



GREATER CAMBRIDGE LOCAL PLAN – THE FIRST PROPOSALS

Land East of Gazelle Way and West of Teversham Road,
Teversham

(HELAA Site Reference: 40250)

– Representation on behalf of Endurance Estates

Client:

Endurance Estates

Landowner:

The White Family
Pembroke College

Date:

December 2021

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1. Representations on Land East of Gazelle Way (East of Cherry Hinton)

The Site and Context

- 1.1 Cheffins has been instructed by Endurance Estates to promote their interests in Land east of Gazelle Way and west of Teversham Road, Teversham (HELAA Site Reference: 40250). Land East of Gazelle Way is located only three miles from the City Centre of Cambridge and offers an opportunity to provide a highly sustainable community – providing a place for people to live alongside a place for people to work – with excellent walking, cycling and public transport links to the City of Cambridge. The site is set within an attractive landscape setting and its enhancement and connectivity into its surroundings is central to the proposal. The site offers an opportunity to be a truly sustainable community, contributing to the Council's aspirations to become a zero-carbon authority by 2030.
- 1.2 The new community provides approximately 1,200 homes, including a mix of housing typologies, tenures, and affordability, alongside approximately 20ha of employment space, which will provide a range of work opportunities for local people, a new local centre with retail and community facilities, and a primary school. There is also potential for the delivery of a new train station hub to support the potential future reopening of a stop at Fulbourn.
- 1.3 Supporting information accompanying these representations includes:
 - Land East of Gazelle Way – A Vision for Development (prepared by PRP).
 - Land Use Plan (prepared by PRP).
 - Review of the Development Strategy and Housing Figures (prepared by Barton Willmore).

Technical Assessment – Response to HELAA

- 1.4 Some initial site and contextual assessments have been carried out as summarised within the supporting Vision Document. Since the technical assessment of the site was undertaken by the Council, the masterplanning approach has evolved to provide a commercial element as part of the proposal to ensure delivery of a sustainable community where people can live and work together. The work carried out to date indicates that some of the scoring in the HELAA needs to be updated and the site should be reassessed to reflect the amendment to the proposal as part of the emerging Greater Cambridge Local Plan (GCLP). The following section provides commentary on the HELAA, including the assessment methodology and the individual scores given for Site 40250 .

General Comments on the Scoring System

- 1.5 The performance of sites submitted for consideration within the GCLP has been coded using a traffic light system (red/amber/green). Although traffic light scoring systems are commonly used in this context, the particular performance criteria applied by the Greater Cambridge authorities appears overly stringent.
- 1.6 According to the published assessment criteria and supporting text within the HELAA, a site will generally be scored as amber where there is a detrimental impact which could be satisfactorily mitigated. This is an unusually strict approach which results in sites seeming to score more poorly than they should. For example, it is more common for such assessments to apply an amber score to indicate that there is a potential issue that would need to be

addressed – for example through further detailed technical work or masterplanning. Where there are clear opportunities for effective mitigation of an impact or evidence to suggest that the particular matter is unlikely to constrain development then a score of green would be more appropriate.

1.7 Ultimately, the key question that needs to be answered by a site assessment would be, “is development of this site acceptable in planning terms?” A revised scoring system based on the following key principles would be easier for stakeholders to understand a site’s suitability for development:

- **Red:** NO. This is a major concern which would likely result in planning permission being refused.
- **Amber:** POSSIBLY. This is a potential concern for which there may be a design solution (i.e. further site-specific work is needed).
- **Green:** YES. This is unlikely to be a significant concern or constraint on development.

Site Assessment

1.8 Notwithstanding the proposed alteration to the scoring system as suggested above, the following commentary is made in relation to the Council’s assessment of Land east of Gazelle Way (HELAA Site Ref: 40250). References to the supporting Vision Document have been made within the following suggestions to provide evidence that some of the scores received for Land east of Gazelle Way should be altered.

Flood Risk

1.9 Site 40554 has been rated ‘amber’ for flood risk, yet the site is within Flood Zone 1. Furthermore, given the size of the site and the large areas of open space proposed within the masterplan, suitable surface water drainage and necessary on-site attenuation systems will be provided through development of the site.

1.10 For these reasons a score of ‘Green’ should be applied in terms of flood risk.

Landscape and Townscape

1.11 The Council has assessed site 40250 as ‘red’ on the basis that the site will amalgamate Cambridge, Teversham and Fulbourn. However, this is not the case; as shown on page 24 of the Vision document and the Land Use Plan accompanying this representation, the proposal retains strategic green breaks between Teversham and Fulbourn, underpinning the landscape-led approach to the masterplan. The proposed development is enveloped in a high-quality, multi-functional landscaped open space, providing both formal and informal opportunities for recreation, as well as biodiversity net gains. In doing so, the open space proposals outlined in the Vision Document create a great place that respects the identities of and separation between existing settlements.

1.12 Landscape characteristics of the site should, therefore, be reviewed in the context of where the development is proposed within the site, which, as demonstrated by the accompanying masterplan, is the area adjacent to the built-up area of Cherry Hinton. As shown on page 24, the proposal would strengthen those connections into the surrounding landscape and villages of Teversham and Fulbourn.

- 1.13 The existing 'wedge' of Greenbelt which provides the separation between that of the proposed development at Land north of Cherry Hinton, and Cambridge Airport (as shown on the South Cambridgeshire Adopted Policies Map 2018) will not be affected by the proposal. On the contrary, development proposals for Site 40250 aim to continue this 'wedge' around the southern perimeter of Teversham, wrapping around the proposed development to ensure that a strategic green break is maintained between Teversham and Fulbourn. This principle could be secured through suitable wording in an allocation and illustrated on an accompanying plan to provide certainty in delivery.
- 1.14 Based on the evidence above, a score of 'Amber' would be appropriate for landscape and townscape factors.

Archaeology

- 1.15 The Roman activity associated with the location of the site 40250 is acknowledged. However, should preservation in situ be required, the site is large enough to accommodate this and design around heritage asset. The score for archaeology should therefore be altered from 'red' to 'Amber' as this is a constraint which can be mitigated, should this arise.
- 1.16 The Scheduled Ancient Monument (SAM) located on the southern boundary of Site 40250, associated with Caudle Corner Farm, will be taken out of agricultural production and maintained as green open space with minimal public access. Removing the SAM from agricultural production and protecting it moving forward will deliver a net benefit in the preservation of the heritage asset. This mitigation would be secured in perpetuity and provides further foundation for the score for archaeological impact to be altered from 'red' to 'Amber'.

Site Access

- 1.17 As shown on page 27 of the Vision Document, the development at Land east of Gazelle Way would have three points of vehicular access onto Gazelle Way, likely to be at its existing junctions with Eland Way. There is potential for an additional, minor access from Teversham Road.
- 1.18 The Council has assessed the design as "acceptable in principle", identifying that any potential constraints could be overcome through development. For this reason, a score of 'Green' would be more appropriate.

Transport and Roads

- 1.19 Development of Land east of Gazelle Way would build on the significant improvements to local walking and cycling routes which have already been secured as part of the Wing and Land North of Cherry Hinton residential developments. This includes local footway and cycleway improvements, along with more significant improvements to the Jubilee Cycleway and the new Coldham's Lane active transport corridor. Further pedestrian and cycle improvements are planned by the GCP, including the Fulbourn Greenway and the Chisholm Trail. To contribute to sustainable transport networks in the local vicinity, development of Site 40250 will deliver high-quality walking and cycling links that will adjoin with existing active travel infrastructure. This would enable the site to be a fully integrated part of the future high-quality walking and cycling network in Cambridge.
- 1.20 Indicative walking and cycling connections are shown on page 26 of the Vision Document, as well as a potential location for a future train station. The Council assessment states that "as this site is located close to Cambridge, the Highway Authority would expect a high sustainable mode share which should be achieved by high quality walking, cycling and public transport links". As demonstrated in the Vision Document this proposal delivers highly

in terms of sustainable modes of travel, thus the site should receive a score of 'Green' for transport and roads.

Green Belt

- 1.21 The Greater Cambridge Partnership assessment identifies the site's location within the green belt as a development constraint. While the proposal would result in the release of some green belt land, extensive efforts have been undertaken during the masterplanning exercises to integrate areas of the green belt with the forthcoming development. Areas of particular significance would be retained and protected.
- 1.22 The existing 'wedge' of Greenbelt – which provides the separation between that of the proposed development at Land East of Gazelle Way and Cambridge Airport as shown on the South Cambridgeshire Adopted Policies Map 2018 – will not be affected by the proposal. In fact, development of Site 40250 would continue this wedge to ensure that a strategic green break is maintained between Teversham and Fulbourn (as shown in the Land Use Plan accompanying this representation). The proposal will also provide new green infrastructure linking Site 40250 with the surrounding Green Belt.
- 1.23 The National Planning Policy Framework (NPPF) sets out the role and function of the Green Belt and defines the purposes of the designation. These purposes have been applied locally under the 'Cambridge Green Belt Purposes' (as set out in the 2018 CCC and SCDC Local Plans) to:
- 1) preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
 - 2) maintain and enhance the quality of its setting; and
 - 3) prevent communities in the environs of Cambridge from merging into one another and with the city.
- 1.24 Taking each of these in turn, the following responses are provided:
- *Point 1* – The development of Site 40250 will not significantly extend the built form of the city, with the masterplan being cognisant of the location and orientation of Teversham and Fulbourn. The proposed development, which aims to deliver a climate-conscious, mixed-use development where people can live and work, will support the dynamism of Cambridge and would not detract from the thriving historic centre.
 - *Points 2 & 3* – The retention of the strategic green break between Teversham and Fulbourn addresses these points, thereby preventing the merging of the urban environs around Cambridge. The proposal will also provide new green infrastructure linking the site with the surrounding Green Belt to promote access to the Green Belt, thereby enhancing the quality and linkages between the urban and rural environments.
- 1.25 Evidently, the release of some of the land from the Green Belt to provide this development presents little conflict with the overall purposes of the Green Belt. The assessment makes reference to the 'Greater Cambridge Green Belt Assessment 2021' evidence document. The parcels of land classified within the site include CHI1, CHI2, CHI3, CHI4, FU1, FU19, TE6, TE7, TE8 TE9. These have been assessed as either 'Very High, High and Moderate High' in terms of the level of impact that the release of these parcels for development would have.
- 1.26 This assessment conflicts with the Council's previous evidence (2012 Inner Green Belt Boundary Study) wherein 'Plan 4 – Areas of Significance of Development on Green Belt' assessed the same parcels of land as either 'medium' or 'low significance'. This resulted in part of the site being the lowest significance of all the Green Belt around Cambridge.

- 1.27 The five principles of the Green Belt – as defined within the NPPF – have remained unchanged in the past 10 years. Therefore, in the context of this site, it is unclear why the classification has changed, with a much clearer and more robust justification for the change in classification needing to be provided. It is also noted that the vast majority of Green Belt parcels within the 'inner green belt area' around Cambridge have been identified as resulting in 'High-Harm'. Such a blanket conclusion does not appear to reflect the differences in context around the city. Further clarification is needed.

The Proposed Policy Framework

- 1.28 The following section includes comments on the emerging policy direction as published in the Greater Cambridge Local Plan First Proposals.

Policy S/JH: New Jobs and Homes

- 1.29 The following is a summary of the of the overarching representations submitted on behalf of Endurance Estates by Barton Willmore. The full report is appended to these site-specific representations for completeness.
- 1.30 The First Proposals draft Plan sets out that the Greater Cambridge Partnership will seek to deliver an objectively assessed need of 58,500 jobs and 44,400 (48,800 inc. 10% buffer) homes during 2020-2041. This represents the Councils' medium+ growth scenario, with the maximum growth scenario (78,700 jobs and 56,500 homes) being discounted on the basis that it does not reflect the most likely level of jobs growth when reflecting on long-term employment patterns.
- 1.31 Within paragraph 5.22 of the Councils' Employment Land and Economic Development Evidence Study, it is in fact recommended that a preferred range for jobs growth would be 'between a central and higher growth scenario'.
- 1.32 The 'central' growth scenario represents an annual average employment growth rate of 1.1%. This is significantly below other assessments of growth for the Districts. The CPIER report quotes ONS 2010-2016 average growth rates of 2.4% and 2.3% across the City and South Cambridgeshire respectively, whilst their own 'blended rate' shows rates of 2.4% (equal to ONS) and 4.2% (significantly more than ONS).
- 1.33 These figures suggest that the First Proposals are not planning for sufficient employment growth and therefore not enough housing to support it.
- 1.34 The employment and housing growth figures for the Local Plan through to 2041 should be revised upwards substantially, in order to accommodate the demonstrable growth potential of the Districts.

Policy S/SB: Settlement Boundaries

- 1.35 The overall development strategy is very reliant on the delivery of an extension to an existing new settlement (Cambourne West and an additional 1,950 dwellings at Cambourne), planned new settlements (Northstowe, Waterbeach and Bourn Airfield) and new communities on the edge of Cambridge (North East Cambridge and Cambridge East). While it is acknowledged that the principle of this growth is already established through adopted development plan documents, the additional dwellings at Cambourne is proposed through the emerging GCLP and associated East West Rail.

- 1.36 While it is acknowledged that the Council's preferred development strategy is to utilise those edge of Cambridge sites which were previously developed, the redevelopment of both North-east Cambridge and Cambridge East poses significant challenges. North-east Cambridge requires the relocation of a sewage treatment works and existing businesses; Cambridge East requires the relocation of airport related uses and businesses. The development of these site is therefore very complex and highly likely to cause delays to delivery within the plan period and also highly likely to give rise to viability issues, leading to a reduction in the level of affordable housing to be provided.
- 1.37 The Councils' preferred development strategy also refers to speeding up housing delivery rates at some new settlements. However, there is no credible evidence that faster housing delivery rates can be achieved at Northstowe or Waterbeach. The Councils have not evidenced if any site-specific circumstances are present on these sites that mean they will deliver an above-average number of dwellings per year over the plan period.
- 1.38 In order to ensure that the overall plan is deliverable, there needs to be greater certainty that sites will come forward within the plan period to deliver the growth required and, in turn, to address the under-delivery of affordable housing within Greater Cambridge. This under-delivery is evidenced through the affordable housing contributions that have come forward on major strategic sites as follows:
- Northstowe (Phase 1 and 2) - 20%
 - Waterbeach - 30%
 - Cambridge East - (Wing) - 30%
 - Cambourne West - 30%
- 1.39 The development strategy should allocate some sites that are capable of delivering policy-compliant levels of affordable housing. Land at Gazelle Way does not have infrastructure constraints and, as such, can provide policy-compliant levels of 40% affordable housing to help address the significant under-delivery in Greater Cambridge. The potential for sites like this to deliver policy compliant levels of affordable housing has been evidenced at Land north of Cherry Hinton.
- 1.40 It is acknowledged that the development of Land at Gazelle Way requires some release of land from the Green Belt, and that the Council have dismissed this as a preferred option as per the following conclusion:
- "Whilst edge of Cambridge Green Belt sites performed in a similar way in many respects to Cambridge East, they would have significant Green Belt impacts and given the relatively good performance of Cambourne, which is not in the Green Belt and would benefit from there was considered to be no exceptional circumstances for releasing land on the edge of Cambridge to meet development needs as a matter of principle and that spatial option was not preferred."*
- 1.41 Greater Cambridge has significant affordability issues and addressing such affordable housing needs should be a priority for the Local Plan. Allocating the land east of Gazelle Way which will deliver the affordable housing required provides justification for the release of Green Belt land, especially since this land is located sustainably and is well served by public transport as required by paragraph 142 of the NPPF when reviewing Green Belt boundaries.

- 1.42 Land at Gazelle Way is located on the edge of Cambridge, only three miles from the City Centre. The site benefits from existing sustainable transport infrastructure, including access to existing cycle routes and bus service provision to access surrounding local amenities and facilities, as well as convenient access into the City Centre. The site will also benefit from being located along the proposed Fulbourn Greenway route and has potential to accommodate a new train station along the Cambridge-Ipswich line. The accessibility of the site is not reliant on expensive major new infrastructure.
- 1.43 The development strategy needs to fully embrace and reflect the strategy for the City of Cambridge to be net zero carbon by 2030. The allocation of highly sustainable sites where housing and jobs are located together, reducing the need to travel, will be instrumental in achieving this goal. The Land at Gazelle Way is within a highly accessible location which means that new residents would not be reliant on their cars to access jobs, shops or socialise either within the Site or within the City. The vision for this site is to provide a highly sustainable community which locates homes and jobs together.
- 1.44 In summary, Endurance Estates wish to object to the 'high risk' nature of the development strategy, which is dependent upon the delivery of some strategic, complex sites. The development of these is highly likely to cause delays to delivery within the plan period and highly likely to give rise to viability issues, leading to a reduction in the level of affordable housing to be provided.
- 1.45 The development strategy should allocate some additional sites such as Land east of Gazelle Way that are capable of delivering policy compliant levels of affordable housing. The allocation of the site would also contribute to the Council's aspirations to become a zero-carbon authority by 2030 by offering an opportunity to be a truly sustainable community which locates homes and jobs together.

Policy GP/GB: Protection and enhancement of the Cambridge Green Belt

- 1.46 The review of the Green Belt is welcomed as there is a compelling need for Greater Cambridge to release some land from the Green Belt to provide the opportunity for sustainable development. However, the results from the 'Greater Cambridge Green Belt Assessment 2021' provide a significantly different assessment of a number of parcels of land compared to that of the Council's previous evidence (2012 Inner Green Belt Boundary Study).
- 1.47 The parcels of land labelled within the assessment as CHI1, CHI2, CHI3, CHI4, FU1, FU19, TE6, TE7, TE8 TE9 have been assessed as either 'Very High, High and Moderate High' in terms of the level of impact that the release of these parcels for development would have.
- 1.48 This assessment conflicts with the Councils' previous evidence (2012 Inner Green Belt Boundary Study) whereby 'Plan 4 – Areas of Significance of Development on Green Belt', assesses the same parcels of land as either 'medium' or 'low significance'. This resulted in part of the site being the lowest significance of all the Green Belt around Cambridge. The five principles of the Green Belt as defined within the NPPF remain unchanged in the past 10 years therefore in the context of this site, it is unclear why the classification has changed, and with a much clearer and more robust justification for the change in classification needing to be provided. It is also noted that the vast majority of Green Belt parcels within the 'inner green belt area' around Cambridge have been identified as resulting in 'High-Harm'. Such a blanket conclusion does not appear to reflect the differences in context around the city. Further clarification is needed.