to wider walking and cycling infrastructure to Babraham, Babraham Research Campus, the Wellcome Genome Campus, Granta Park, Little and Great Abington, Linton, and Whittlesford Parkway Station, including addressing local severance from the A1307 and A11;*

iii. *The GCP Cambridge South East Transport (CSET) Phase 2 scheme which will provide a high quality public transport corridor and active travel route from the proposed A11 Travel Hub to the Cambridge Biomedical Campus, Cambridge city centre and the Linton and Sawston Greenways;*

iv. *Extension of the CSET Phase 2 public transport corridor and services directly into the site via a segregated link from the proposed Travel Hub across the A11 into the site, to support the early phases of development. This must be in place to support first occupation of the site, unless it can be demonstrated by the applicant through a detailed*

Transport Strategy and phasing plan (as agreed with the Local Planning Authority and, Local Highways that, to support first occupation, there is an alternative, temporary means of securing a frequent, reliable, prioritised public transport service providing fast, direct connections between the site and Cambridge Biomedical Campus, key nearby mobility hubs, and other key destinations in and around Cambridge. If a temporary approach is agreed, the agreed phasing plan must demonstrate an appropriate trigger for completion of the segregated link based on the development capacity supported by that temporary approach;

v. *A package of bus improvements providing links to Granta Park, Babraham Research Campus, Genome Campus, Cambridge Biomedical Campus, North East Cambridge, Cambridge railway stations (including Cambridge South and Whittlesford Parkway station), Linton and Haverhill;*

vi. *Bus priority measures along the A1307 between Haverhill and Cambridge, as required, including at Fourwentways junction;*

vii. *Necessary off-site highway mitigation and appropriate site access arrangements. Ensuring there is no direct access from the new settlement to the Worsted Road Roman Road, reflecting archaeological, heritage and ecological sensitivities.*

4.5 In summary, the infrastructure requirements set out in policy S/GF can be broken down into the following components:

a. Design principles to shape the form of development to ensure that sustainable travel is a focus within Grange Farm
b. A requirement for land budgets to ensure that sufficient land is set aside for sustainable travel items
c. Off-site infrastructure requirements to ensure safe and sustainable connectivity to and from Grange Farm can be achieved.

4.6 As a greenfield allocation, Grange Farm provides an opportunity for the internal layout and design of the development to be planned from the outset in accordance with the requirements of Policy S/GF. In this respect, the site is effectively a blank canvas, and there is no inherent reason why the development should be unable to incorporate the required design principles and land provision.

4.7 Furthermore, these requirements are consistent with established national planning and transport policy objectives. Their incorporation into the development would therefore represent the implementation of requirements that should, in any event, form part of the design of a sustainable new settlement.

4.8 The requirements identified under (c) are materially different. These comprise physical, off-site infrastructure interventions that are necessary to establish safe, appropriate and sustainable connections

between Grange Farm and the surrounding settlements, transport networks and facilities and vice versa noting that the Site would establish a town of circa 11,000 people and land uses which attract trips to the Site from existing settlements.

4.9 Unlike internal design principles, these interventions are dependent upon land outside the allocation, third-party land interests, highway authority involvement, funding and coordinated delivery. They cannot therefore be assumed to arise simply through the normal development process.

4.10 The off-site infrastructure requirements identified in Policy S/GF have therefore been cross-referenced against the Councils' Infrastructure Delivery Plan (IDP) to establish whether the infrastructure identified as necessary to support the allocation is appropriately recognised and planned for.

4.11 The IDP identifies the following classifications of infrastructure requirements:

- **Critical infrastructure** – interventions/projects without which planned development will simply be unable to proceed. These interventions should therefore be regarded as **prerequisites to development**, rather than measures that can be deferred or treated as discretionary enhancements.
- **Essential infrastructure** – interventions/projects that are essential if development is to take place in a manner that allows the Councils and partners to comply with legislative requirements and/or key policies. These interventions are therefore fundamental to the **soundness and deliverability of the Plan**.

4.12 In short where the Councils identifies infrastructure as being "Critical", its absence means that the draft allocation cannot proceed in any form. There is no phasing flexibility possible with the term "Critical": it must be in place at first occupation.

4.13 Where the Councils identifies infrastructure as being "Essential", if it is not planned for and supported by a clear and credible mechanism for its delivery, the Councils' terminology indicates that it is their opinion that the Plan would be **unsound**, as it would not provide a sufficiently robust basis for demonstrating that the proposed development can be delivered in accordance with the relevant legislative and policy requirements.

4.14 A summary of the off-site infrastructure requirements and their status in the IDP is provided below.

Item	IDP Status
High quality segregated active travel connections across the A1307 andA11 and along Newmarket Road to connect the site with Granta Park and the CSET Phase 2 Travel Hub and active travel path, to support the early phases of development	Cost: £11M Unfunded. To be fully funded by developers.

Item	IDP Status
	Priority: **ESSENTIAL**
Improvements to wider walking and cycling infrastructure to Babraham, Babraham Research Campus, the Wellcome Genome Campus, Granta Park, Little and Great Abington, Linton, and Whittlesford Parkway Station, including addressing local severance from the A1307 and A11	Cost: £15.5M Unfunded. To be fully funded by developers. Priority: **ESSENTIAL**
The GCP Cambridge South East Transport (CSET) Phase 2 scheme which will provide a high quality public transport corridor and active travel route from the proposed A11 Travel Hub to the Cambridge Biomedical Campus, Cambridge city centre and the Linton and Sawston Greenways	**Not included in the IDP** **OMISSION**
Extension of the CSET Phase 2 public transport corridor and services directly into the site via a segregated link from the proposed Travel Hub across the A11 into the site, to support the early phases of development. This must be in place to support first occupation of the site, unless it can be demonstrated by the applicant through a detailed Transport Strategy and phasing plan (as agreed with the Local Planning Authority and, Local Highways that, to support first occupation, there is an alternative, temporary means of securing a frequent, reliable, prioritised public transport service providing fast, direct connections between the site and Cambridge Biomedical Campus, key nearby mobility hubs, and other key destinations in and around Cambridge. If a temporary approach is agreed, the agreed phasing plan must demonstrate an appropriate trigger for completion of the segregated link based on the development capacity supported by that temporary approach;	Cost: £30M Partially finding but no information on the extent of funding gap. No identification of funding sources. No identification of expected cost for developers. Priority: **CRITICAL**
A package of bus improvements providing links to Granta Park, Babraham Research Campus, Genome Campus, Cambridge Biomedical Campus, North East Cambridge, Cambridge railway stations (including Cambridge South and Whittlesford Parkway station), Linton and Haverhill	Cost: £15M Unfunded. To be fully funded by developers. Priority: **ESSENTIAL**

Item	IDP Status
Bus priority measures along the A1307 between Haverhill and Cambridge, as required, including at Fourwentways junction	**Not included in the IDP** **OMISSION**
Necessary off-site highway mitigation and appropriate site access arrangements. Ensuring there is no direct access from the new settlement to the Worsted Road Roman Road, reflecting archaeological, heritage and ecological sensitivities	Cost: £66.68M Unfunded. To be fully funded by developers. Priority: **ESSENTIAL**

Table 4.1: Comparison of S/GF Infrastructure versus IDP Status

4.15 The comparison between the infrastructure requirements identified in Policy S/GF and the Councils' Infrastructure Delivery Plan (IDP) is significant. Policy S/GF identifies a number of transport interventions as necessary to support the delivery of the allocation, including infrastructure required to establish safe and sustainable connections and, in the case of the CSET Phase 2 extension, infrastructure required to support the first occupation of the development.

4.16 It is noted that the policy with regards to the CSET extension includes the following words:

"This must be in place to support first occupation of the site, unless it can be demonstrated by the applicant through a detailed Transport Strategy and phasing plan (as agreed with the Local Planning Authority and, Local Highways that, to support first occupation, there is an alternative, temporary means of securing a frequent, reliable, prioritised public transport service providing fast, direct connections between the site and Cambridge Biomedical Campus, key nearby mobility hubs, and other key destinations in and around Cambridge"

4.17 It is noteworthy that the policy uses the term "in place to support first occupation" which aligns with the Councils' definition of Critical infrastructure and their definition of the link as being Critical.

4.18 It is, however, concerning that, having clearly defined the infrastructure as **Critical** and required it to be delivered prior to first occupation, the Councils then appears to backtrack by suggesting that an "alternative" approach could be taken. The existence of a policy provision allowing an alternative solution does not, in itself, provide evidence that such an alternative exists. Indeed, the Councils' own evidence in the current TWAO Inquiry is that there is no alternative to CSET capable of delivering the same benefits. It follows, on the basis of the Councils' own evidence, that there can be no alternative approach to the CSET extension that would deliver equivalent benefits. The alternative solution provision is therefore otiose and serves only to introduce unnecessary uncertainty into the policy

requirement, which should be clear and unambiguous as to the infrastructure required to support the allocation and the circumstances in which it must be delivered.

4.19 The IDP nevertheless indicates that a number of these requirements are currently unfunded, while other infrastructure identified in Policy S/GF is not included within the IDP at all. This raises a fundamental issue concerning the deliverability of the allocation and whether the Plan has made adequate provision for infrastructure that its own policy framework identifies as necessary.

4.20 The position can be summarised as follows:

Infrastructure requirements	Status in IDP	Funding Position	Policy significance
High-quality segregated active travel connections across the A1307 and A11 and along Newmarket Road, connecting Grange Farm with Granta Park and the CSET Phase 2 Travel Hub and active travel path	Included	£11m; unfunded; to be fully funded by developers	**Essential**
Wider walking and cycling improvements connecting Babraham, Babraham Research Campus, Wellcome Genome Campus, Granta Park, Little and Great Abington, Linton and Whittlesford Parkway Station, including addressing severance created by the A1307 and A11	Included	£15.5m; unfunded; to be fully funded by developers	**Essential**
CSET Phase 2 high-quality public transport corridor and active travel route	Not included	No provision identified in IDP	**Essential infrastructure requirement identified by Policy S/GF**
Extension of the CSET Phase 2 public transport corridor and services into Grange Farm via a segregated link across the A11	Included	£30m; only partially funded; funding gap and funding sources not identified; developer contribution not identified	**Critical**
Bus improvement package connecting Grange Farm with key employment, education, healthcare and transport destinations	Included	£15m; unfunded; to be fully funded by developers	**Essential**
Bus priority measures along the A1307, including at Fourwentways	Not included	No provision identified in IDP	**Essential infrastructure requirement identified by Policy S/GF**
Necessary off-site highway mitigation and appropriate site access arrangements, including restrictions on direct access to Worsted Road/Roman Road	Included	£66.68m; unfunded; to be fully funded by developers	**Essential**

Table 4.2: S/GF Deliverability Status

4.21 The table demonstrates that the transport infrastructure requirements associated with the allocation are substantial. The identified costs alone amount to approximately £138.18 million, excluding requirements for which no cost is identified in the IDP.

4.22 Of the infrastructure items identified within the IDP, several are recorded as unfunded and reliant upon developer funding, including £11 million of active travel infrastructure, £15.5 million of wider walking and cycling improvements, £15 million of bus improvements and £66.68 million of highway mitigation and access works. The £30 million CSET Phase 2 extension into the Site is identified as partially funded, but the IDP does not identify the funding shortfall, its source, or the proportion expected to be met by the developer.

4.23 More importantly, a distinction must be drawn between CSET itself and the CSET extension serving Grange Farm. CSET is currently the subject of a TWAO and is identified by the Councils as "Essential" infrastructure, while the CSET extension is identified as "Critical" and required prior to first occupation.

4.24 Crucially, the CSET extension is not a standalone transport solution. Its sole purpose is to connect the Site to CSET; without CSET being delivered and operational, the extension has no meaningful transport function. The "Critical" extension is therefore wholly dependent upon the "Essential" CSET scheme. The two must consequently be treated as a single, linked infrastructure requirement for IDP and deliverability purposes. The IDP cannot demonstrate delivery of the extension without also demonstrating a credible funding, consenting and delivery pathway for CSET itself. This is particularly significant because Policy S/GF identifies the CSET extension into the Site as Critical and requires it to support first occupation.

4.25 The position is further weakened because infrastructure identified in Policy S/GF does not appear to be included within the IDP at all. In particular, the absence of the CSET Phase 2 scheme itself in the context of S/GF and the bus priority measures along the A1307, including at Fourwentways, means that the IDP does not provide for infrastructure which the policy framework identifies as Essential to support the allocation.

4.26 This creates a fundamental disconnect between the Plan's policy requirements and its infrastructure delivery framework. Where infrastructure is identified as necessary to support the allocation but is omitted from the IDP, unfunded, or lacks a clear mechanism for securing its delivery, the Plan has not demonstrated how that infrastructure will be provided. Given the scale of the development and the existing constraints on the highway and sustainable transport networks, these are fundamental infrastructure requirements, not secondary mitigation measures.

4.27 The issue is compounded by the proposed phasing of the allocation. Only 57% of the proposed allocation, approximately 2,550 dwellings, is intended to come forward within the current Plan period, with the remaining 43% having less certainty of delivery. Nevertheless, the infrastructure requirements appear to have been identified on the basis of the full 4,500-dwelling development. The Plan must

therefore demonstrate either how the infrastructure required for the full development will be secured and funded despite the different levels of planning certainty, or provide a robust staged infrastructure strategy identifying the infrastructure required for the first 2,550 dwellings and how the remainder will subsequently be funded and delivered.

4.28 In the absence of such evidence, the Plan has not demonstrated a realistic, funded and deliverable strategy for providing the infrastructure necessary to make the allocation acceptable and sustainable. This goes directly to the soundness and deliverability of the allocation and, consequently, the Plan as a whole.

5.0 MODELLING APPROACH

General

5.1 Strategic modelling undertaken. This relies on core scenario from the current National Trip End Model (NTEM)

5.2 NTEM produces estimates of person travel by purpose, across all modes of travel (including walking and cycling), for each of its zones across Great Britain. The NTEM zonal system is appropriate for a national model and can be used by transport modellers to provide a broad indication of changes in travel patterns over time. Primary inputs to the NTEM include the Government's population and household forecasts. The model is managed and maintained by the Department for Transport (DfT).

5.3 The NTEM is reviewed on a five-year cycle and was most recently updated in 2022. That update is, inter alia, based on the Office for Budget Responsibility (OBR) 2018-based population projections, using the 0% EU migration variant. In recent years, however, migration from non-EU countries has significantly exceeded the levels assumed in those projections. For example, the 2018 population forecasts predicted that the population of England would increase by approximately 4.1 million people between 2023 and 2043. The closest equivalent period in the current population forecasts is 2022 to 2042, over which the Government now forecasts an increase of 7.1 million people—almost double the previously forecast growth over a comparable 20-year period.

5.4 Since 2022 there have been several changes of government. The current Government has stated an intention to address the identified misalignment between median incomes and house prices through the planning system. This is being pursued by applying a multiplier to planned housing requirements based on the ratio between median house prices and median salaries at a local level. As a result, the geographical distribution of planned housing delivery is increasingly out of step with the locations implied by forecast changes in the number of households alone.

5.5 Recognising that forecasts and policy priorities can change over time, the DfT provides a range of NTEM-based trip forecast scenarios. These are intended to give traffic modelling practitioners flexibility to select the most appropriate scenario for each test case, having regard to local characteristics and the purpose of the model. While the "Core Scenario" is generally considered the standard approach, the DfT also provides High Economy and Low Growth Economy, reflecting alternative assumptions regarding population, household formation, and economic activity.

5.6 The Councils' requirement to allocate additional land for housing arises from the Government's revised methodology for assessing housing need, which identifies a substantial misalignment between median house prices and median salaries. Consequently, housing delivery in the area will exceed the level that would be expected based solely on forecast household growth. When this is combined with the Government's revised population projections—which show a significantly higher population in 2042 than was assumed in the 2018 forecasts underpinning the current NTEM—it is clear that, as a minimum, the DfT's High Economy Scenario should be used as the basis for traffic modelling in the Greater Cambridge area.

5.7 This means that where the assessment indicates that an allocation can avoid a step change in infrastructure requirements at a particularly sensitive or constrained part of the highway network, the effects of this underestimation may be disproportionate. In such circumstances, the methodology may materially understate the infrastructure required to accommodate the allocation, whether in terms of highway capacity or sustainable transport provision.

Trip Budgets

5.8 The outcome of the modelling exercise is, in part, the establishment of a trip budget for each allocation. To some extent, this provides a degree of comfort that, even if there are shortcomings in the forecasting methodology, development of an individual site will not result in severe operational or unacceptable highway safety impacts, provided that the agreed trip budget is not exceeded.

5.9 However, this approach raises significant questions about how the trip budgets are intended to operate in practice and how they will be controlled and enforced over the lifetime of the Plan.

5.10 A key concern for the Inspector is what happens if the site's agreed trip budget is reached before the development has been fully built out. If development must cease once the trip budget has been exhausted, there is a high risk that the Plan's housing numbers cannot be delivered. More fundamentally, the consequence may not simply be a shortfall in housing numbers: development could effectively stop with only a few hundred homes delivered, leaving an incomplete and potentially isolated residential development in the countryside rather than the strategic, comprehensively planned place envisaged by the Plan.

5.11 This raises a fundamental question as to whether the proposed approach is sufficiently flexible and resilient to deliver the strategic allocation in the form upon which the Plan's housing strategy and infrastructure assumptions rely. The Inspector therefore needs to understand not only whether the trip budget can be enforced, but what happens if it is reached and what additional interventions would be required to enable the remainder of the site to be delivered.

5.12 For example, if the trip budget is reached before build-out, would further development require additional junction capacity, improvements to the strategic road network, changes to access arrangements, public transport interventions, active travel measures, or other measures capable of reducing or redistributing traffic generation? If such interventions may ultimately be necessary to unlock the later phases of the allocation, they need to be identified, tested and secured at the Plan stage rather than being left to be resolved once development has already commenced.

5.13 Conversely, if development is permitted to continue beyond the agreed trip budget without further intervention, the purpose of imposing that budget as a mechanism for controlling the site's highway impacts is undermined. The Inspector therefore needs to understand how the trip budget is intended

to operate in practice and, critically, what mechanism will ensure that the highway constraint remains effective whilst avoiding a situation in which the strategic allocation becomes incapable of delivering its planned housing and infrastructure.

5.14 The Plan and the associated planning permission should therefore provide a clear and credible pathway for what happens when the initial highway capacity is reached. If the consequence is that housebuilding must stop, the Inspector needs to be satisfied that the additional infrastructure or mitigation required to enable subsequent phases has been identified, assessed and can realistically be delivered. Otherwise, there is a material risk that the Plan is relying upon housing delivery from a strategic site without demonstrating that the site can in fact be delivered in full.

5.15 A trip-budget approach therefore creates a fundamental delivery issue which the Plan needs to address. If the Councils intends to rely upon trip budgets as a hard constraint, there will need to be sufficient reserve sites or additional capacity elsewhere in the Plan to ensure that housing delivery can continue if an allocation reaches its trip budget before it has been fully built out.

5.16 The Councils should therefore clearly explain the mechanism by which trip budgets will be monitored, enforced and managed, including what happens when a budget is reached and how the Plan will maintain sufficient housing delivery capacity in those circumstances.

5.17 There is also a more fundamental concern about the extent to which the trip budgets provide a meaningful measure of the overall transport impacts of development.

5.18 The budgets focus on weekday peak-hour traffic flows. Whilst peak-hour network capacity is clearly an important consideration, it is not the same thing as assessing whether development is genuinely reducing dependence on private car travel or reducing overall traffic generation.

5.19 This distinction is particularly important in the context of national planning policy, which places considerable emphasis on reducing the need to travel and promoting sustainable modes of transport.

5.20 The Councils should therefore be demonstrating not simply that development can be accommodated within an agreed peak-hour trip budget, but that the Plan is capable of delivering the necessary modal shift and reduction in car dependency through the location of development and the provision of genuinely attractive alternatives to private car travel.

5.21 This is particularly important in the context of the declared climate emergency. A methodology which treats a reduction in peak-hour trips as sufficient evidence of reduced transport impact risks overlooking whether total car use, total vehicle kilometres and associated carbon emissions are actually being reduced.

5.22 There is a further, fundamental problem with relying upon peak-hour traffic volumes as the principal measure of impact. When congestion reaches a certain level during the conventional peak period, many people will adjust their journey times to avoid the worst congestion, travelling either earlier or later than they would otherwise have done.

5.23 This phenomenon results in peak spreading, whereby traffic that would otherwise have been concentrated within the modelled peak hour is displaced into the hours immediately before and after it.

5.24 Consequently, a development may remain within its peak-hour trip budget without there having been any meaningful reduction in overall car travel. Instead, the traffic has simply been redistributed across a wider period.

5.25 Rather than demonstrating a genuine reduction in car use, the proposed weekday peak-hour trip budgets may therefore simply be capturing changes in driver behaviour, including people choosing to travel outside the traditional peak periods in response to congestion.

5.26 If that is the case, the apparent reduction in peak-hour traffic does not represent a reduction in overall car use. The trips have not disappeared; they have merely moved to a different time period. But a car journey undertaken at 11:00am remains a car journey irrespective of whether it is within the tightly constrained Trip Budget window.

5.27 This is particularly important because the objective of sustainable transport policy should be to achieve a genuine reduction in car dependency through the integration of land-use and transport planning, supported by a step change in the quality, availability and attractiveness of sustainable travel infrastructure.

5.28 The fundamental problem is that a trip that moves from 08:00 to 07:30 has not ceased to be a car trip. Unless the Councils can demonstrate that its trip-budget approach will deliver a genuine reduction in car dependency and overall traffic generation, rather than simply displacing trips outside the modelled peak hour, the budgets risk becoming a mathematical exercise in moving traffic around the network rather than a meaningful mechanism for managing its impacts. The Plan should not treat the absence of a peak-hour capacity exceedance as evidence of sustainable development where the underlying level of car use remains unchanged.

Summary

5.29 The modelling evidence therefore suffers from a fundamental problem: it appears to underestimate the amount of traffic that the Plan will generate and then uses a narrow peak-hour trip-budget approach to demonstrate that the resulting traffic can be accommodated. The use of an outdated NTEM growth scenario, despite substantially higher population projections and increased housing requirements, risks

understating the underlying growth in travel demand. The subsequent reliance on peak-hour trip budgets compounds that problem by treating the absence of a capacity exceedance in a particular hour as evidence that development can be accommodated, without demonstrating that overall traffic generation or car dependency will actually reduce.

5.30 The Councils must therefore demonstrate that its transport evidence provides a realistic, robust and proportionate assessment of the transport consequences of the Plan, and that the proposed trip budgets are capable of being monitored, enforced and delivered without compromising the Plan's housing trajectory. It must also demonstrate that the apparent containment of peak-hour traffic is the result of genuine modal shift rather than simply the displacement of car journeys into other periods. Without that evidence, there is a significant risk that the Plan is relying upon a forecast of traffic demand which is too low and a mitigation mechanism which does not measure the full extent of the transport impacts.

5.31 The trips have not disappeared; they have merely moved. A trip that moves from 08:00 to 07:30 remains a car trip. The purpose of sustainable transport planning is not simply to redistribute car journeys so that they fall outside the modelled peak hour, but to achieve a genuine and sustained transfer from private car use to walking, cycling and public transport throughout the day. The Councils therefore needs to demonstrate that its Plan, through the location of development and the provision of appropriate sustainable transport infrastructure, will deliver that modal shift across the full daily travel pattern—not merely within the narrow periods tested by the highway model. Without that evidence, the Plan risks presenting a redistribution of car trips as sustainable transport mitigation. That is not a robust basis for concluding that the allocations are deliverable or that their transport impacts are acceptable. The resulting failure to properly assess and plan for sustainable travel means that the Plan is not justified, not effective and not consistent with national policy and therefore fails the tests of soundness.

6.0 TRIP FORECASTING METHODOLOGY

6.1 As identified above, the draft allocation would establish a new town of around 11,000 people together with a range of everyday destinations which, whilst serving the Site's residents, would also attract trips from outside the Site in their own right. As a consequence, the residual increase in vehicular traffic still has the potential to be substantial and, if not appropriately mitigated, would give rise to significant adverse environmental effects at a local level, as well as material operational impacts on the existing highway network.

6.2 The output of the traffic modelling undertaken by the Councils is a series of Trip Budgets for each strategic allocation. Whilst the traffic forecasting methodology and the effectiveness of trip budgets to actively manage car usage in favour of sustainable modes is not agreed with, the Councils have identified a Trip Budget of 1,114 peak hour two-way vehicle movements for Grange Farm. This is 1,114 two-way vehicle movements in the morning peak hour and 1,114 two-way vehicle movements during the evening peak hour. This means that no more than 1,114 vehicle movements should be recorded travelling in or out of the allocation during either morning or evening weekday peak hours. Internal vehicle trips are excluded from the Trip Budgets.

6.3 Whilst the transport vision for Grange Farm is necessarily ambitious, the trip forecasting underpinning it must be realistic and deliverable. If vehicle demand is underestimated, the Trip Budget would be reached before the Site is built out, effectively capping delivery of the strategic allocation. It is therefore important that the forecasting methodology provides a realistic basis for demonstrating that the full allocation can be delivered within the proposed highway parameters.

Visionary External Trip Generation

6.4 The promoters of the Site have presented a visionary forecast, weekday peak hour external car generation[2] in the scenario that 4,500 dwellings are provided is summarised below:

- Two-way morning, weekday peak hour: 822 car movements.
- Two-way evening, weekday peak hour: 1,113 car movements.

6.5 The above data shows that the peak hour trip forecasts meet the trip budget identified for Grange Farm of 1,114 two-way vehicle trips during each of the morning and evening, weekday peak hours.

6.6 The forecast therefore represents, in effect, a best-case outcome for external car trip generation. This is important because the Trip Budget is dependent upon the validity of the underlying assumptions regarding mode share, trip internalisation and the extent to which residents and users of the

[2] Source: Tables 1.3 and 1.4 of Topic paper 3 prepared by KMC

development will choose sustainable modes of travel. Crucially, these assumptions are also dependent upon the delivery of the transport infrastructure identified by the Councils as Critical or Essential, which is implicit in the Trip Budget.

6.7 In particular, the Trip Budget is predicated upon the delivery of the CSET extension, which the Councils identifies as Critical. If that infrastructure is not delivered prior to first occupation, as envisaged by the Councils, and indeed the CSET that it is being extended from, there is no reasonable basis upon which the Trip Budget can be relied upon as an effective constraint on external vehicle movements.

6.8 The consequence is immediate and fundamental: if the forecast cannot be achieved without the Critical infrastructure, the Inspector needs to understand what happens to the development in its absence. Does the Site require additional highway infrastructure to accommodate the traffic generated, or does the level of housing that can be delivered need to be reduced?

6.9 Either way, the current Trip Budget cannot simply be relied upon as demonstrating that 4,500 dwellings are deliverable. The Plan needs to clearly establish the infrastructure and delivery mechanisms necessary to ensure that the assumptions underpinning the Trip Budget are in place before they are relied upon to support housing delivery.

Comparison with Existing Development

6.10 Greater Cambridgeshire is not new to strategically planned, comprehensive development. The area already contains major planned settlements, including Northstowe and Cambourne, which provide valuable real-world evidence against which the assumptions underpinning proposed new settlements can be tested.

6.11 These developments are particularly relevant because they demonstrate how residents actually travel once a substantial new community has been created, rather than relying solely upon forecasts of how residents are expected to travel.

6.12 In the case of Cambourne, there is a particularly valuable body of survey and analysis evidence, including work undertaken in connection with subsequent development proposals and by independent agencies.

6.13 Cambourne provides a useful comparator because, at the time of the relevant surveys, it comprised approximately 4,250 dwellings, together with a range of employment, retail, education and leisure facilities, including:

- South Cambridgeshire offices;
- Mix of type and scale of employment opportunities;
- a leisure centre;

- Supermarket;
- Library;
- Primary health care trust;
- Dentist;
- primary education; and
- local retail and community facilities.

6.14 Whilst it is unclear what facilities and other land uses development at Grange Farm would be required, Cambourne nonetheless provides a useful real-world test of the extent to which a comprehensively planned development can internalise trips and achieve sustainable travel behaviour. However, as currently worded, the range of everyday destinations to be provided within Grange Farm is unknown, and the policy provides little guidance as to what these should comprise. Cambourne therefore provides a useful, and arguably best-case, comparator of a similarly sized new settlement planned and delivered in a rural setting in South Cambridgeshire.

6.15 Of particular relevance is the comprehensive survey and analysis undertaken by TRICS[3], which examined travel behaviour and the extent to which trips generated by Cambourne were internalised or made externally.

6.16 The results provide an important evidence base because they capture actual observed behaviour within an established planned settlement, rather than relying solely upon theoretical assumptions concerning future modal shift.

6.17 It is noted that Cambourne did not have a secondary school within the settlement at the time of the survey. The scale of development, at 4,250 dwellings, was not considered sufficient at that stage to support a secondary school, and secondary-age pupils were instead transported to Comberton Village College by dedicated school bus services.

6.18 At the time of the study, Cambourne was also served by a 10-minute frequency bus service during the peak period. Whilst this is not the equivalent level of attractiveness that the Councils anticipates from CSET and the CSET extension, it nonetheless provides a level of service approaching a genuine 'turn-up-and-go' frequency.

6.19 Cambourne therefore provides a particularly useful proxy against which to test the forecast external trip generation of the Grange Farm assuming that CSET and the CSET extension is operating from first occupation.

[3] TRICS (Trip Rate Information Computer System) is the UK's established industry-standard database for assessing development trip generation.

6.20 It allows the assumptions within the strategic modelling to be compared with actual observed travel behaviour from a planned settlement of substantial scale, rather than simply accepting the forecast modal split as an inherent feature of the model.

6.21 The Cambourne forecast, weekday peak hour external car generation[4] when applied to Grange Farm in the scenario that 4,500 dwellings are provided is summarised below:

- Two-way morning, weekday peak hour: 1,668 car movements.
- Two-way evening, weekday peak hour: 2,679 car movements

6.22 The mix of land uses within Cambourne provides a strong basis for internalisation. Nevertheless, its observed travel behaviour indicates that, even with a comprehensively planned new settlement and a range of everyday facilities, external car movements remain significant. Applied to 4,500 dwellings at Grange Farm, the Cambourne evidence would indicate some 1,668 two-way car movements in the morning peak, some 50% above the Trip Budget of 1,114.

6.23 The position is more pronounced in the evening peak. Applying the observed Cambourne traffic patterns would result in some 2,679 two-way car movements, some 140% above the Trip Budget.

6.24 It is recognised that the evening peak at Cambourne will be influenced, inter alia, by the supermarket and other retail, leisure and everyday facilities provided there. However, this also illustrates the inherent difficulty in achieving a material degree of internalisation through the provision of such facilities: the same uses that reduce the need for residents to travel externally can themselves become destinations that attract additional car trips. There is no evidence to suggest that this would be materially different with regards to Grange Farm.

6.25 The Cambourne evidence provides a direct real-world test of the assumptions underpinning the Grange Farm Trip Budget. On that evidence, there is no realistic prospect of limiting external car movements from 4,500 dwellings to 1,114 movements in either peak hour. The observed traffic generation at a comparable new settlement exceeds the proposed budget by 50% in the morning and 140% in the evening. This is not a marginal difference that can reasonably be attributed to forecasting uncertainty; it demonstrates a fundamental disconnect between observed real-world travel behaviour in a carefully planned and controlled new town development, the Trip Budget derived from the Councils' modelling, and the more visionary assumptions underpinning the promoters' forecasts. The Inspector therefore needs to understand how the proposed Trip Budget can credibly be relied upon as the basis for determining the transport impacts and deliverability of the allocation when the available real-world evidence points to materially higher levels of car generation.

[4] Source: Tables 1.3 and 1.4 of Topic paper 3 prepared by KMC

6.26 The Cambourne survey data provides data throughout the day. This has been used to consider the potential impacts of peak spreading at Grange Farm and is presented below for a development of 4,500 dwellings.

Time Period	Cars
0700-0800	1,158
0800-0900	1,575
0900-1000	1,412
1600-1700	2,043
1700-1800	2,530
1800-1900	2,134

Table 6.1: Two-way car trips during peak periods

6.27 Whilst there is a discernible peak hour in both the morning and evening, the evidence demonstrates substantial levels of traffic occurring in the periods immediately before and after the conventional peak hours.

6.28 This exposes a further limitation of relying upon a peak-hour Trip Budget as the principal measure of transport impact. Compliance with the Trip Budget could be achieved through a redistribution of journeys across the day without any corresponding reduction in overall car travel. A peak-hour budget does not, of itself, control total daily car trips, vehicle kilometres or the associated carbon and environmental impacts.

6.29 The Cambourne evidence therefore provides more than a useful comparator: it provides the most directly relevant real-world evidence available against which the assumptions for Grange Farm can be tested. It demonstrates both that the proposed 1,114 Trip Budget is not consistent with observed travel behaviour at a comparable new settlement and that controlling traffic within two defined peak hours is not equivalent to controlling overall car dependency or its environmental consequences.

6.30 The Inspector should therefore require the Councils to demonstrate how the proposed Trip Budget can realistically be achieved, and how the Plan will manage transport and environmental impacts if actual car generation exceeds it. The issue is not simply whether the numbers can be made to fit within a modelled peak hour, but whether the strategy is capable of delivering sustainable travel patterns in practice.

7.0 INFRASTRUCTURE DELIVERY AND ADEQUACY

CSET Extension

7.1 It is a further 800m from the A11 Travel Hub to the entrance to Grange Farm. Whilst this is identified by Government as a reasonable walking distance to this type of facility, this distance is measured only to the entrance to the site. None of the proposed housing would be located within this walking distance.

7.2 The site itself is approximately 1,800m in length, meaning that residents at the furthest parts of the site could be expected to walk up to approximately 2.6km to reach the A11 Travel Hub. In response to this gap in accessibility, the CSET Extension proposal would provide a direct connection between Grange Farm and the CSET facility.

7.3 The CSET Extension is identified as critical infrastructure. This means that, by the Councils' definition, development at Grange Farm cannot proceed without it.

7.4 The Councils have commissioned a high-level feasibility report for the route, which has informed the IDP. The potential route is illustrated in the extract below.

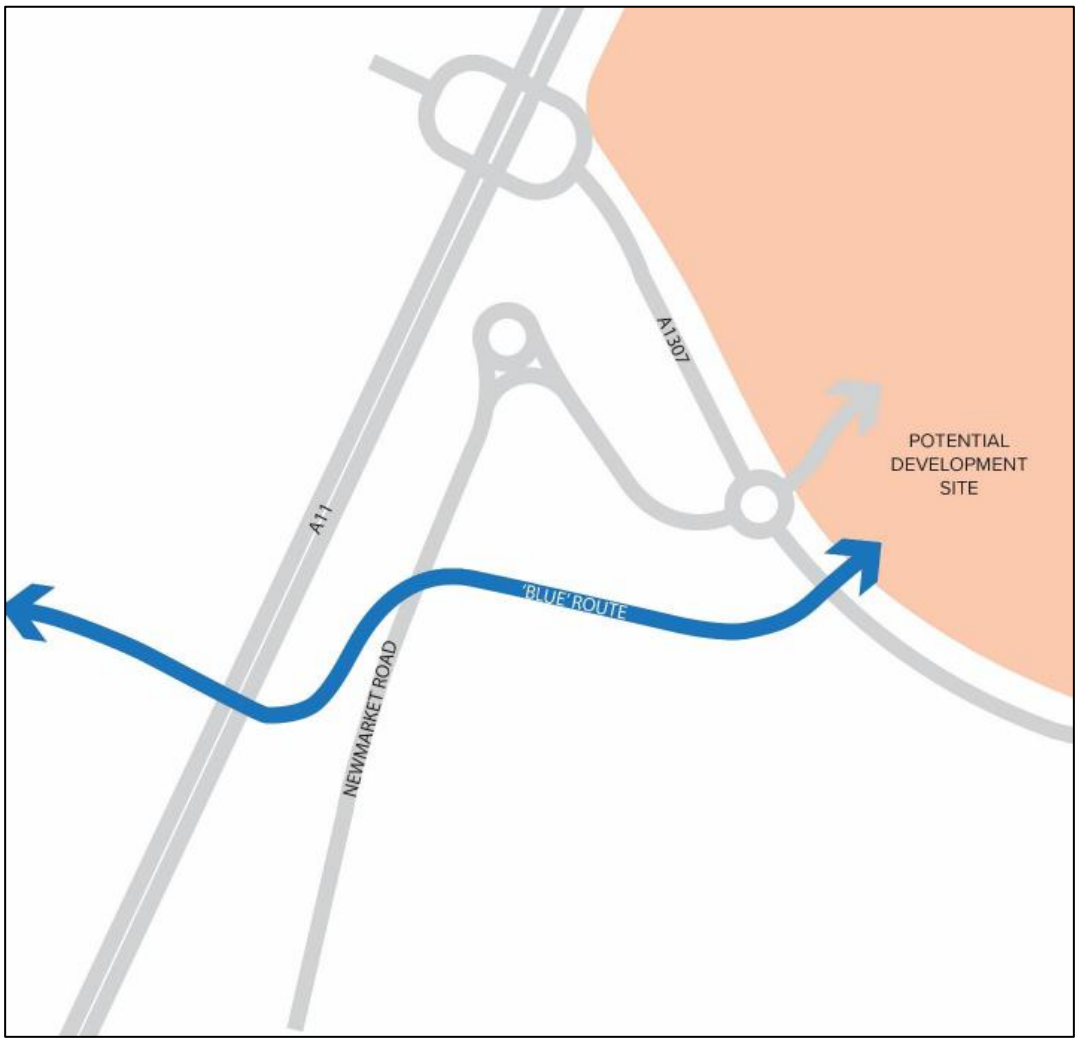


Figure 7.2: CSET Extension

7.5 The following potential issues have been identified in relation to its delivery:

- Busway turning radii: Consideration will need to be given to how the route curves between the A11 and Newmarket Road. There are options for the CSET busway that may require wider turning radii than those shown. The solution currently being proposed would involve a double signalised junction.
- A1307 signalised junction: The proposed busway will require a signalised junction crossing of the A1307. This will need to be taken into account when developing any potential new main vehicular access to the Grange Farm site.

7.6 This would mean that, over the approximately 800m length of the extension, buses would need to traverse three signalised junctions: two on Newmarket Road and one crossing the A1307 to enter Grange Farm.

7.7 It would be possible to control these signals so that buses received priority through a coordinated "green wave". However, this would have implications for traffic using the wider road network, and in particular the A1307.

7.8 On the A1307, the effect could be similar to a railway level crossing, with traffic being stopped as a bus departs the A11 Travel Hub to ensure that buses using the busway are not impeded when they reach the junction.

7.9 In this context, it should be noted that the proposed access to Grange Farm from the A1307, which provides the direct link to the Strategic Road Network (SRN), would be located in close proximity to the proposed busway crossing. Queueing traffic associated with the busway crossing could therefore block back over the Grange Farm access junction, interfering with vehicles entering and exiting the site.

7.10 In turn, this could affect queues at the Grange Farm access, with a potential safety impact on the adjacent Fourwentways Junction if queuing vehicles were to block its exits.

7.11 In summary, the extension from the A11 Travel Hub would extend approximately 800m and would require:

- a new bridge over the A11 dual carriageway;
- two new signal-controlled junctions on Newmarket Road; and
- a new level-crossing-type arrangement on the A1307.

7.12 This represents a substantial amount of infrastructure which could quite reasonably exceed the £30 million cost allowance included in the IDP and which relates to just approximately 800m of busway.

7.13 Moreover, delivery of the extension is, to a significant extent, outside the control of the landowners and the Councils' because:

- the route involves the construction of a new bridge over a National Highways asset, which would require agreement with National Highways; and
- the route south of the A1307 crosses third-party land, which would need to be acquired, potentially through compulsory purchase.

7.14 It is also unclear whether the extension would be delivered under the normal planning consent regime or whether it would be subject to the Transport and Works Act (TWA) regime.

7.15 In either case, it is apparent that a significant amount of feasibility, planning, design and permitting work would be required before the CSET Extension could be constructed and opened.

7.16 A summary of the anticipated requirements is set out below, although this is not an exhaustive list:

- Preliminary route design – line and level to feed into flood risk / drainage assessments and bridge design;
- agree the principle of drainage / flood risk works with the Environment Agency and Lead Local Flood Authority (LLFA) bearing in mind potential impact on adjacent flood risk zones as well as flood risk zones and surface water flooding;
- identify heritage assets at risk and avoid;
- agree outline design of new bridge;
- Undertake environmental impact assessment and prepare documents for planning application;
- Submit planning application;
- Prepare detailed highway design;
- Detailed design of new bridge and agreement of the construction details with National Highways (or their successors);
- Detailed design of water management, including mitigation of construction in flood risk zones 2 and 3 and agreement with Environment agency and LLFA;
- Preparation of tender documentation and tendering;
- Construction of the works having regard to track possession timetable;
- Commissioning of works; and
- Opening.

7.17 The above list is not exhaustive and excludes a number of additional risks and requirements, including:

- statutory utility diversions;
- the need to acquire third-party land, either directly for the road or to accommodate enabling works;
- the potential for a Compulsory Purchase Order (CPO) inquiry in relation to such land acquisition; and
- the potential for legal challenge to any planning permission granted.

7.18 Taken together, there is every prospect that the scheme could take between 15 and 20 years to design, obtain the necessary consents for and construct.

7.19 However, that timeframe fails to coincide with the duration of the Plan period. The IDP identifies the CSET Extension as "critical", i.e. a pre-requisite for any development to be delivered at the site.

7.20 In these circumstances, there is a genuine possibility that Grange Farm would be unable to deliver any housing during the Plan period.

CSET Extension crossing of A1307 and Impacts at Fourwentways Junction

7.21 The scale of the proposed traffic increase is particularly concerning given the existing conditions on the A1307 and at Fourwentways. The A1307 already carries approximately 20,500 vehicles per day and is

subject to congestion and poor journey-time reliability. Fourwentways is itself an established congestion point.

7.22 Against this existing baseline, the proposed Grange Farm allocation is forecast, based on observed traffic patterns at Cambourne, to generate approximately 21,000 additional vehicle movements per day external to the development. In simple numerical terms, this is equivalent to adding a volume of traffic broadly the same as the entire existing daily flow on the A1307. These movements will all be required to use the A1307 hence the allocation has the potential to more than double traffic on the corridor, before allowing for any background traffic growth.

7.23 This scale of increase requires a particularly resilient demonstration that the network can accommodate the additional demand. It is not a marginal increase on an unconstrained network; it is a transformational increase on a corridor which is already experiencing congestion and poor journey-time reliability. The Councils have simply not undertaken this assessment.

7.24 Importantly, this short section of the A1307 is the only means of vehicular access to the proposed 4,500 homes. While two access junctions are proposed, they are located in such close proximity on the same section of the A1307 that, in practical terms, they function as a single point of access. They therefore provide little or no resilience in the event of an incident or obstruction on the A1307.

7.25 This has potentially serious consequences for the safety and resilience of the development. An incident, obstruction or closure on this section of the A1307 could effectively sever vehicular access to, and egress from, the entire 4,500-home development. This could prevent or materially delay the access of emergency services, including fire, ambulance and police, while also preventing residents from leaving the development when necessary. The fact that there are two junctions does not address this fundamental risk, because both depend upon the same short section of the A1307.

7.26 The proposed access arrangements therefore do not provide the level of independent access and emergency resilience that would reasonably be expected for a development of 4,500 homes.

7.27 The proposed junction arrangements create a further concern. The principal site access and proposed CSET connection would be located in close proximity to one another and to Fourwentways. It is therefore not appropriate to assess these junctions in isolation. Their proximity means that queues, delays and turning movements at one junction will directly affect the operation of the others. The assessment must demonstrate that the combined network operates satisfactorily, rather than simply establishing that each individual junction can operate acceptably when considered separately.

7.28 The assessment must also consider what happens if the A1307 does not have sufficient capacity to accommodate the additional traffic. Traffic does not simply disappear when a strategic route becomes congested. Drivers may seek alternative routes through the surrounding road network. In this location,

there are limited alternatives to the A1307 and the surrounding rural network includes narrow roads, constrained junctions, limited forward visibility and routes which are not designed to accommodate substantial increases in through-traffic. There is therefore a clear risk that traffic will be displaced onto rural lanes and other unsuitable local routes.

7.29 Such displacement would not be solely a matter of highway capacity. Increased traffic on rural lanes could give rise to significant environmental and community impacts, including increased noise and disturbance, vehicle emissions and air quality impacts, reduced tranquillity and changes to the character of the rural environment. It could also increase conflict with pedestrians, cyclists, equestrians and other vulnerable road users using these routes. These effects are particularly relevant given the rural character of the surrounding network and the limited capacity of many of these roads to accommodate materially higher traffic flows. The assessment should therefore demonstrate not only that the A1307 and Fourwentways can accommodate the forecast traffic, but also that the development will not result in unacceptable traffic displacement and associated environmental impacts on the surrounding rural road network.

7.30 The numerical evidence therefore raises a fundamental issue of uncertainty. A development capable of generating approximately 21,000 additional daily vehicle movements is being proposed with its sole means of highway access onto a corridor carrying approximately 20,500 vehicles per day and yet the Councils have not identified what mitigation will be needed and hence has not demonstrated that it would be deliverable or financially viable.

7.31 It is therefore premature to rely on the assumption that suitable mitigation can be designed and delivered at a later stage when the scale of the additional traffic, the capacity of the A1307 and the operation of the proposed network have not yet been robustly demonstrated to be manageable.

Alternative Locations

7.32 The proposed distribution of growth raises significant questions about whether the Greater Cambridge Local Plan is making best use of existing settlements and planned public investment. Given the substantial public expenditure on the Cambourne to Cambridge (C2C) busway, there is a compelling case for Cambourne to be a principal focus for future development.

7.33 Cambourne already has approximately 6,500 dwellings built or permitted, an established town centre, a leisure centre and a range of community infrastructure, including healthcare, primary and secondary education provision as well as ambulance and fire station. Further housing would support its town centre, strengthen existing services and build upon this established infrastructure. Crucially, the C2C busway has secured its Transport and Works Act Order (TWAO), providing greater certainty over the delivery of this major public transport investment.

7.34 The proposed Local Plan allocates 2,550 homes at Cambourne North and 2,550 homes at Grange Farm within the plan period to 2045. However, the longer-term potential differs substantially: Cambourne North is expected to accommodate a further 10,450 homes beyond 2045, compared with 1,950 at Grange Farm.

7.35 In this context, the contrast in infrastructure provision is stark. Cambourne is an established town with a major programmed public transport scheme that has secured its TWAO. By contrast, Grange Farm is currently a greenfield site which is critically reliant on a connection to CSET, yet the route and deliverability of that connection have not been considered in any meaningful detail, and CSET itself has yet to secure approval. It is therefore difficult to understand why both locations are allocated identical levels of housing within the plan period without giving substantially greater weight to the differences in infrastructure provision, transport accessibility and delivery certainty.

7.36 The Inspector is therefore invited to examine whether the Plan gives sufficient priority to maximising Cambourne's capacity for sustainable growth and making best use of the significant public investment in the C2C busway, before directing equivalent levels of development to greenfield locations where the necessary infrastructure requirements remain unclear and their delivery uncertain.

Summary

7.37 The fundamental concern with Grange Farm is infrastructure deliverability and certainty. The Site is dependent on the proposed CSET Extension, which the Councils identify as Critical infrastructure, yet the scheme remains at a high-level feasibility stage and requires significant further design, land acquisition, approvals and third-party agreements. Given its complexity and the potential 15–20 year delivery timeframe, there is a genuine risk that the infrastructure required to support the allocation will not be delivered within the Plan period. It also remains reliant on the main CSET scheme whose delivery remains in doubt.

7.38 There is a parallel concern regarding the highway network. The A1307 already carries approximately 20,500 vehicles per day, while Grange Farm is expected to generate approximately 21,000 additional external vehicle movements per day—broadly equivalent to the existing daily flow on the A1307. This has the potential to more than double traffic on an already constrained corridor. The proposed CSET crossing, site access and Fourwentways are in close proximity and must therefore be assessed as an integrated network, including the potential for congestion and traffic displacement onto surrounding rural roads. If the A1307 cannot accommodate the additional demand, displaced traffic could seek alternative routes through rural lanes, bringing not only increased traffic and road safety concerns, but also environmental impacts including noise, disturbance, air quality impacts and increased pressure on the character and tranquillity of the rural environment. The Councils have not demonstrated that the necessary mitigation is identified, deliverable or financially viable.

7.39 This creates a fundamental uncertainty over whether Grange Farm can be sustainably delivered within the Plan period. That uncertainty is particularly significant when compared with Cambourne, where approximately 6,500 homes are already built or permitted, established services and infrastructure are in place, and the C2C busway has secured its TWAO. Despite these very different levels of infrastructure maturity and delivery certainty, the Plan allocates 2,550 homes to each location within the Plan period. The Inspector is therefore invited to consider whether the Plan should rely on a greenfield allocation whose critical infrastructure and transport impacts remain uncertain in circumstances where there is an established alternative with committed public transport infrastructure.

8.0 SUMMARY AND CONCLUSION

8.1 The evidence does not demonstrate that Grange Farm can be delivered sustainably at the proposed scale within the Plan period. The allocation is heavily dependent upon major future transport infrastructure, substantial funding and significant changes in travel behaviour, while the existing highway network is already constrained and could face a potentially transformational increase in traffic.

8.2 Grange Farm is a rural location with high existing car dependency and limited sustainable transport options. Its transport strategy is therefore heavily dependent upon major future infrastructure, particularly CSET and the CSET Extension.

8.3 The CSET Extension is identified by the Councils as Critical infrastructure and is required to support first occupation. Yet its delivery requires further design, land acquisition, statutory approvals, third-party agreements and construction. It is also dependent upon CSET itself. The Plan has not demonstrated that this infrastructure can be delivered, funded and operational in the timescale required.

8.4 The wider funding position is also a concern. Significant elements of the transport strategy remain unfunded or are not properly reflected in the IDP. Identified transport costs already amount to approximately £138 million, excluding infrastructure for which no cost has been established. The approximately £30 million CSET Extension is only partially funded, with the funding gap and its source not identified.

8.5 The highway implications are potentially transformational. The A1307 already carries approximately 20,500 vehicles per day, while the development could generate around 21,000 additional external vehicle movements per day based on observed Cambourne travel behaviour. This is broadly equivalent to the entire existing daily flow on the A1307 and has the potential to more than double traffic on an already constrained corridor.

8.6 The impacts cannot be considered solely at the A1307. The CSET crossing, Grange Farm access and Fourwentways are closely connected. If capacity is exceeded, traffic may seek alternative routes through the surrounding rural network. Those roads are not designed for substantial increases in through-traffic. Displacement could result in increased congestion, noise, disturbance, vehicle emissions and air-quality impacts, reduced tranquillity and changes to rural character, as well as increased conflict with vulnerable road users.

8.7 There is also a significant question over the realism of the proposed Trip Budget. The Grange Farm budget is 1,114 two-way vehicle movements in each weekday peak hour. By comparison, observed Cambourne travel behaviour produces approximately 1,668 morning movements and 2,679 evening movements when applied to the proposed Grange Farm scale – approximately 50% and 140% above the Grange Farm budget respectively.

8.8 This is not simply a modelling technicality. Cambourne provides real-world evidence of how residents of a large planned settlement actually travel. It raises a serious question as to whether the Grange Farm Trip Budget can realistically be achieved.

8.9 Nor is keeping traffic within a peak-hour budget the same as reducing car dependency. Traffic can be shifted to earlier or later periods without reducing overall vehicle use, congestion or carbon emissions. The Plan needs to demonstrate genuine modal shift, not simply redistribution of car journeys.

8.10 Taken together, these matters create a fundamental uncertainty over the deliverability, sustainability and transport impacts of Grange Farm.

8.11 The Plan is relying upon:

- critical infrastructure which is not yet demonstrated to be deliverable when required;
- substantial transport investment which remains unfunded or insufficiently accounted for;
- a highway network which could face a potentially transformational increase in traffic;
- assumptions about sustainable travel which appear difficult to reconcile with observed behaviour at Cambourne; and
- a Trip Budget which is substantially below the level of vehicle movements indicated by that real-world evidence.

8.12 These are not matters which can simply be left to a future planning application. They go directly to whether the allocation can be delivered in accordance with its own policy requirements.

8.13 The evidence therefore does not currently provide the necessary confidence that Grange Farm can be delivered at the proposed scale without relying upon infrastructure, funding and travel behaviour which have not yet been demonstrated to be deliverable.

8.14 Accordingly, the Inspector is respectfully requested to remove the Grange Farm allocation from the Plan. In the absence of robust evidence demonstrating that the necessary transport infrastructure, funding and network capacity can be secured and delivered within the Plan period, the allocation should not be relied upon to meet the Plan's housing requirement. If the Inspector considers that the identified deficiencies can be resolved, there should at minimum be clear, evidenced and enforceable measures demonstrating how the necessary infrastructure and transport capacity will be secured before the allocation is relied upon for housing delivery.

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GWP Report No: 260922

Our ref:
Your ref:

By e-mail only:
To:

24 September 2026

Dear

Policy S/GF: Land Adjacent to A11 and A1307 at Grange Farm - Water Related Risks

There are significant uncertainties concerning both the future potable water supply and the treatment and disposal of wastewater from the development. In our opinion, these matters are sufficiently important that Policy S/GF should provide clearer and more definite safeguards to ensure that development, and specifically occupation, does not occur until suitable water supply and wastewater infrastructure has been delivered.

The proposed policy wording in relation to water and wastewater under Policy S/GF "*Resources"* is very limited when compared with other technical areas such as built form, nature, and movement. The current wording does not do enough to recognise the River Granta as a critical local receptor which needs safeguarding through careful planning, detailed evaluation of water related risks, and delivery of robust mitigation measures. The River Granta is a chalk stream, a globally rare habitat type, which is recognised as being under ecological pressure from low flows, groundwater abstraction and pollution, including nutrient and sediment inputs.

Wastewater Treatment and Disposal

There is currently significant uncertainty regarding the ultimate wastewater solution.

The Greater Cambridge Integrated Water Management Study – Detailed Water Cycle Study assumes that Grange Farm would be served by Sawston Water Recycling Centre, but also records that Anglian Water has suggested that a separate on-site treatment works could serve the development, subject to an appropriate delivery model and identification of a suitable discharge point.

The Developer's more recent technical work (*Managing Water, Carbon and Finite Resources Technical Appendix*, Hilson Moran, June 2026) recognises that the site overlies a Principal Aquifer and lies within groundwater Source Protection Zones. It confirms that there is currently no capacity at Sawston wastewater treatment works, and there is only capacity for 600 homes at another local wastewater treatment works (Linton). It then proposes on-site treatment as an alternative. The proposed approach is treatment through a Membrane Bioreactor, followed by discharge through reed beds and infiltration into the Chalk Aquifer which directly feeds the River Granta. The report records consultation with the Environment Agency (EA) who indicated that such an approach may be achievable in principle, but very costly, and that a Hydrogeological Risk Assessment (HRA) would be required: "*the HRA should also verify the discharge volumes and that this solution should be modelled against predicted groundwater levels to confirm the unsaturated buffer is achievable*" and "*the HRA should assess the impact on River Granta*".

The proposed policy wording in Policy S/GF does not reflect this requirement from the EA to safeguard the water environment and potential receptors, including the Chalk Aquifer and the River Granta.

We also note that the developer refers to this option as water recycling or implementing a "*Water Recycling Centre*". The on-site option currently described, comprises wastewater treatment followed by discharge to

ground, this is not water recycling - it is conventional treatment and discharge. Our assumption is that describing this as water recycling may be a strategy to meet other policy requirements related to water recycling. This is supported by the recorded EA comments, suggesting the proposed approach is a permitted groundwater discharge rather than managed aquifer recharge. It is reasonable for the detailed treatment process, effluent quality, discharge volumes, nutrient loads and hydrogeological modelling to be developed at planning and permitting stage. These assessments require a defined development, wastewater load, treatment process and discharge arrangement. However, given the sensitivity of the receiving environment, we consider that the allocation policy should be considerably clearer about what will have to be demonstrated before an on-site discharge solution can be accepted.

We recommend that Policy S/GF includes the following wording:

A comprehensive Foul Drainage and Wastewater Treatment and Disposal Strategy shall be submitted with the outline planning application and agreed with the Local Planning Authority in consultation with the relevant sewerage undertaker and Environment Agency. The Strategy shall demonstrate a deliverable solution for each phase and for the development as a whole.

Where on-site wastewater treatment and discharge to ground is proposed, the application shall be supported by a detailed Hydrogeological Risk Assessment and appropriate groundwater modelling. The assessment shall consider the Principal Aquifer, Source Protection Zones, relevant public water-supply abstractions and the River Granta chalk stream, and shall establish appropriate baseline groundwater-level, groundwater-quality and surface-water-quality conditions. It shall assess the effects of the proposed discharge under appropriate future groundwater and climate-change conditions (including extreme future groundwater level impacts on unsaturated zone thickness) and include credible treatment-plant failure and other abnormal-operation scenarios.

The assessment must demonstrate that unacceptable effects on groundwater, public water supply and the River Granta can be avoided and that the proposed discharge is capable of obtaining the necessary environmental permit. Where acceptable impacts cannot be demonstrated and mitigated, an alternative off-site wastewater solution shall be provided.

No occupation within any phase shall take place until the foul drainage and wastewater infrastructure required to serve that phase is operational and the Local Planning Authority is satisfied that suitable arrangements are in place for the ownership, adoption, operation, maintenance and monitoring of the relevant wastewater assets.

This wording recognises the uncertainties and the EA's responses during initial consultations and safeguards the local water resources, and the River Granta.

Given the identified potential for risks associated with wastewater disposal on the underlying aquifer and public water supplies, and EA stated need for Hydrogeological Risk Assessment given the proximity to the River Granta, it follows that sites more distant from sensitive receptors are likely to present a lower risk. Logically therefore, potential sites creating a generically higher risk should be deprioritised for development, and indeed if groundwater risk was not part of the original site screening criteria and selection process, perhaps the inclusion of this within the housing strategy analysis should be revisited.

Water Supply

The development of the Grange Farm site is dependent on implementing future water transfer projects by Cambridge Water, initially through the temporary Grafham Transfer, and ultimately through the Fens Reservoir project. The Fens Reservoir is a Nationally Significant Infrastructure Project. Cambridge Water's Water Resources Management Plan (WRMP) states: *"our baseline supply/demand balance shows an immediate deficit"* and "*that we must implement solutions to maintain a continual supply of water".*

The first principal intervention is the Grafham Transfer, which is expected to provide approximately 26 Ml/d from around 2032, although a planning application is yet to be submitted for the scheme. This is, however, an interim resource. Cambridge Water's WRMP states that it expects to use the Grafham Transfer for approximately five years before replacing it with approximately 44 Ml/d from the Fens Reservoir, currently expected to become available in 2036/37. The Grafham resource is itself time-limited.

The Proposed Greater Cambridge Local Plan recognises this dependency in Policy S/GF. It states that "*Conditions are likely to be necessary to limit first occupations of new dwellings taking place until after the Grafham Transfer water supply intervention becomes operational or where alternative headroom is secured, in consultation with Cambridge Water and the Environment Agency, where the LPA is satisfied that there is scope for earlier development".*

We do not consider dependence on this future infrastructure would make the allocation inherently undeliverable. However, it does create a delivery risk which is substantially outside the control of the Grange Farm developer. As well as requiring the initial occupation to be phased after the completion of the Grafham Transfer, later stages of a development of this scale cannot reasonably rely indefinitely upon the temporary Grafham resource if the longer-term strategic supply is delayed.

The existing policy approach should therefore be strengthened so that occupation is expressly tied to demonstrated water-supply headroom for each phase, rather than merely anticipating that conditions are "*likely*" to be imposed.

We recommend that Policy S/GF includes the following wording:

No occupation of the development shall take place unless the Local Planning Authority, in consultation with Cambridge Water and the Environment Agency, is satisfied that sufficient sustainable water-supply headroom is available to serve the relevant phase of development.

The phasing and delivery plan shall identify the strategic water-resource infrastructure relied upon to serve each phase. First occupation shall not take place before the Grafham Transfer is operational. Where later phases rely upon the Fens Reservoir or other replacement strategic water resources, occupation of those phases shall not take place until the relevant resource, or an equivalent sustainable alternative, is available and operational.

Water supply arrangements must be consistent with the relevant Water Resources Management Plan and must not compromise the achievement of environmental objectives for the Chalk Aquifer and associated chalk streams.

Development proposals should clearly demonstrate through engineering and/or design studies how water usage will be limited to no more than 80 litres/person/day.

This wording recognises that the two schemes have different functions and timescales. It safeguards future homeowners and existing residents from future water shortages while protecting water resources in line with the Water Resources Management Plan. It also reflects the emerging policy related to water efficiency.

Error in the Policy Wording

In addition to the above, there seems to be an error in the wording of Policy S/GF. Paragraph 28 refers to the Oakington Brook. It is believed reference to this watercourse is incorrect as the Oakington Brook is located c. 17km northwest of the site location. If any flood modelling were required then this should reference the River Granta, which flows to the south of the site through Great Abington and Little Abington. However, the low fluvial flood risk to the site and lack of interaction with watercourses means it is unlikely that modelling may be required.

Conclusion

Water supply and wastewater treatment are fundamental infrastructure dependencies for a development of this scale and the present policy should provide firmer safeguards, given the critical sensitivity of local receptors. In our opinion, the Local Plan should expressly link occupation of each phase to confirmed sustainable water-supply capacity and should set clear requirements for the assessment, permitting and delivery of any on-site wastewater treatment and groundwater-discharge solution.

We therefore recommend that representations on water matters focus on seeking modifications to Policy S/GF along the lines set out above. There is also potential to review the site selection and screening process to understand whether risk to groundwater was part of the process and whether this should be revisited in light of the risks present at this site.

Partner and Senior Hydrologist

ASSET HERITAGE CONSULTING

specialist independent advisers in the historic built environment

conservation & listed buildings | heritage planning matters | expert witness | audits | research
listed buildings | conservation management and advice | archaeology | historic interiors

HERITAGE STATEMENT

In respect of

PROPOSED LAND ALLOCATION AT GRANGE FARM, ABINGTON, CAMBRIDGESHIRE

On behalf of

Richard Buxton Solicitors & Abington Parish Council

AHC REF: ND/10508

September 2026

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1.0 INTRODUCTION AND SCOPE OF REPORT

1.1 The purpose of this report, which has been prepared and written by Dr. Nicholas Doggett, FSA, MICfA, IHBC, Managing Director of Asset Heritage Consulting Ltd., on behalf of Richard Buxton Solicitors and Abington Parish Council is to provide an analysis of the potential impact of the proposed land allocation for development at Grange Farm, Abington ("the land allocation site or site") on the significance of the setting of the various designated and non-designated heritage assets in the vicinity.

1.2 These are as follows: the Scheduled Roman road of Worsted Street on the northern boundary of the site; the Scheduled barrow cemetery centred on NGR TL 52536 50628; the Grade II listed Worsted Lodge Farmhouse; the Grade II listed 8 Cambridge Road; Great & Little Abington Conservation Area and the non-designated Grange Farm itself.

1.3 As recognized in both the promoters' own Heritage Report of June 2026 (by Landgage Heritage) and the Council's more recent Heritage Impact Assessment, the allocation proposals cause varying degrees of harm to all these heritage assets.

1.4 In my professional opinion, (my qualifications and experience are attached at **Appendix 1** of this report), and based on my own site visit to the site and surrounding area on 15 September 2026, I agree that the proposals would indeed be harmful to the setting of all these heritage assets and hence their significance.

1.5 The supposed heritage mitigation measures put forward by the promoters for the identified heritage assets (particularly those of a built nature or otherwise visible above ground such as the Scheduled Roman road) are, in my view, far from adequate to avoid or even minimize heritage harm.

1.6 I therefore consider this clear harm should be treated as an important and material factor in determining the appropriateness of the proposed land allocation here.

2.0 ASSESSMENT OF HERITAGE SIGNIFICANCE

Worsted Street

2.1 This stretch of Roman road (also known as the *Via Devana* – a term first coined in the 18th century) runs from Colchester (the earliest Roman urban settlement), via Cambridge to Chester, with the section that runs along the northern boundary of the site forming part of the Scheduled Monument.

2.2 This section is a grassed trackway and, as explained on the Interpretation Panel next to the parking area in the layby to the south-east of Worsted Lodge Farm, its Roman origins (complete with traces of the *agger* and ditches) remain clearly apparent today.

2.3 It is thought that the survival of the character of the Roman road is due to the fact later road traffic primarily used what is now the A1307, which here follows a similar course to the Roman Road, but to the south instead.

2.4 As a Scheduled Monument, its national importance is beyond dispute, its high significance only increased by the fact that it is also a public bridleway. This bridleway is clearly well used and enjoyed by walkers and cyclists, several of whom I encountered (purely by chance) during my site visit.

2.5 Although bordered by hedges on both sides, various gaps in these, particularly to the south provide extensive views of the surrounding countryside. The gaps in the hedge are particularly prevalent on the southern side and provide different views across the site.

2.6 These views undoubtedly add to how the Scheduled Monument is experienced, as do those on the trackway itself, in which the Gogmagog Hills just outside Cambridge, are clearly visible to the west as one approaches the layby referred to above.

2.7 It must be acknowledged that the constant traffic noise from the A11 detracts somewhat from how the Monument is experienced, but this diminishes the further the walker travels to the east and does not seriously affect its overall significance.

Bronze Age Barrow Cemetery centred on NGR TL 52536 50628

2.8 Although Landgage's Heritage Report fails to recognize that the barrow cemetery was scheduled on 27 May 2026 and incorrectly identifies the barrows as non-designated heritage assets, even this acknowledges that the barrows '*are potentially heritage assets of at least regional if not national significance*' (paragraph 4.1.42).

2.9 Now that the barrow cemetery is a Scheduled Monument its national significance is, of course, beyond dispute. I would however acknowledge that as the barrows are not visible above ground (owing to extensive plough damage) their significance is essentially archaeological, rather than as visual features in the landscape as many barrows are.

Worsted Lodge Farmhouse

2.10 This farmhouse is constructed of the local bluff gault brick under a plain tile roof of Mansard form with two dormers, its main entrance being on the symmetrical south elevation with its original sash windows and 20th-century canted bay windows; there is a service wing to the rear. The farmhouse dates to the late 18th or early 19th century.

2.11 As a Grade II listed building, it is undoubtedly of national significance, that significance primarily stemming from its 'special' architectural and historic interest. The contribution that the site makes to the significance of its setting is not direct, primarily owing to the 50m distance between the nearest part of the site and the listed building.

2.12 That said, as stated at paragraph 4.1.24 of the Landgage Heritage Report, '*The study* (allocation) *site forms part* (of the) *setting of the farmhouse, specifically the northwestern corner which encompasses the thick grove of trees to the south of the plot and the part of the road which provides longer views of the building and its immediate setting. Therefore, the northwestern corner of the study site can be said to contribute positively to the significance of the building by providing part of the rural character of the building's setting, which aligns with its historic interest*'.

2.13 I concur with this assessment of how the allocation site contributes to the significance of Worsted Lodge Farmhouse.

8 Cambridge Road

2.14 8 Cambridge Road is a timber-framed and plastered cottage of 17th-century date under a pantile roof, renovated and extended during the 20th century.

2.15 As a Grade II listed building, it is undoubtedly of national significance, that significance primarily stemming from its 'special' architectural and historic interest.

2.16 The building sits in an enclosed plot on the north side of the A1307 but as the Landgage Heritage Report acknowledges (paragraph 4.1.28), '*The rural fields immediately north of the plot comprise the wider rural setting of the cottage and form part of views out from the grounds of the property*'.

2.17 Furthermore, at paragraph 4.1.29 Landgage go on to say that '*The study* (allocation) *site is located 35m north of 8 Cambridge Road and forms part of the immediate rural setting of the building as it contains the agricultural land immediately north of the cottage which allow for long intermittent views of the building and an appreciation of the rural setting in which it is located*'.

2.18 As with Worsted Lodge Farmhouse, I agree with this assessment of how the allocation site contributes to the significance of the listed building.

Great and Little Abington Conservation Area

2.19 This conservation area was first designated in 1972 and extended to its present size in 1993. It contains many historic buildings, including 31 which are listed at Grade II and five Grade II* listed buildings.

2.20 It is however well separated from the allocation site and none of the settings of the listed buildings referred to above derives significance from their relationship with the site.

2.21 The setting of the conservation is partly formed by extensive areas of later 20th and early 21st-century residential development to the north and south-east of the designated area, together with the industrial estate of Granta Park and the wooded Lagden's Grove to the west.

2.22 I note however that the Landgage Heritage Report states (paragraph 4.1.38) that '*Another key element of the setting of the conservation area is the ridge to the north of the area, in the southern part of the study site. This is prominent on the approach into the conservation area from the west along Bourn Bridge Road towards Church Lane. The presence of the ridge makes the rural fields on its slope prominent and provides a strong visual marker of the rural nature of the conservation area's setting*'.

2.23 In the following paragraph (under the heading 'Relationship with the Study [i.e. Allocation] Site)', Landgage go on to explain that 'The study site is located 155m north of the conservation area separated by the A1307 and mature foliage and other buildings within the intervening landscape. The majority of the study site is not intervisible with the conservation area. <u>The only exception to this is the ridge located in the southern part of the study site which is prominent on approaches into and out of the conservation area and plays an important positive role in its setting. Therefore, this ridge forms part of the setting of the conservation area</u>'.

2.24 Once again, only the emphasis is mine and I agree with Landgage Heritage that the rural ridge on the allocation site forms part of the setting of the conservation area. I am therefore also of the view that this ridge forms part of the significance of the setting of the designated area.

<u>Grange Farmhouse</u>

2.25 This farmhouse, which is now surrounded by modern farm buildings of utilitarian character, form and appearance appears to have 18th-century origins but was largely rebuilt in the local gault brick in the 19th century.

2.26 As a non-designated heritage asset, it is clearly of lower heritage value than either Worsted Lodge Farmhouse or 8 Cambridge Road. As however it is an historic building

at the centre of the allocation site, the surrounding agricultural fields must originally have been farmed from here, as remains the case today.

2.27 As noted in the Landgage Heritage Report (paragraphs 4.1.56 to 4.1.59) these fields are now separated from the farmhouse by the modern farm buildings but they still contribute to the significance of Grange Farmhouse, albeit that significance must be regarded as lower than that of the designated heritage assets discussed above.

3.0 HISTORIC ENGLAND SETTINGS GUIDANCE, THE LAND ALLOCATION PROPOSALS & THE HERITAGE ISSUES

3.1 Before looking in detail at the issue of whether the land allocation proposals are harmful to the setting of the heritage assets and their significance set out in Section 2.0 of this report, it is helpful first briefly to examine Historic England's '*Historic Environment Good Practice Advice in Planning Note 3- The Setting of Heritage Assets*' (2nd edn., December 2017) given its clear relevance to the proposals and that Landgage Heritage purports to have followed its methodology in compiling its report on behalf of the promoters. This document is attached at **Appendix 2**.

3.2 Historic England's 'Settings' guidance builds on and incorporates the advice given in its earlier guidance documents on this important topic and as noted above is, of course, very relevant to the heritage issues raised by the land allocation proposals.

3.3 For instance, at Section 9 is the sensible and pragmatic advice that '*Setting is not a heritage asset, nor a heritage designation, though land within a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance*', before going on in the immediately following paragraphs to '*examine some more general considerations relating to setting and significance*'.

3.4 These 'general considerations' are discussed under a series of sub-headings: 'Change over time, Cumulative change, Access and setting, Buried Assets and setting, Designed settings, Setting and urban design' and end with 'Setting and economic and social viability'.

3.5 Of these sub-headings, I consider 'Change over time' 'Cumulative Change' and 'Access and setting' to be the most directly relevant to the matters before this inquiry, as the following extracts show: ('Change over time') – '*Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance...*' (Cumulative Change) – '*Where the*

significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments)'. ('Access and setting') - '*Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number...*'

3.6 Sections 10 and 11 of HEAN 3 consider 'Views and setting': (10) '*The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset*'; (11) '*Views which contribute more to understanding the significance of a heritage asset include: those where the composition within the view was a fundamental aspect of the design or function of the heritage asset ...*'

3.7 Part 2 of HEAN 3 deals with 'A Staged Approach to Proportionate Decision-Taking', which sets out the five steps necessary to achieve this and provides the appropriate point in this report to turn to a further examination of Landgage's Heritage Report prepared on behalf of the promoters.

3.8 This is necessary because, while as made clear in Section 2.0 of this report, I broadly agree with their conclusions on the significance of the settings of the heritage assets they have identified in their report, I fundamentally disagree with their findings on how that significance will be affected by the land allocation proposals, as set out in Section 5 'Proposed Development and Predicted Effects' of their report.

3.9 As far as below-ground archaeology is concerned it should be noted that Landgage Heritage themselves have already acknowledged the following in their report

(paragraph 5.3.1): '*The proposed development would result in below ground impacts within locations of high impact such as attenuation basins, roadways, foundations and drainage. This would be a substantial level of impact where these intersect with below ground archaeological remains as it would cause truncation or removal of these*'. For ease of reference, I take the impact of the land allocation proposals on every other individually identified heritage asset in turn below as in Section 2.0 of this report.

Worsted Street

3.10 Paragraph 5.3.3 of the Landgage Heritage Report states that '*development should not encroach in the north of the study site to the degree that would affect the legibility of this quality (an appreciation of the scale and linear nature of the road) from this location. A sufficient buffer should also be allowed to ensure the linear nature of the road can be appreciated*'

3.11 In my view, this buffer would need to be considerably more extensive than that shown in Fig. 68 of the Council's Policy S/GF for the potential land allocation if this quality is to be maintained and enjoyed as is currently the case.

3.12 Likewise, the suggestions Landgage put forward at paragraphs 5.3.5 and 5.3.6 for additional interpretation boards to be put up in the open land created by the buffer seem to me to be of little value, particularly when there is already an interpretation panel (redone as recently as 2017) in place in the parking layby directly on the route (see paragraph 2.2 above).

Bronze Age Barrow Cemetery centred on NGR TL 52536 50628

3.13 In my opinion, the offers made for the 'cessation of ploughing' (see paragraphs 5.3.17 to 5.3.19) of the Landgage Report) on and around the barrows carry little or no weight now that the barrow cemetery is a Scheduled Monument.

Worsted Lodge Farmhouse

3.14 I do not understand how '*opportunities for new appreciation to be provided of the farmhouse from within the study site, as part of the evolving strategy for open space*' (paragraph 5.3.9 of the Landgage Report) would work in practice or how this would be in any way preferable to the retention of the existing agricultural landscape in heritage terms.

8 Cambridge Road

3.15 The Landgage Report offers no 'opportunity' for the enhancement of the setting of this listed building, despite acknowledging that the rural backdrop provided by the allocation site forms part of the significance of this setting (see paragraphs 2.14 to 2.18 above), apparently because '*this property is relatively enclosed*' (paragraph 5.3.12).

3.16 Certainly, it is my view that a substantial open buffer must be created behind this listed building as part of the land allocation proposals if any semblance of its existing rural setting is to be preserved.

Great and Little Abington Conservation Area

3.17 '*New opportunities for increased appreciation of its character and appearance, especially if views of church towers are gained from any locations*' (paragraph 5.3.15 of the Landgage Report) is not in my view any substitute for the loss of those remaining parts of the village's rural setting that exist today.

Grange Farmhouse

3.18 There is only scant recognition in the Landgage Report (paragraphs 5.3.20 to 5.3.22) that the existing rural setting of this non-designated heritage asset would effectively be irrevocably destroyed by the land allocation proposals.

3.19 In overall terms the scale and proximity of the land allocation proposals to the heritage assets identified above can only have an adverse impact on the way the long-established significance of their settings is currently experienced, as well as on the

rural character and appearance of the area in general. As Historic England's Settings guidance makes clear, the historic connection between places and the kinetic experience of approaching a place can often contribute positively to the settings heritage assets and their significance.

3.20 For all the reasons set out above, it is my considered professional view that no amount of tinkering with the proposed land allocation would rectify the significant and irrevocable harm the proposals would cause. Put simply, this is the wrong scheme in the wrong place in heritage terms.

4.0 CONCLUSION

4.1 For all the reasons set out in the body of this report, it is clear to me that the land allocation proposals would cause a major and irretrievable degree of harm to the significance of the settings of the heritage assets affected.

4.2 In such circumstances there can only be a strong heritage-based presumption against this proposed land allocation.

QUALIFICATIONS AND EXPERIENCE

NICHOLAS DAVID BARTHOLOMEW DOGGETT, B.A., Ph.D., Cert. Archaeol., FSA, MCIfA, IHBC, Managing Director of Asset Heritage Consulting:

After reading archaeology and history at the University of Southampton and completing a postgraduate qualification at the University of Oxford I worked for several years as an archaeologist, both in the United Kingdom and abroad. From 1984 to 1988 I was employed on the English Heritage Resurvey of listed buildings in Shropshire, Oxfordshire and Cornwall. From 1988 to 1989 I was a member of the Conservation Team at Bedfordshire County Council before joining South Oxfordshire District Council, where I was head of Conservation from 1991 to 2002, before leaving for CgMs in October 2002, of which I was a Director from 2004.

I left CgMs in November 2010 to establish Asset Heritage Consulting, a specialist heritage consultancy based in Oxford but working across the country.

My doctoral research on 16th-century English architecture was completed in 1997 and has subsequently been published. I am a member of the Institute of Field Archaeologists and the Institute of Historic Building Conservation. I was elected a Fellow of the Society of Antiquaries in October 2016.

I am the author of two books and several articles and papers on archaeology, building conservation and architectural history, including contributions to the *Oxford Dictionary of National Biography*, and have given lectures and taught on summer schools on these subjects for Oxford University Department of Continuing Education and many other organizations. I was formerly committee secretary of the Buildings Special Interest Group of the Chartered Institute for Archaeologists and am currently a committee member of the Oxfordshire Architectural & Historical Society.

In the private sector my clients have included Bournville Village Trust, various Oxford colleges, several Local Planning Authorities, the Metropolitan Police, the Home Office and numerous major house builders. I have also acted as a consultant for English Heritage and Cadw on applications for listing, re-grading, de-listing and Certificates of Immunity. I have given evidence relating to the historic built environment at numerous public inquiries and hearings and in court, both for appellants, third parties and local planning authorities.

Historic England

The Setting of Heritage Assets

Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)



Summary

This document sets out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets. The guidance has been written for local planning authorities and those proposing change to heritage assets.

It replaces The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 – 1st edition, 2015 and Seeing the History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011).

It is one of three related Good Practice Advice (GPA) Notes, along with *GPA1 The Historic Environment in Local Plans* and *GPA2 Managing Significance in Decision-Taking in the Historic Environment*.

First published by English Heritage March 2015. This edition published by Historic England December 2017. All images © Historic England unless otherwise stated.

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Front cover: York Water Gate, Victoria Embankment Gardens, City Of Westminster, Greater London.
Built for the Duke of Buckingham in 1626 to provide access to the Thames. View from south east.

This document was produced by Historic England in collaboration with the Historic Environment Forum, and with the particular assistance of:

Association of Local Government Archaeological Officers

British Property Federation

Council for British Archaeology

Chartered Institute for Archaeologists

Country Land and Business Association

Civic Voice

Heritage Alliance

Historic Houses Association

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Introduction

1 The purpose of this Historic England Good Practice Advice note is to provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance in the national Planning Practice Guide (PPG). It should be read in conjunction with Good Practice Advice notes 1 (The Historic Environment in Local Plans) and 2 (Managing Significance in Decision-Taking in the Historic Environment). This good practice advice acknowledges the primacy of the NPPF and PPG, supporting the implementation of national policy, but does not constitute a statement of Government policy itself, nor does it seek to prescribe a single methodology or particular data sources. Alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives. This guidance, *Good Practice Advice 3 – The Setting of Heritage Assets* (2nd edition, 2017) supersedes *Good Practice Advice 3 – The Setting of Heritage Assets* (1st edition, 2015) and *Seeing the History in the View: A Method for assessing Heritage Significance within Views* (English Heritage, 2011).

2 The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve or invest need to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time those taking decisions need enough information to understand the issues.

3 This note gives assistance concerning the assessment of the setting of heritage assets, given:

- the statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings, and
- the policy objectives in the NPPF and the PPG establishing the twin roles of setting (see boxes below): it can contribute to the significance of a heritage asset, and it can allow that significance to be appreciated. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the heritage asset's conservation, including sustaining significance (NPPF, paragraph 132).

4 This note therefore starts by giving general advice on understanding setting and how it may contribute to the significance of heritage assets, before adding advice on how views play a part in setting; it ends by suggesting a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets (Part 2, paragraphs 17–42).

5 Consideration of the contribution of setting to the significance of heritage assets, and how it can enable that significance to be appreciated, will almost always include the consideration of views. The staged approach to taking decisions on setting given here can also be used to assess the contribution of a view, or views, to the significance of heritage assets and the ability to appreciate that significance.

6 Views, however, can of course be valued for reasons other than their contribution to heritage significance. They may, for example, be related to the appreciation of the wider landscape, where there may be little or no association with heritage assets. Landscape character and visual amenity are also related planning considerations. The assessment and management of views in

the planning process may therefore be partly or wholly separate from any consideration of the significance of heritage assets. This advice therefore directs readers elsewhere for approaches to landscape and visual impact assessment and amenity valuation (paragraphs 15 and 16).

Part 1: Settings and Views

NPPF Glossary: Setting of a heritage asset

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2: Glossary).

PPG: What is the setting of a heritage asset and how should it be taken into account?

The "setting of a heritage asset" is defined in the Glossary of the National Planning Policy Framework.

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (PPG, paragraph: 013, reference ID: 18a-013-20140306).

Difference between setting and curtilage, character, context and landscape

7 Setting is separate from the concepts of curtilage, character and context:

- Curtilage is a legal term describing an area around a building and, for listed structures, the extent of curtilage is defined by consideration of ownership, both past and present, functional association and layout. The setting of a heritage asset will include, but generally be more extensive than, its curtilage (if it has one) (see Identification and Designation of Heritage Assets: Listed Buildings in the Historic England *Heritage Protection Guide*).

- The historic character of a place is the group of qualities derived from its past uses that make it distinctive. This may include: its associations with people, now and through time; its visual aspects; and the features, materials, and spaces associated with its history, including its original configuration and subsequent losses and changes. Character is a broad concept, often used in relation to entire historic areas and landscapes, to which heritage assets and their settings may contribute.

- The context of a heritage asset is a non-statutory term used to describe any relationship between it and other heritage assets, which is relevant to its significance, including cultural, intellectual, spatial or functional. Contextual relationships apply irrespective of distance, sometimes extending well beyond what might be considered an asset's setting, and can include the relationship of one heritage asset to another of the same period or function, or with the same designer or architect. A range of additional meanings is available for the term 'context', for example in relation to archaeological context and to the context of new developments, as well as customary usages. Setting may include associative relationships that are sometimes referred to as 'contextual'.

- To avoid uncertainty in discussion of setting, a landscape is 'an area, as perceived by people, the character of which is the result of the action and interaction of natural and/or human factors' (Glossary, *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment, p 157, based on the definition in the European Landscape Convention, European Treaty Series – No. 176, Florence, 20.x.2000, p 2).

The extent of setting

8 The NPPF makes it clear that the extent of the setting of a heritage asset 'is not fixed and may change as the asset and its surroundings evolve' (NPPF, Annex 2: Glossary). All of the following matters may affect considerations of the extent of setting:

- While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset.

- Extensive heritage assets, such as historic parks and gardens, landscapes and townscapes, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own. A conservation area is likely to include the settings of listed buildings and have its own setting, as will the hamlet, village or urban area in which it is situated (explicitly recognised in green belt designations).

The Courts have held that it is legitimate in appropriate circumstances to include within a conservation area the setting of buildings that form the heart of that area (R v Canterbury City Council ex parte David Halford, February 1992; CO/2794/1991). And NPPF paragraph 80, for example, makes it clear that historic towns are regarded as having a setting.

- Consideration of setting in urban areas, given the potential numbers and proximity of heritage assets, often overlaps with considerations both of townscape/urban design and of the character and appearance of conservation areas. Conflict between impacts on setting and other aspects of a proposal can be avoided or mitigated by working collaboratively and openly with interested parties at an early stage.

Setting and the significance of heritage assets

9 Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance. The following paragraphs examine some more general considerations relating to setting and significance.

The setting of World Heritage Sites may be protected as 'buffer zones' – see PPG, paragraph: 033 Reference ID: 2a-033-20140306.

- Change over time
  Settings of heritage assets change over time. Understanding this history of change will help to determine how further development within the asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset. Settings of heritage assets which closely resemble the setting at the time the asset was constructed or formed are likely to contribute particularly strongly to significance but settings which have changed may also themselves enhance significance, for instance where townscape character has been shaped by cycles of change over the long term. Settings may also have suffered negative impact from inappropriate past developments and may be enhanced by the removal of the inappropriate structure(s).

- Cumulative change
  Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments).

- Access and setting
  Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; this would downplay such qualitative issues as the importance of quiet and tranquillity as an attribute of setting, constraints on access such as remoteness or challenging terrain, and the importance of the setting to a local community who may be few in number. The potential for

appreciation of the asset's significance may increase once it is interpreted or mediated in some way, or if access to currently inaccessible land becomes possible.

- **Buried assets and setting**

Heritage assets that comprise only buried remains may not be readily appreciated by a casual observer. They nonetheless retain a presence in the landscape and, like other heritage assets, may have a setting. These points apply equally, in some rare cases, to designated heritage assets such as scheduled monuments or Protected Wreck Sites that are periodically, partly or wholly submerged, eg in the intertidal zone on the foreshore.

  - The location and setting of historic battles, otherwise with no visible traces, may include important strategic views, routes by which opposing forces approached each other and a topography and landscape features that played a part in the outcome.

  - Buried archaeological remains may also be appreciated in historic street or boundary patterns, in relation to their surrounding topography or other heritage assets or through the long-term continuity in the use of the land that surrounds them. While the form of survival of an asset may influence the degree to which its setting contributes to significance and the weight placed on it, it does not necessarily follow that the contribution is nullified if the asset is obscured or not readily visible.

- **Designed settings**

Many heritage assets have settings that have been designed to enhance their presence and visual interest or to create experiences of drama or surprise. In these special circumstances, these designed settings may be regarded as heritage assets in their own right, for instance the designed landscape around a country house. Furthermore they may, themselves, have a wider setting: a park may form the immediate surroundings of a great house, while having its own setting that includes lines-of-sight to more distant heritage assets or natural features beyond the park boundary. Given that the designated area is often restricted to the 'core' elements, such as a formal park, it is important that the extended and remote elements of the design are included in the evaluation of the setting of a designed landscape. Reference is sometimes made to the 'immediate', 'wider' and 'extended' setting of heritage assets, but the terms should not be regarded as having any particular formal meaning. While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is large-scale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary. It can include:

  - land which is not part of the park or garden but which is associated with it by being adjacent and visible from it

  - land which is not part of the site but which is adjacent and associated with it because it makes an important contribution to the historic character of the site in some other way than by being visible from it, and

  - land which is a detached part of the site and makes an important contribution to its historic character either by being visible from it or in some other way, perhaps by historical association

- **Setting and urban design**

As mentioned above (paragraph 8, The extent of setting), the numbers and proximity of heritage assets in urban areas mean that the protection and enhancement of setting is intimately linked to townscape and urban

design considerations. These include the degree of conscious design or fortuitous beauty and the consequent visual harmony or congruity of development, and often relates to townscape attributes such as enclosure, definition of streets and spaces and spatial qualities as well as lighting, trees, and verges, or the treatments of boundaries or street surfaces.

See *Managing Significance in Decision–Taking in the Historic Environment: Historic Environment Good Practice Advice in Planning 2* (2015) and *Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1* (2016).

- Setting and economic viability

Sustainable development under the NPPF can have important positive impacts on heritage assets and their settings, for example by bringing an abandoned building back into use or giving a heritage asset further life. However, the economic viability of a heritage asset can be reduced if the contribution made by its setting is diminished by badly designed or insensitively located development. For instance, a new road scheme affecting the setting of a heritage asset, while in some cases increasing the public's ability or inclination to visit and/or use it, thereby boosting its economic viability and enhancing the options for the marketing or adaptive re-use of a building, may in other cases have the opposite effect.

Views and setting

10 The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.

11 Views which contribute more to understanding the significance of a heritage asset include:

- those where the composition within the view was a fundamental aspect of the design or function of the heritage asset
- those where town- or village-scape reveals views with unplanned or unintended beauty
- those with historical associations, including viewing points and the topography of battlefields
- those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected
- those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant

12 Assets, whether contemporaneous or otherwise, which were intended to be seen from one another for aesthetic, functional, ceremonial or religious reasons include:

- military and defensive sites
- telegraphs or beacons
- prehistoric funerary and ceremonial sites
- historic parks and gardens with deliberate links to other designed landscapes and remote 'eye-catching' features or 'borrowed' landmarks beyond the park boundary

13 Views may be identified and protected by local planning policies and guidance for the part they play in shaping our appreciation and understanding of England's historic environment, whether in rural or urban areas and whether designed to be seen as a unity or

as the cumulative result of a long process of development. This does not mean that additional views or other elements or attributes of setting do not merit consideration. Such views include:

- views identified as part of the plan-making process, such as those identified in the *London View Management Framework* (LVMF, Mayor of London 2010) and *Oxford City Council's View Cones* (2005) and *Assessment of the Oxford View Cones* (2015 Report)
- views identified in character area appraisals or in management plans, for example of World Heritage Sites
- important designed views from, to and within historic parks and gardens that have been identified as part of the evidence base for development plans, and
- views that are identified by local planning authorities when assessing development proposals

Where complex issues involving views come into play in the assessment of such views – whether for the purposes of providing a baseline for plan-making or for development management – a formal views analysis may be merited.

Landscape Assessment and Amenity

14 Analysis of setting is different from landscape assessment. While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all. Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it – a church spire, for instance – is a major component of the setting, rather than just an incidental element within the wider landscape.

15 Assessment and management of both setting and views are related to consideration of the wider landscape, which is outside the scope of this advice note. Additional advice on views is available in *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition, published by the Landscape Institute and the Institute of Environmental Management and Assessment (in partnership with Historic England).

> Being tall structures, church towers and spires are often widely visible across land- and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view.

16 Similarly, setting is different from general amenity. Views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting.

Part 2: Setting and Views – A Staged Approach to Proportionate Decision-Taking

17 All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies. Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (ie the capacity of

the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.

18 Conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development. Many places coincide with the setting of a heritage asset and are subject to some degree of change over time. NPPF policies, together with the guidance on their implementation in the Planning Policy Guidance (PPG), provide the framework for the consideration of change affecting the setting of undesignated and designated heritage assets as part of the decision-taking process (NPPF, paragraphs 131-135 and 137).

19 Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes

Each of these steps is considered in more detail below.

For further information on Strategic Environmental Assessment and Environmental Impact Assessment, see *Sustainability Appraisal and Strategic Environmental Assessment: Historic England Advice Note 8* (2016).

Development proposals involving the setting of single and less significant assets and straightforward effects on setting may best be handled through a simple check-list approach and can usefully take the form of a short narrative statement for each assessment stage, supported by adequate plans and drawings, etc.

Cases involving more significant assets, multiple assets, or changes considered likely to have a major effect on significance will require a more detailed approach to analysis, often taking place within the framework of Environmental Impact Assessment procedures. Each of the stages may involve detailed assessment techniques and complex forms of analysis such as viewshed analyses, sensitivity matrices and scoring systems. Whilst these may assist analysis to some degree, as setting and views are matters of qualitative and expert judgement, they cannot provide a systematic answer. Historic England recommends that, when submitted as part of a Design and Access Statement, Environmental Statement or evidence to a public Inquiry, technical analyses of this type should be seen primarily as material supporting a clearly expressed and non-technical narrative argument that sets out 'what matters and why' in terms of the heritage significance and setting of the assets affected, together with the effects of the development upon them.

Step 1: Identify which heritage assets and their settings are affected

20 The setting of a heritage asset is 'the surroundings in which a heritage asset is experienced' (NPPF, Annex 2: Glossary). Where that experience is capable of being affected by a proposed development (in any way) then the proposed development can be said to affect the setting of that asset. The starting point of the analysis is to identify those heritage assets likely to be affected by the development proposal.

21 It is important that, at the pre-application or scoping stage, the local authority, having due regard to the need for proportionality:

- indicates whether it considers a proposed development has the potential to affect the setting of (a) particular heritage asset(s), or
- specifies an 'area of search' around the proposed development within which it is reasonable to consider setting effects, or
- advises the applicant to consider approaches such as a 'Zone of Visual Influence' or 'Zone of Theoretical Visibility' in relation to the proposed development in order to better identify heritage assets and settings that may be affected

A 'Zone of Visual Influence' defines the areas from which a development may potentially be totally or partially visible by reference to surrounding topography. However, such analysis does not take into account any landscape artefacts such as trees, woodland, or buildings, and for this reason a 'Zone of Theoretical Visibility' which includes these factors is to be preferred.

22 For developments that are not likely to be prominent or intrusive, the assessment of effects on setting may often be limited to the immediate surroundings, while taking account of the possibility that setting may change as a result of the removal of impermanent landscape or townscape features, such as hoardings or planting.

23 The area of assessment for a large or prominent development, such as a tall building in an urban environment or a wind turbine in the countryside or offshore, can often extend for a distance of several kilometres. In these circumstances, while a proposed development may affect the setting of numerous heritage assets, it may not impact on them all equally, as some will be more sensitive to change affecting their setting than others. Local planning authorities are encouraged to work with applicants in order to minimise the need for detailed analysis of very large numbers of heritage assets. They may give advice at the pre-application stage (or the scoping stage of an Environmental Statement) on those heritage assets, or categories of heritage asset, that they consider most sensitive as well as on the level of analysis they consider proportionate for different assets or types of asset.

24 Where spatially extensive assessments relating to large numbers of heritage assets are required, Historic England recommends that local planning authorities give consideration to the practicalities and reasonableness of requiring assessors to access privately owned land. In these circumstances, they should also address the extent to which assessors can reasonably be expected to gather and represent community interests and opinions on changes affecting settings.

25 Where the development proposal affects views which may be particularly helpful in allowing the significance of an asset to be appreciated and which are therefore part of the setting, it is often necessary to identify viewing points for assessment. An explanation why a particular viewing point has been selected will be needed. Sometimes a heritage asset is best appreciated while moving (for example, in a designed landscape, where its three-dimensional

formal qualities are an essential part of its significance). These, such as the changing views of the Tyne bridges viewed from the banks of the River Tyne or of the Tower of London from the south bank of the River Thames in London, are often termed 'kinetic' views.

Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

26 The second stage of any analysis is to assess whether the setting of an affected heritage asset makes a contribution to its significance and the extent and/or nature of that contribution; both setting, and views which form part of the way a setting is experienced, may be assessed additionally for the degree to which they allow significance to be appreciated. We recommend that this assessment should first address the key attributes of the heritage asset itself and then consider:

- the physical surroundings of the asset, including its relationship with other heritage assets
- the asset's intangible associations with its surroundings, and patterns of use
- the contribution made by noises, smells, etc to significance, and
- the way views allow the significance of the asset to be appreciated

27 The box below provides a (non-exhaustive) checklist of the potential attributes of a setting that it may be appropriate to consider in order to define its contribution to the asset's heritage values and significance. Only a limited selection of the attributes listed will be of particular relevance to an asset. A sound assessment process will identify these at an early stage, focus on them, and be as clear as possible what emphasis attaches to them. In doing so, it will generally be useful to consider, insofar as is possible, the way these attributes have contributed to the significance of the asset in the past (particularly when it was first built, constructed or laid out), the implications of change over time, and their contribution in the present.

A handy way of visualising the contribution of setting to the significance of heritage assets may be diagrammatically to map past and present relationships between a heritage asset and its surroundings, weighting the mapped connections to demonstrate the relative contribution of the relationship to the significance of the asset or the ability to appreciate the significance. By setting out the relationships and considering the level of their contribution to significance, it is possible to gauge impact more transparently and more consistently.

Change can also have the effect of strengthening relationships, for example by removing visual impediments such that significance is better revealed; mapping thereby provides one mechanism for identifying opportunities for enhancement.

28 The local authority Historic Environment Record is an important source of information to support this assessment and, in most cases, will be able to provide information on the wider landscape context of the heritage asset as well as on the asset itself. Landscape Character Assessments, Historic Landscape Character Assessments, Conservation Area Appraisals, the Register of Parks and Gardens and the Parks & Gardens UK database are also important sources in this regard.

29 This assessment of the contribution to significance made by setting will provide the baseline for establishing the effects of a proposed development on significance, as set out in 'Step 3' below. It will, therefore, be focused on the need to support decision-taking in respect of the proposed development. A similar approach to

assessment may also inform the production of a strategic, management or conservation plan in advance of any specific development proposal, although the assessment of significance required for studies of this type will address the setting of the heritage asset 'in the round', rather than focusing on a particular development site.

30 An assessment of the contribution to significance of a view does not depend alone on the significance of the heritage assets in the view but on the way the view allows that significance to be appreciated. The view may be part of a landscape, townscape or other design intended to allow a particular attribute of the asset to be enjoyed, such as its reflection in a body of water. Heritage assets (sometimes of different periods) may have been deliberately linked by the creation of views which were designed to have a particular effect, adding meanings through visual cross-references. Composite or fortuitous views which are the cumulative result of a long history of development, particularly in towns and cities, may become cherished and may be celebrated in artistic representations. The ability to experience

Assessment Step 2 Checklist

The starting point for this stage of the assessment is to consider the significance of the heritage asset itself and then establish the contribution made by its setting. The following is a (non-exhaustive) check-list of potential attributes of a setting that may help to elucidate its contribution to significance. It may be the case that only a limited selection of the attributes listed is likely to be particularly important in terms of any single asset.

The asset's physical surroundings

- Topography
- Aspect
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)
- Definition, scale and 'grain' of surrounding streetscape, landscape and spaces
- Formal design eg hierarchy, layout
- Orientation and aspect
- Historic materials and surfaces
- Green space, trees and vegetation
- Openness, enclosure and boundaries
- Functional relationships and communications
- History and degree of change over time

Experience of the asset

- Surrounding landscape or townscape character
- Views from, towards, through, across and including the asset
- Intentional intervisibility with other historic and natural features
- Visual dominance, prominence or role as focal point
- Noise, vibration and other nuisances
- Tranquillity, remoteness, 'wildness'
- Busyness, bustle, movement and activity
- Scents and smells
- Diurnal changes
- Sense of enclosure, seclusion, intimacy or privacy
- Land use
- Accessibility, permeability and patterns of movement
- Degree of interpretation or promotion to the public
- Rarity of comparable survivals of setting
- Cultural associations
- Celebrated artistic representations
- Traditions

these same views today can illuminate the design principles and taste of our predecessors.

31 The impact of seasonal and day/night changes on a view or views needs to be considered, including other changes that may mean that a view at a particular point in time may not be representative of the experience over longer periods. Does summer foliage hide an asset that is visible in winter? Does artificial external lighting at night emphasise some aspects of an asset and leave others in the dark.

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it

32 The third stage of any analysis is to identify the effects a development may have on setting(s) and to evaluate the resultant degree of harm or benefit to the significance of the heritage asset(s). In some circumstances, this evaluation may need to extend to cumulative and complex impacts which may have as great an effect on heritage assets as large-scale development and which may not solely be visual.

33 The wide range of circumstances in which setting may be affected and the range of heritage assets that may be involved precludes a single approach for assessing effects. Different approaches will be required for different circumstances. In general, however, the assessment should address the attributes of the proposed development in terms of its:

- location and siting
- form and appearance
- wider effects
- permanence

34 The box (see below) provides a more detailed list of attributes of the development proposal that it may be appropriate to consider during the assessment process. This list is not intended to be exhaustive and not all attributes will apply to a particular development proposal. Depending on the level of detail considered proportionate to the purpose of the assessment, it would normally be appropriate to make a selection from the list, identifying those particular attributes of the development requiring further consideration and considering what emphasis attaches to each. The key attributes chosen for consideration can be used as a simple check-list, supported by a short explanation, as part of a Design and Access Statement, or may provide the basis for a more complex assessment process that might sometimes draw on quantitative approaches to assist analysis.

35 In particular, it would be helpful for local planning authorities to consider at an early stage whether development affecting the setting of a heritage asset can be broadly categorised as having the potential to enhance or harm the significance of the asset through the principle of development alone; through the scale, prominence, proximity or placement of development; or through its detailed design. Determining whether the assessment will focus on spatial, landscape and views analysis, on the application of urban design considerations, or on a combination of these approaches will clarify for the applicant the breadth and balance of professional expertise required for its successful delivery.

36 Cumulative assessment is required under the EU Directive on EIA. Its purpose is to identify impacts that are the result of introducing the development into the view in combination with other existing and proposed developments. The combined impact may not simply be the sum of the impacts of individual developments; it may be more, or less.

Assessment Step 3 Checklist

The following is a (non-exhaustive) check-list of the potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset. It may be that only a limited selection of these is likely to be particularly important in terms of any particular development.

Location and siting of development

- Proximity to asset
- Position in relation to relevant topography and watercourses
- Position in relation to key views to, from and across
- Orientation
- Degree to which location will physically or visually isolate asset

Form and appearance of development

- Prominence, dominance, or conspicuousness
- Competition with or distraction from the asset
- Dimensions, scale and massing
- Proportions
- Visual permeability (extent to which it can be seen through), reflectivity
- Materials (texture, colour, reflectiveness, etc)
- Architectural and landscape style and/or design
- Introduction of movement or activity
- Diurnal or seasonal change

Wider effects of the development

- Change to built surroundings and spaces
- Change to skyline, silhouette
- Noise, odour, vibration, dust, etc
- Lighting effects and 'light spill'
- Change to general character (eg urbanising or industrialising)
- Changes to public access, use or amenity
- Changes to land use, land cover, tree cover
- Changes to communications/accessibility/ permeability, including traffic, road junctions and car-parking, etc
- Changes to ownership arrangements (fragmentation/permitted development/etc)
- Economic viability

Permanence of the development

- Anticipated lifetime/temporariness
- Recurrence
- Reversibility

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

37 Maximum advantage can be secured if any effects on the significance of a heritage asset arising from development likely to affect its setting are considered from the project's inception. Early assessment of setting may provide a basis for agreeing the scope and form of development, reducing the potential for disagreement and challenge later in the process.

38 Enhancement (see NPPF, paragraph 137) may be achieved by actions including:

- removing or re-modelling an intrusive building or feature
- replacement of a detrimental feature by a new and more harmonious one
- restoring or revealing a lost historic feature or view
- introducing a wholly new feature that adds to the public appreciation of the asset
- introducing new views (including glimpses or better framed views) that add to the public experience of the asset, or
- improving public access to, or interpretation of, the asset including its setting

39 Options for reducing the harm arising from development may include the repositioning of a development or its elements, changes to its design, the creation of effective long-term visual or acoustic screening, or management measures secured by planning conditions or legal agreements. For some developments affecting setting, the design of a development may not be capable of sufficient adjustment to avoid or significantly reduce the harm, for example where impacts are caused by fundamental issues such as the proximity, location, scale, prominence or noisiness of a development. In other cases, good design may reduce or remove the harm, or provide enhancement. Here the design quality may be an important consideration in determining the balance of harm and benefit.

40 Where attributes of a development affecting setting may cause some harm to significance and cannot be adjusted, screening may have a part to play in reducing harm. As screening can only mitigate negative impacts, rather than removing impacts or providing enhancement, it ought never to be regarded as a substitute for well-designed developments within the setting of heritage assets. Screening may have as intrusive an effect on the setting as the development it seeks to mitigate, so where it is necessary, it too merits careful design. This should take account of local landscape character and seasonal and diurnal effects, such as changes to foliage and lighting. The permanence or longevity of screening in relation to the effect on the setting also requires consideration. Ephemeral features, such as hoardings, may be removed or changed during the duration of the development, as may woodland or hedgerows, unless they enjoy statutory protection. Management measures secured by legal agreements may be helpful in securing the long-term effect of screening.

Step 5: Make and document the decision and monitor outcomes

41 It is good practice to document each stage of the decision-making process in a non-technical and proportionate way, accessible to non-specialists. This should set out clearly how the setting of each heritage asset affected contributes to its significance or to the appreciation of its significance, as well as what the anticipated effect of the development will be, including of any mitigation proposals. Despite the wide range of possible variables, normally this analysis should focus on a limited number of key attributes of the asset, its setting and the proposed development, in order to avoid undue complexity. Such assessment work is a potentially valuable resource and should be logged in the local Historic Environment Record.

42 The true effect of a development on setting may be difficult to establish from plans, drawings and visualisations. It may be helpful to review the success of a scheme and to identify any 'lessons learned' once a development affecting setting has been implemented that was intended to enhance, or was considered unlikely to detract from, the significance of a heritage asset. This will be particularly useful where similar developments are anticipated in the future.

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HEAG180
Publication date: First Edition March 2015
© English Heritage
Second Edition December 2017 © Historic England
Design: Historic England