

Land at Babraham: Site promotion
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LAND AT BABRAHAM SITE PROMOTION

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1.0 Introduction

1.1 Background

This document is submitted by Bidwells on behalf of Cheveley Park Farms Limited as a representation to the Greater Cambridge Local Plan (First Proposals) consultation. The land in question is in the vicinity of Babraham and was promoted in the Council's 'call for sites' process in 2019. It was assigned reference 40297 (Land adjacent to Babraham, CB22 3AF, CB22 3AP, CB22 3AG, CB22 3AZ) in the Council's Housing and Economic Land Availability Assessment (HELAA) document.

The promoted site comprises some 613 hectares to include housing (including affordable housing, key worker housing and housing for older people) as well as employment uses, community facilities, schools, public open space and areas for biodiversity enhancement. The site would be delivered over five phases, with a country park and associated links being provided to the north of the A1307 during Phase 5.

1.2 Proposed development

The proposed development will deliver the following development and land uses over five phases:

- 3,000 new dwellings (40% of which would be affordable)
- 6.3 hectares of employment use
- 31 hectares of research and development land as an extension to Babraham Research Campus
- 170 hectares of country park
- New secondary school
- Two new primary schools
- Ten hectares of outdoor sports facilities
- 65 hectares of green open space, including allotments, public squares and leisure/recreation space
- 15 hectares of land for education purposes
- An integrated transport interchange (on estate land) to be delivered by the proposed Cambridge South East Transport (Phase 2) (CSET) scheme

Development at Babraham will deliver significant environmental, social and economic benefits in a highly sustainable location. This aligns with the Council's development strategy for the emerging Local Plan for Greater Cambridge ('the Plan') and the aspirations for the Plan area over the Plan period to 2041.

The proposed development provides a sustainable new settlement adjacent to the science parks to the south of Cambridge, known as the 'southern cluster'. It will deliver considerable environmental benefits through the creation of a substantial country park and implementing significant areas of 'green' and 'blue' infrastructure which would be an integrated part of the development.

Overall, it is anticipated that the proposed development would support a residential population of approximately 7,300 people. Over five phases, the proposed development would include two 2-form entry primary schools and one 6-form entry secondary school.

It is anticipated that the proposed development would require 39.3ha of public open space to meet the needs of its resident population. The masterplan provides for approximately 200ha of 'green' and 'blue' infrastructure, plus 170ha for the proposed country park. Provision exceeds the demand generated by the proposed development and will enable consider biodiversity net gain, as well as ensuring there is sufficient room to address existing shortfalls in formal open space in adjacent settlements.

The proposed two local centres proposed are sized to ensure that they remain flexible spaces providing for a range of uses to meet the needs of the population. These will include a healthcare centre, retail and other services (such as a pharmacy) cafes and restaurants, and various leisure uses.

It is anticipated that the resident population will include approximately 3,800 people in employment. These will likely find approximately 1,500 jobs onsite, the local centres, schools and those that choose to work at or from home. This is anticipated to create a 'surplus' of 2,250 people in employment that could make use of the opportunities at the surrounding science parks.

1.3 Site phasing

The masterplan shows five phases of development which would provide varying types of development. Phase 5 would deliver a country park to the north of the A1307 which would include significant enhancements to the landscape and linkages to/from Babraham. This will ensure that there are opportunities for recreation associated with the masterplan.

The delivery of Phase 1 includes an extension to Babraham village to the east. This will follow a careful approach which is informed by the significance and setting of the built heritage and landscape assets in the area. Phase 1 would be located adjacent to the proposed CSET scheme which will provide a dedicated busway to/from Cambridge via Sawston and the Cambridge Biomedical Campus and a dedicated travel hub at the A11/A1307 junction. Phase 1 would deliver a new primary school, a local centre and a variety of home types as well as a community centre in addition to significant areas of landscaping and open space.

Phases 2 and 3 will deliver key elements of the masterplan including the local centre and a secondary school, in addition to a variety of dwelling types, landscaping and public spaces. Phase 4 will incorporate a range of house types, a local centre and a primary school. Provision of the proposed country park, farmland and the wider landscape/open space improvements will be developed in parallel with Phase 5 which would also deliver an extension to Babraham Research Campus.

It should be noted that the proposed phases are not strict sequential timescales for development although it is assumed that Phase 5 would be completed towards the end of the Plan period. The delivery of phases would depend on market conditions and demand which would inform the timescales for the development being built-out. However, it should be assumed that Phase 1 would be built first, due to its proximity to Babraham.

1.4 Babraham Research Campus phasing

The proposed development has been developed as a residential-led development which supports employment opportunities at the existing science parks in the southern cluster. The promoted site includes expansion land for the Babraham Research Campus. The Campus is subject to draft

allocation S/BRC in the Plan for additional research and development uses. The proposed expansion to the north-west is intended to come forward for development after the proposed allocation S/BRC has been built out and is intended as an additional phase to expansion of the Campus, towards the end of the Plan period.

1.5 Scope of representation

The masterplan and vision document which accompany this representation explain the design evolution and concepts which form part of the proposed development. These are supported by technical and feasibility studies which should be read in conjunction with this document. The supporting documents to this representation are as follows:

- Vision document including proposed masterplan
- Access and movement strategy
- Archaeology and built heritage assessment
- Flood risk assessment and drainage strategy
- Landscape and visual assessment
- Preliminary Ecological Assessment and Biodiversity Net Gain Assessment
- Socioeconomic and health impact assessment
- Utilities technical note

2.0 Representation 1: Development Strategy

2.1 Development strategy

Policy S/DS (Development strategy) of the Plan outlines that the proposed development strategy for Greater Cambridge is to direct development to where it has the least climate impact. This includes where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.

The broad strategy for the Plan is to ensure that housing is in sustainable locations which will reduce the need for travel and carbon production. The Plan identifies the need to deliver 48,840 homes over the Plan period of which a significant proportion are planned to be in the Cambridge urban area or near the city.

2.2 The southern cluster

The Plan identifies that to the south of Cambridge between the M11 and the A1307, is home to a range of major business parks with world-leading facilities together with excellent and improving public transport links. The Council seeks to support this business cluster through ensuring that more business space is provided where needed and that new housing in and around villages are well-connected to jobs by public transport, cycling and walking facilities. Much of this area is in the Green Belt and the Council believes that a case can be made for 'exceptional circumstances' to release areas of Green Belt land as new development in this location will generate less carbon emissions from car use.

This area is known as the 'southern cluster' and the Council identifies that focusing development in this area provides the opportunity to locate homes near jobs and support the development of the important employment sites in this area. It also identifies that there are existing and planned public transport opportunities to access Cambridge, helping to minimise traffic and related carbon emissions.

The 'southern cluster' policy in the Plan identifies four key areas of development in this area:

- Draft allocation S/BRC (Babraham Research Campus): Remove the developed area of the campus from the Green Belt and allocate an additional area for employment development (research and development) of 17.1 hectares within and adjoining the existing built area
- Draft allocation S/GC (Genome Campus, Hinxton): Policy area to support development which relates to the campus and its role as a centre for genomics and associated bioinformatics industries
- Draft allocation S/RSC (Other site allocations in the rural southern cluster): To include residential development at Sawston, Great Shelford and Duxford and employment land at Fourwentways

The development strategy for the Plan area is to focus development near Cambridge and within the southern cluster. The southern cluster has a particular draw for economic development with the significant importance placed on the proximity and interconnectivity of homes and employment opportunities and their accessibility by public transport, bicycle and on foot. The proposed allocations are all within close proximity and accessible by sustainable transport

modes. This will become even more evident when the CSET scheme is delivered at Babraham and the settlement and area is made more accessible from a wider geographical area.

The key focus is on housing and employment opportunities in the southern cluster and development at Babraham will deliver housing and jobs where it is needed. We note the proposed allocation of Babraham Research Campus for additional research and development floorspace which will result in a greater draw to that site. The proposed allocation does not include any additional housing and it is important that housing can be delivered adjacent to the site to accommodate the greater footfall to/from the site and to limit commuting by the private car. The emphasis needs to be on access from local housing and by sustainable means of transport and development at Babraham will mean that this strategic objective can be achieved.

2.3 Sustainability

We note that the Plan seeks to classify Babraham as a 'Group Village' as it has a primary school. This 'upgrade' in classification acknowledges that the village contains a range of services and facilities which means that it is a sustainable location for growth. Such growth is clearly being promoted by the Council by draft allocation S/BRC and facilitation of the CSET scheme adjacent to the settlement. We consider Babraham has a pivotal role to play in promoting opportunities for employment in the southern cluster and that homes should be located adjacent to such opportunities. We consider that the Local Plan should seize this opportunity to co-locate employment opportunities and housing and allocate the subject site for mixed use development, as per the masterplan.

3.0 Representation 2: Housing and Job Numbers

3.1 Socio-economic assessment

This representation is accompanied by a socio-economic assessment which examines the housing and job numbers outlined in the Plan. The assessment examines the amount of current and future employment opportunities within the 'southern cluster' of science parks, that are located within walking or cycling distance of the site. These include the Babraham Research Campus (BRC), Granta Park and the Wellcome Genome Campus (WGC). The Cambridge Biomedical Campus (CBC) on the edge of Cambridge is also sometimes included within the cluster, despite being located approximately 6km to the north of the BRC.

CBC will be linked to the BRC and Granta Park by the CSET scheme which includes a transport hub between the BRC and Granta Park, providing some 1,250 car parking spaces and an off-road busway, pedestrian and cycle route into CBC.

Existing employment is estimated from the Business Register and Employment Survey (BRES) produced by the Office for National Statistics (ONS) which provides a breakdown of employment by industrial sector at the Lower Super Output Area (LSOA) geography. In 2019, the BRES suggests that there were 17,000 jobs in this area. This area has seen sustained growth, largely driven by the recent southern cluster expansion of the BRC, which is now fully occupied. In 2019 there were 6,090 people in employment, a 15.6% increase from 2018. Of these, 4,000 people were in the scientific research and development sector, accounting for 20% of all employment in this sector in Greater Cambridge.

Granta Park saw a decline in employment between 2018 and 2019, to 3,890 people. Overall however, employment levels have remained broadly the same since 2015. Scientific research and development is by far the largest sector with 3,000 people in 2019. Overall therefore, the three science parks account for approximately 40% of the jobs in this area. CBC saw rapid growth in 2019 with the relocation of the Papworth Hospital to the Campus. Overall, there were 20,105 people employed in this area with 93.5% in the three main sectors of education, human health and scientific research and development.

According to ONS Small Area Population Estimates (SAPE), the area had a resident population of 15,257 people in 2019, of which 12,380 were aged 16+. Assuming an employment rate of 65.5% (the long-term average for Cambridgeshire pre-pandemic it is estimated that this area had a resident labour force of 8,109 people. Therefore, in 2019, it is likely that there were approximately 8,891 more jobs in the area than people in employment. This results in substantial commuting into the area.

The WGC has planning permission for a mixed-use development that includes 150,000m² of floorspace and 1,500 dwellings. The socioeconomic assessment that accompanied the planning application suggests that this would create 4,300 additional jobs. However, the assessment does not consider the number of residents in employment. Using standard population density multipliers for South Cambridgeshire, it is estimated that the 1,500 dwellings would have a population of 3,672 people. Of these, 2,889 people would be aged 16+. Assuming an employment rate of 65.5%, this would suggest a resident labour force of 1,892 people. The BRC is also identified to expand with a further 1,400 jobs anticipated plus a small amount of housing, most of which would be for students.

There are various other much smaller employment and residential developments that are likely to occur in the area over the Plan period but these are generally anticipated to cancel out one another and therefore are not considered further. Therefore, it is anticipated that the number of

jobs would increase to 22,700 while the residents in employment would increase to 10,001 people. The difference between jobs and residents in employment would have grown to approximately 12,699 people, increasing the amount of commuting into the area by over 50%.

The proposed development at Babraham is anticipated to deliver a further 1,534 jobs, but also boost the resident labour force by 3,784 people. The net effect of this is that it will provide 2,250 residents in employment that could work elsewhere in the area. The effect of the proposed development would be to increase the number of jobs to 24,234 and the number of residents in employment to 16,483 people. This would reduce the difference between jobs and residents in employment to approximately 7,751 people, reducing the amount of commuting into the area by almost 13% compared to data from 2019.

Current proposals either permitted or in the Plan seek to build on the essential life science research for which the southern cluster is world-renowned. However, these proposals are currently insufficiently supported by housing development to ensure a sustainable mix of uses and limit commuting by private car as far as possible. Indeed, it is likely that they will exacerbate the current levels of in-commuting. The proposed development will provide an opportunity to redress this balance by providing more housing, and therefore more local labour, than jobs. This would be labour that would be able to walk or cycle to the three science parks. It would entirely reverse the issues related to the expansion of WBC and BRC and make a notable improvement on the current situation.

3.2 Representation

Based on our socioeconomic assessment, we object to draft Policy S/JH of the Plan. Our assessment identifies a significant shortfall in housing numbers when assessed against the proposed jobs across the Plan period. This would necessitate the need for 'in commuting' which is clearly not aligned with draft Policy S/DS (Development strategy) of the Plan. This policy requires that development is directed to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.

The proposed development would seek to redress the balance between jobs and houses in the Plan and would negate significant levels of 'in commuting;' to the science parks. Policy S/RSC (Other site allocations in the Rural Southern Cluster) of the Plan has a clear emphasis on the area south of Cambridge, between the M11 and the A1307 which is home to a range of major business parks with world-leading facilities and has some excellent and improving public transport links. The onus of the Plan is supporting this business cluster through ensuring that more business space is provided where needed and new housing in and around villages that are well-connected to jobs by public transport, cycling and walking facilities. Development in this location will generate less carbon emissions from car use with the opportunity to locate homes near jobs and support the development of the important employment sites in this area. There are also existing and planned public transport opportunities to access Cambridge, helping to minimise traffic and related carbon emissions.

We do not believe the Plan goes far enough to redressing the balance between proposed the proposed number of jobs and dwellings across the Plan period. The number proposed in the Plan will not meet demand and will not go far enough to prevent 'in commuting' for jobs within the southern cluster. This is clearly not in keeping with the main theme of the Plan which is to co-locate houses and jobs and to reduce carbon emissions. The co-location of new dwellings and employment opportunities at the site will ensure that this imbalance can be redressed and that

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the Plan goes further to addressing its key themes and providing realistic numbers of dwellings and jobs over the Plan period.

4.0 Representation 3: Site Assessment

We have reviewed the Council's assessment of site 40297, contained in the HELAA assessment document and in some cases, do not consider that the conclusions are justified or evidenced. We have assessed each technical element of the site assessment proforma document and have provided representations below.

4.1 Adopted development plan policies

This category was assessed as 'amber'. This means that development of the site would be incompatible/inconsistent with an adopted Development Plan policy or allocation. The assessment concludes that it would be outside the defined Development Framework for the village and within the Cambridge Green Belt.

We do not concur with this rating for the category. We consider that Babraham is an appropriate location for residential and employment development as it is a sustainable village which is located in close proximity to key employment opportunities. Whilst the site is outside the Development Framework for the adopted Local Plan, its allocation for mixed use development would mean that it would be accommodated within the Framework and therefore the principle of development at the site would be acceptable. This would mean that it would be assessed as 'green' - Defined as where development of the site would not be inconsistent with an adopted Development Plan policy or allocation.

We consider that 'exceptional circumstances' can be demonstrated to justify removal of the site from the Green Belt. The quantum and location of development could be informed by a site-specific policy. This would guide the amount and type of development at the site and would ensure that areas of public open space and education facilities could be fixed. It would not be necessary to include areas of public open space within the defined Development Framework and such areas could remain as Green Belt land as such uses would not be 'inappropriate'.

4.2 Flood risk and drainage

This category was assessed as 'amber'. This means that the site contains areas at high, or medium risk from surface water flooding and/or the site contains some land in Flood Zones 2 and/or 3 but there is sufficient land in Flood Zone 1 to accommodate at least five additional dwellings. The assessment concludes that site is partly in Flood Zone 2 (5%) and Flood Zone 3 (3%) with 2% of the site lying in an area of: lies in a 1 in 1000-year chance of surface water flooding.

We do not concur with the rating for this category. The majority of the site is located within Flood Zone 1 (low probability) with areas of Flood Zones 2 (medium probability) and 3b (functional floodplain) which are associated with the watercourse corridor of the River Granta. The risk of flooding from all other sources (surface water, reservoirs and groundwater) is considered to be either 'low' or 'very low'.

No development would occur within the floodplain of the River Granta thereby allowing preservation of flow routes and flood storage and providing social and environmental benefits. A sustainable drainage management strategy would accommodate surface water runoff from the proposed development, ensuring that the development does not increase flood risk elsewhere. Surface water drainage would follow a hierarchy, firstly aiming to discharge to the ground via infiltration, then to a surface waterbody or course, and lastly to the sewer network. Due to the presence of terrace deposits and underlying chalk bedrock, infiltration drainage may be feasible for the site but should be confirmed through future site investigations.

The surface water drainage strategy will be designed so SuDS are dispersed and integrated within the wider landscape. SuDS will deliver long-term mitigation by attenuating and treating surface water runoff through a mixture of on-plot solutions and strategic attenuation features. The surface water strategy would include open swales/rills, attenuation basins, ponds, wetlands, infiltration SuDS, porous paving, bio-retention areas, green roofs and rainwater harvesting. In addition to providing a drainage function, SuDS will be utilised to create amenity benefits, ecological enhancement, water quality treatment and biodiversity opportunities

Given the above, we consider that flood risk for this site should be assessed as 'green' with the requirement for a drainage strategy identified in the policy wording associated with any allocation for residential development at the site.

4.3 Landscape and townscape

This category was assessed as 'red'. This means that development of the site would have a significant negative impact which cannot be mitigated. The assessment concludes that a large-scale development would have a permanent significant adverse impact upon the local and wider landscape and settlement character, views and visual amenity. Development would be an encroachment into the rural countryside and an amalgamation of Babraham and Sawston.

We do not concur with the rating for this category. The masterplan has evolved since the 'call for sites' process in 2019 and takes into account the constraints and opportunities at the site. The provision of significant areas of open spaces, including to the south-west of the site, adjacent to Sawston and to the east of Babraham, means that the built form of the development has been reduced. This means that the setting of these settlements is preserved and there is no risk of amalgamation of and encroachment upon neighbouring settlements.

The design evolution process assessed land to the east of Babraham and the character and setting of the conservation area and associated listed buildings. This process has seen the introduction of a corridor of open space in this area and creation of a green space within this sensitive area. Development to the east of Babraham has been designed as a fine grain in order to preserve and enhance the heritage setting of Babraham.

The proposed development provides extensive areas of open space and areas for biodiversity enhancement. These have been designed to mitigate any impact on the setting of the site and wider area. In addition, the proposed development adjacent to the existing settlement has been allocated as 'low density' which would comprise two storey dwellings, with significant areas of greenery between plots. The higher density areas would be located to the south and west of the existing settlement. These would typically comprise up to four storey dwellings, including flats and would be accommodated in the core of these areas with lower density dwellings allocated to the periphery of the areas designated for built development. The location of and parameters for these spaces could be fixed by any policy wording for an allocation at the site. This would ensure that the areas of built development were fixed and therefore that there would be no significant adverse impacts on the character and setting of the site and wider area.

4.4 Biodiversity and geodiversity

This category was assessed as 'amber'. This means that development of the site may have a detrimental impact on a designated site or those with a regional or local protection, but the impact could be reasonably mitigated or compensated. The assessment concludes that development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.

We do not concur with the rating for this category. A Preliminary Ecological Assessment has been undertaken for the site and this has informed the evolution of the masterplan and the vision document. The strategy for the site includes retention of existing ecological features at the site wherever possible, including existing hedges and woodland which will be enhanced with native planting and maintained for nature conservation purposes. Ecological enhancements should also be viewed in tandem with the drainage strategy. This includes the opportunity to create a strong 'blue' corridor along the River Granta and the proposed SuDS features which would provide enhanced habitats. The river also provides the opportunity to offer a pedestrian trail linking people to the river. Likewise, the proposed country park will include nature routes and provide opportunities to enhance biodiversity and provide habitat enhancement.

A high-level biodiversity net gain assessment has been undertaken, based on the masterplan. This broad assessment demonstrates that an overall net gain of 882.31 habitat area units could be achieved. This is equivalent to a biodiversity net gain of +53.08% which is in excess of the proposed minimum 20% net gain in the Plan and demonstrates that the proposed development would have significant ecological and biodiversity enhancements associated with it.

Any policy wording associated with a site allocation could specify the location, type and nature of biodiversity enhancements to ensure they are delivered across the site. It could also include a parameter plan to show the key focus for biodiversity enhancements and where this should be delivered at the site. As this can be reasonably fixed through policy wording, we suggest that ecology and biodiversity matters can effectively be rated as 'green'.

4.5 Open space and green infrastructure

This category was assessed as 'green'. For this category, this means that development of the site would not result in the loss of any open space. The assessment concludes that the site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.

We concur with the rating for this category. The site is arable land the loss of which would not result in open space or green infrastructure. The proposed development would deliver a wide range of open space, green infrastructure and formal sports pitches and open space and green infrastructure would be considerably enhanced as a result of the proposed development.

4.6 Historic environment and archaeology

The historic environment was assessed as 'amber'. This means that that development 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. The assessment concludes that development on some parts of the site would cause higher level harm which would be difficult or impossible to mitigate. This includes the following:

1. The long barrow, setting of the bowl barrow and the Roman Road;
2. Close proximity to the (listed) George Public House, outbuildings, farmhouses, and Brick Row on south side of High Street with impact on setting of individual listed buildings and the conservation area;
3. Setting of ice house: Impact would vary depending on location, layout, scale and design of proposed development

Archaeology was assessed as 'red'. This means that there is known archaeology of significance which could not be mitigated through design or conditions Impact on nationally important

archaeology. The assessment concludes that numerous sites of prehistoric date are recorded within and in close proximity to the site which includes a Scheduled long barrow and associated enclosure.

We do not concur with the rating for this category. A number of built heritage assets have been identified at and adjacent to the site, which have a visual or physical connection with the site or are associated with the setting of the surrounding landscape.

A site sensitivity plan has been prepared for the masterplan, which provides a guide for the approach to the location of zones of development. This takes into account the significance and setting of the identified built heritage assets as well as views in, out and across them. These identified zones will need to be further refined and assessed as detailed design progresses, in order to further mitigate or remove any elements of harm. They also need to be considered alongside below-ground heritage and landscape considerations.

As a result of the assessment of the site, parameters have been set out from which the design team has developed a design response within the site masterplan. This takes account of the contribution which the site makes to the setting of the various built heritage assets. It is possible that development on certain areas of the site will result in a degree of harm to the significance of heritage assets, and great care will be required to mitigate such impacts through the location, form, scale and design of the proposals as they emerge.

Great weight will be attached to the objective of preserving the settings of listed buildings and other impacts arising would need to be clearly outweighed by public benefits arising from proposals. The masterplanning exercise will evolve to ensure impacts on built heritage assets are mitigated or removed altogether and these impacts are likely to be at the level of "less than substantial" harm in terms of the policies of the National Planning Policy Framework.

For built heritage and archaeology the masterplan has evolved to preserve and enhance the heritage assets at and adjacent to the site. The masterplan restricts development in close proximity to Babraham and provides a buffer against the existing urban form. This seeks to preserve and enhance the character and setting of the conservation area and listed buildings within the settlement. The masterplan also shows that development directly in front of Babraham Hall is to be restricted to protect its setting.

The masterplan will preserve the existing tree-lined view towards the Babraham Institute with other opportunities to create similar tree lined corridors to other existing and new site assets. There is also the opportunity to recognise the heritage of the site, by creating a new focal open space where the Roman Camp is located, with the south-eastern part of the site in addition to opportunities to create a heritage trail linking together the historic monuments and landmarks.

Whilst there are clear constraints and opportunities associated with built heritage and archaeology, the masterplan has evolved to account for the constraints and to ensure they can be turned into opportunities. We consider that any policy wording associated with an allocation at the site could limit development in certain locations to ensure that development would preserve and enhance the built heritage and archaeology of the area. This could be secured through a parameters plan which would specify areas to be preserved as open spaces and design solutions such as vistas, design codes and materials which would ensure that the character and setting of the site and wider area is preserved and enhanced. This will be developed through future iterations of the masterplan, but we consider that the rating for this category could effectively be assessed as 'green'.

4.7 Accessibility to services and facilities

This category was assessed as 'green'. There are various criteria for this assessment, but the assessment concludes that the site has good accessibility to key local services, transport, and employment opportunities and that the proposed development would require accompanying primary school, secondary school, local centre / employment provision and community centre

We concur with this assessment. The southern cluster is favoured as an area for significant expansion for employment and dwellings. The proposed transport hub and CSET scheme Cambridge makes this a highly sustainable and accessible location which is appropriate for new jobs and homes. Draft allocation S/BRC will result in additional jobs being delivered adjacent to Babraham and co-locating homes and jobs nearby is an appropriate strategy.

The proposed development will deliver a wide range of facilities and services, including open spaces, sports pitches, retail opportunities and new education facilities. This will ensure that the proposed development is 'self-contained' and that a wide range of 'day-to-day' needs can be met within the development itself. This will ensure that reliance on the private car and 'out-commuting' is limited.

4.8 Transport, roads and site access

This category was assessed as 'amber'. This means that any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated. The site assessment concludes that the proposed site is acceptable in principle subject to detailed design. There are potential access constraints, but these could be overcome through development.

We do not concur with this assessment. The site promoter has undertaken an assessment of access arrangements to/from the site and these are reflected in the masterplan. The site has significant frontage with the A1307, from which the main vehicular access will be taken by a proposed new junction with controlled pedestrian crossing facilities. This junction will be located away from Babraham High Street and measures will be implemented to limit vehicle trips along the High Street. Local vehicular access will also be taken via High Street off the A505 and Sawston Road. Within the site the road network will be designed in accordance with the latest design standards meaning the needs of pedestrians and cyclists will be prioritised and considered from an early stage in the design of the layout in preference to the private car.

As part of any planning application for the site, a detailed Transport Assessment would be undertaken, the scope of which would be agreed with Officers at Cambridgeshire County Council. The Transport Assessment would provide a detailed technical assessment of the impact of the site on the operation of local transport networks, including the road network, along with appropriate mitigation. The traffic impacts of the site are likely to be significantly reduced by the proximity of the CSET scheme and the Transport Assessment will take this into account.

Access to/from the site should be assessed in conjunction with the sustainable nature of the masterplan, good accessibility to jobs and opportunities to travel by public transport. Access to/from the site is acceptable and with relevant mitigation measures, would not have any significant adverse impacts on the local and strategic highways network. Whilst such matters would be developed as part of the wording of any draft allocation at the site and/or through a planning application, we consider that this matter could reasonably be assessed as 'green'.

4.9 Noise, vibration, odour and light pollution

This category was assessed as 'amber'. This means that the site is capable of being developed to provide healthy internal and external environments in regard to noise/vibration/odour/light

pollution after careful site layout, design and mitigation. The assessment concludes that the proposed site will be affected by road traffic noise from nearby main roads but is acceptable in principle subject to appropriate detailed design considerations and mitigation.

We do not concur with this assessment. Whilst there will be some sources of pollution associated with noise, vibration and light pollution, these could be limited through appropriate design and specifications. The assessment acknowledges that these matters are acceptable in principle subject to appropriate detailed design considerations and mitigation. We consider that these matters can be addressed at the planning application stage and through conditions and we consider that this category can effectively be assessed as 'green'.

4.10 Air quality

This category was assessed as 'amber'. For this category, this means that the site is capable of being developed to provide healthy internal and external environments in regard to air quality after careful design and mitigation. The assessment concludes that it is a large site with a significant number of residential units with the potential for an impact on Air Quality management Areas (AQMA) without mitigation.

We concur with this assessment. We do not consider that development at the site would have any adverse impacts on air quality either in itself or cumulatively. The site is not located in an AQMA and there is no reason that it would have any adverse impact on the Cambridge or A14 corridor AQMAs – which are the nearest designations.

4.11 Contamination and ground stability

This category was assessed as 'amber'. For this category, this means that the site is likely to be capable of being developed after appropriate mitigation or remediation of contamination / ground stability issues. The assessment concludes that the site is in previous agricultural land use with potential for historic contamination. Planning conditions may be required.

We do not concur with this assessment. There is unlikely to be significant contamination at the site as comprises arable land. However, there may be localised areas which are subject to more intensive agricultural use which may need to be investigated further for contaminated land. The site assessment accepts that planning conditions would be required which pertain to contaminated land and these matters could be scoped and addressed at a planning application stage. As such, we consider this category could be effectively classified as 'green'.

4.12 Housing land supply

The proposed development would deliver approximately 3,000 dwellings across the plan period, many of which could be delivered in five years, thereby making a positive contribution to the housing land supply for the Greater Cambridge area. This should be afforded significant weight in assessing this representation.

4.13 Deliverability

The HELAA assessment identifies that the site is available and achievable. This is still the case.

5.0 Representation 4: Green Belt

5.1 Exceptional circumstances

Paragraph 140 of the National Planning Policy Framework states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. This includes the requirement to take into account promoting sustainable patterns of development. We have outlined below the 'exceptional circumstances' which would justify release all or some of the site from the Green Belt.

The socio-economic assessment submitted with this representation identifies a clear need to provide additional jobs in the Plan area over and above that outlined in the Plan. With this, comes the need to provide more dwellings and to identify suitable locations for them.

The site is located in the 'southern cluster' which is a clear preferred area for jobs and new dwellings. The site will also seek to deliver an additional phase of expansion to Babraham Research Campus in the longer term. There are clear benefits to the proposed development which should be regarded as 'exceptional circumstances'. These include the need for additional jobs and dwellings over and above those identified in the Plan. This means that the Council needs to find more sites for such development. We consider that the provision of jobs and dwellings (including at least 40% affordable housing and specialist housing) in a sustainable location and adjacent to an existing source of employment provides 'exceptional circumstances' for Green Belt release. The proposed development would support the national and internationally acclaimed status of the Babraham Research Campus and other science parks in the southern cluster. It would also fit neatly with the development strategy for the Plan and in particular the proximity of frequent and accessible modes of sustainable transport.

A Landscape and Visual Appraisal (LVA) and Green Belt Study have been produced to consider the potential effects of development on the Green Belt. This document accompanies this representation.

The LVA concludes that the proposed development will result in some adverse effects associated with the change of land use. The introduction of new urban areas within a largely rural landscape will change the distinctive qualities of the Green Belt and result in an alteration of its existing character. However, the masterplan includes mitigation measurements that will lessen the perceived adverse effects. Strategic open spaces are designed to break the urban fabric and retain discrete sense of openness and local key views. A generous landscape buffer is proposed adjacent to Sawston to prevent visual coalescence of the proposed and existing villages. Green corridors mitigate effects on the setting of the existing public rights of way and define independent character areas, which aim to replicate a system of nucleated villages akin to the contextual landscape character. The two school sites along the southern boundary will include detailing of these sites, particularly the siting of playing fields and outdoor recreational space, will also contribute to the retention of some visual Green Belt qualities. Similarly, detailed landscape plans for the proposed open spaces will mitigate any visual impact.

The masterplan has evolved in response to the landscape constraints to produce a masterplan which takes account of the key assets of the Green belt in this location and seeks to mitigate any impact. Any harm should be balanced against the significant gains which would be delivered by the proposed development and which would constitute 'exceptional circumstances'. It should be noted that the proposed development will bolster the preferred development strategy for the southern cluster and will provide jobs in close proximity to employment opportunities, notably Babraham Research Campus which is subject to a draft allocation for additional employment space. The Development Strategy Topic Paper identifies the continued support for the continued

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growth of nationally important research campus meeting which has an evidenced need for additional space. Combined with the development strategy for the Plan area, we consider that the delivery of a wide range of dwelling across a number of tenure types, in addition to employment opportunities, education facilities and extensive public open space, provide sufficient justification for release of the land from the Green Belt. This release would be across the proposed phases outlined above and would include varying levels of development at Babraham. We consider that development at Babraham provides a significant opportunity to promote additional housing and employment opportunities in the Plan area which should be given significant weight in assessing this site representation.

6.0 Conclusion

The proposed development at Babraham is clearly in line with the development strategy for the Plan. It provides dwellings and employment opportunities in a sustainable location in the 'southern cluster' in a location that is easily accessible and which is sustainable.

Our assessment of the proposed employment numbers over the Plan period shows that growth in the Plan area has been underestimated. Our assessment outlines what we consider to be more realistic job numbers which are higher than those in the Plan. In turn, a higher number of jobs means that additional dwellings need to be found to accommodate this growth. Provision of those dwellings within the southern cluster will ensure that the capacity for jobs in sustainable locations is maximised and that 'in commuting' is limited. This will seek to limit carbon emissions which is a key theme of the Plan. We consider that the site at Babraham is an appropriate location for growth and will deliver significant benefits across the three strands of sustainability.

Development at the site would be delivered across five phases, with the proposed country park being delivered alongside Phase 5. We have assessed the site over five phases and we consider that all technical matters can be satisfactorily addressed. However, if the Council considered that a small quantum of development at the site was warranted, we would be pleased to discuss this matter further.

Our interrogation of the HELAA assessment document demonstrates that all the outlined technical matters could be satisfactorily addressed, either through the wording of a draft policy for the site or through a planning condition or Section 106 Agreement associated with any planning application at the site. The technical reports which accompany this representation have been undertaken subsequently to the HELAA assessment and we consider that the matters assessed as 'red' or 'amber' can effectively be assigned a 'green' rating.

The representations made in this document are done so in respect of the emerging policies and draft allocations in the Plan. We consider that the provision of additional jobs and dwellings should be examined further as we consider the Plan needs additional allocations for development to meet demand and to fit in with its overall development strategy. The proposed development would meet this demand in a sustainable location in the southern cluster, which is likely to be the focus for development in future iterations of the Plan.



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