



GREATER CAMBRIDGE LOCAL PLAN: FIRST PROPOSALS CONSULTATION 2021

Land at Rectory Farm, Milton

Prepared by Strutt & Parker on behalf of Gonville and Caius College

December 2021

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Client Name:	Gonville & Caius College
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1. INTRODUCTION

- 1.1 This representation has been prepared by Strutt & Parker on behalf of Gonville & Caius College to support the promotion of land at Rectory Farm, Milton as part of the Greater Cambridge First Proposals Consultation 2021.
- 1.2 In September 2021 Greater Cambridge Shared Planning Service published the Greater Cambridge HELAA, which provided an initial assessment of the sites put forward for allocation as part of the Call for Sites consultation within Greater Cambridge.
- 1.3 This representation provides a response to the 'First Proposals' Consultations and covers the following topic. The representation has been structured to respond to relevant questions as set out within the First Proposals Consultation. In addition, a detailed assessment is provided in respect of the HELAA Assessment for the site.
- 1.4 The HELAA excludes the Rectory Farm site from allocation primarily on the basis of landscape issues and highways issues.
- 1.5 The site was originally submitted as part of the Call for Sites for up to 1,500 dwellings and 30,000 m² of employment. For reasons explained at Call for Sites stage and set out within this representation it is considered that the site is suitable and deliverable in the medium term for a development of that scale.
- 1.6 It is considered that several of the assessments criteria, particularly regarding the landscape impact and the transport impact on the A14 should be re-categorised. This is particularly the case given that HELAA assessment appears to have been undertaken in isolation and has not given due consideration to the major transport projects being promoted along the A10 corridor. Further analysis of this is set out within section 7 of this report.

2. QUESTION: Do you agree that we should plan for an extra 550 homes per year, so that housing keeps up pressure with increased jobs in our area?

- 2.1 We agree that it is very important that housing delivery keeps up with demand for increased jobs within the area.
- 2.2 As part of the preparation of the emerging Greater Cambridge Local Plan, the Shared Planning Service has identified a need for 2,321 dwellings to be built per year. A significant proportion of this growth is made up of existing allocations within the Local Plan.
- 2.3 The initial evidence base and spatial options assessment for the emerging Local Plan, set three growth options; 'minimum' (40,300 dwellings - based upon standard methodology); 'medium' (46,200 dwellings- based upon economic forecast based upon long term historic employment) and 'maximum' (67,700 dwellings – based upon fast economic growth in the recent past). In view of this, the housing delivery target of 44,400 new homes over the plan period alongside 58,500 new jobs would fall between the 'minimum' and 'medium' growth scenarios previously suggested.
- 2.4 As acknowledged within the Development Strategy Topic Paper, that accompanies this consultation it is acknowledged that the Greater Cambridge economy is dynamic and does not readily align with national or regional forecasts for job growth. In particular, it has a world- renowned life sciences cluster which has the potential to drive growth beyond typical regional or national rates. It is also acknowledged that in the recent past employment growth within the region has been significantly higher than predicted.
- 2.5 Accounting for the evidence set out within the Development Strategy Topic Paper, it is not clearly justified why only 44,400 new homes and 58,500 new jobs are proposed over the plan period. It is considered that this approach should be re-visited to increase both housing and employment allocations within the Local Plan. It is considered that the delivery of housing should be significantly increased, in line with the 'maximum' growth forecast, to align with economic growth within the recent past. The case for maximum growth forecast is further supported by significant transport investment within the area over the plan period. This includes schemes such as East- West Rail, Cambridge South Station and the delivery of a number of Rapid Transit Routes proposed by the Greater Cambridge Partnership.
- 2.6 The provision for lower growth scenarios does also not appear to be consistent with the government's objectives for the Ox- Cam Arc as a centre for housing and employment growth.

3. QUESTION: Do you agree that new development should mainly focus on sites where car travel, and therefore emissions, can be minimised?

- 3.1 Yes, in principle the proposal to focus development on sites where car travel can be minimised is supported. National policy is clear within paragraph 79 of the NPPF that planning policies should identify opportunities for villages to grow and thrive, especially where they will support local services. The updated NPPF (2021), also provides additional emphases on the suitability of providing significant extensions to villages, provided that they are well located and designed.
- 3.2 The site at Rectory Farm is located in a very sustainable location, with the development not overly reliant on car travel, with many public transport options easily accessible. It is located centrally along a key growth corridor within the emerging Local Plan. To the north, is Waterbeach New Town, which has planning consent and an allocation for the delivery of over 5,000 dwellings within the plan period and the delivery of a further 4,000 dwellings after the end of the plan period. To the south is the North- East Cambridge Major area of change, which has a draft allocation for the delivery of 3,900 dwellings within the Local Plan period and 8,350 dwellings in total, along with the delivery of 15,000 new jobs.
- 3.3 It is clear from both the adopted and emerging Local Plan, that the A10 corridor from north- east Cambridge to Waterbeach is a key focus for growth. We fully support this approach. Consistent with this objective, it is considered that further growth should be provided on land to the west of Milton, at Rectory Farm. Rectory Farm is a particularly sustainable option for growth, given that it immediately adjoins the existing park & ride to the south of the site. In addition, the proposed 'central option' of the Cambridge to Waterbeach Rapid Transit Route immediately dissects Rectory Farm and has the ability to provide a bus stop within Rectory Farm, which could serve both the existing village of Milton and new job and housing growth at Rectory Farm. There is also the ability to provide ease of cycle access into the City from the site, via Waterbeach Greenway.

4. QUESTION: We think that the area of Milton Road in North-East Cambridge (including the current waste water treatment plant) can be developed into a lively and dense city district, after the water treatment plant relocated. What housing, jobs, facilitates or open spaces do you think this site should provide?

- 4.1 We support the proposed allocation and redevelopment of north- east Cambridge in principle and as set out in section 3 above, we consider that the corridor between north-east Cambridge and Waterbeach provides a sustainable transport corridor and should provide a focus for growth. However, we do consider that the GCSPS have taken an inconsistent approach in terms of the scoring of North- East Cambridge site within the HELAA than they have for land adjacent to Rectory Farm. Land within North- East Cambridge has a draft allocation for development, despite the fact that it is to a large extent reliant on the relocation of the Waste Water Treatment Works, which is subject to a complicated Development Consent Order approval process.
- 4.2 The Local Plan also references that the sustainability of North- East Cambridge will improve as a result of planned infrastructure projects such as the Chisholm Trail, Waterbeach to Cambridge Public Transport Corridor and Waterbeach Greenway. We fully support and agree that the delivery of these three important projects will improve the sustainability not only of North- East Cambridge, but also the settlements of Milton and Waterbeach. Within the HELAA Land at Rectory Farm has been deemed unsuitable on the basis of additional traffic pressure on the A14, however Cambridge North- East, which is both a significantly larger development and closer to the A14 has been deemed suitable on transport grounds. It is therefore unclear, why a different approach appears to have been taken between Cambridge North- East and land at Rectory Farm in this regard, which is not justified or sound in planning terms
- 4.3 Further analysis of this point is set out within our response to the HELAA, within section 7 of this report.

5. QUESTION: We think we should be very limited about the development we allow in villages, with only a few allocated sites in villages, with good public transport connections and local services. Which villages do you think should see new development of any kind?

- 5.1 The proposed strategy focuses on locating new development in and around Cambridge City, growing existing new settlements, with a small degree of growth in the rural southern clusters.
- 5.2 It is considered that additional growth should be provided within the most sustainable and largest villages within South Cambridgeshire, such as Milton. As set out in detail within our Call for Sites submission (which has been appended to this representation), Milton is arguably the most sustainable of the Minor Rural Service centres, given its very close proximity to Cambridge, its range of services and the ability to travel from Milton to Cambridge by sustainable transport means. Rectory Farm, is particularly sustainable given that it abuts Milton Park & Ride, which provides for direct and convenient bus access to the City.
- 5.3 The delivery of major transport schemes along the Waterbeach to Cambridge corridor will further improve the sustainability of Milton, particularly on its western side. The sustainability of Milton will be further enhanced by the additional of 15,000 jobs in north-east Cambridge, which will be very easily accessible by both bike and bus from land at Rectory Farm.
- 5.4 It is therefore considered that appropriate growth should be provided within the more sustainable, larger villages such as Milton.

6. QUESTION: What housing, jobs, facilities or open spaces do you think should be provided in and around these villages?

- 6.1 It is important that a range of housing, jobs and facilities are provided within larger villages as part of new allocations to allow them to thrive and remain vibrant. Gonville and Caius College are fully committed, to engagement with the Greater Cambridge Shared Planning Service and Milton Parish Council regarding the mix and type of housing to be delivered land at Rectory Farm.
- 6.2 The size of the site also means that there is capacity for up to 30,000 m² of employment floor space included within the site. The College are flexible regarding the type of employment space to be delivered as part of the allocation, in order to meet the extensive demand for job growth along this corridor.

7. QUESTION: Are there any sites which you think should be developed for housing or business use, which we haven't got on our map so far? Yes, the site at Rectory Farm should be allocated for mixed use development and would be a sound allocation as part of the emerging Local Plan.

7.1 The site was promoted originally at Call for Sites stage for a residential-led mixed use development for 1,500 dwellings and up to 30,000m² of employment space. This section of the report re-assesses the sites suitability, and demonstrates that it is a suitable location for mixed use development. The site has scored red in the HELAA Assessment in respect of Landscape and Townscape Impact and Strategic Transport Matters. For reasons set out within this section, it is considered that these sections need to be re-scored within the HELAA.

Response to HELAA

7.2 This section provides responses to the findings of the Greater Cambridge Housing and Employment Land Availability Assessment (HELAA) Report 2021.

Site Assessment Summary

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

7.3 A detailed review of the HELAA in respect of the land at Rectory Farm are set out below. The issues identified 'green' were:

- Open Space/Green Infrastructure;
- Accessibility to Services and Facilities; and
- Historic Environment.

7.4 These issues have therefore not been assessed as part of this representation as they are considered acceptable.

7.5 In the order they appear within the HELAA response, our assessment of each of the HELAA assessment criteria is set out as follows:

Adopted Development Plan Policies

7.6 The location of the site outside of the development boundary, within the green belt and partially within the Mineral and Waste Consultation Area is accepted.

- 7.7 The proximity of the site, immediately adjacent to the development boundary is noted, with residential development bordering the site to both the east and the park and ride and the Recycling Centre to the south.
- 7.8 However, the assessment fails to consider the impact of the Cambridge to Waterbeach Rapid Transit Route. The Rapid Transit Route will provide a new defined boundary to the west of Milton. Whilst the exact location of this boundary is unknown, it will significantly change the characteristics of this site. Whilst, this Rapid Transit Route, will not change the planning policy designations, it is considered to be a material planning consideration and is discussed further within the Landscape and Townscape section of this report.

Flood Risk

- 7.9 The issue of Flood Risk has been identified as 'Amber' in the site assessment, despite being located wholly in Flood Zone 1, and at low risk of surface water flooding; a 1 in 30-year event. Only 2% of the site is within land at risk from surface water flooding in a 1 in 1,000-year event, and 8% within a 1 in 1000-year event. The significant size of the site, would allow for developable areas to be directed outside of the small parts of the site that are within surface water flood risk areas. In this regard, flood risk is not considered to be a constraint on development of the site.
- 7.10 Site 40321, located at Newton Hall Industrial Estate, is also subject to an 'Amber' assessment of flood risk. However, unlike the site at Rectory Farm located wholly in flood zone 1, the Newton Hall site is located within both flood zone 2 and 3. It therefore appears that there has been a lack of consistency in the scoring that has been used.
- 7.11 It is therefore considered that our site, within Zone 1, should be re-assessed and designated as 'Green' for flood risk.

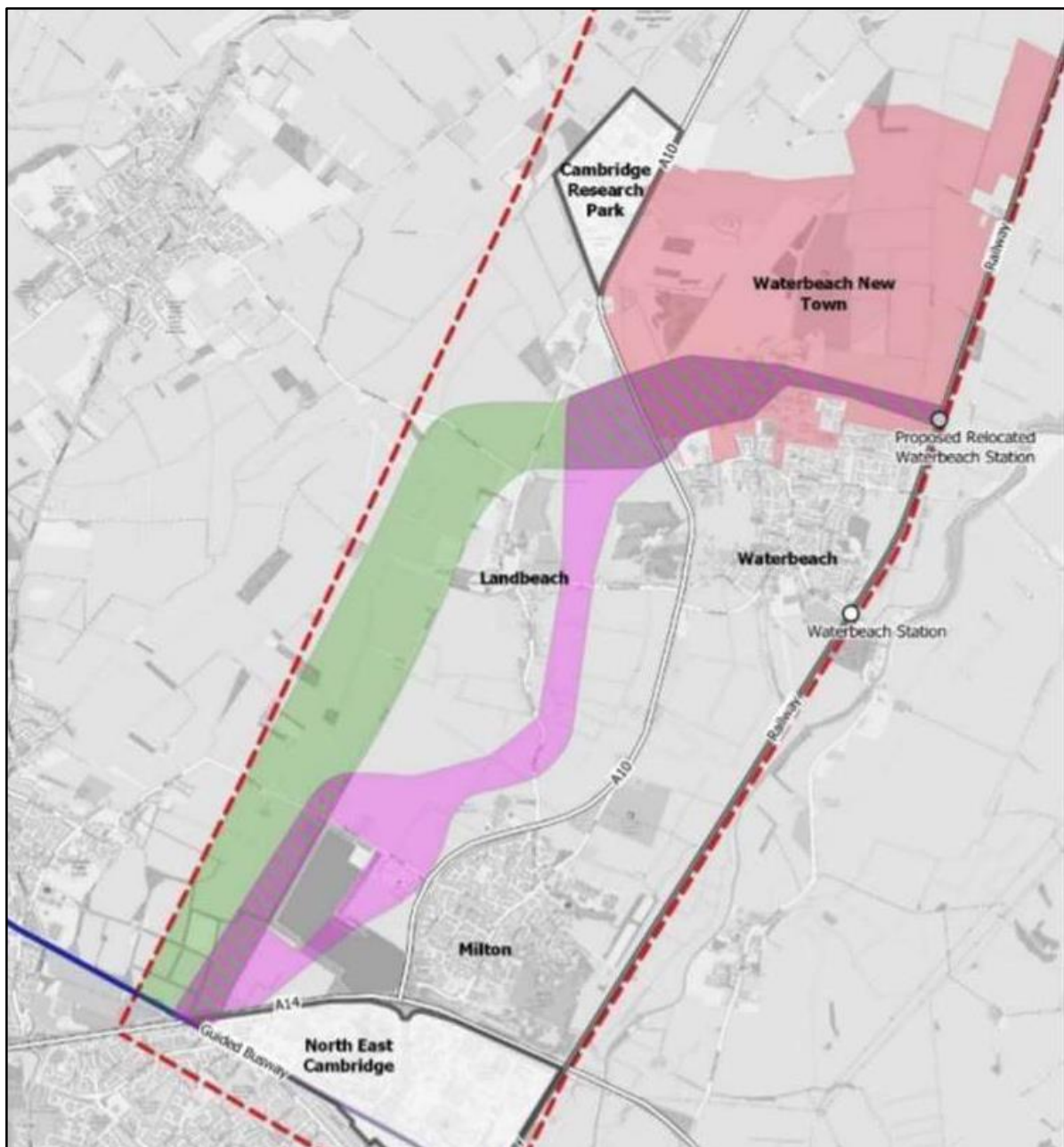
Landscape and Townscape

- 7.12 As outlined above, the Landscape and Townscape assessment is a 'red' issue in the HELAA on the grounds that 'harm would still be adverse, unacceptable and incongruous with the rural landscape'.
- 7.13 The HELAA continues, identifying how development in this location would adversely impact local views present due to a lack of intervening vegetation and built form.
- 7.14 Views on this area of land are not considered to be of such significance to prevent logical and sustainable development. The entire site is relatively flat, and thereby the land is not considered overly sensitive in landscape terms and it is not situated within a protected area.

7.15 When considering the impact of this site in landscaping terms, it does also not appear that the GCSPS have assessed the impact that the delivery of the Rapid Transit Route in this location will have in landscape terms.

7.16 In this regard, the Greater Cambridge Partnership have begun public consultation on the proposed Cambridge to Waterbeach rapid transit route. One of the routes currently being considered would dissect Rectory Farm and provide a clear and logical defined boundary on the west side of the delivery of any development on the site. Even if the western route was selected as the preferred option by the Greater Cambridge Partnership, this would still result in a new feature within the landscape, which significantly reduces the landscape sensitivity of the site when viewed to the west.

Figure 1: Cambridge to Waterbeach Rapid Transit Route Area of Search



7.17 In addition, Gonville and Caius College would also be happy to commit to the provision of extensive landscape planting towards the west and north boundaries of the site in order to minimise the impact of development on the landscape. Whilst it is acknowledged that any development of this scale would have some landscape impact, this needs to be considered holistically against the benefits that a development in this location could offer.

7.18 Considering the above, it is considered that the issue to Landscape and Townscape should be re-categorised as 'Amber', with the flat landscaping limiting existing views resulting in a less sensitive landscape.

Biodiversity and Geodiversity

7.19 The HELAA considers the impact on biodiversity and geodiversity to be 'amber', however it is considered that this assessment should be amended to green.

7.20 The HELAA assessment acknowledges that 'there are no apparent priority habitats within the site' and has instead assumed ecological value is 'likely' to be found along the site boundaries.

7.21 As part of any development of this site, provision can be made for substantial green buffers along the field boundaries. The site is an arable field of low ecological value and devoid of ecological features and therefore it is considered that the site should be re-categorised as green.

7.22 In addition, the site has the potential to provide significant opportunities for biodiversity net gain and provision for the delivery of large areas of open space, as part of the overall strategy for development of the site.

Archaeology

7.23 Archaeology is categorised as 'amber' in the HELAA assessment, due to 'extensive Iron Age and Roman archaeology with finds of Roman date recorded in the area'.

7.24 Although this is accepted, the preliminary stage of this site promotion means that in depth archaeology investigations are required prior to the true nature and extent of the heritage assets being confirmed. Gonville and Caius College are committed to undertaking appropriate archaeological work at the appropriate time to inform the provision for development on this site.

7.25 It is accepted that Amber is a suitable score for the site in archaeological terms.

Site Access

- 7.26 The Site Access is identified as 'Amber' but described as 'acceptable in principle, subject to detailed design' in the HELAA 2021.
- 7.27 At this stage in the evaluation of sites submitted in the 2019 Call for Sites Consultation, 'acceptable in principle' is as positive as can be, detailed access proposals are yet to be confirmed.
- 7.28 The size of the site means that the site benefits from several options for access, with multiple access options. The chosen access would not cause any highway safety issue and would achieve the relevant visibility splay. This is particularly the case, given that Butt Lane already provides access to Milton Road Park & Ride and the Milton Recycling Centre, both of which are uses that have a high number of traffic movements. Butt Lane is a straight road, with very good visibility splays.
- 7.29 The principle of the proposed access is established and that the site benefits from very good access, the site access score should be re- categorised as 'Green.'

Transport on Roads

- 7.30 The HELAA responses acknowledges that the A10 Corridor is subject to major transport investments, including the Waterbeach to Cambridge Greenway, the Rapid Transit Route and the A10 study, which has identified a multi- modal package of measures required to unlock growth in this area.
- 7.31 Gonville and Caius College are supportive of all of these transport improvement schemes. Delivery of development at Rectory Farm in this location, would also have the ability to assist with funding of these major transport improvement schemes via Section106 funding, which will further assist with the delivery of these transport schemes.
- 7.32 As acknowledged within the consultation responses, the impact of the scheme on functioning trunk roads and local roads can be reasonably mitigated and therefore it is considered that this scoring should be green, rather than amber.

Noise, Vibration, Odour and Light Pollution

- 7.33 It is acknowledged that the A10 is a significant source of noise. However, accounting for the size of the site being some 95 hectares, there is the ability for development to be set back well away from the A10 boundary to ensure that noise matters are fully mitigated against as a result of the delivery of any development.

- 7.34 Despite being categorised as ‘amber’, the assessment notes that although the site would be impacted by traffic noise, it is ‘acceptable in principle subject to appropriate detailed design considerations and mitigation’.
- 7.35 Appropriate design and site layout can be used to mitigate against any noise, vibration, odour and light pollution. The employment land could potentially be located immediately west of the A10, acting as a buffer between the residential development and A10.
- 7.36 Further to this, natural buffers can be designed into the proposal, reducing any adverse impacts associated with the A10.

Air Quality

- 7.37 The site is not located either within, or in proximity to an Air Quality Management Zone.

Contamination and Ground Stability

- 7.38 The HELAA references the proximity of the site to the recycling centre to the south. Accounting for the size of the site and that it is a greenfield site, it is considered that in the event that there are any contaminated land issues, they would relate to a very small proportion within the southern part of the site, which can be adequately mitigated against.

Strategic Highways Impact

- 7.39 The assessment identifies issues of highways impact as ‘red’, due to the apparent impact on the A14, with sites having to demonstrate ‘no net increase in vehicle trips on the strategic road network’.
- 7.40 However, the approach and assessment of the site, in this regard, is not consistent with the scoring of the land which is situated within the North- East Cambridge Area Action Plan. The HELAA response in this regard, is also inconsistent with the assessment of the site on ‘Transport and Road’ section of the HELAA for Rectory Farm (as outlined above), which also references the nil policy position, but acknowledges that the delivery of the site could provide reasonable mitigation.
- 7.41 As detailed within earlier sections of this report, The Cambridge North- East Action Plan establishes a vision for a new city district in North East Cambridge, comprising 182 hectares of brownfield land; the land included in this plan is identified below.
- 7.42 The Area Action Plan will be the planning framework developed by Cambridge City.

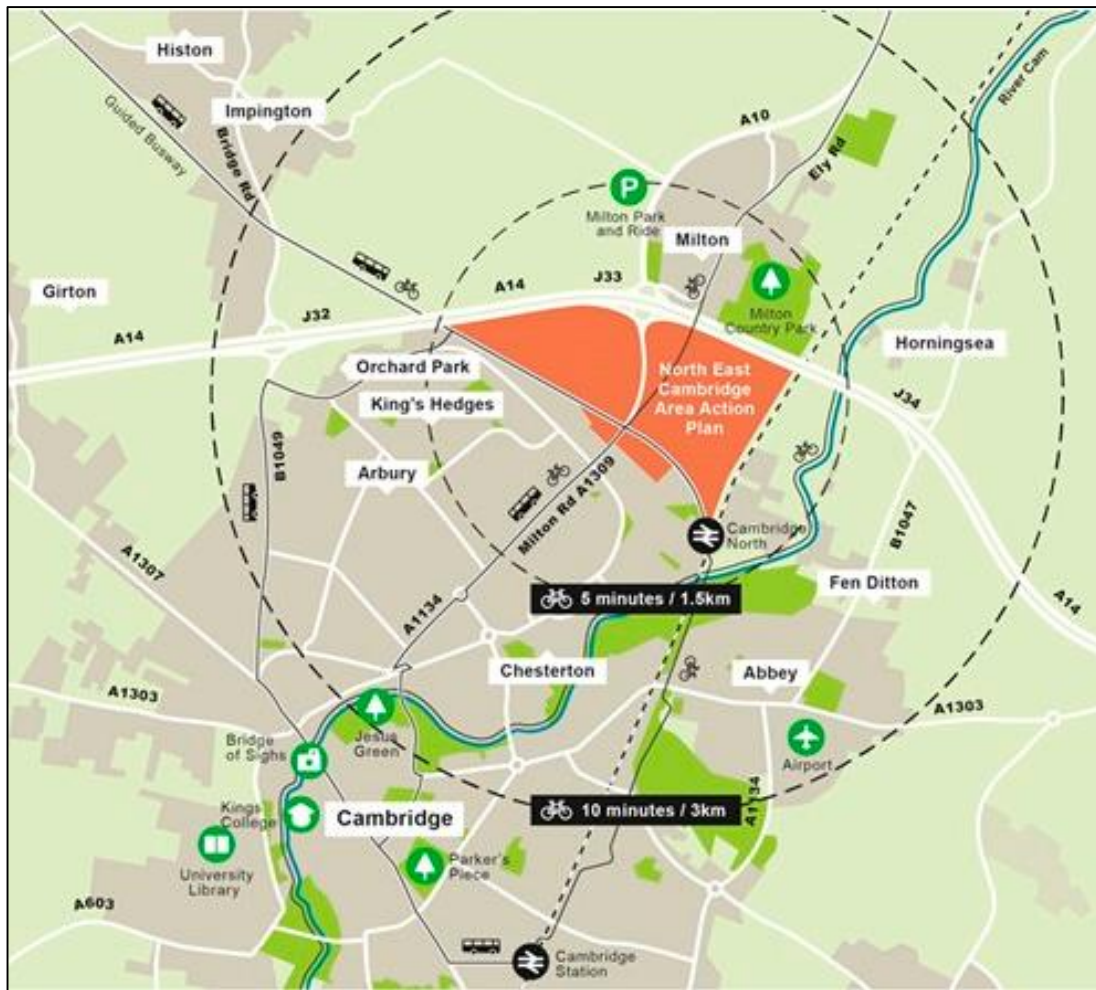


Figure 2 North East Cambridge Area Action Plan

7.43 According to section two of the draft North East Cambridge Area Action Plan and the First Proposals, the objectives for the plan include the following;

- 8,000 homes for 18,000 residents;
- 10 hectares of public parks and squares;
- 3 primary schools;
- 1 new library;
- 10 new or improved walking and cycling connections; and
- 20,000 new jobs across many sectors.

7.44 Despite this substantial size of this proposal to completely regenerate and fully redesign a 182-hectare area immediately adjacent to the south of the A14, the land within this proposal has been considered to be suitable having regard to impact to impact upon the A14.

7.45 By contrast the development proposals at Rectory Farm, whilst of a significant scale are substantially smaller than the proposed development within the Cambridge North- East Area Action Plan. Therefore, it is very surprising and an unsound planning approach to deem land at Rectory Farm unsuitable having regard to the impact upon traffic along the A14, but land within the north- east Action Plan as suitable. This appears to be unjustified in planning policy terms and the First Proposals cannot be considered to be sound in that regard.

7.46 It is considered imperative for all sites to be scored fairly and reasonably in order for the First Proposals to be considered sound. At a minimum, Rectory Farm should be re-assessed in line with the recommendations for Cambridge North- East having regard to impact on the A14. As set out within paragraphs 7.30 to 7.32 above, Gonville and Caius College have no objection to the provision of appropriate infrastructure funding from the development on Rectory Farm sites, to assist with the delivery of the major transport infrastructure improvements along this corridor.

7.47 Considering the above, the site at Rectory Farm should be reassessed as ‘amber’.

Summary

7.48 It is therefore considered that with the re-assessment shown below, the site should be viewed as acceptable and included an allocation in the HELAA for the Greater Cambridgeshire Local Plan.

ISSUE	HELAA ASSESSMENT	UPDATED ASSESSMENT	COMMENTS
Adopted Development Plan Policies	Amber	Amber	Located outside of the development framework.
Flood Risk	Amber	Green	Site located wholly in Flood Zone 1.
Landscape and Townscape	Red	Amber	The site landscape is not overly sensitive due to the flat nature of the land. The proposed busway will act as a buffer and visually impact the existing open landscape.
Biodiversity and Geodiversity	Amber	Green	No designations on or immediately adjacent to the site and site is arable land of low ecology value.

ISSUE	HELAA ASSESSMENT	UPDATED ASSESSMENT	COMMENTS
Archaeology	Amber	Amber	Any adverse impact associated with development can be sufficiently mitigated against. Further site investigation is required.
Site Access	Amber	Green	The proposed site is acceptable in principle and has very good visibility spays
Transport and Roads	Amber	Amber	Cambridge to Waterbeach Rapid Transit route and other major transport improvement schemes, are proposed to run adjacent to this site will result in a range of sustainable travel options accessible to all.
Noise, Vibration, Odour and Light Pollution	Amber	Green	Appropriate mitigation through natural buffers and site layout can reduce any associated adverse impact.
Air Quality	Amber	Green	The site is not located within an Air Quality Management Zone.
Contamination and Ground Stability	Amber	Green	There is no evidence to suggest previous land uses has resulted in the land to be contaminated, only land on the adjacent site. Further site investigation work will be carried out to understand the land condition.
Strategic Highways Impact	Red	Amber	Impact on the A14 is minimal compared to proposals included in the North East Cambridge Area Action Plan and has the ability to provide Section 106 funding to mitigate against its impact.

8. CONCLUSION

8.1 This representation has been prepared by Strutt & Parker, on behalf of Gonville & Caius College to support the allocation of a mixed use site, comprising 30,000 m² of employment space, and up to 1,500 dwellings.

8.2 The site has a number of favourable attributes that would demonstrate it is a sound allocation for housing and employment growth, within the emerging Local Plan:

- It is located in a highly sustainable location, adjacent to the A10. It is situated within a very sustainable growth corridor, with Cambridge North- East Area Action Plan to the South and Waterbeach New Settlement to the north. The provision for substantial growth at Milton would fully align with the objectives of achieving a cluster of growth along the Cambridge North- East- Waterbeach Corridor
- The site is in a very sustainable location adjacent to Milton Park & Ride and also benefits from very good cycle access to Cambridge City, which are being further improved as part of Waterbeach Greenway project. It benefits from very good ease of access to Cambridge North- East and the existing Science Parks within this area.
- The HELAA Assessment for the site needs to be re- visited to account for the impact that the Waterbeach to Cambridge Rapid Transit Route will have in providing a clear and defined landscape buffer for the development at Rectory Farm. Secondly the number of major transport projects along this corridor, would provide mitigation to the development of this site. In this regard the impact of development at Rectory Farm appears to be inconsistently scored having regard to Cambridge North- East Area Action Plan Sites.

8.3 In light of the above, it is therefore considered that land at Rectory Farm, Milton, provides an excellent location for development and would be a sound basis for allocation as part of the emerging Local Plan.