

GREATER CAMBRIDGE LOCAL PLAN–THE FIRST
PROPOSALS

Land at Maarnford Farm, Hunts Road, Duxford,
CB22 4RE

Site Reference 40558

Representations on behalf of F C Butler & Sons
Ltd

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Client F C Butler & Sons Ltd

Reference

Date 10.12.21

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Checked by:

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APPENDICES

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1. Introduction

- 1.1. Cheffins have been instructed by the F C Butler & Sons Ltd to continue to promote their interests at the 1.66 hectare rectangular parcel of land at Maarnford Farm, Hunts Road, Duxford, CB22 4RE (HELAA Site Ref: 40558. My clients welcome the proposal for this site to be allocated for residential development for 60 dwellings under Policy Ref S/RSC/MF. It is reiterated that this site is available and can be delivered at an early stage of the Greater Cambridge Plan. The site also represents a logical extension to the existing development to the south east and represents an appropriate scale of development immediately adjacent to a Group Village.
- 1.2. As part of the work undertaken to demonstrate the deliverability of this site these representations are accompanied by an illustrative masterplan (see Appendix A) which demonstrates how 60 dwellings could be accommodated on this site. A highways note has also been prepared which confirms that a safe means of access can be created onto Hunts Road (see Appendix B)

2. Site Location and Context

- 2.1. Land at Maarnford Farm, Duxford comprises a rectangular parcel of former agricultural land which has been used for the storage of caravans. An existing farm house is located in the northern corner of the site. A telecommunications mast is located to the south west of the farm house, with a large agricultural building to the south west of this. The site immediately adjoins the existing settlement envelope of Duxford and is bound to the south east by Maarnford Close. The land to the south west and north west comprises agricultural land, with significant hedgerows representing a clear demarcation between the site and the adjoining land. A similar hedge separates the site from Maarnford Close and screens the site from Hunts Road. Duxford Community Centre is located on the north-east of Hunts Road.
- 2.2. The land represents a logical extension to Duxford, a view shared by the Greater Cambridge Plan in recommending that this land is allocated for development.
- 2.3. The site is well located to key services and facilities with Duxford Pre-School, Duxford Community Primary School and the Community Centre being located immediately to the north-west of the site, and at circa 200m from the site is within easy walking distance. The site is also within easy walking distance of the public house and shop in St Peter's Street, 500m to the south-east of the site. There are also bus stops located in St Peter's Road, and as detailed in the highway note, Duxford has regular bus services to Cambridge and Saffron Walden. The site is also within walking distance of Whittlesford Parkway Station providing links to Cambridge and London.
- 2.4. The entirety of the site is in Flood Zone 1 and has been assessed by the Council as not being at risk of surface water flooding.

3. Master Planning Approach

- 3.1. An illustrative masterplan has been produced for this site has demonstrated that the site can provide 60 dwellings, whilst achieving a substantial landscape edge and as well as providing space for the existing telecommunications mast.
- 3.2. The site will provide policy compliant levels of affordable housing. The use of the land will include for access/roads, on plots and boundary landscaping, public open space and space around the telecommunications mast.
- 3.3. The benefits of the proposed development are wide-ranging and will promote the social, economic and environmental objectives of the National Planning Policy Framework. The site is located in a highly sustainable location, adjacent to existing services and facilities and will

deliver housing and assist in the continued economic growth in the region. The site is also immediately available for development.

3.4. In particular, development of the site will provide:

- Further family housing;
- Mixed house-types;
- Affordable homes;
- Potentially custom or self build housing

3.5. Approximately 20% of the site area is proposed as public open space, which is designed to maintain existing ecological features on site (e.g. trees and hedges on the site boundaries). The existing and enhanced landscaping will provide an improved green edge to the village, as well as significant biodiversity benefits.

3.6. The existing public transport options will encourage sustainable modes of travel to existing local services and facilities.

4. Technical Assessments

4.1. Some initial site and contextual assessments have been carried out in relation to masterplanning, landscaping and access. This work indicates that some of the scoring in the HELAA needs to be updated, and reinforces the suitability of this proposal to allocate this site for development in 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 40558.

5. Comments on the Scoring Methodology and System

5.1. The performance of sites proposed for the GCLP have been coded using a traffic light system (red/amber/green). Although traffic light scoring systems are commonly used in this context, the performance criteria applied by the Greater Cambridge authorities appears overly stringent and inconsistent.

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

5.3. 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.

6. Suitability for development

Adopted Development Plan Policies

- 6.1. Being outside the current settlement boundary for Duxford as defined in the South Cambridgeshire Adopted Policies Map), the site is assessed as being amber. However, the boundaries are due to be reviewed as part of the plan-making process for the GCLP, "with boundaries defined to take into account the present extent of the built-up area as well as planned new development" under proposed policy *S/SB Settlement Boundaries*. It is unclear if these planned boundary changes have been considered in the HELAA assessment. The settlement boundary of Duxford will need to be reviewed to accommodate this development and the proposal to allocate this site has accepted that this will occur. There are questions as to whether this scoring should be altered.

Landscape and Townscape

- 6.2. The scoring in relation to Landscape and Townscape is also somewhat perverse. The site is currently used for a caravan park which does not contribute to the townscape/landscape character of the area. The proposed landscape mitigation and enhancement of the boundary treatment as advised by the Council will minimise the impact of development. This score should be amended to green and again emphasises that an unnecessarily strict approach is being applied to the assessment of sites.

Archaeology

- 6.3. In relation to archaeology "the comment that it is located close to the historic village core" is not underpinned by any evidence to substantiate this comment. As part of an application the site will be subject to an appropriate archaeological assessment and intrusive investigations if deemed necessary. Therefore, this score should be changed to green on the proviso that the requisite investigations are undertaken.

Accessibility to Services and Facilities

- 6.4. The scoring in relation to this section of the site assessment is somewhat crude and should clearly identify aspects which have scored highly and others less well. For example the site is in very close proximity to a primary school which should be seen as a positive. Whilst, the distance from a secondary school appears to be seen as a negative, even though it is anticipated that pupils will have access to school transport. A more appropriate measure would be to advise whether these educational establishments have capacity or there is room for their expansion.
- 6.5. The scale of the proposed development should also be factored into the scoring mechanism, with access to larger scale facilities being of more importance for large scale settlements. The final paragraph of the assessment advises that there is "Adequate accessibility to key local services, transport, and employment" and the "Proposed development would not require delivery of accompanying key services". In view of the positive comments made again it is unclear as to why an amber score has been given, especially as the site is in an unquestionably sustainable location.

Site Access

- 6.6. As detailed in the highway note (Appendix B) accompanying these representations it is apparent that a safe means of access can be created from this site onto Hunts Road. In the light of the information provided to accompany these representations it is recommended that the scoring regarding this site is changed to green.

Transport and Roads

- 6.7. The comments made regarding the need to contribute/deliver major transport infrastructure is noted. However, it is clear that the scale of contributions sought should be commensurate with the scale of development proposed and not impact on the viability of the development.

- 6.8. However, notwithstanding this assessment, it is clear that the current scoring system is in need of updating. The scoring system also needs to reflect changes in modern living and technological advancements, including increased homeworking, more widespread use of remote services (e.g. GP and pharmacies), increased online shopping (including groceries), and the growth in micro-mobility (e.g. e-bikes and electric scooters).
- 6.9. The Transport Statement which will accompany an application for development will seek to assess, where necessary, the cumulative impact of this site and any committed/allocated sites on local junctions and the M11. Although the comments made that "Any potential impact on the functioning of truck roads and/or local roads could be reasonably mitigated" needs to be commensurate with the scale of development proposed.

Noise, Vibration, Odour and Light Pollution

- 6.10. It is apparent from the comments made that noise, vibration, odour and light pollution are not major constraints and the design of development will need to ensure that these can be mitigated. Therefore, it is not considered that the above issues should be seen as a constraint to development and should score green.

Contamination and Ground Stability

- 6.11. The site will need to be subject to a Phase 1 Contamination report and if contamination is identified it will be remediated in accordance with an agreed strategy. Therefore, it is not considered that contamination should be seen as an impediment to development. As stated the issue of contamination can be addressed by way of suitable conditions attached to a planning permission

Constraints to development

- 6.12. The comments within this section are noted and it is recognised that it is difficult to identify land which is within the lower grades of agricultural land classification. In addition, its use has evidently changed from an agricultural use to the storage of caravans. Its loss would also not prejudice the farming of adjacent agricultural land. As part of the development of the site the electric overhead lines will either need to be diverted off the site or be placed underground.
- 6.13. The scheme will need to incorporate a suitable drainage system to ensure that the EA Source Protection Zone 3 is not adversely affected. Finally, as detailed on the attached illustrative masterplan the impact of the telecommunication apparatus has been taken into account in the design of a residential scheme.

7. Conclusion

- 7.1. As detailed above this site is clearly available and deliverable. The illustrative mastepan has confirmed that the proposed development of the site will not have an adverse impact on the landscape.
- 7.2. The highway has confirmed that the site can be readily accessed from Hunts Road and confirmed that the site is in walking distanc of local services and facilities and Whittlesford Station.
- 7.3. Whilst some question have been raised as to scoring applied by the Council in their site assessment, there are not considered to be any constraints which cannot be addressed by suitable mitigation or technical reports. These repoirts also reinforce the Councils view that this site is suitable for development
- 7.4. There is significant demand for residential development within the Greater Cambridge Authority area and this site will clearly help to meet this demand for both market and affordable housing. The site will aid the viability and vitality of local servoces and facilities.
- 7.5. The draft allocation of this site is therefore supported and the landowners look forward to working with the Council to deliver this site.

APPENDIX 1: Site Plan

APPENDIX 2: Accommodation Plan

APPENDIX 3: Highway Note