

GREATER CAMBRIDGE LOCAL PLAN

Response by Martin Grant Homes Ltd

NORTH CAMBOURNE

DECEMBER 2021

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1. Introduction

- 1.1. Savills is instructed to act on behalf of Martin Grant Homes Ltd (MGH). MGH controls a substantial area of land to the north of (and adjoining) Cambourne (referred to as North Cambourne).
- 1.2. Our representations are structured to respond to relevant sections of the Greater Cambridge Local Plan (GCLP) 'First Proposals' consultation. This follows on from our representations to the 'First Conversation' in the previous stage of the Local Plan during 2020, and our earlier response to the Call for Sites in 2019.
- 1.3. This representation is accompanied by a vision document and illustrative masterplan (under separate cover), setting out the key strategies and proposals for North Cambourne, and by other technical reports on transport and landscape. The vision document and illustrative masterplan explain how new employment could be delivered together with new infrastructure, facilities and housing, creating a new sustainable community, that is well connected to Cambourne and to Cambridge as well as providing improved access to services and facilities for existing Cambourne residents.
- 1.4. Development at North Cambourne is a highly sustainable option for accommodating both new housing and new jobs in the Greater Cambridge area. There is significant opportunity for development here of a scale that can promote self-containment and consolidate the functions of the existing settlement. This will support internalised movements using active travel and sustainable modes, minimising carbon impacts as compared to other development options and thereby addressing the Climate Emergency that the Greater Cambridge local authorities have declared.
- 1.5. The Government has identified the Oxford-Cambridge Arc as a key corridor for growth in the country. This reflects the fact that the fundamentals of the economy in Cambridge are very strong, with certain key sectors clustered in the area including Life Sciences and Bio-Medical. The Arc therefore represents one of, if not the best, opportunity for delivering growth where the economy can sustain it, where productivity is high, and where there are huge opportunities to improve equality and sustainability¹.
- 1.6. The narrative as a whole indicates MGH's general views, as well as indicating areas of support or objection in relation to the First Proposals emerging policies and general direction of travel for the Local Plan. The headings and sub-headings in the following sections relate to the main sections and policies in the First Proposals consultation.
- 1.7. MGH has already consulted widely among local communities on its proposals for North Cambourne and will continue to participate in the discussion about where growth should take place in Greater Cambridge in order to appreciate, advance and fully embed all of the benefits that development can deliver here, as well as understand and respond to local concerns.

¹ [The Oxford-Cambridge Innovation Arc, Savills, 2019](#)

2. Vision and Development Strategy

Vision and aims

- 2.1. Helping Greater Cambridge transition to net zero carbon by 2050, by ensuring that development is sited in places that help to limit carbon emissions, is designed to the highest achievable standards for energy and water efficiency, and is resilient to current and future climate risks, requires bold action - and promptly. MGH shares the Councils' commitment to delivering homes, jobs and infrastructure in the most sustainable places that will secure this transition in a timely way.
- 2.2. We support the emerging Local Plan aims to;
- increase and improve networks of habitats for wildlife and green spaces for people;
 - create new distinctive and inclusive places that will help people to lead healthier and happier lives, where there is less reliance on travel by unsustainable modes;
 - encourage a flourishing mixed economy, providing a range of jobs whilst protecting the global reputation of Greater Cambridge for innovation;
 - plan enough homes to meet the needs of the area, including affordable housing and a wide range of housing to suit the needs of the community;
 - plan for transport, water, energy and digital networks; and health, education and cultural facilities; in the right places and built at the right times to serve the growing communities;
 - help to tackle the climate emergency through proactive interventions to mitigate carbon emissions through sustainable design measures, eliminating the need to use fossil fuels within buildings and achieving net zero emissions through on-site measures.
- 2.3. In the current consultation the Greater Cambridge authorities have indicated that location is the single biggest factor in impacting on carbon, albeit recognising that it is not suitable to focus on any one broad location. In order to balance this, we understand that the combined authority is proposing;
- 1) a blended strategy – taking the most sustainable elements of the Western Cluster / Public Transport corridors (incorporating Cambourne) and including them, to meet a variety of needs; and
 - 2) a focus on development at a range of the best performing locations in terms of minimising trips by car.
- 2.4. In addition, the Greater Cambridge authorities have indicated that mitigating carbon emissions from new buildings will be a key issue in delivering the authorities' longer-term net zero carbon objectives. With South Cambridgeshire having declared a climate emergency in 2019, it now aiming to halve emissions by 2030 and reduce them to zero by 2050. In terms of the effect of these goals on emissions from new development, we understand that the combined authority is proposing;
- 1) a net zero carbon policy for new development; and
 - 2) a focus on calculating whole life carbon emission from new development.

- 2.5. In the public feedback sessions held so far as part of this First Proposals consultation, a focus on public transport corridors and the densification of the Cambridge urban area were the top options preferred by respondents.
- 2.6. Importance was also given in the feedback sessions to the opportunity to deliver sufficient jobs as well as homes, and the particular recognition of the benefits that East West Rail (EWR) brings to Cambourne. The preference being to expand here, rather than create further new settlements.

How much development and where? - general comments

- 2.7. The NPPF, at paragraph 61, sets a requirement to determine minimum housing numbers using the standard method. At paragraph 81 the NPPF also states that significant weight should be placed on the need to support economic growth and productivity, and that policies should address the specific locational requirements of different sectors. The NPPF states that this is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential. This includes making provision for clusters or networks of knowledge and data-driven, creative or high-tech industries, but also recognising all of the supporting roles that employment and services need to provide to support communities. Paragraph 105 of the NPPF also sets out the requirement that the planning system should actively manage patterns of growth in support of sustainable transport objectives. Significant development, it states, should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, which can help to reduce congestion and emissions, and improve air quality and public health.
- 2.8. The location of Greater Cambridge within the national economic priority area of the Oxford to Cambridge Arc lends even further weight to the need to support this growth. The Arc already supports two million jobs and brings £110 billion to the UK economy per annum, which is over 7% of England's economic output (Gross Value Added)². The emerging Spatial Strategy and Vision for the Arc suggests that by 2050 the economic output could increase by between £80 billion and £160 billion per annum, and up to a further one million jobs generated.
- 2.9. MGH supports the strategic ambitions to deliver substantial growth in the GCLP plan period to 2041, and in the wider Arc Strategy to 2050, and we have set out our position in more detail in the following sections.
- 2.10. The timeframes associated with plan making also need to be realistic. Paragraph 22 of the NPPF states that "*strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.*"
- 2.11. The updated Planning Practice Guidance (PPG) states that where the new policy applies, "*the authority will need to ensure that their vision reflects the long-term nature of their strategy for the plan or those larger*

² Oxford-Cambridge Arc Policy Paper, February 2021 [Oxford-Cambridge Arc - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

scale developments. It is not anticipated that such visions would require evidence in addition to that already produced to support the plan.”

- 2.12. A recent Ministerial Letter³ to the Chief Executive of the Planning Inspectorate confirms that the changes to the NPPF are intended to ensure that local authority plan preparation can continue “*at pace while also ensuring that the government’s objectives are delivered*”
- 2.13. For the strategic sites contained in the Plan, MGH suggests that it sets out an indicative plan for ‘future Growth Areas’ for the period to 2050, which aligns with the timescale for the Oxford to Cambridge Arc Strategy.

Policy S/JH - New jobs and homes

New jobs

- 2.14. The Cambridge economy is internationally significant and sits at the heart of three economic corridors. Its influence therefore extends far beyond Greater Cambridge. There are really important key sectors located here; research & development, professional services, health and care. Nevertheless, the joint authorities recognise the need for a mixed economy providing a wide range of jobs, whilst maintaining the global reputation of Greater Cambridge for innovation.
- 2.15. The evidence base documents within the First Proposals consultation make clear that the effect of this highly successful local economy is that it comes at a cost; high house prices and low levels of affordability, leading to increased commuting distances and associated carbon emissions impacts. There is also a potential threat of de-population from Greater Cambridge with economic migration to more affordable areas, especially if working patterns in the knowledge economy are increasingly flexible and supported by technological advances.
- 2.16. We understand that the approach taken to forecasting jobs has involved looking back, to review both recent and longer-term employment trends, but also a look forward using the standard regional economic forecast as a baseline. The conclusions set out in the evidence base have been towards promoting a ‘central scenario’ seen as ‘*most likely*’ accounting for longer term patterns of employment growth, but with acknowledgement of recent fast growth in key sectors.
- 2.17. However, there has also been a ‘higher scenario’ considered, which is seen as ‘*plausible*’, and which places greater weight on the recent fast jobs growth in the key sectors. It is also noted that there has also been accelerated growth in jobs generally in recent years.
- 2.18. There is a difficulty (that is recognised in the GL Hearn ‘Housing and Employment Relationships Report’) in delivering the homes to match job provision, and a recognition that existing (2011 Census) commuting patterns would expect Greater Cambridge to continue to be a net importer of labour. The minimum growth model takes the number of houses that would derive from the Government standard method to calculate the number of jobs that this would support; whereas the higher growth model takes more specific account

³ [Correspondence overview: Changes to the National Planning Policy Framework: letter to the Planning Inspectorate - GOV.UK \(www.gov.uk\)](#)

of evidence of job forecasting in Greater Cambridge, and uses that to calculate the homes required to support it.

- 2.19. MGH asserts that, if the objective of the plan is a successful economy that can continue to thrive and meet the local authority carbon emissions targets, it will need the homes to match jobs, or commuting will increase. Alternatively, the policy would need to be to deliberately constrain job growth, which, in our view, does not comply with government policies or the Arc strategy. Given the very particular, arguably exceptional, ambitions for growth in Greater Cambridge the latter approach would be unlikely to be found sound.
- 2.20. Savills undertook an Employment Market Assessment in July 2020, on behalf of MGH, which indicates that the Cambourne office market, while smaller compared to other urban areas in the region, has a diverse business sector base comprised of companies in the knowledge economy. This mix is comparable to that found in Cambridge and signifies that Cambourne is already seen as an attractive office location. Cambourne's office rents are competitive compared to other regional markets in the wider area and there is a good level of high-quality office premises.
- 2.21. The industrial market in Cambourne was assessed in the same study as being limited at present, compared to main industrial locations at Bedford and Cambridge and, to a lesser degree, Biggleswade and Huntingdon. Bedford and Cambridge dominate the 'large sheds' market (over 10,000 sqm) while the other locations cater more for 'mid box' industrial sheds (2,000 - 5,000 sqm). However, much of this stock is assessed to be in need of renewal, which could provide an opportunity for Cambourne in the near to medium-term.
- 2.22. The Employment Market Assessment also indicated that the new EWR station and other mass transit proposals would enable a significantly larger labour catchment to access North Cambourne via public transport modes. We estimate that this could achieve a theoretic modal shift from car to rail within the 30 and 45-minute drive time catchments of more than 50%. This point is explored in further detail in Section 4 of our vision document. This shift would help underpin future investment, given the importance placed by businesses in having access to suitably qualified staff.
- 2.23. Much of the existing and future (once EWR is operational) local labour catchments have skill levels higher than the national average, which would benefit office-based occupiers in particular. The Savills employment study also identified the positive impact that new rail stations across the UK have had on their local commercial markets within a 2-mile radius. These positive impacts included reduced vacancies, higher rents, and increased leasing activity and new deliveries compared to their relevant regional markets. Based on these factors we estimate that Cambourne could capture up to 15% of future office growth within its office market area and up to 5% of its industrial market area.
- 2.24. From the Savills Employment Market Assessment this translates to:
- 37ha of office land (or 185,000 sqm of office floorspace) over 20 years or 55ha (278,000 sqm) over a 30-year period, based on a 50% plot ratio;
 - 11ha of industrial land (or 43,000 sqm of industrial floorspace) over 20 years or 16ha (65,000 sqm) over a 30-year period, based on a 40% plot ratio.



- 2.25. Our ambition for North Cambourne, contained within the vision document and illustrative masterplan, therefore indicates much more than the 40,000 sqm of employment space shown in the previous SHLAA submission.
- 2.26. The masterplan in the vision document shows a large area of employment space together with the homes that can be accommodated at North Cambourne, that equates to just over 1 job per home. We would also wish to generate more jobs within the existing areas of Cambourne, in order to rectify the current imbalance of 0.35 jobs per home that presently exists within the settlement and which gives rise to high levels of out-commuting.
- 2.27. Overall, the importance of a job led approach, incorporating a realistic assessment of local economic factors and the ability to deliver housing that supports the labour market in a sustainable way, is critical to the strategic policy for Greater Cambridge and meeting the wider economic objectives for the Arc. These objectives will be supported by the growth proposed at North Cambourne.

New homes

- 2.28. The recognised need is to provide homes consistent with the forecast jobs (as detailed in the ‘Housing and Employment Relationships’ report).
- 2.29. The Greater Cambridge LPAs have explained that the proposed housing quantum is derived from understanding workplace populations, commuting patterns and resident populations, and has also involved testing likely commuting patterns. The housing forecast is associated with the most likely central employment scenario, and assumes that all the additional homes generated by forecast jobs above those supported by the standard method will be provided in full within Greater Cambridge.
- 2.30. The table below identifies the scenarios in the First Proposals consultation that have been assessed in seeking to identify the overall position on Objectively Assessed Need. Importantly, we understand that the jobs are proposed across all employment sectors, including business, retail, leisure, education and healthcare.

	Homes 2020 - 2041	Jobs 2020 - 2041
Minimum Growth – Gov Standard Method	36,700	45,800
Per annum	1,743 homes	2,181 jobs
Central Scenario – ‘Most likely’	44,400	58,500
Per annum	2,111 homes	2,786 jobs
Higher Scenario – ‘Plausible’	56,500	78,700
Per annum	2,690 homes	3,748 jobs

Table 2.1 – Homes and Jobs Scenarios in the First Proposals Local Plan 2041

- 2.31. The table above suggests a changing factor of 1.24 to 1.31 to 1.39 jobs per home, as the numbers increase. We suggest that this, in turn, could potentially increase the amount of displacement and commuting. This is particularly relevant in Cambourne, where the job to home ratio is currently low. Furthermore, it is accepted by the joint authorities that planning for the standard method of calculating homes would increase the risk of higher levels of commuting.

2.32. It is also notable that an independent economic review has suggested an even higher number of jobs could be created, based on the recent accelerated growth in some sectors. The consultation document highlights that the Cambridgeshire and Peterborough Independent Economic Review (CPIER) says: “*A distinguishing feature of [Cambridgeshire and Peterborough] is how strongly it has grown recently... This has been driven primarily, but not entirely, by rapid business creation and growth in the south – Cambridge and South Cambridgeshire.*”.

2.33. In conclusion, MGH would strongly support the higher scenario for jobs and housing that has been assessed, given that it is seen as ‘plausible’, and also that the recent trend demonstrates accelerated growth in jobs in Greater Cambridge. It is this level of growth in jobs that should guide the housing targets in order to avoid local labour shortages causing damage to the economic potential of the area and / or giving rise to longer distance commuting, which will render the 2030 and 2050 net zero carbon targets unachievable.

Policy S/DS – Development strategy

2.34. As set out above, it is essential, not just for the prosperity of those living in the area, but also for the wider region within the Oxford-Cambridge Arc and the UK in general, that Greater Cambridge plays its part in delivering economic growth.

2.35. The obligation is on the LPAs to properly plan for and match the provision, and manage the impacts, of housing, including affordable housing, and jobs. The failure to co-ordinate and plan sufficient land for development would result in the Local Plan being found unsound and in turn potential unplanned development arising, in the absence of a 5-year housing land supply. In turn this would have external implications for infrastructure delivery, worsening housing and employment land affordability, increased commuting and carbon impacts. Clearly this is not sustainable in terms of social, economic and environmental impacts. In other words, not delivering sufficient land for jobs and housing would be contrary to climate mitigation strategies.

2.36. The evidence base is, we accept, currently blurred by the effects of COVID-19, but Greater Cambridge is in a strong position given its sectoral mix and there is still high demand for workspace.

2.37. The consultation document makes clear the existing commitments and allocations within the emerging Plan. Northstowe and Waterbeach are progressing, of course, and the hope from the joint authorities is for accelerated pace there. However, there are no changes proposed to overall numbers in those locations, and it is difficult to know how the LPAs expect to force that pace anyway.

2.38. MGH argue that a better pace overall is likely to be delivered by opening up new locations around Cambridge, including those supported by new infrastructure such as a rail station, and other public transport provision. Policy S/DS recognises the opportunity for “*Evolving and expanding Cambourne into a vibrant town alongside the development of the new East West Rail station, which will make it one of the best connected and most accessible places in the area*”, and identifying the delivery of 1,950 homes in the plan period.

2.39. We understand that Cambourne is identified as a broad location for growth, but with no specific sites identified at this point. The LPA has left the zone for Policy S/CB as, what has been referred to in one of

the consultation sessions as a “*mysterious circle*” because the sites are not yet defined, and suggesting that the delivery of the development here would be later in the plan period. However, MGH can start delivering development at North Cambourne before the rail connections are all in place, because new sustainable transport infrastructure (C2C and Park & Ride) will be delivered in advance of the rail and provide a sustainable mode of transport as an alternative to the car. The C2C scheme will connect Cambridge to Bourn Airfield New Village and Cambourne, and therefore residents of North Cambourne would also be able to utilise this new infrastructure for travel.

- 2.40. Moreover, whilst Paragraph 23 of the NPPF states that “*Broad locations for development should be indicated on a key diagram...*” MGH considers that the opportunity exists for greater precision and therefore greater certainty (both spatially and in terms of the tests of soundness) compared to the loosely positioned circle over the existing settlement. At present the uncertainty risks raising concern with local residents unnecessarily as well as making planning for new infrastructure, such as the MRT more difficult.
- 2.41. The consultation rightly recognises the prospects for Cambourne as one of the best-connected places in the area, due to the planned preferred EWR route and station at North Cambourne. Our vision document and illustrative masterplan shows how these new place-making components can be delivered. The vision document, along with the transport paper that supports this representation, also explore how the new community at North Cambourne can be well connected to the existing settlement by the creation of ‘green bridges’ supporting active travel and high levels of permeability. The proposed location of the North Cambourne railway station will also add significantly to the impetus for these improved connections.
- 2.42. We also note that, in the transport modelling of the new settlement location options tested, the Cambourne area performed best in terms of active mode share for trips generated and equal best for car trips per dwelling. Again, our transport paper identifies more detailed information to further support these measures and thus further reduce carbon emissions.
- 2.43. The Development Strategy Topic Paper highlights that future development at Cambourne will address a series of key issues:
- How to integrate with and maximise the opportunity provided by East West Rail;
 - The role of the new development in Cambourne as a place, and how it can contribute towards the achievement of net zero carbon;
 - The relationship with Cambourne and Bourn Airfield, and how to make the area more sustainable, through the mix of services, employment and transport opportunities offered by the area as whole;
 - The economic role of the place, and which employment sectors would benefit from the location to support the needs of the Greater Cambridge economy;
 - How the place will develop over time, and the infrastructure needed to support different stages during its development;
 - Making effective connections within the new development and with Cambourne for public transport and active travel, as well as connections to surrounding villages so they can also benefit;
 - Be structured around, and have local and district centres that can meet, people’s day to day needs within walking distance, including responding to changing retail and working patterns;

- How it can help deliver the Western Gateway Green Infrastructure project, and in doing so positivity engage with its landscape setting, as well as recreation and biodiversity enhancement opportunities such as woodland planting; and
- Take opportunities to reduce flood risk to surrounding areas, that take innovative solutions to the management and reuse of water.

2.44. In addition, the Council's evidence indicates that large scale development at Cambourne could have landscape impacts and that these would be hard to address. We consider this point further in our response to the HELAA assessment, in the vision document and in a supporting landscape paper prepared by Cooper Landscape Planning.

2.45. Landscape factors will be explored further as part of preparing the draft Local Plan, but the Councils are clear that the design of North Cambourne will need to be 'landscape led' in order to minimise impacts in the wider landscape and to have a focus both on place making for the expanded town, and the delivery of the wider vision for green infrastructure set out in the plan. This includes supporting the objectives for 'Strategic Green Infrastructure Initiative 8: Western gateway multifunctional GI corridors'

2.46. Notwithstanding the issue of landscape, the consultation paper also highlights that, in the context of the significant economic and carbon benefits of locating development at the proposed new rail station at Cambourne, it is considered that the benefits are likely to outweigh the level of landscape harm..

2.47. The supporting text to draft policy S/CB says that, nevertheless, it is '*too early to identify a specific development area and amount of development*' (hence the 'mysterious circle'). The document does though go on to provide suggested provisional amounts and timescales associated with Cambourne as follows;

- *"..anticipated to start delivering in 2032/2033 after opening of the new railway station, with build out rates based on Housing Delivery Study assumptions for new settlements of gradual increase in annual completions to maximum of 300 dwellings a year;*
- *1,950 dwellings anticipated in 2020-2041*
- *Noting as above that it is too early to identify a specific development area and amount of development for Cambourne broad location, for the purpose of transport and other evidence testing we needed to include a specific number of total dwellings assumed to be present once development is fully built out. We therefore included an assumption of 10,000 dwellings.*

Use of this figure is a proxy for a strategic scale development for the purposes of testing at this point, and does not mean that the Councils have made any decisions about the level of housing that should be located in this area."

2.48. Building on the points set out in earlier sections, MGH advocates that the joint authorities plan for a level of growth that is informed by the economic strategy, and which is noted as plausible, should be pursued. This involves matching the provision of jobs with homes in locations that are capable of higher levels of self-containment and where the options to reduce reliance on private cars are highest.

2.49. The GL Hearn Employment Land Review that forms part of the evidence base stated that the higher employment scenario places greater weight on the fast jobs growth seen in the recent past, particularly in key sectors. By implication, this higher-level outcome is considered *possible* in the report but not the most

likely. As such, the maximum level of homes, associated with the higher employment scenario, is not considered by the report to represent the objectively assessed need for homes in Greater Cambridge.

- 2.50. Importantly though the Employment Land Review makes recommendations to plan positively for growth and provide for more than the medium level of jobs, in order to provide flexibility (Section 5.3 of the Development Strategy Topic Paper refers).
- 2.51. In planning positively for growth, MGH agrees that it is appropriate that the new Local Plan provides new land for the identified undersupply in particular types of employment and where those are most suitable to meet sustainable development targets. This is particularly the case where there is a more blended market demand between Research and Development and office uses (former Class B1 b and a).
- 2.52. The GL Hearn supplementary paper identifies that spreading employment outside of Cambridge would be contrary to prime office market preferences for the city centre and city fringe locations. However, the paper also acknowledges that secondary offices and lab development is likely to be successful around Cambourne with improved accessibility.
- 2.53. It is also highlighted that industrial and warehousing tend to have a greater reliance on strategic road access rather than public transport and would benefit from the A428 connection. If higher growth is achieved over the next two decades, then it is suggested by the GL Hearn review that the current pipeline of supply is likely to be insufficient without further supply being made in the new plan.
- 2.54. It is noted that there is a likely undersupply in general industrial premises (Class B2). These premises are required and any losses, particularly in the city, would require re-provision that would need to be either on alternative sites within Cambridge or more likely elsewhere in South Cambridgeshire. Further provision should therefore be made in the new plan to address this anticipated undersupply.
- 2.55. The GL Hearn paper also anticipates undersupply in warehousing and distribution (Class B8) space, and it is suggested that suitable locations should be identified for small and mid-sized light industrial and distribution units with the drive-in e-commerce further increasing the need for smaller scale warehousing opportunities (final mile centres). This positive approach will ensure a flexible supply, supporting a healthy local economy over the plan period and beyond. Again, the GL Hearn paper recognises the opportunity that Cambourne provides for this sector.
- 2.56. The GL Hearn analysis therefore allows the expansion of Cambourne to be planned in a way that anticipates the sort of employment spaces that would be likely to be successful in the area, and is well aligned to the mixed employment strategy that the plan is seeking.
- 2.57. The consultation document states that having identified the objectively assessed need for housing to support the medium level jobs, the next consideration is whether it is appropriate and possible to meet those needs in full within the plan area. The total homes arising from the forecast jobs is identified in section 4 of the strategy topic paper as the objectively assessed need. In translating jobs to homes, this is represented by the scenario whereby the additional homes above the standard method are calculated with a 1:1 commuting ratio ('consume our own smoke'). The evidence also considered the implications of following existing commuting patterns, which would have the effect of some of the additional homes having to be provided outside of Greater Cambridge.

2.58. Given the Councils' aims of limiting global carbon emissions, and the key acknowledged role that the location of development plays in carbon emissions, the principle of limiting longer distance commuting is particularly important. In this context, as a matter of principle, the Councils' intention is to meet the objectively assessed needs for housing identified within Greater Cambridge over the plan period, unless evidence identifies an insurmountable problem with achieving that in a sustainable way.

2.59. In the spatial options for the Western Cluster, including Cambourne, the consultation paper says;

"Headline sustainability benefits noted include:

- Further develops and enhances a new settlement where the groundwork has already been laid, providing access to services and facilities within Cambourne and likely provision of new services and facilities, resulting in positive effects for accessibility, equalities, health, climate change mitigation and air quality.*
- Good access to public transport and services, facilities and employment centres elsewhere, once strategic transport infrastructure is complete.*

Headline sustainability challenges noted include:

- Access to jobs and services outside Cambourne are beyond reasonable walking and cycling distance, which could encourage car use, despite public transport provision and investment.*
- Could result in damage to or degradation of biodiversity assets and green infrastructure."*

MGH fully endorses the first two points, and does not consider that the latter two represent substantial risks in the overall balance. The vision document, and our responses to the HELAA and the Sustainability Appraisal in the following sections of this representation explain why.

3. Spatial Options - New Settlements

Policy S/CB: Cambourne

3.1. Cambourne is a location where housing and employment already exist and where there is supporting community infrastructure in terms of shops, schools and other services. There is, however, significant potential to add to the range of uses located at Cambourne in a highly sustainable way, including new leisure, employment and homes enabling more residents to both live and work there and thereby increasing self-containment and correspondingly reducing the need to travel. Our evidence shows that, by increasing self-containment and extending existing and proposed public transport, there is the opportunity to add significant levels of employment and housing to the north of Cambourne without impacting on overall levels of car-based journeys⁴.

⁴ See calculations in Appendix 1 of our previous representation to the First Conversation consultation, on potential transport movements, improved self-containment, and modal shift and as set out in the vision document submitted with this representation.

- 3.2. We note that whilst there was no specific consultation on the issue of development at Cambourne in the First Conversation consultation, the Councils did ask for views about focusing development on transport corridors. In the consultation response to the First Conversation there was broad support for this approach, and for focusing development at public transport nodes.
- 3.3. Further to this, development around Cambourne formed a core part of '*Strategic Spatial Option 8: Growth around Transport Nodes: Western Cluster*'. Stakeholder workshops identified the benefits of matching jobs and homes with planned infrastructure around the EWR station and Greater Cambridge Partnership Cambourne to Cambridge Public Transport Project.
- 3.4. The First Proposals consultation document acknowledges that EWR means that Cambourne will be one of the best-connected places in the region, although the location of the new station is '*yet to be resolved*'. Nevertheless, we know from the EWR 2021 consultation⁵ that the preferred option for the route and a station to serve Cambourne is on MGH land, to the north of the A428. EWR has said, in support of this emerging preference (Route Alignment 9), "***we believe that there is more potential for new homes and communities in the area (particularly for North Cambourne compared to Cambourne South)***" and identify that the route can support more jobs and prosperity, as well as being cost-effective.
- 3.5. Savills and MGH have actively engaged in the EWR Consultation that took place earlier in 2021. We have shared with the EWR team our masterplans and details of the optioned land, which was previously submitted in the Call for Sites. We have also confirmed that we understand there is a need to re-appraise the masterplans in light of the preferred option to position a station at North Cambourne.
- 3.6. We have confirmed to the EWR team that MGH is fully supportive of the proposed alignment, due to the benefits for Cambourne, as acknowledged in the First Proposals consultation. In addition, MGH is keen to continue to engage actively with EWR as well as participate in wider stakeholder discussions. We understand that the preferred option may require a four-track width, as a passing loop, to accommodate freight if needed, rather than just two tracks, in part of the section north of the A428. Again, this has been considered in our emerging illustrative masterplan, with a sufficient width of rail corridor to accommodate this ambition.

The expected delivery of East West Rail and its relationship with Cambourne

- 3.7. The EWR project, and its preferred alignment, is a significant bonus to this already highly sustainable location. We suggest that the earlier delivery of this new mixed-use community should not be delayed pending the construction of the railway line and station, but rather that it's delivery should be facilitated sooner, recognising the major benefits the railway and station will bring, in due course, to a settlement that is already well connected, whilst also being capable of high levels of self-containment.
- 3.8. The AECOM supplement paper that forms part of the evidence base states that the Councils' assumptions in the Preferred Options trajectory result in delivery at Cambourne starting in 2032/33. This reflects the anticipated date for the new station at Cambourne to be opened as part of EWR and that the Councils will either not require a further supplementary guidance document after an allocation is made in the new Local

⁵ [Preferred-Route-Option-Announcement-Preferred-Route-Option-Report.pdf \(eastwestrail-production.s3.eu-west-2.amazonaws.com\)](#)

Plan or that this will be prepared alongside the final stages of the Local Plan and adopted around the same time. This will be important in helping to speed up delivery, and allows proper consideration to be given to the component parts as the Plan evolves through to the submission stage.

- 3.9. EWR should be operational from 2030 onwards which will increase demand for housing in this location with good accessibility to employment and services in Cambridge, Milton Keynes and Bedford; and by this point Cambourne will be well-established as a new town and will begin to be a market in its own right (rather than 'overspill' for Cambridge). Combining the trajectories from Bourn Airfield, Cambourne West (due to be completed in 2037/38) the peak delivery is set to be 550 dwellings in 2036/37 from three strategic sites along the A428 / EWR corridor.

The MGH Vision for Cambourne

- 3.10. It is very clear that the Greater Cambridge combined authorities acknowledge that Cambourne can develop into a more substantial and self-contained town with a more vibrant centre (p.23 of the 'First Proposals' consultation document). MGH supports the overall aims for an expanded Cambourne to provide sufficient critical mass to allow it to perform the following role as a:

- Well-connected place through high quality public transport, cycling and walking facilities;
- South Cambridgeshire town for the 21st century which achieves carbon net zero targets;
- growing employment centre to provide local opportunities for its residents and nearby communities; and
- place that meets the day to day needs of its residents.

- 3.11. MGH considers that there is a fundamental opportunity to the north of Cambourne to create a scale of growth that allows for, what the First Proposals consultation refers to specifically as a '*more substantial town with a more fully developed and lively centre*', with a sufficient socio-economic and physical mass to allow it to self-support required job and housing provision, as well as reduce the effects of travel by private car. It will also reduce development pressure on the Cambridge Green Belt and the associated need to demonstrate exceptional circumstances for development there.

- 3.12. The Transport Appraisal, prepared by i-Transport, that is appended to this representation makes clear that development of land north of Cambourne is not reliant on any new rail corridor or bus corridor coming forward. However, the site provides demonstrable opportunity for creation of a new multi-modal transport hub in the event that EWR and/or Cambridge to Cambourne come forward.

- 3.13. The site is well located to promote a new transport hub and can offer direct connections from the A428 and can facilitate a future, new, North Cambourne railway station, as part of East-West Rail should this come forward. Similarly the site can support C2C, should it come forward, as well as Park & Ride.

- 3.14. A summary of the potential transport interventions that may benefit the site are outlined in the i-Transport report that accompanies this representation.

- 3.15. MGH sees the 1,950 homes identified in Policy S/CB as the initial stage of a more significant opportunity, given that there is every opportunity for raising the numbers at Cambourne, building on the points we make in this representation.

- 3.16. The timescale for the Plan is currently proposed to 2041 but, as we emphasised at paragraph 2.10, strategic policies are encouraged by the NPPF to look at longer timescales for delivery. This extension of time is necessary both to meet the requirements of the NPPF and to properly consider how strategic growth can take place in a coordinated way alongside the substantial investment in infrastructure that is planned for the area. The recent 'Building Better Building Beautiful Commission' report endorses the joint authorities approach informed by the 2050 Peterborough and Cambridgeshire plan. The Commission also envisage a strategic plan of some 30 years as the necessary requirement to deliver place stewardship and ensure integrated control.⁶
- 3.17. MGH support the preferred strategy, which proposes densification of Cambridge, including the non-GB edge, and expanding a growth area around transport nodes (in particular around Cambourne) with limited development in the villages, whilst recognising that some villages are located sustainably and able to accommodate some growth.
- 3.18. Given the preferred strategy set out in the consultation, and that Cambourne is recognised as a suitable location with existing great links, and proposed improvements in infrastructure, the emerging Plan should evaluate how the settlement should grow to become a truly vibrant and highly sustainable community.
- 3.19. MGH's answer is to propose a wide mix of land use, including leisure and cultural facilities, together with a mix of new housing typologies (to balance the current homogenous suburban offering at Cambourne) and a choice of schools. These built components would be set within extensive Green Infrastructure, woodland and green spaces, with development guided by a code for great placemaking.
- 3.20. The aspirations of existing Cambourne residents are also really important, in terms of access to jobs / leisure / community and nature, and there seems to be a high level of optimism about how EWR can allow these to begin, and for the best opportunities to be brought forward.
- 3.21. Work MGH has undertaken with the Town Council shows that many people support an extension of Cambourne to the north, particularly if it delivers on better shopping, a swimming pool (and potentially cinema, and other leisure uses). That scale of ambition all helps the sustainability picture too, and gets Cambourne towards being the 'proper town' that the consultation document alludes to
- 3.22. MGH is therefore seeking allocation of its land interest at North Cambourne as part of this emerging Local Plan, in recognition of the long-term opportunity here to deliver sustainable development.

Greater Cambridge HELAA Report – Site Reference 40114

- 3.23. The scoring and weighting in the HELAA Report, and in relation to land North of Cambourne (Site Ref 40114) is necessarily high level. However, it also indicates some results that seem, on the face of it, to be unsubstantiated, especially in the context of the large area of land controlled by MGH and the significant opportunities this provides for landscape measures, biodiversity net gain and wider benefits that can be delivered within this wider space.

⁶ [Living with beauty: report of the Building Better, Building Beautiful Commission \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/614446/living-with-beauty-report-of-the-building-better-building-beautiful-commission.pdf)

- 3.24. The North Cambourne site is identified in the HELAA Report both as ‘available’ and ‘achievable’, with which we concur. However, the ‘suitability’ overall score is ‘red’, and also contains some red scores on technical matters; namely Landscape & Townscape, Biodiversity & Geodiversity; Historic Environment and Archaeology.
- 3.25. Based on the Methodology and Assessment Criteria, the overall concluding red score on suitability indicates that *‘The site does not offer a suitable location for development for the proposed use and/or there are known significant constraints or impacts which cannot be mitigated’*.
- 3.26. Fundamentally MGH does not consider the HELAA Report to represent an accurate analysis of the land at North Cambourne. By their nature, developments on greenfield sites will involve the loss of existing open land (often of high agricultural land value in the Cambridgeshire context) and associated impacts on landscape that are negative and unavoidable. However, the assessment also needs to take account of the wider prospects for mitigation, including extensive buffer planting and off-sets, and for biodiversity net gain, as well as the wider balance of benefits and improvements in the context of the Local Plan strategies for sustainable growth. We have developed these points further in our consideration of the Sustainability Appraisal in Section 5, and our vision document demonstrates the overall benefits.
- 3.27. Looking in more detail, the Methodology for the Assessment Criteria of Suitability indicates that for Landscape and Townscape the red score is associated with development that would have a *‘significant negative impact which cannot be mitigated’* and for Biodiversity where the development would have *‘a detrimental impact on designated sites, or those with a regional or local protection which cannot be reasonably mitigated or compensated as appropriate’*. For Historic Environment the red score is considered to apply where development of the site would *‘cause substantial harm, or severe or significant “Less than substantial harm” to a designated heritage asset or the setting of a designated heritage asset which cannot be reasonably mitigated.’* For Archaeology the red score indicates *‘Known archaeology of significance which could not be mitigated through design or conditions.’*
- 3.28. In the following sections we tackle these main ‘red’ flags, which were weighed against the suitability of the site;
- 3.29. Landscape & Townscape – the HELAA identifies that the site lies within the National Character area of the Bedfordshire & Cambridgeshire Claylands, and the Local Character area of the Western Claylands. The assessment comments that there are wide, local views and amenity views due to the open nature of the fields and low-lying boundary hedgerows. The effect of large-scale development is seen as having a significant adverse effect on the landscape as a resource in its own right and effects on views and visual amenity.
- 3.30. The Chris Blandford Associates supplementary report within the Council’s evidence base suggests that the provision of appropriate strategic landscape mitigation and enhancement measures for integrating the extension of Cambourne into the surrounding countryside would be a key policy consideration for the new Local Plan. Such an approach, it suggests, is likely to be based on the following principles;
- Maintain strategic countryside gaps to protect the distinct character and separate identity of the rural villages;

- Create a strong landscape structure to screen/soften the edges of built development as experienced in views across adjacent landscape types;
 - Strengthen the character of linear landscape features to create biodiverse and accessible green corridors connecting new settlements to the surrounding countryside (informed by the findings of the Green Infrastructure Study); and
 - Ensuring high quality and distinctive design that is responsive to local character and creates a strong sense of place through sustainable building/urban design and appropriate landscaping and green infrastructure provision.
- 3.31. Our representation is supported by a Landscape & Visual Assessment (LVA), prepared by Cooper Landscape Planning. This assesses our emerging illustrative masterplan in the context of the landscape character areas, key views and associated receptors. The LVA concludes that it is obvious that development will change the local landscape character of any site, and North Cambourne is no different. Nevertheless, the design approach adopted of retaining an open landscape, with development enclosed behind strong woodlands is an approach that will work well in this landscape.
- 3.32. Accordingly, the proposal at North Cambourne has been based on a positive landscape vision:
- retaining an open agricultural landscape, as well as accommodating a new settlement;
 - providing a series of significantly strong woodland to create the framework for development; and
 - forward planning the eastern area to allow for the growth of planting for development commencing in the west.
- 3.33. The extended North Cambourne proposal has been modelled to provide an accurate representation of how the housing blocks would look from key viewpoints. This includes the location of the new woodland in the east, planted in advance and reaching up to 10-15m by the time in the western and central parcels have been built out.
- 3.34. The photomontages provided demonstrate that the area extended to the east will not produce unacceptable visual effects when seen from the local villages of Elsworth and Knapwell.
- 3.35. Overall the view is that the proposals will become assimilated into this landscape, and the design adopted will follow the landscape character principles set out in guidance.
- 3.36. Biodiversity & Geodiversity – the HELAA confirms the location of an SSSI, Wildlife Site and Ancient Woodland within the area of MGH land interest. The summary states that the development would have adverse impact on designated sites, or those with a regional or local protection '*which cannot be reasonably be mitigated or compensated as appropriate*'.
- 3.37. However, the Biodiversity & Green Spaces Topic Paper states that the Western Gateway Multi-Functional GI corridors provide opportunities to improve biodiversity by expanding and joining up the existing woodland, hedgerow and grassland habitat network.

- 3.38. The objectives identified in the Topic Paper will be delivered through an extensive Green and Blue Infrastructure Strategy that will include new woodland planting, natural regeneration, hedgerow extension and management, and habitat restoration. The strategy also requires that opportunities for biodiversity offsets from EWR are sought. Other suggested measures include;
- ensuring negative impacts from access and recreational pressure on sensitive ecological sites (Eversden and Wimpole SAC, and woodland SSSIs) are minimised, by providing additional GI sites for recreation, promoting alternative or new access routes, and educating visitors on the value of conserving habitats.
 - improving access throughout the area for people (where it will not cause detrimental impact on ecological sites - as above) through opportunities associated with East West Rail as well as along river corridors.
- 3.39. In the vision document and illustrative masterplan we identify how we can capitalise on these opportunities, and identify ways to make suitable and substantial net gains. The Green Infrastructure being proposed is in excess of 60% of the land interest (around 400 acres). This point is also expanded upon in following sections.
- 3.40. Heritage – the presence of a listed asset, under ‘Historic Environment’, and crop marks under ‘Archaeology’, have resulted in views in the HELAA that development would cause substantial harm, or the more severe end of ‘less than substantial harm’. Again this seems to take no account of the ability to reflect on setting, historic landscape, buffers and mitigation, plus the need to consider significant public benefits that would accrue.
- 3.41. The Chris Blandford Associates paper assessing the blended approach comments that “*The concentration of development at Cambourne, the NEC and Airport, should enable the management of risk through appropriate design responses e.g. height, massing, landscape etc. The Cambourne area poses lower inherent risks with regard to Cambridge and designated heritage assets than many other sites.*”
- 3.42. The Savills Heritage Team has reviewed the more detailed aspects of this topic. The known heritage assets sensitive to any development within the site includes the two Grade II listed structures at New Inn Farm, and potentially non-designated heritage assets at other historic farmsteads within, and immediately adjacent to, the site.
- 3.43. Beyond this initial desk-top analysis, there has been no fieldwork or on-site investigation of the indicated cropmark and earthwork features within the site.
- 3.44. As part of the ongoing planning process, a staged programme of archaeological fieldwork and supporting studies will be undertaken to increase the understanding of heritage assets on the site. This would include further Desk-Based Assessment and geophysical surveying, and focused evaluation trenching by way of an agreed Written Scheme of Investigation, as necessary. These methods will provide a greater understanding of the extent and type of features that exist. The results of this additional assessment would further inform the level of significance of these remains and any further mitigation that may be necessary.

- 3.45. A sensitively designed layout of any proposed development, which includes off-setting development and/or the appropriate use of intervening landscaping would be implemented to mitigate potentially adverse harm to the setting of the designated and non-designated heritage assets within or adjacent to the site. Notably, avoiding built development adjacent to the listed New Inn Farmhouse and barns would preserve their setting and minimise harm. Development would therefore not give rise to any direct harm to the fabric of listed buildings. In addition, a scheme which provides a degree of separation of any new development and incorporates layered tree planting/vegetation buffers and open-ness around New Inn Farmhouse and barns would provide reasonable mitigation. With this combination of measures any substantial or significant 'less than substantial' harm to the setting/significance of the designated heritage assets would be avoided.
- 3.46. In considering any non-designated built heritage assets, their identification and assessment would be undertaken, and the significance they possess and/or the contribution of their setting to their significance would be understood. A design scheme which recognises their setting and responds to it by safeguarding where necessary and appropriate off-sets would mitigate any harm resulting from development.
- 3.47. We also notice that some other sites that are indicated as being '*located in a landscape of cropmarks of late prehistoric and Roman settlement and associated activity*' are scored as amber. This scoring appears to acknowledge the potential for mitigation to be implemented in a way that is consistent with the approach described above. The Heritage and Archaeology HELAA analysis for North Cambourne should therefore be revised accordingly.
- 3.48. Other elements of the HELAA which scored as amber for North Cambourne included; Adopted Development Plan Policies, Flood Risk, Site Access, Transport & Roads, Noise, Vibration, Air Quality and Ground Conditions (including the loss of Grade 2 Agricultural Land). However, the HELAA recognises the potential to overcome and mitigate for concerns in these areas, subject to detailed design, conditions and controls. The illustrative masterplan contained in the vision document provides an initial assessment of the range of measures that would be incorporated in the scheme at North Cambourne to ensure a comprehensive mitigation strategy is implemented. The site is of sufficient scale to accommodate these mitigation strategies as well as secure a scale of development consistent with the sustainable new community that MGH proposes.

4. Other Policies

Climate Change

- 4.1. The big themes of the emerging Local Plan are an excellent way to progress the underpinning principles for growth in Greater Cambridge. Care needs to be used in prioritising each of these themes. A balanced approach should be used. Each policy of the new Local Plan, and each potential site for employment or housing (or both), will have different impacts that are nuanced depending on proposals and site locations. The Sustainability Appraisal is the key to understanding relative impacts on the four big themes, and we have commented separately on that in Section 5. However, it is clear that the location and design of development will play a key part in achieving key principles of sustainability, including minimising operational carbon emissions and the effects of movements, which relate to climate change, wellbeing, social inclusion and place making.

- 4.2. A number of the issues raised in relation to reducing impacts on the climate are applicable to all policies and developments. The preparation of the Local Plan should therefore focus on those issues that have the most impact on the decision-making for the Local Plan, including:
- setting policies to reduce operational carbon emissions from new development;
 - assessing whole life carbon emissions to account for a balanced approach to embodied and operational emissions for new buildings;
 - promoting patterns of development that reduce the need to travel; and
 - locating development where a choice of travel options exist other than the private car.
- 4.3. We would also add: -
- encouraging transport choices that have less impact on the climate, such as walking, cycling and public transport;
 - promoting self-containment and sustainable settlements, where public transport can easily be supported and a wide range of facilities and services are within walking and cycling distance;
 - allocating development where public transport infrastructure already exists, is planned, or can be provided, to encourage sustainable travel.
- 4.4. A key requirement for reaching net zero carbon targets is the minimisation of vehicular movements (with transport making the largest contribution, and responsible for 34% of emissions in South Cambridgeshire). The plan should therefore favour options that are capable of providing alternatives to private car use. Public transport is not only more efficient, it reduces traffic queues (and therefore impacts positively on productivity), it is better for health and wellbeing⁷, and is socially inclusive as it allows equal mobility for those without access to a car (and for those who do not wish to own a car).
- 4.5. There are two key factors that can assist in reducing car travel and increasing public transport:
- placing jobs, leisure facilities and shopping in close proximity to housing, thereby reducing the need to travel and increasing 'self-containment';
 - and providing new development in locations that provide alternatives to the private car – in particular good public transport services.
- 4.6. A further requirement to reduce the risk of climate change impacts is to minimise the energy used to construct and operate new development, with over 40% of UK emissions arising from built property⁸. Whilst the costs of achieving more sustainable buildings will be similar regardless of the location of development, there will be greater opportunity for carbon reduction to be achieved where development is at sufficient scale to provide an integrated and holistic approach to climate change mitigation and adaptation.
- 4.7. The Climate Change Topic Paper sets out a number of emerging policies aimed at reducing carbon emissions from new buildings, and ensure that suitable adaptation measures are incorporated into proposals to futureproof development against a changing climate.

⁷ [Transport planning for healthier lifestyles](#), see section 1.2

⁸ UK Green Building Council, 2019.

CC/NZ: Net zero carbon new buildings

- 4.8. This policy sets out an ambitious approach to address carbon emissions through the sustainable design of new buildings, reducing energy demand in the first instance through a ‘fabric first’ approach, before selecting low carbon, fossil fuel free building systems and then employing renewable technologies to offset residual emissions to zero. The policy also incorporates an approach to tackle embodied emissions in construction materials and processes by consideration of whole life carbon analysis to ensure that low impact construction methods are deployed.
- 4.9. In order to meet these policy objectives, for the site at North Cambourne MGH will utilise the energy hierarchy approach to first reduce the demand for heating through efficient design of the building fabric. In addition MGH will adopt measures consistent with those set out in the UK Government’s Future Homes Standard consultation⁹, intended to provide new homes ready for the 2050 net zero carbon economy. This ‘fabric first’ approach has the added benefit of ensuring energy bills will be kept to a minimum for new occupants.
- 4.10. The site will not be connected to the gas grid and will instead employ all-electric building systems, providing heating, cooling (where needed) and hot water through the use of heat pump systems. These will avoid the need to retrofit or upgrade building systems in future.
- 4.11. Where suitably co-located, waste heat from non-domestic uses can be used to heat homes. Opportunities for heat sharing between domestic and non-domestic uses will be explored in more detail as the scheme design is progressed.
- 4.12. A systematic approach to renewable technology selection will be undertaken to understand the feasibility of various technologies in delivering the maximum level of renewable energy generation through onsite means, aiming to achieve net zero carbon emissions without offsetting where possible. Site-wide emissions will be established for all building uses, aiming to provide net zero across the site as a whole, with buildings with surplus savings offsetting those where net zero is harder to achieve.
- 4.13. Offsite measures, such as carbon offsetting, will only be used as a last resort in situations where it is impractical to generate sufficient renewable energy from onsite systems.
- 4.14. Whole life carbon assessment will also be undertaken to establish the lifecycle performance of proposed embodied and operational energy efficiency measures, in line with current RICS best practice guidance.¹⁰ The whole life carbon analysis will account for the ongoing decarbonisation of the UK electricity network, with the UK Government recently announcing that it is aiming for net zero carbon electricity from 2035.

CC/WE: Water efficiency in new developments

- 4.15. This policy recognises the increasingly importance of potable water scarcity in the region and sets out

⁹ <https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings>

¹⁰ <https://www.rics.org/globalassets/rics-website/media/news/whole-life-carbon-assessment-for-the--built-environment-november-2017.pdf>

measures to reduce potable water consumption in new development as follows:

- Residential developments should be designed to achieve a standard of 80 litres/person/ day unless demonstrated impracticable.
- Non-residential development will be required to achieve full credits for category Wat 01 of BREEAM unless demonstrated impracticable.

4.16. North Cambourne will therefore aim to reduce potable water consumption to the levels set out above by utilising low flow fixtures and fittings throughout the development.

4.17. It is unlikely that the 80 litres per person per day target will be achievable through low flow fittings alone. The potential to include rainwater harvesting will therefore be investigated in more detail, Rainwater harvesting systems could be employed at a building level or used in conjunction with the site-wide Sustainable Urban Drainage Systems (SuDS) features to provide a centralised rainwater collection system to be used in washing machines and toilet flushing,

CC/DC: Designing for a changing climate

4.18. New buildings will need to include adaptations to the changing climate. In particular, increased temperatures and changing rainfall patterns have been highlighted as key considerations of a climate change adaptation strategy, prioritising passive solutions where possible to reduce the need for artificial cooling.

4.19. The scheme will utilise a sitewide approach to reduce climate risks, including the integration of sustainable drainage systems as part of the landscape design, the use of urban greening to reduce heat build-up in developed areas through increased tree canopy cover and integrated green space.

4.20. Buildings will be designed to reduce the risk of overheating through two primary courses of action. Firstly, heat gain into buildings will be minimised through fenestration design and external shading where needed. Secondly, natural ventilation strategies will be employed to ensure buildings are able to purge excess heat effectively.

4.21. All overheating measures will be thoroughly tested in accordance with the Good Homes Alliance Overheating Tool¹¹ to ensure the risk of overheating is minimised. Additional analysis will be conducted where required, accounting for future weather scenarios with increased air temperatures. This will be developed in more detail once dwelling designs are more advanced.

CC/FM: Flooding and integrated water management

4.22. The emerging policy sets a requirement for new development to provide integrated water management, including SuDS, where surface water is managed close to its source and on the surface where possible. In addition, potential flood risk from developments will need to be fully addressed and account for potential climate change impacts.

¹¹ <https://goodhomes.org.uk/overheating-in-new-homes>

- 4.23. North Cambourne is located in Flood Zone 1, so is at low risk of flooding from rivers and the sea. However, there are some isolated areas of the Site at risk of surface water flooding, adjacent to existing watercourses. Through an integrated sitewide SuDS strategy, this risk will be mitigated within public open spaces and potentially mitigated through a centralised rainwater harvesting system to reduce potable water consumption.
- 4.24. The SuDS strategy will aim to ensure that the peak runoff rate post development is no greater than that which currently exists on the Site.

CC/CE: Reducing waste and supporting the circular economy

- 4.25. The objective of this policy is to reduce the amount of waste being sent to landfill, both during the construction and operational phases of development. Circular economy principles are seen as the best means of ensuring materials stay in their highest use state for the longest period of time, with disposal and end of life considerations forming part of the development design principles.
- 4.26. Operational waste should be managed in accordance with relevant Waste Management Design Guidance, aiming to provide adequate, flexible and easily accessible waste storage for site occupants.
- 4.27. Circular economy principles will therefore be combined with the whole life carbon assessment to minimise the carbon embodied in construction materials, and ensure materials and buildings are capable of being reused and adapted over their lifespan.
- 4.28. The design of buildings will be carefully considered to allow for disassembly and material repurposing at the end of useful life. The scheme will adopt a 'materials bank' approach to construction. Dynamically and flexibly designed buildings will be incorporated into the circular economy, where materials in buildings sustain their value. This will lead to waste reduction and the use of fewer virgin resources.
- 4.29. During design development, the design team will examine the potential to include innovative approaches to operational waste management, including underground refuse systems in higher density areas of development.

CC/CS: Supporting land-based carbon sequestration

- 4.30. This policy supports the creating of land and habitats that are able to sequester carbon through changes of use and through tree planting.
- 4.31. At North Cambourne the landscape strategy will be designed to sequester carbon, as well as providing biodiversity and landscape benefits. The current illustrative scheme contained in the vision document includes approximately 400 acres of open space. If 5% (20 ha) of that is planted as new woodland, it would sequester approximately 4,500 tonnes of carbon dioxide over the next 100 years of growth. The tree growth will be managed to provide amenity, biodiversity and carbon benefits to the site.

Biodiversity and green spaces

- 4.32. MGH is supportive of the Policies in this section of the First Proposals consultation, and of the proposed

policy direction under Policy BG/BG: Biodiversity and geodiversity.

- 4.33. New development provides significant opportunities for improvements to the natural environment, particularly at strategic development sites that provide greater scale to make changes. At such new developments of scale it is possible to target specific biodiversity issues, and provide well planned green infrastructure that relates to and enhances existing natural features. The Local Plan policies should require net biodiversity gains on-site to be fully explored and provided. Urban extensions will allow green infrastructure to reach into urban areas, providing an extended green space network for both existing and new employees and residents.
- 4.34. In carrying out biodiversity assessments, value should be placed on the longevity of new communities such as that being proposed at North Cambourne, and new natural habitats associated with them. These habitats are designed to be retained in perpetuity. Existing trees and hedgerows may be given high biodiversity value because of their longevity, but it should also be recognised that older trees will eventually die. New environmental features and natural habitats can have significant ecological value as they mature over a period of decades following construction.
- 4.35. As per the aims of Policy BG/TC, it is certainly beneficial to increase tree and woodland cover from 7.4% to 19% by the 2050s, but care should also be taken in determining how/if this approach is consistent with maximising net biodiversity gains. For example, it is known that peat bog, bramble scrub and lowland meadows have a greater value in biodiversity than blanket tree cover¹². A mosaic of habitat creation is therefore preferred over blanket tree cover with the range of habitats determined by a clear understanding of the existing habitat value and potential of the location.
- 4.36. Green Infrastructure is intrinsic to good design and should be planned as part of all new developments, as proposed by Policy BG/EO. Evidence shows that small green spaces provided throughout development increase the amounts of physical activity that residents carry out and, and that these spaces are supportive of good mental health and wellbeing. MGH is aware of these benefits and propose new green infrastructure as part of the proposals at North Cambourne, where significant areas of the site will be used for green space in conjunction with sport, recreation, natural habitats and biodiversity offsetting.

Wellbeing and inclusion

- 4.37. There is a significant body of evidence emerging¹³ that shows healthy lifestyles are best supported by developments that are able to provide: -
- 'gentle density' that is only achievable in more urban areas;
 - where public transport is available;
 - mixed use development, supported by larger local populations;
 - walkable neighbourhoods;
 - shops, services and places to meet; and are
 - leafy with regular green spaces.

¹² [Biodiversity Net Gain Research – Savills Rural](#)

¹³ [Spatial Planning for Health – an evidence resource for planning and designing healthier places, Public Health England, 2017](#)

- 4.38. The best way of achieving these aims is in the allocation of larger sites that are capable of accommodating a mix of uses. The consultation also notes that, in response to the First Conversation consultation on how the plan could achieve 'good growth', respondents agreed that development should be in sustainable locations, delivering a range of housing, including affordable housing, with access to safe and affordable sustainable transport as is proposed at North Cambourne.
- 4.39. The promotion of social inclusion in Cambridgeshire is an important consideration. We note the disparities in quality of life and life expectancy in the most deprived areas of the county compared to the least deprived areas¹⁴. These disparities are not easy to resolve even over one Local Plan period because they are influenced by underlying socio demographics including aspirations and wages. The creation of new education, employment and training opportunities, where a wide mix of housing types can also be provided, and where open spaces, leisure and cultural activities are available to all, will help to improve the life chances of all residents and improve social inclusion.
- 4.40. Access to public transport is a key measure of social inclusion. For less affluent households, a second car is often not available, limiting the ability of the household to access employment opportunities.
- 4.41. The creation of truly mixed-use communities where access to jobs and facilities is maximised for all residents, as proposed at North Cambourne, is therefore a key measure in assessing which sites should come forward for development.
- 4.42. Larger sites are preferred in achieving overall gains for inclusion and balanced place making as they can better provide:-
- homes for all parts of the community;
 - a wider range of accessible jobs;
 - support the delivery of low carbon transport infrastructure;
 - ensure that infrastructure, services and facilities are provided alongside new employment and homes; and
 - support arts and culture.
- 4.43. The approach to delivering a mix of employment that is advocated in the emerging plan is also capable of being delivered at North Cambourne. Importantly, North Cambourne is not a stand-alone new community, but one that expands an existing community. This provides the opportunity to address some of the deficiencies of the existing community, particularly in terms of the availability of local jobs and facilities, as well as deliver a new community that can fully address the policy agenda of the emerging GCLP. North Cambourne as a location will be further enhanced with the delivery of new infrastructure specifically aimed at enhancing levels of public transport use in the form of C2C and East West Rail.
- 4.44. The presence of Cambourne as an existing settlement requires that consultation with existing communities will remain key in formulating a framework to guide future development at North Cambourne, both in terms of location and design. Design Charrettes or other similar processes, carried out at the right time and involving community representatives, local politicians and other stakeholders can help to gain buy-in from

¹⁴ [Greater Cambridge Local Plan Scoping Report p39](#)

the community. MGH is committed to consultation in relation to its proposals for North Cambourne and has already been in discussion with relevant stakeholders and local communities for several years.

- 4.45. Consultation with existing communities will remain key for MGH in establishing a legitimate plan to guide future development, both in terms of location and design. Design Charrettes or other similar processes, carried out at the right time and involving community representatives, local politicians and other stakeholders can help to gain buy-in from the community. MGH is committed to consultation in relation to its proposals for North Cambourne and has already been in discussion with relevant stakeholders and local communities for several years.

Great places policies

- 4.46. MGH recognises that maintaining and creating great places is crucial to sustaining the quality of the area for people who live, work, study in, and visit Greater Cambridge. The overall policy aims for Great Places; for design to be responsive to people and place, to protect and enhance important landscape and heritage assets, and to achieve high quality development that meets climate change requirements, are all supported by MGH.
- 4.47. We recognise the importance of the recent changes to the national planning policy guidance and the introduction of a national design guide, which envisage that development will be led by local 'design codes' and which are informed by the traditions of an area, assisting in creating identity and distinctiveness. MGH endorse this approach to design as well as the involvement of local residents and other stakeholders via an open and transparent consultation process. We expect that developments on key sites, such as North Cambourne, should be prepared in accordance with a development brief or design code.
- 4.48. A significant issue for North Cambourne is demonstrating the ability to create a successful level of connectivity, and to ensure that existing and new neighbourhoods function successfully. The new crossing points need to be designed for a high degree of permeability, including easy access for active travel on foot and by cycle, and making sure that that A428 is not perceived as a barrier in any way. We consider this in more detail in our vision document.
- 4.49. Elsewhere in this representation we have also highlighted how consolidation of development at Cambourne, that supports its recognised role as a highly sustainable location, can assist the aims of making great places. The ability to create a scale of development that is supported by a range of services and community infrastructure, including a choice of schools and leisure facilities, can have a positive impact on the overall location.
- 4.50. Cambridgeshire already has a great track record in delivering well-designed new neighbourhoods. Emerging guidance in the form of the national design guide and updates to the PPG has re-enforced this process, and the implications of the work carried out by the Building Better, Building Beautiful Commission will inform revisions to the NPPF. The Greater Cambridge authority will need to ensure that resources are in place so that proposals that come forwards are well considered, maximising the benefits that new development can bring, including those delivered by high quality design that relate to all aspects of health, social inclusion and wellbeing.

Jobs policies

- 4.51. The Greater Cambridge economy is of national importance. MGH agrees with this assessment, and that continuing economic growth is vital for the nation, the region, and for Greater Cambridge. Our overall position on the opportunity for sustainable growth led by employment, rather than for the creation of jobs being led by housing delivery, is set out in detail in Section 2 of this representation.
- 4.52. The importance of the Cambridge economy extends across the region, but there are also multiple benefits that arise locally. The international reputation of Cambridge powers a local economy that is much more than global high-tech businesses. This international reputation has been a spring-board for diverse local business across a wide range of types, including start-ups, studios, workshops, manufacturing, leisure, retail and logistics businesses. This process needs to be encouraged and facilitated to ensure a diverse local economy is created that ensures that the benefits of growth are spread across the population rather than being focussed solely in one sector or location. This ongoing economic diversification will help to balance social and economic inequalities across the Greater Cambridge area.
- 4.53. The ongoing ability of Greater Cambridge to provide economic growth, and therefore improvements in standards of living for the area as a whole are highlighted in the Cambridgeshire and Peterborough Independent Economic Review (CPIER), September 2018¹⁵. The CPIER indicates that employment growth to date has been faster than envisaged. The Councils should look to draw on this opportunity to deliver better lifestyles for all those living and working in the wider region, and in particular to deliver benefits across the communities of Greater Cambridge.

Homes policies

- 4.54. In previous representations, MGH has emphasised that if insufficient housing is built to meet local need it will result in:-
- worsening affordability;
 - damage to the local economy;
 - damage to equality and social inclusion;
 - adverse implications arising from climate change; and
 - adverse impacts on the ability of people to live healthy lives.
- 4.55. The government has been clear that the Oxford Cambridge Arc should support economic growth. To do so will require housing to support the growing local work force. The Cambridgeshire and Peterborough Growth Deal¹⁶ is predicated on the delivery of increased employment growth. The CPIER indicated that in order to realise the growth that could be delivered, a total of some 2,900 homes per year would be needed, which is notably higher than the 'Central Scenario' that has been assessed in the First Proposals consultation. MGH strongly agrees that the Local Plan should provide for higher levels of housing growth to support a strong economy, in accordance with government policy.
- 4.56. There is a need to provide for a wide range of housing in the Local Plan, including a diverse range of

¹⁵ [Cambridgeshire and Peterborough Independent Economic Review, September 2018](#)

¹⁶ [Cambridgeshire and Peterborough Devolution Deal](#)

tenures, with rented accommodation, retirement living, market housing, and affordable housing together with some custom and self-build homes. A diversity of typologies will improve the ability of the market to achieve enhanced levels of delivery of all types of housing whether rent or buy. Such diversity is best achieved on larger sites which can adapt to market trends as demand changes in order to create diverse communities with a range of socio-economic groups.

- 4.57. High standards of housing can be achieved through use of the preparation of development briefs or design codes. The recent changes to the national planning policy guidance and the introduction of a national design guide prescribe that local 'design codes' be produced which are informed by the traditions of an area, assisting in creating identity and distinctiveness. MGH endorses this approach to design.

Affordable Housing

- 4.58. The housing strategy in emerging Policy H/AH identifies the requirement for 40% of homes on sites of 10 or more dwellings to be affordable. It also sets out that the Councils will seek the following proportions of different tenures of affordable homes in South Cambridgeshire: 70% affordable housing for rent (social rent homes and / or affordable rent homes) and 30% intermediate tenures. The expectation is also to deliver 25% First Homes in line with the NPPF and transitional guidance.
- 4.59. Overall MGH is supportive of the proposed policy direction, but that the need for viability testing may arise in some areas. Housing affordability is a key issue for equality both nationally and more significantly, within Greater Cambridge. It is also an international issue. International companies able to offer better living standards with a smaller portion of wages needed to pay for living accommodation can tempt workers from the UK to other destinations across the globe. The government and local authorities recognise in the Oxford-Cambridge Arc document that median house price to median income ratio has been increasing across the UK, and increasing more significantly across the Arc.
- 4.60. Savills estimates that for its economic potential to be reached, 9.6 million sq ft of business floor spaces is needed across the Arc, with 680,000 homes beyond the existing pipeline.¹⁷ If the Arc is to deliver its employment potential, housing affordability must be addressed through the building of significant numbers of homes.

Infrastructure policies

- 4.61. Significant infrastructure is being brought forwards in the Greater Cambridge area including EWR. Additional Park and Ride provision is also planned, together with the C2C. MGH supports the proposed policy direction, including Policy I/ST which seeks to deliver sustainable and inclusive communities by minimising the need to travel and reducing travel distances. We agree that new development should be located appropriately to maximise the benefits of investment in this new strategic infrastructure, which has the ability to increase the availability and use of more sustainable modes of transport and thereby address the environment and on quality of life impacts of car use.
- 4.62. Local infrastructure such as schools, health facilities and leisure facilities should be key elements of new development if it is to be sustainable and contribute to the creation of robust, mixed-use communities. Such

¹⁷ [The Oxford Cambridge Innovation Arc, Savills, 2019 p3](#)

infrastructure is best delivered where its effectiveness is maximised across both existing and new communities.

- 4.63. The MGH proposals at North Cambourne would deliver new infrastructure that serves the new community, but also serves the existing community at Cambourne. New residents would benefit from the existing services and facilities provided at Cambourne, with new infrastructure broadening choices. The extension of Cambourne will deliver new options for education, additional community facilities with opportunities for cultural facilities, and a broader leisure offer that could include for example a swimming pool or local cinema. Smaller developments, for example in many of the surrounding villages, are not able to deliver such opportunities because neither the existing community or the new development provide sufficient critical mass to support them.
- 4.64. Utilities will need to be carefully considered alongside new development proposals. As the move to electric cars takes place, the burden on the electricity grid (for vehicle charging) becomes much greater. New developments will need to consider new ways of generating electricity to enhance and supplement grid supply. Options to generate renewable energy on site will be fully investigated to maximise the output potential in a compatible manner with the proposed masterplan. This is currently likely to include rooftop photovoltaic panels, but other sources of energy, such as heat sharing, may become apparent as the masterplan is developed. Such an investment in new infrastructure can best be achieved on larger, mixed use developments that allow heat to be used efficiently by transfer from employment buildings, which need heat during the day, and homes that require maximum heating during the evenings.
- 4.65. Delivery of the Local Plan, and its ability to be found sound, is contingent on water supply being adequate without causing environmental harm, including excessive demand on the chalk aquifer. A number of measures are being explored – including water transfers and imports. However, current evidence says that the planned reservoirs and improvements to supply will be too late in the plan period to meet the need of the preferred trajectory.
- 4.66. An 'Integrated Water Management Study' is part of the evidence base, with inputs from Stantec. At the Regional level we understand that the water companies are looking at the co-creation of a regional plan – that will be the subject of consultation next year (albeit the final document may not be available for the GCP Examination in Public).
- 4.67. We note that, on water supply and wastewater treatment, the Stantec supplementary paper states that specific constraints which require management and/or further investment associated with the preferred spatial option (Option 9) are connected to growth at Cambourne. At Cambourne there are local wastewater treatment capacity constraints although opportunities to supply Cambourne with fresh water from outside the area easing likely short term local supply shortages.
- 4.68. Usage in Cambridge Water Area is also notably high (143 litres per person per day) compared to standard national requirement for new homes – so the area is at risk of serious water stress without significant measures to improve supply. The proposed approach to reduce / re-use would be a move towards 80 litres per person per day, which the Councils say doesn't add much more to the cost of development according to the LPA. The scheme will aim to target this lower value with a combination of low flow fittings, and potentially rainwater harvesting systems, either on an individual building level or as a centralised system, incorporated within the development SuDS strategy.

5. Sustainability Appraisal

- 5.1. The GCLP First Proposals Sustainability Appraisal (SA) was published in August 2021. The purpose of the SA is to promote sustainable development through integrating sustainability considerations into the preparation of plans. It is an integral part of good plan making and an ongoing process, involving continuing iterations to identify and report on the potential social, economic and environmental effects of the Local Plan.
- 5.1.1. The SA contains an assessment of the potential impact that site allocation options could have on a range of predefined social, economic and environmental objectives, set out during the SA scoping process. For the GCLP, the following objectives have been defined:
- SA 1: Housing - To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home.
 - SA 2: Access to services and facilities - To maintain and improve access to centres of services and facilities including health centres and education.
 - SA 3: Social inclusion and Equalities - To encourage social inclusion, strengthen community cohesion, and advance equality between those who share a protected characteristic (Equality Act 2010) and those who do not.
 - SA 4: Health - To improve public health, safety and wellbeing and reduce health inequalities.
 - SA 5: Biodiversity and geodiversity - To conserve, enhance, restore and connect wildlife, habitats, species and/or sites of biodiversity or geological interest.
 - SA 6: Landscape and townscape - To conserve and enhance the character and distinctiveness of Greater Cambridge's landscapes and townscapes, maintaining and strengthening local distinctiveness and sense of place.
 - SA 7: Historic environment - To conserve and/or enhance the qualities, fabric, setting and accessibility of Greater Cambridge's historic environment.
 - SA 8: Efficient use of land - To make efficient use of Greater Cambridge's land resources through the re-use of previously developed land and conserve its soils.
 - SA 9: Minerals - To conserve mineral resources in Greater Cambridge
 - SA 10: Water - To achieve sustainable water resource management and enhance the quality of Greater Cambridge's waters.
 - SA 11: Adaptation to climate change - To adapt to climate change including minimising flood risk.
 - SA 12: Climate change mitigation - To minimise Greater Cambridge's contribution to climate change
 - SA 13: Air quality - To limit air pollution in Greater Cambridge and ensure lasting improvements in air quality.
 - SA 14: Economy - To facilitate a sustainable and growing economy.
 - SA 15: Employment - To deliver, maintain and enhance access to diverse employment opportunities, to meet both current and future needs in Greater Cambridge.
- 5.2. The SA contains an appraisal of the various spatial options proposed for the Local Plan, with detailed analysis provided at the Strategic Spatial Options level and at a site level.

5.3. The Land north of Cambourne is included within the ‘Growth around transport nodes’ Strategic Spatial Option (Option 8), and the SA finds that this option performs at least as well as, if not better than, the other Strategic Spatial Options for the listed SA objectives.

Strategic Spatial Option	SA 1	SA 2	SA 3	SA 4	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12	SA 13	SA 14	SA 15
1. Densification of existing urban areas	+++	+/-	+/-	-/+?	-/+?	-/+	-	++	-?	-/+?	-/+	++/-	++/-	-/+	-/+
2. Edge of Cambridge – outside the Green Belt	+++	+/-?	+/-	+/-?	-/+?	-/+	-?	++/-	-?	-/+?	+/-?	-/+	-/+	-/+?	-/+?
3. Edge of Cambridge – Green Belt	++	+/-?	+/-	+/-	-/+?	-/+	-?	-/+?	-?	-/+?	++/-	+/-?	-/+?	+/-?	+/-
4. Dispersal - new settlements	+?	+/-?	+/-	+?	-/+?	-/+	-?	++/-	-?	-/+?	-/+?	-/+?	-/+?	+/-	+/-
5. Dispersal - villages	+++	-/+	+/-?	+/-?	-?	-?	-?	-?	-?	-/+?	-?	-	-	+/-	-/+
6. Public transport corridors	+++	+/-	+?	+/-	-/+?	-/+	-?	-/+?	-?	-/+?	+/-?	++/-	-/+?	+/-	+/-
7. Supporting a high-tech corridor by integrating homes and jobs	+++	+/-?	+	+/-	-/+?	-/+	-?	-?	-?	-/+?	+/-	++/-	++/-	+/-	+/-
8. Expanding a growth area around transport nodes	++	+/-?	+?	+/-	-/+?	-/+	-?	-/+?	-?	-/+?	-?	++/-	++/-	-/+	-/+
9. Preferred options spatial strategy (Blended strategy including Cambourne)	+++	+/-?	+/-	-/+	-/+?	-/+	-?	-/+?	-?	-/+?	+/-?	++/-	++/-	+/-	+/-
10. Blended Strategy including Edge of Cambridge: Green Belt	+++	+/-?	+/-	-/+	-/+?	-/+	-	-/+?	-?	-/+?	+/-?	-/+	-/+	+/-	+/-

Table 5.1 : SA Non-Technical Summary Table 3: Summary of SA effects for Strategic Spatial Options 2020-2041

5.4. Key issues here relate to SA 14 (Economy) and SA 15 (Employment). As discussed above, the provision of extensive employment space and supporting community facilities will provide benefits for both these objectives, as well as linking residents of Cambourne with employment opportunities elsewhere in the district following the implementation of EWR and C2C.

5.5. Adaptation to climate change (SA 11)., specifically flood risk, is also highlighted as an issue with a negative impact. However, as stated above, the Land north of Cambourne is within Flood Zone 1, and is therefore at a low risk of flooding. Although some isolated pockets of surface water flood risk exist on site, which can be mitigated effectively through SuDS interventions incorporated within the public open spaces.

5.6. At a more detailed level, the comparison of the SA objectives is provided for each site within the Strategic Spatial Option. The table below is reproduced from the SA:



GCSP ref	Site	Proposed use	SA 1	SA 2a	SA 2b	SA 3a	SA 3b	SA 3c	SA 4a	SA 4b	SA 5	SA 6	SA 7	SA 8	SA 9	SA 10	SA 11	SA 12a	SA 12b	SA 13	SA 14	SA 15
40131	Land west of Broadway, South of Beaufort Road, Cambourne	Residential	+	++	++?	0	0	0	+	0	-?	-?	-?	-	0	-?	-	+++?	+	-	0	+
40132	Land south of School Lane, east of A1198, Cambourne	Residential	+	++	++?	0	0	0	-	-?	-?	-?	-?	-	-?	-?	-	+++?	+	-	0	++
40447	Land at Grange Farm, Caxton	Residential	+	-?	++?	0	0	0	+	0	-?	-?	-?	-	-?	-?	-	+++?	-	-	0	-
40473	Land to north-east of the junction of A1198 and A428 at Caxton Gibbet	Residential	+	-?	++?	0	0	0	++	0	-?	-?	-?	-	0	-?	-	+	-	-	0	-
404954	Land at Vine Farm and to the south of Caxton, Caxton	Residential	+	++?	+++?	0	0	0	-	0	-?	-?	-?	-	-?	-?	-	+++?	+	-	0	-
404956	Land at Crow's Nest Farm, Papworth Everard	Residential	+	-?	++?	0	0	0	-	0	-?	-?	-?	-	0	-?	-	+	-	-	0	-
51601	Land south of A428 and west of the A1198, Caxton	Residential	+	++	+++?	0	0	0	+	0	-?	-?	-?	-	0	-?	-	+++?	+	-	0	-
51612	Land north east of Bourn	Residential	+	++?	++?	0	0	0	+	0	-?	-?	-?	-	-?	-?	-	-	+	-	0	-
51668	Land north and south of Cambridge Rd, Ettisley	Residential	+	++	+++?	0	0	0	+	0	-?	-?	-?	-	0	-?	-	+	+	-	0	-
40076	Land south west of Caxton Gibbet	Mixed use	+	-?	-	0	0	0	-	0	-?	-?	-?	-	0	0	0	+	-	-	++	++
40114	Land north of Cambourne, Knapwell	Mixed use	+	++	+++?	0	0	0	+	0	-?	-?	-?	-	0	-?	-	+++?	+	-	+	++

Table 5.2: Table 4.22: Summary of SA findings for the Growth around transport nodes: Cambourne Area site options

5.7. A comparison of the sites presented above, indicates that the Land north of Cambourne performs better than any of the other sites, when SA objectives are combined, with the Site performing at the highest level in relation to other sites for:

- SA 2 (Access to services and facilities)
- SA 12 (Climate change mitigation)
- SA 15 (Employment)

5.8. The objectives for which the Site is marked with a negative impact compared with other sites include

- SA 5 (Biodiversity and geodiversity)
- SA 6 (Landscape and townscape)
- SA 7 (Historic environment)

5.9. Following the publication of the SA, a number of additional studies have been carried out to demonstrate that the impacts referred to above can be mitigated through good design and urban planning. The illustrative masterplan for the Site has therefore been updated to account for this most recent information as well as relevant mitigation measures.

5.10. A summary of the relevant impact and mitigation studies is provided below, with additional information provided in accompanying technical reports.

Biodiversity and geodiversity

5.11. North Cambourne contains the Elsworth Wood SSSI, the Knapwell Wood ancient woodland, and is adjacent to the Brockley End Meadow County Wildlife Site. It also contains areas of deciduous woodland which have been classed as priority woodland, along with ditches, watercourses, grasslands, hedges and wooded boundaries that are also likely to have ecological value.

- 5.12. The illustrative masterplan contained in the vision document shows how the features identified as being of greatest ecological value will be retained. These features will be protected and enhanced during the construction and operation of phases of the proposal, with suitable measures employed to ensure relevant species and habitats are protected in accordance with relevant Natural England guidance pertaining to SSSIs.
- 5.13. The guidance for the Elsworth Wood SSSI and the associated Impact Risk Zone states that, 'New housing developments will require an assessment of recreational pressure on relevant SSSIs and measures to mitigate adverse impacts.'
- 5.14. As shown in the illustrative masterplan, considerable areas of North Cambourne will be dedicated to recreational open space, with approximately two-thirds of the site area retained as open space. This level of provision will ensure that there will be no additional recreational pressure placed on the SSSI. In addition, no built development is proposed within 250m of the SSSI, providing ample buffer space to mitigate potential impacts during construction and operation.
- 5.15. To ensure the protection of the most sensitive habitats, the illustrative masterplan shows considerable buffer zones around other ecological sites of interest. The Forestry Commission and Natural England recommend a 15m buffer zone around woodlands to avoid root damage during development. The masterplan has been developed to provide a 25m buffer zone around the woodland, exceeding recommended distances and further mitigating impacts.
- 5.16. In addition, the scale of the site is such that there is sufficient land available to accommodate significant new planting and thereby enhance woodland coverage. Furthermore, the masterplan shows an integrated green infrastructure network that will link key areas of woodland habitat, including Elsworth Wood, Knapwell Wood, Honeyhill Wood and New Wood.
- 5.17. In addition to providing added amenity, habitat and biodiversity value, the extent of tree planting will also deliver carbon sequestration benefits. Furthermore, any hedgerow loss or alteration to existing hedgerows will be compensated for by new hedgerow planting.
- 5.18. In addition to Green Infrastructure, significant areas of North Cambourne will be dedicated to enhance the provision of blue infrastructure. The addition of extensive water bodies will increase the diversity and ecological capacity of the area as well as provide for the management of surface water as part of a site-wide SuDS strategy.

Landscape and Townscape

- 5.19. Additional analysis has been undertaken to assess the landscape effects of development on the land at North Cambourne (a full Landscape Assessment report, prepared by Cooper Landscape Planning is provided as an accompanying technical report). The report updates a previous study undertaken in 2020 with the revised illustrative layout provided as an Appendix. The extent of potential development shown in previous proposals has been reduced in response to this landscape-led approach to design. This approach makes use of the screening effect afforded by:
- woodland areas within and on the edge of the site;

- the extensive local hedgerow network; and
 - the plateau effect of the landform and the gentle north- south valleys.
- 5.20. A series of photomontages have been developed to demonstrate that the proposed illustrative masterplan will not have a significant detrimental impact on the landscape, and particularly that the area of development will not produce unacceptable visual effects when seen from local villages including Elsworth and Knapwell.
- 5.21. Other key conclusions from this analysis are consistent with the findings of the 2020 study and demonstrate that North Cambourne is largely inconspicuous in views from the surrounding landscape. This is in part due to the flat nature of the topography adjoining the northern boundary of the Site, such that visibility is readily curtailed by intervening features such as hedgerows, woodland and trees. Another factor contributing to the lack of views is the scarcity of publicly accessible viewpoints from roads and other public rights of way within the surrounding landscape and with very few elevated viewpoints in the area.
- 5.22. Importantly, the scale of the site provides for the creation of a distinctive sense of place for new development, which respects the existing landscape characteristics as well as accommodating new woodland and hedgerows.
- 5.23. The creation of green corridors along a series of small-scale valleys and associated watercourses enhance the existing landscape character of the Western Claylands is in keeping with the Cambridgeshire Landscape Guidelines.
- 5.24. The landscape and visual appraisal demonstrates that there are potential effects that would be caused by new development at North Cambourne, but that these potential effects can be successfully addressed by a landscape-led approach to design, which respects key landscape characteristics and views.
- 5.25. The illustrative masterplan demonstrates how a design approach based on strong green corridors, open spaces, retention and enhancement of woodland and respect for views can high quality new community.

Historic Environment

- 5.26. As stated above in Section 3, the presence of a listed building and existence of archaeological crop marks give rise to potential for adverse effects on historic assets. In order to assess this impact and set out potential mitigation measures in more detail, an additional assessment of heritage features on the site has been carried out by Savills Heritage, included as an accompanying technical report.
- 5.27. The summary provided in Section 3 states that the known heritage assets sensitive to any development within the site includes the two Grade II listed structures at New Inn Farm, and potentially non-designated heritage assets at other historic farmsteads within, and immediately adjacent to, the site.
- 5.28. In light of the presence of these historic features, a series of measures is proposed to mitigate any adverse effects, including
- locating certain types of development/open space appropriately to preserve archaeology in situ;

- undertaking a staged programme of archaeological fieldwork, including a Desk-Based Assessment and / or geophysical surveying to focused evaluation trenching by way of an agreed Written Scheme of Investigation. The results of this additional assessment could further inform the level of significance of these remains and any further mitigation that may be necessary; and
- a sensitively designed layout, which includes off-setting development and/or the appropriate use of intervening landscaping to help mitigate potentially adverse harm to the setting of the designated and non-designated heritage assets within or adjacent to the site. Notably, this includes there is no built development adjacent to the listed New Inn Farmhouse and barns in order to preserve their setting and minimise impact.

These measures reduce the risk of adverse impact on the historic environment. It should, however, be noted that none of the sites under consideration for the Cambourne Area are considered to be free of risk to the historic environment, and that all would require mitigation in some form, similar to that described above.

Summary

- 5.29. As a result of the additional design assessment and mitigation analysis set out above and in the accompanying technical reports, a comprehensive mitigation strategy has been devised to avoid negative impacts on the key characteristics of the site highlighted in the SA, including biodiversity and geodiversity, landscape and townscape, and the historic environment.
- 5.30. Additional documentation has also been provided as part of the SA evidence base, including the supplement to Appendix E of the SA, '*Councils' justification for selecting sites to take forward for allocation and discounting alternatives*'. Within this part of the SA, a summary is provided of why sites subject to appraisal were included in the First Proposals as preferred options, and why other sites were not included.
- 5.31. The land at North Cambourne is included in this report, with the following narrative, '*The preferred development strategy identifies Cambourne as a broad location for future development, in association with the opportunities provided by East West Rail and in particular the proposed new railway station. The location of the station has not yet been established and will be key to understanding where and how additional development should be planned, including considering the individual site constraints identified when testing these land parcels which were put forward through the call for sites process. The allocation of a specific area or quantity of growth has therefore been rejected.*'
- 5.32. The SA and resulting narrative does not include any reference to the SA objectives referred to above, choosing to focus on the uncertain delivery of the North Cambourne station as part of East West Rail. Nevertheless, the site scores positively in relation to criterion SA 12 (Climate change mitigation) in the SA scoring matrix (as shown above). The reasoning in the SA and the consequent rejection of the site is therefore at odds with other elements in the SA findings.
- 5.33. Notwithstanding the SA, greater certainty has more recently been provided on the location of the new railway station for East West Rail with the publication of 'Making Meaningful Connections' Consultation Document published in March 2021. This consultation document shows the preferred option for a station at Cambourne to the north of the A428. This recent commitment further underpins the suitability of the North

Cambourne proposal as a highly sustainable location for a new mixed-use community and overrides the reason for rejection of the site in the site-specific SA process.

- 5.34. MGH therefore request that the North Cambourne proposal is confirmed in future drafts of the GCLP and that the information submitted with these representations is taken into account to amend the evidence base for the GCLP in support of the allocation.



6. APPENDICES

Appendix 1 – Transport Appraisal by i-Transport



North Cambourne

Transport Appraisal

Client: Martin Grant Homes

i-Transport Ref: VP/MD/ITL17310-001B

Date: 09 December 2021

North Cambourne

Transport Appraisal

Client: Martin Grant Homes

i-Transport Ref: VP/MD/ITL17310-001B

Date: 09 December 2021

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Quality Management

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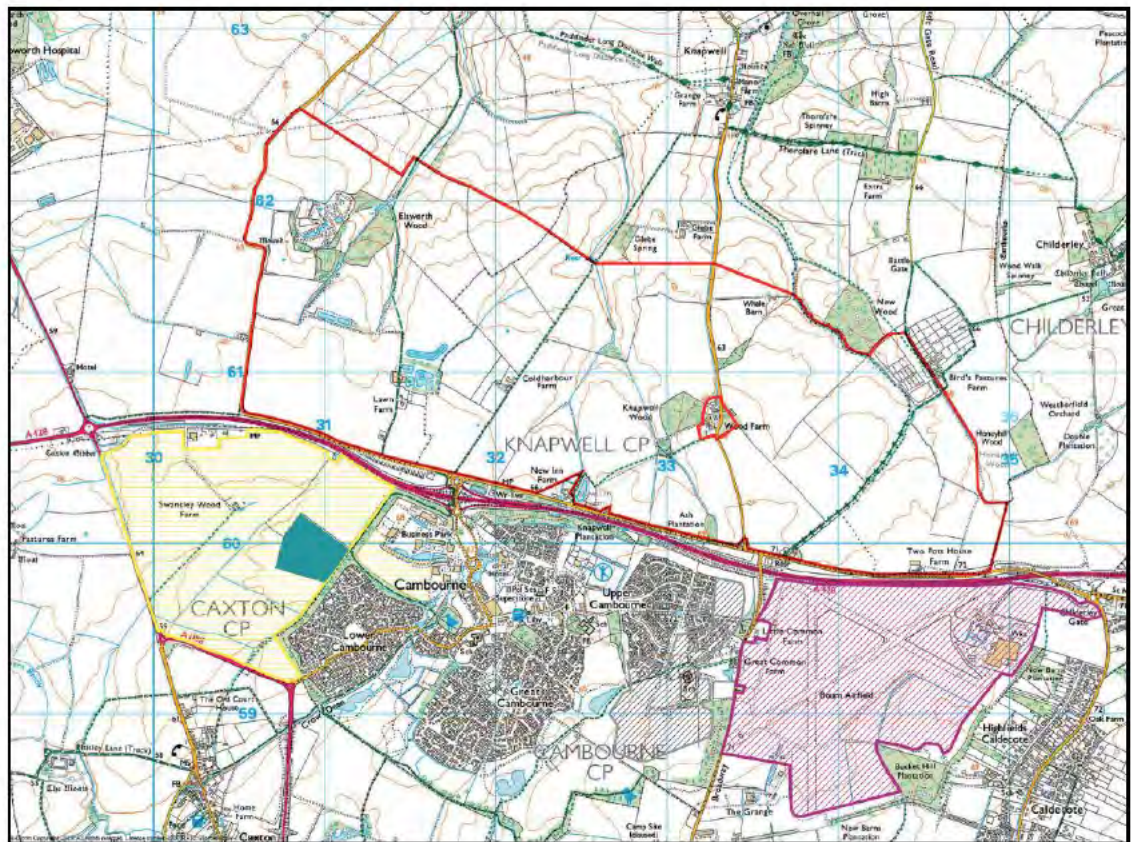
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SECTION 1 Introduction

1.1 Context

- 1.1.1 Cambridge City Council and South Cambridgeshire District Council have committed to preparing a joint Local Plan for their combined area, referred to as Greater Cambridge, a strand of work which originated as part of the City Deal agreement with central government established in 2014. The individual Councils both adopted separate Local Plans respectively in September and October 2018 which set out the development needs of the local authority areas up to 2031.
- 1.1.2 Martin Grant Homes has appointed i-Transport LLP to provide highways and transport advice, including the preparation of this report to support written representations in respect of the Greater Cambridge Local Plan First Proposals (Preferred Options) Consultation, in connection with a site allocation of land to the north of Cambourne, South Cambridgeshire.
- 1.1.3 Martin Grant Homes controls a large parcel of land to the north of Cambourne, identified at Image 1.1 (overleaf) and referred to herein, as North Cambourne.
- 1.1.4 Martin Grant Homes seeks the allocation of their land interest at North Cambourne, in the Greater Cambridge Local Plan for long-term housing and employment to establish a highly sustainable mixed-use community.
- 1.1.5 This report considers access opportunities to the North Cambourne site and its sustainability in terms of access to services and facilities by non-car modes, including walking, cycling and public transport. It explores a range of opportunities that future development of this site will bring, not just in respect of delivery of new and much needed housing and jobs, but also in terms of the opportunities that exist through development of this site to improve the sustainable travel characteristics of the existing settlement of Cambourne in delivery of an expanded settlement.
- 1.1.6 In addition, this report also provides a high-level comparison of the accessibility of the site compared to sites which have already received allocations within the Greater Cambridge Local Plan (2018).

Image 1.1: Site Location Plan



Source: Savills

1.2 Report Structure

1.2.1 Following this introductory chapter, the remainder of this report is structured as follows:

- **Section 2:** considers relevant policy at both a National and local level in the context of the subsequent appraisal;
- **Section 3:** considers the existing travel characteristics of Cambourne;
- **Section 4:** explores existing barriers to sustainable travel;

- **Section 5:** considers the range of transport interventions that can deliver change in the context of mixed-use development;
- **Section 6:** outlines the opportunities the site brings forward from a transport perspective;
- **Section 7:** provides a comparative appraisal of North Cambourne against the transport objectives of Cambridge City Council and Cambridge District Council's Sustainability Appraisal (SA) Report (to accompany the Greater Cambridge Local Plan First Proposals DPD) and in terms of public transport accessibility; and
- **Section 8:** provides a summary and conclusion.

1.3 Conclusion

1.3.1 In conclusion, North Cambourne:

- meets the transport 'tests' of NPPF;
- has a level of accessibility above that reflected in the SA;
- has comparable public transport accessibility with other allocated sites; and
- will deliver a betterment to the existing car based transport characteristics of the existing settlement.

1.3.2 Expansion of Cambourne to North Cambourne offers the opportunity to deliver much needed housing, to expand Cambourne in a coherent way that overcomes the severance of the A428, that delivers a settlement that radiates out from its urban centre, allowing the whole community to be within walking distance of the urban core, and expanding in a way that avoids linear development south of the A428; thus, increasing opportunities for sustainable travel at the same time as facilitating a new public transport hub should infrastructure schemes including East West Rail and Cambourne to Cambridge (C2C) come forward.

1.3.3 North Cambourne offers a real opportunity to create an enlarged and more sustainable settlement which will be to the benefit of both existing and future residents.

1.3.4 Thus, in transport terms this site is a suitable site for future allocation for mixed residential and employment development. North Cambourne can work in isolation or be complimentary to other sites which received allocation through the 2018 Local Plan process and those that are being considered within this emerging Local Plan.

SECTION 2 Policy Considerations

2.1 National Planning Policy Framework (NPPF)

2.1.1 Any allocation of North Cambourne will need to be tested against the three principal transport criteria set out in paragraph 110 of the National Planning Policy Framework (NPPF) (July 2021), namely:

- Will the opportunities for sustainable travel be appropriately taken up given the type of the development and its location?
- Will safe and acceptable access be provided for all users?
- Will the residual traffic impacts be acceptable?

2.1.2 In addition, paragraph 110 of the NPPF refers to the need for the design of streets, parking areas and other transport elements to reflect national guidance (including the National Design Guide and the National Model Design Code). Whilst not addressed specifically within this Note, the need for the development to reflect national guidance will be seen as a 'golden thread' running through all elements of the site should it come forward for development.

2.2 Greater Cambridge Local Plan

2.2.1 The policy objectives of the Greater Cambridge Local Plan are set out within the series of documents which underpin it. The key documents to consider in respect of transport are the Spatial Options Report and the Sustainability Appraisal. The test for any allocation is against the objectives of these two documents.

Spatial Options Reports

2.2.2 The Spatial Options consist of eight evidence-based reports. Within these reports, nine strategic spatial scenarios are identified and assessed. A summary of the spatial options assessed, in relation to transport include:

Spatial Option 6: Public transport corridors

2.2.3 This option seeks to focus new homes along public transport corridors and around transport hubs. This is identified through either expanding or intensifying existing settlements or with

more new settlements. To meet the medium growth figures, a large new settlement on a public transport corridor is required.

- 2.2.4 The Transport Evidence Report states that this option shows good performance with regard to reducing the car mode share, particularly in locations close to the emerging C2C scheme (including Cambourne).

Spatial option 8: 'Expanding a growth area around transport nodes

- 2.2.5 This option focuses homes at Cambourne and along the A428 public transport corridor as a response to a new East West Rail station and public transport improvements. To meet the minimum needs, Cambourne will be expanded by the equivalent of a small new settlement (4,500 total, when fully built out), and the balance spread across three villages on the A428. To meet medium growth figures a further four minor rural centres/group villages within 5km of Cambourne are required. In addition, North East Cambridge will also be developed. To meet the maximum growth figures there will be greater expansion of Cambourne by the equivalent of a larger new settlement (8,000 total, when fully built out) together with growth spread across three villages on A428, one Minor Rural Centre and three Group villages within 5km of Cambourne all at higher delivery rates. In addition, Cambridge Airport and North East Cambridge are required at higher delivery rates'.

- 2.2.6 This is further considered through the Transport Evidence Report which also states that new homes are to be located along the A428.

Spatial Option 9: Preferred options spatial strategy (blended strategy including Cambourne)

- 2.2.7 This option includes a substantial amount of housing development within Cambridge City, particularly at North East Cambridge and densification of consented development at North West Cambridge and the Cambridge urban area. It also includes a substantial amount of housing development at Cambridge Airport and around Cambourne, with additional development within the 'southern cluster' and villages. This option also includes faster delivery rates at Northstowe and Waterbeach. It focuses employment development at North East Cambridge, Cambridge Airport, Cambridge Biomedical Campus and Cambourne, although the majority is expected to come forward beyond the plan period. Additional rural employment locations are identified at Babraham and on the A14 corridor in vicinity of Swavesey Junction, as well as in the southern cluster and villages.

2.2.8 The Transport Evidence Report concludes the assessment of Spatial Option 9 could achieve “...low levels of car use and high levels of Active Travel and Public Transport use”. Further, it notes that Cambourne could benefit from the proposed C2C improvements and that the vehicular distance travelled, as a result of the additional development, would be less compared to any of the other core strategic spatial options. This would be supported through the public transport improvements in this area which will provide both future and existing residents with the opportunity to travel by sustainable modes. This latter point is key since it is only development north of Cambourne that can truly offer the potential to benefit the existing settlement of Cambourne.

Sustainability Appraisal

2.2.9 As stated within the Greater Cambridge Local Plan: First Proposals SA the ‘*Sustainability Appraisal is a statutory requirement of the Planning and Compulsory Purchase Act 2004. It is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts*’.

2.2.10 The SA seeks to gather together:

- policies, plans and programmes of relevance to the Local Plan,
- baseline information on environmental, social and economic issues in Greater Cambridge,
- key sustainability issues for Greater Cambridge, and
- a SA framework which provides a way in which the sustainability impacts of implementing a plan can be described analysed and compared.

2.2.11 The SA offers 15 objectives, of which two relate directly to transport as follows:

- SA Objective 2: Access to Services and Facilities; and
- SA Objective 12: Climate Change Mitigation.

SA Objective 2: Access to Services and Facilities

2.2.12 The questions asked within SA2 that are relevant to transport are:

- SA 2.1: Does the Plan “**support the existing city, district, local, neighbourhood, rural and minor rural centres?**”

- SA 2.2: Does the Plan provide for “**sufficient local services and facilities to support new and growing communities (e.g. schools, employment, training and lifetime learning facilities, health facilities, sport and recreation, accessible green space and services in local centres)?**”; and
- SA 2.3: Does the Plan provide for “**development within proximity to existing or new services and facilities that are accessible for all?**”

SA Objective 12: Climate Change Mitigation

2.2.13 The questions asked within SA12 that are relevant to transport are:

- SA 12.4: Does the Plan support the “**growth of public transport networks, modal shift away from private cars and onto public transport, and access to public transport options?**”
- SA 12.5: Does the Plan create, “**maintain and enhance attractive and well- connected networks of public transport and active travel, including walking and cycling?**”
- SA 12.6: Does the Plan “**support development which is in close proximity to city, district and rural centres, services and facilities, key employment areas and/or public transport nodes, thus reducing the need to travel by car?**”
- SA12.7: Does the Plan “**address congestion hotspots**” in the road network

2.3 **Cambridgeshire and Peterborough Local Transport Plan**

2.3.1 Development of North Cambourne will also need to consider the strategy of the Cambridgeshire and Peterborough Local Transport Plan (LTP). The LTP sets out that integrated transport and spatial planning will play an important role in achieving healthy and thriving communities in the combined authority area.

2.3.2 At paragraph 2.15 it states:

‘Reducing the need to travel, and distances travelled, through integrated land use, transport planning, investment in digital and mobile connectivity and energy supply, will be a central pillar in meeting local and national ambitions to significantly reduce greenhouse gas emissions by 2050.’

2.3.3 At paragraph 2.15 it also states:

‘Growth will be inclusive, truly sustainable and spread evenly across the entirety of the area,’

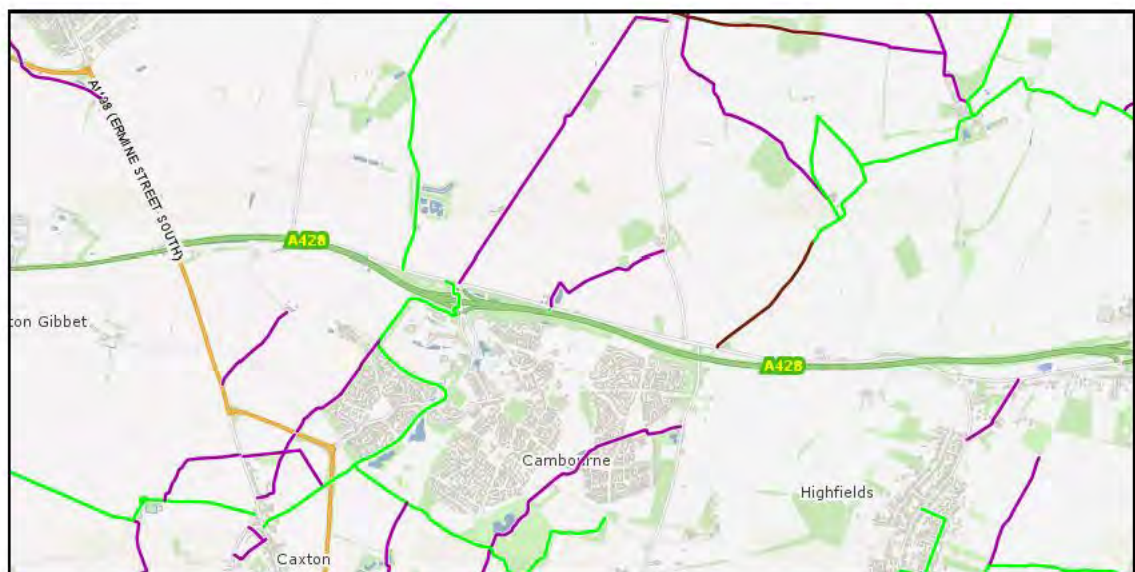
2.3.4 Thus, any development of Land at North Cambourne needs to have the objectives of the LTP at its heart and needs to be centred upon creating a new sustainable and well-connected community.

SECTION 3 Existing Conditions

3.1 Walking and Cycling

- 3.1.1 There is an existing network of pedestrian infrastructure within Cambourne which provides connections across the settlement to the local services and facilities as well as residential areas. There are also some shared footway/cycleways along sections of highway within the village.
- 3.1.2 There are limited formal crossing points for pedestrians and cyclists across the centre, with the vast majority of crossing points consisting of informal refuge islands. The roads are street lit and subject to a 30 mph speed limit through the centre.
- 3.1.3 There are limited Public Rights of Way (PRoW), as shown in Image 3.1.

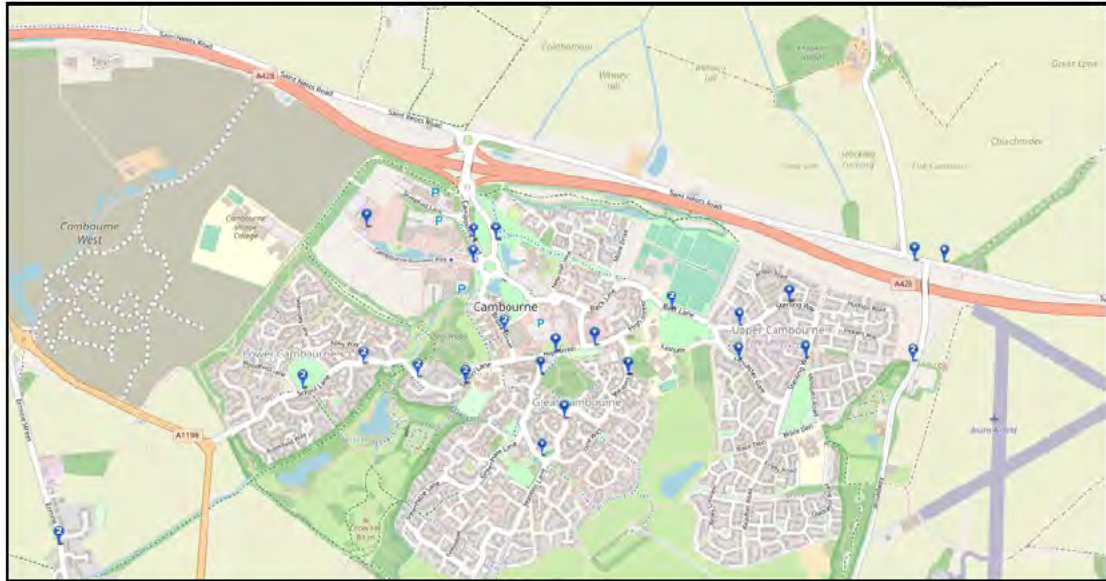
Image 3.1: Public Rights of Way



Public Transport

- 3.1.4 There are a number of local bus stops on the local highway network within Cambourne and these are shown in Image 3.2.

Image 3.2: Local Bus Stop Provision – Cambourne



- 3.1.5 These bus stops provide access to a limited number of bus routes. The destinations of which include Cambridge, St Neots and Huntingdon, with up to five buses per hour towards Cambridge. The bus routes provide frequent services to Cambridge for access to a higher order settlement and source of greater retail, leisure and employment facilities.
- 3.1.6 The closest railway stations to the site are located within Cambridge and Huntingdon. Both are accessible via the bus services serving Cambourne.

Local Highway Network

- 3.1.7 Cambourne is designed with priority to the vehicle. The highway network consists of wide carriageway, roundabouts and no traffic signals or formal crossing facilities. The junctions are large, to provide vehicle capacity but to the detriment of pedestrians and cyclists. As such the priority is to vehicle movements throughout the centre. This is shown in Images 3.3 and 3.4.

Image 3.3: Cambourne



Image 3.4: Cambourne

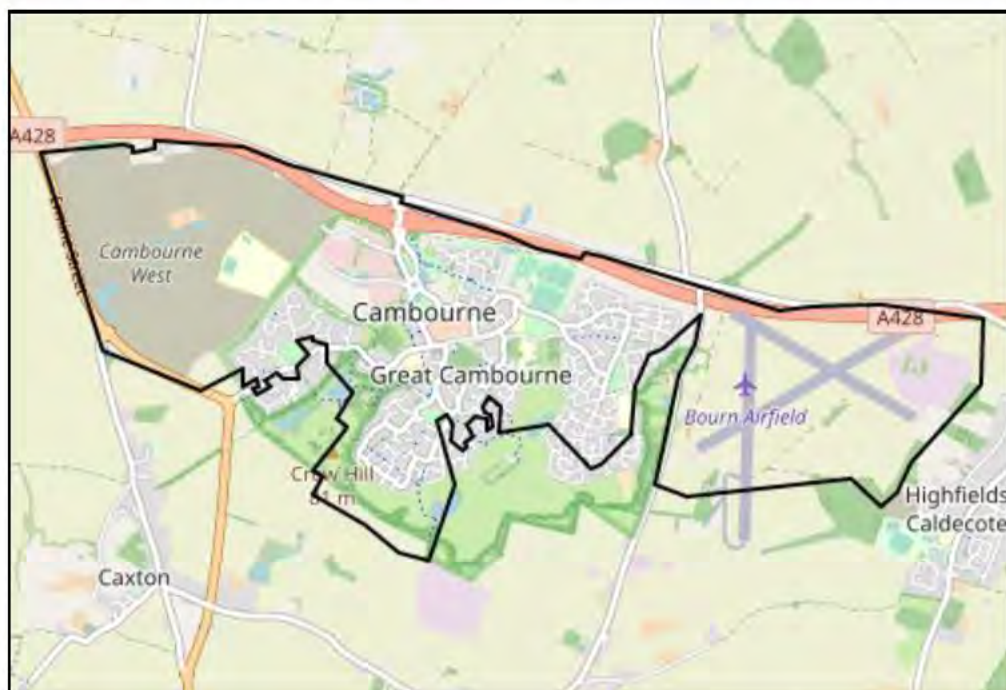


3.1.8 The A428 is a dual carriageway road, maintained by National Highways, and provides access towards Cambridge in the east and towards Bedford in the west. The road forms a northern boundary to the village of Cambourne.

3.2 Local Travel Patterns

- 3.2.1 A review of the 2011 Census data for existing residents in the local area has been undertaken to understand the main destinations for employment.
- 3.2.2 The data has been examined for the Middle Super Output Area (MSOA) South Cambridgeshire 020. This area includes the existing village of Cambourne. It is considered that this area will most likely represent travel patterns of future residents. The MSOA boundary is illustrated in Image 3.5.

Image 3.5: MSOA South Cambridgeshire 020



Source: Nomis

- 3.2.3 The data has been examined to determine where people travel for work in the area. The top car driver workplace destinations are presented in Table 3.1.

Table 3.1: Main Employment Destinations – Existing Residents

Main Destinations	%
South Cambridgeshire	36%
Cambridge	33%
Huntingdonshire	9%
North Hertfordshire	3%

Main Destinations	%
All other	19%
<i>North</i>	3%
<i>East</i>	4%
<i>South</i>	10%
<i>West</i>	3%

Source: WU03EW - Location of usual residence and place of work by method of travel to work (MSOA level)
 – South Cambridgeshire 020

- 3.2.4 The same data has been reviewed for existing employees in Cambourne area and sets out where employees of Cambourne reside. The top destinations are set out in Table 3.2.

Table 3.2: Main Employment Destinations – Existing Employees

Main Destinations	%
South Cambridgeshire	40%
Huntingdonshire	22%
Cambridge	9%
East Cambridgeshire	5%
Bedford	3%
North Hertfordshire	3%
All other	18%
<i>North</i>	4%
<i>East</i>	5%
<i>South</i>	8%
<i>West</i>	1%

Source: WU03EW - Location of usual place of work and residence by method of travel to work (MSOA level)
 – South Cambridgeshire 020

3.3 Key Destinations

- 3.3.1 Whilst commuting trips account for a large proportion of journey purposes, particularly during peak periods, significant amounts of travel demand is also generated by education, leisure, retail, and health trips. The existing non-residential destinations within Cambourne are limited. The local centre is limited in diversity of land uses with little leisure facilities and dominated by a few

large retail stores, of which all are located within the centre. A business park is located to the west of the settlement, accessed from within Cambourne as well as a secondary school.

SECTION 4 Existing Barriers to Cambourne

4.1 Design

4.1.1 The existing Cambourne settlement is heavily designed around the private vehicle. The existing Cambourne settlements includes the following features which all promote and prioritise the private vehicle usage:

- Roundabouts and wide carriageways to accommodate vehicular traffic;
- Limited cycle facilities including cycle crossing and cycle routes;
- Lack of formal pedestrian crossing facilities and pedestrian routes and public rights of way through the site linking between the commercial and residential areas;
- Public realm areas dominated by car parking;
- Limited public transport provision and services; and
- Limited range of commercial/ leisure uses and complementary facilities;

4.1.2 All of the above support and encourage movement by vehicle throughout the centre and prioritise the vehicle over walking, cycling and public transport modes.

4.2 TRICS Cambourne Study

4.2.1 In 2018, TRICS¹ undertook a research study of the existing Cambourne settlement to seek to understand the relationship between large settlements and the impact of trip internalisation. The 2018 surveys, and resultant findings, were published to the TRICS database in 2020 (Cambourne Village TRICS Survey – Technical Report May 2020).

4.2.2 The study included a range of multi-modal surveys covering a number of non-residential commercial uses within Cambourne town centre (including the Morrisons, Poundland and library) as well as surveys at the cordons of the settlement to understand the number of trips generated. The surveys however did not include any educational sites nor the business park to the north-west and thus there are limitations in terms of the conclusions that can accurately be drawn from this data.

¹ A national, standard database of traffic surveys of various land uses

4.2.3 Given the limitations in data collection, the results do not allow for an accurate internalisation factor to be calculated, but do reveal the following transport headline issues:

- The vast majority (95%) of trips into and out of Cambourne are by vehicle. Of the remainder a further 4% are by public transport and 1% on foot;
- The vehicle mode share of internal trips to the non-residential units was lower than the external trip vehicle proportion. This suggesting that internal trips are undertaken by modes other than the private car; and
- On average across the various non-residential uses the breakdown in trips of internal (to Cambourne) to external trips was roughly split evenly.

4.3 Internalisation

4.3.1 A review of the proportion of internalisation of the existing Cambourne settlement has been undertaken using the 2011 Census data. The data has been examined to understand the proportion of residents within Cambourne who also work in Cambourne. The data demonstrates that the internalisation rate of Cambourne was 12%². This is low, albeit not surprising given the relatively limited offering within Cambourne's urban centre currently and the design of the settlement which centres upon facilitating car use.

4.3.2 A review of the internalisation rates of other 'new' settlements has been undertaken and includes:

- Harlow – 51%; and
- Welwyn Garden City - 43%

4.3.3 The data above demonstrates clearly that Cambourne offers a very low proportion of trip internalisation and, at just 12%, there are opportunities to increase this proportion of internalisation, particularly compared to other settlements which are reaching close to 50% internalisation.

4.3.4 A review of the 20-minute walking isochrone from the centre of the existing Cambourne local centre is provided in Image 4.1. The image illustrates the majority of the existing Cambourne

² A total of 379 residents, of the total 3,280, worked and lived in Cambourne in 2011

settlement is within a 20-minute walking distance of the main local centre. A 20-minute walk is considered a reasonable and suitable walking distance for the majority of persons.

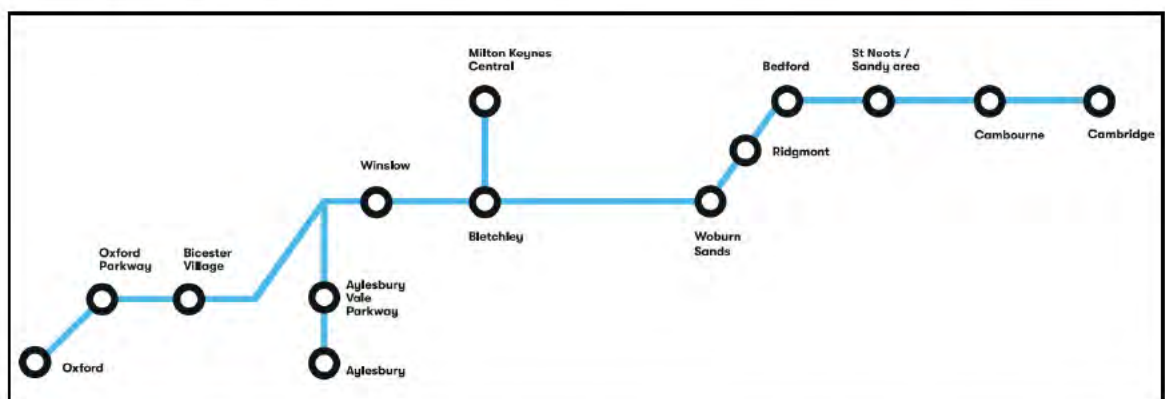
SECTION 5 Transport Interventions

- 5.1.1 Development of North Cambourne is not reliant on any new rail corridor or bus corridor coming forward, but it will benefit should such interventions come about in the plan period. However, the site provides demonstrable opportunity for creation of a new multi-modal transport hub in the event that East West Rail and/or C2C come forward.
- 5.1.2 The site is well located to promote a new transport hub and would offer direct connections from the A428 and can facilitate a future, new, Cambourne North railway station, as part of East-West Rail should this come forward. Similarly, the site can support C2C should it come forward, as well as Park & Ride.
- 5.1.3 A summary of the potential transport interventions that may benefit the site are outlined below.

5.2 East-West Rail

- 5.2.1 The East-West Rail project seeks to create a new railway connection between Oxford and Cambridge. The project combines improvement of existing railway tracks and the creation of new tracks to deliver a new efficient east-west connection. The Bedford to Cambridge section of the planned route will deliver new railway tracks between the two settlements.
- 5.2.2 The latest consultation by East West Rail in June 2021, included a new station at Cambourne named 'Cambourne North'. The location of the station along the line is shown in Image 5.1.

Image 5.1: East West Rail



- 5.2.3 The same consultation outlined a potential route alignment with the location of the new Cambourne North station shown in Image 5.2.

Image 5.2: East West Rail – Proposed Cambourne North Station



- 5.2.4 The route alignment illustrates a new station to the north of Cambourne, north of the A428, and within Martin Grant Homes' North Cambourne site.
- 5.2.5 A new station in a location north of the A428 and the existing settlement of Cambourne would provide an opportunity for the creation of a new multi-modal transport hub, providing an interchange of various services (including local bus routes, a Park and Ride site, cycle hubs and C2C should it come forward). The most recent consultation supported this aspiration stating "... ***there is more potential for new homes and communities in the area (particularly for Cambourne North compared to Cambourne South)***".
- 5.2.6 North Cambourne is not reliant on EWR arriving at Cambourne, since the proposals seek to create a settlement with a diverse mix of land uses which can support those who wish to live and work in Cambourne and thus reduce the need to travel at all and also the need to travel outside of Cambourne. However, the location of the (current) proposed EWR station is such that it falls within Martin Grant's Landholding and thus, if it were to come forward this site could not only accommodate the station but would also offer the opportunity to provide a fully integrated public transport hub with C2C (if it came forward), park and ride and a series of sustainable transport measures proposed for North Cambourne and connections to existing Cambourne also.

5.3 Cambourne to Cambridge (C2C)

- 5.3.1 The C2C project is one of Greater Cambridge Partnership's (GCP) key corridor schemes to deliver a sustainable transport programme. The project proposes a new reliable, public transport route which will route between Cambourne and Cambridge, servicing residents and employees. The

route will also be supported by new walking and cycling facilities to further encourage and support sustainable travel. The route will be served by modern, electric public transport vehicles. The aims of the C2C route include:

- Encouraging and supporting trips between Cambourne and Cambridge by sustainable modes;
- Providing a reliable and sustainable service and improvements to walking and cycling infrastructure;
- Providing a link into a new park and ride facility at Scotland Farm (see Section 5.4); and
- Reducing congestion and journey times along the A428 and reducing air pollution.

5.3.2 The proposal currently proposes to run the service on the existing road through Cambourne. Upon leaving Cambourne, onto the A428, a new off-road, purpose build track will route south of the A428. The current proposals are shown in Image 5.3.

Image 5.3: Cambourne to Cambridge C2C Routing



5.3.3 In July 2021, the GCP approved the next stage of the project which includes the preparation of an Environmental Impact Assessment of the scheme.

5.3.4 Like East West Rail, North Cambourne is not reliant on its delivery but the site offers real opportunity for a new integrated transport hub which C2C can tie directly into.

5.3.5 This would be to the benefit of new residents and existing residents alike and would greatly improve the sustainable travel opportunities for the wider Cambourne settlement which is currently heavily car based. There is a real opportunity at North Cambourne to accommodate both EWR and C2C to the benefit of the wider area, which reduce congestion on the A428 between Cambourne and Cambridge, a route heavily used by those who live in Cambourne and work in Cambridge and vice versa.

5.4 Park & Ride

5.4.1 Cambridge currently benefits from five P&R sites serving the city centre. The Local Transport Plan sets out a preferred P&R site at Scotland Farm which would form part of the wider C2C scheme (as identified at Image 5.3). Previous representations made in respect of the LTP on behalf of Martin Grant Homes made the case that North Cambourne offered a superior location for P&R, than Scotland Farm, for a variety of reasons, not least because a proposed P&R site at Cambourne would bring forward the following benefits:

- A greater aligned interchange with C2C services as well as EWR services via the new Cambourne North station compared to the Scotland Farm site;
- Improved journey times for C2C by providing a better linked park & ride site (the site at Scotland Farm is north of the A428 and requires additional distance travelled and thus time incurred for a tie in with C2C services which run south of the A428 in that vicinity);
- Providing direct access from the A428.
- A greater critical mass, servicing future and existing residents of Cambourne, Cambourne West and Bourn Airfield sites;
- The opportunity for future passengers to walk and cycle to the site from the existing and future settlements; and
- Becoming part of a wider public transport and sustainable travel interchange hub.

5.4.2 As such it is considered that a new P&R site, within the proposed North Cambourne site, still offers a preferential location compared to Scotland Farm and can bring forward a wealth of benefits, with greater, more positive impacts in comparison.

5.4.3 The current proposals at Scotland Farm would act as a satellite relative to where development of land and provision of new homes at Cambourne is concentrated, as well as a satellite to the A428 alignment. North Cambourne offers the opportunity to provide a robust and harmonious approach to integrated public transport interventions and it can facilitate better linked P&R to the benefit of new residents but also to the benefit of the wider area through reduced congestion between Cambourne and Cambridge and a better connection to C2C. This site offers the potential to capture trips earlier (i.e. further west) than a facility at Scotland Farm. In addition, with the right mix of land uses in Cambourne the P&R offers the potential to capture trips from

those that live in Cambridge but choose to work in Cambourne, and provide a central location within the urban area allowing easy access to employment.

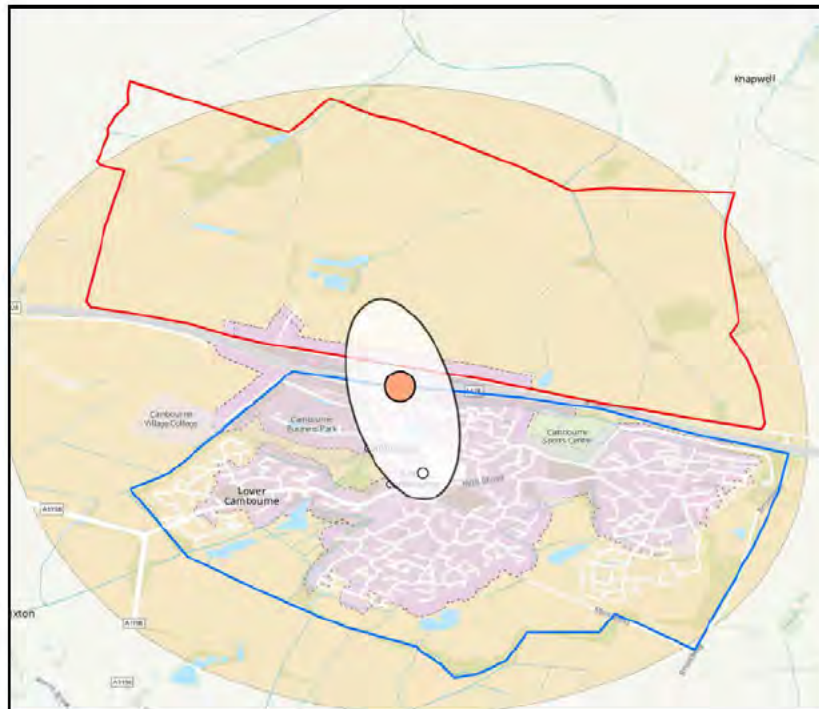
- 5.4.4 The North Cambourne site is more accessible from the A428 than the proposed P&R site at Scotland Farm. The Scotland Farm will provide a protracted access to C2C which offers a less attractive facility for users generally which may impact negatively on uptake.

SECTION 6 Opportunities

- 6.1.1 As presented in earlier sections of this note, allocation of North Cambourne offers the potential to bring forward a range of opportunities to support and facilitate a settlement that can achieve a higher rate of internalisation, and also use of non-car borne travel modes, for both the existing settlement of Cambourne and the future enlarged settlement. In short, allocation of North Cambourne offers the potential to improve the sustainability of the existing settlement of Cambourne which in turn can reduce the need to travel and relieve congestion at existing hotspots between Cambourne and Cambridge. No other site in the Cambourne area can achieve this to the same degree that North Cambourne can, not least because the site of East West Rail's proposed new station sits within the landholding of North Cambourne and thus development of this site would put the new EWR station at the heart of an enlarged Cambourne.
- 6.1.2 Allocation of this site will allow the existing Cambourne settlement and local centre to grow, to incorporate a more diverse mix of land uses as well as benefit from a larger critical mass which, in turn, can support sustainable travel improvements to the benefit of all.
- 6.1.3 Most importantly, development of North Cambourne can work to resolve the wrongs of the past and facilitate the following opportunities:

New mixed use, diverse neighbourhood

- 6.1.4 The site will provide a new mixed use, diverse neighbourhood which includes a range of employment, retail and leisure facilities for both existing and future residents. The new centre will be located within a 20-minute walk of both the existing and future settlement areas, facilitating future trips to be undertaken on foot and by cycle. The centre will provide direct and attractive routes for those walking and cycling and will be easily located by foot and cycle to new transport infrastructure and services including a potential new public transport hub within the newly extended urban centre.
- 6.1.5 A review of a 1.5km walk time buffer around the potential new, expanded, centre (considering both the existing and new community combined) is presented in Image 6.1. This demonstrates that the majority of the new community, and the existing Cambourne local centre, would be within a 1.5km walk distance (a reasonable walking distance for all) of the new urban centre to be delivered and the existing urban centre of Cambourne.

Image 6.1: Proposed 1.5km Buffer

Facilitate New Transport Improvements and Services

6.1.6 The site can facilitate a new transport hub which could include opportunities to provide any number, if not all of, the following:

- A more attractive and convenient P&R scheme both in terms of general use and the link to C2C it can offer (compared to the current Scotland Farm site);
- Bus stop and interchange for the C2C bus services;
- New Cambourne North railway station;
- A cycle hub; and
- Provisions for dedicated car club spaces.

6.1.7 The multi-modal transport interchange hub would be accessible by good quality and attractive walking and cycling routes for both existing and future residents.

6.1.8 There is evidence that many of those who live in Cambourne, work in Cambridge but also that vice versa a significant proportion of those who work in Cambourne, travel from Cambridge. Thus, there is demand for travel east-west between Cambridge and Cambourne and there are existing congestion hotspots at locations along the A428 corridor west of Cambridge.

- 6.1.9 Creation of a new transport hub combining integrated bus, cycle, P&R and taxi modes in addition to EWR and C2C should these schemes come forward, would offer real potential to remove car-based trips from the network between Cambourne and Cambridge reducing congestion. This site can capture trips earlier in the approach to Cambridge than a site at Scotland Farm, relieving congestion on the A428 to better effect.

Urban Design to Influence Mode Shift

- 6.1.10 The new community North of Cambourne can be designed to influence and support mode shift. This would include measures such as good quality provision of cycle routes and footways throughout the site, linking with existing and future uses across the area, overlooked and attractive walking and cycling routes, provision of landscaping to promote trips on foot and by cycle (including seating, street lined trees, available crossing facilities) and the promotion of these walking and cycling routes over vehicle streets i.e. creation of a sustainable travel hierarchy within the development that ties into and improves the existing settlement of Cambourne.
- 6.1.11 The impact of design on mode choice is a key factor in influencing modal shift and will not only help support increased sustainable trips but will contribute towards improving the sustainability of the existing Cambourne settlement and wider local environment.

Innovative Delivery and Servicing Strategy

- 6.1.12 The site has the potential to deliver innovative delivery and servicing strategies which will benefit from new and emerging technologies and supporting environmentally friendly methods. Such innovative strategies might include:
- Provision of electric cycles and cargo bike hubs for last mile deliveries;
 - Electric vehicle charging provision across all uses and for public parking;
 - Introduction of autonomous robots delivering food and essentials;
 - Delivery lockers (such as Amazon, UPS etc) located in central locations; and
 - Potential use of underground refuse storage (or similar) systems to reduce impact from refuse collection vehicles.

Facilitate Links to other Sites

- 6.1.13 The proposal will facilitate links to other allocated and committed sites in the area, including Bourn Airfield and Cambourne West. The development of this site would result in greater critical

mass of the combined settlement and would allow the site to bring together a new, larger, more mixed-use settlement which will benefit from all of the above.

- 6.1.14 North Cambourne is complimentary to Bourne Airfield and Cambourne West. Alone, these two sites will create a linear settlement to the south of the A428 which offers no means of delivering a diverse range of land uses which can support a more sustainable Cambourne, and no means of incorporating an integrated public transport hub with a new station North of Cambourne.
- 6.1.15 Expansion to the north can create a settlement that radiates out from the urban centre of Cambourne, enables a hierarchy of travel modes centred on active and sustainable modes to be delivered and which increases opportunities for sustainable travel at the same time as facilitating a new public transport hub should infrastructure schemes including EWR and C2C come forward.
- 6.1.16 North Cambourne would introduce sustainable travel at the heart of Cambourne which cannot be achieved by linear development to the south of the A428 alone.
- 6.1.17 Green connections delivered as part of North Cambourne offer a means of overcoming severance and delivering a fully connected community.

Overcoming A428 severance

- 6.1.18 The site lies to the north of the A428 and would allow for new crossings across the A428, for existing and future residents to access and benefit from a range of uses and facilities, including new transport services and facilities as well as employment, retail and leisure uses.
- 6.1.19 The new crossing points would offer benefit to the existing community of Cambourne, particularly if EWR/ C2C come forward given that North Cambourne can accommodate a new integrated transport hub for the wider settlement.

Support Modal Shift

- 6.1.20 All of the opportunities outlined above would, collectively, support and facilitate real opportunities for modal shift both for new residents of an expanded settlement and existing residents of Cambourne. This latter aspect is particularly important having regard to the existing dominance of the private motor car.
- 6.1.21 There is significant opportunity to right the wrongs of the past and create a community that can, to a greater extent, support itself. This can happen regardless of whether EWR and C2C are delivered, however, the site can also accommodate an integrated transport hub which could

incorporate one or both of these transport schemes should they be realised which will be of further benefit to Cambourne, in addition to also accommodating P&R.

SECTION 7 Comparative Appraisal

7.1.1 Section 2 of this report has already highlighted the transport related objectives of the SA, which are SA2 and SA12. Development of North Cambourne can go a long way towards delivering the transport objectives of the SA.

7.2 Sustainability Appraisal: Transport Objectives

SA 2: Access to Services and Facilities

7.2.1 In respect of SA2 North Cambourne can:

- **support the existing settlement of Cambourne** and offer opportunities to make Cambourne more sustainable through the creation of a more diverse mix of land uses that will support a local population, that can be within a 1500m walking distance of the urban centre and which can accommodate future delivery of an integrated public transport hub. This cannot be delivered to the same extent through further linear development to the south of the A428.
- deliver sufficient local services and facilities to support an increased settlement benefiting both the **new and growing communities (e.g. through provision of education, employment opportunities, sport and recreation, accessible green space and improved services in local centres)**; and
- deliver development **within proximity to existing or new services and facilities that are accessible for all.**

SA12: Climate Change

7.2.2 In respect of SA12 North Cambourne can:

- support the **growth of public transport networks** (i.e. delivery of a new integrated multi-modal transport hub), **create modal shift away from private cars and onto public transport**, and **provide access to public transport options** both for the existing community of Cambourne and new residents;
- **maintain and enhance attractive and well- connected networks of public transport and active travel, including walking and cycling** in a way that overcomes the severance of the A428 and offers betterment to the existing community of Cambourne and to new residents;

- **support development which is in close proximity to the existing settlement of Cambourne, that offers improved access to employment areas and can facilitate a new integrated public transport hub, thus reducing the need to travel by car** for those who live in Cambourne and those who work there; and
- **address congestion hotspots** in the road network through increasing internalisation of trips and reducing the need to travel by car at all.

7.2.3 Thus, North Cambourne delivers against the transport related objectives of the SA.

7.3 Sustainability Appraisal: Wider Objectives

7.3.1 Furthermore, there are a number of other objectives that are not directly related to transport but that are linked and should also be considered. Development of North Cambourne can also satisfy the following objectives:

SA objective 3: Social Inclusion and Equalities

“To encourage social inclusion, strengthen community cohesion, and advance equality between those who share a protected characteristic (Equality Act 2010) and those who do not.”

7.3.2 The site will integrate the new community North of Cambourne to the existing Cambourne area as well as providing connections towards Bourn Airfield and Cambourne West. This will be supported through a new, expanded local centre to benefit both existing and future residents of the area.

7.3.3 The site will be designed to promote walking and cycling through appropriate infrastructure, including wide footways, cycleways and crossing points, alongside appropriate landscaping to support an attractive pedestrian and cyclist environment.

SA objective 4 – Health

“To improve public health, safety and wellbeing and reduce health inequalities”

7.3.4 The site will create the opportunity for green links to be provided over the A428 to better link to the new development and onward to the countryside surrounding. It will also facilitate, promote and encourage a modal shift to more sustainable modes of travel, including increasing the proportion of trips by walking and cycling through the following:

- Design led scheme which promotes pedestrian and cyclist movement over the private vehicle;
- Facilitating the provision of a multi-modal transport hub which provides a key interchange between sustainable travel options;
- Design of permeable, attractive and direct walking and cycling routes through the site and connections to existing and committed settlements; and
- The provision of innovative transport approaches including cycle parking, electric vehicle charging provision and innovative delivery strategies.

SA objective 13: Air Quality

“To limit air pollution in Greater Cambridge and ensure lasting improvements in air quality”

7.3.5 The site will meet Greater Cambridge’s objectives to limit air pollution through the following;

- Growth and support of public transport network and a new multi-modal transport hub;
- Facilitating and supporting modal shift;
- Reducing the need to travel;
- The creation of attractive and well-connected walking and cycling routes to new and existing settlements; and
- The support for innovative transport and delivery strategies.

7.4 Sustainability Appraisal: Cambourne Area Site Options

7.4.1 A comparison of all sites within the Cambourne area against SA Objectives SA2 and SA12 is presented within the SA and demonstrates that North Cambourne is identified as perhaps the best performing site of all 11 sites considered.

Image 7.1 – Extract of SA Scoring SA2 and SA12

GCSP ref	Site	Proposed use	SA 1	SA 2a	SA 2b	SA 12a	SA 12b
40131	Land west of Broadway, South of Beaufort Road, Cambourne	Residential	+	++	+?	+++?	+
40132	Land south of School Lane, east of A1198, Cambourne	Residential	+	++	+?	+++?	+
40447	Land at Grange Farm, Caxton	Residential	+	-?	+?	+++?	-
48054	Land at Vine Farm and to the south of Caxton, Caxton	Residential	+	+?	+++?	+++?	+
48096	Land at Crow's Nest Farm, Papworth Everard	Residential	+	-?	+?	+	-
51601	Land south of A428 and west of the A1198, Caxton	Residential	+	+?	+++?	+++?	+
51612	Land north east of Bourn	Residential	+	+?	+?	-	+
51668	Land north and south of Cambridge Rd, Eltisley	Residential	+	+?	+++?	+	+
40076	Land south west of Caxton Gibbet	Mixed use	+	--?	--	+	-
40114	Land north of Cambourne, Knapwell	Mixed use	+	++	+++?	+++?	+
56461	Land at Crow Green, north-east of Caxton Gibbet	Employment	0	--?	N/A	+	-

7.4.2 Image 7.1 above illustrates the proposed site scores positively against the SA objectives 2 and 12, relating to transport. It is noted that this site is the only site which scores the most positively against the objectives outlined above.

7.4.3 No other sites considered can offer the benefits that North Cambourne can in terms of:

- Reduced severance of the A428;
- Facilitating a new integrated transport hub;
- Increasing the population entirely within a 1500m walk distance buffer;
- Extending the existing urban area to create an enlarged urban core adjacent to an integrated public transport facility;
- A 15-20 minute sustainable settlement; and
- Increased internalisation of trips to reduce the need to travel at all and the need to travel by car between Cambourne and Cambridge (and vice versa).

7.5 Spatial Options

7.5.1 As set out within Section 2 of this report, the transport evidence report concludes that Spatial Option 9 i.e. development at Cambourne could achieve “...low levels of car use and high levels of Active Travel and Public Transport use”.

7.5.2 The information set out within subsequent sections of this report supports this and demonstrates that North Cambourne offers a real opportunity for the creation of a sustainable settlement, that goes further than just benefiting residents of that new settlement and can offer a significant opportunity for the existing community of Cambourne through correcting the 'wrongs' of the past and significantly improving the potential for sustainable travel for those who live and work in Cambourne.

7.5.3 Further, it notes that Cambourne could benefit from the proposed C2C improvements and that the vehicular distance travelled, as a result of the additional development, would be less compared to any of the other core strategic spatial options. This would be supported through the public transport improvements in this area which will provide future and existing residents with the opportunity to travel by sustainable modes.

7.6 Local Transport Plan

7.6.1 Turning to the LTP, it is again the case that North Cambourne delivers against the objectives set out therein.

7.6.2 North Cambourne offers significant opportunity to create a settlement which is focussed on reducing the need to travel at all and for those essential journeys, focussing on self-containment of trips as far as possible and certainly to a degree far greater than the existing settlement of Cambourne achieves today.

7.6.3 If growth were to be entirely linear, south of the A428, or spread evenly across the wider plan area, the opportunities to achieve a high proportion of internalisation would be lost. Larger settlements have a higher degree of travel self-containment than smaller settlements, they have a higher concentrated population to support sustainable travel infrastructure and they offer greater chance of success through reducing the need to travel and reducing the distances travelled. Thus, providing locations for growth that reduce the need to travel and distances travelled is an important priority and North Cambourne can deliver on this.

7.7 NPPF

7.7.1 As referenced in Section 2 of this report, any Allocation of North Cambourne will be tested against the three principal transport criteria set out in paragraph 110 of the National Planning Policy Framework (NPPF) (July 2021), namely:

- Will the opportunities for sustainable travel be appropriately taken up given the type of the development and its location?
- Will safe and acceptable access be provided for all users?
- Will the residual traffic impacts be acceptable?

7.7.2 Information set out within this report has demonstrated that North Cambourne offers great opportunity for sustainable travel improvements not only for the new development but also for the existing settlement and residents of Cambourne and can deliver a diverse range of land uses aimed at reducing the need to travel at all and, for essential journeys, reducing distance travelled and offering greater opportunity for sustainable modes on those journeys. North Cambourne therefore satisfies the tests of the NPPF where it relates to sustainable travel opportunities being taken up.

7.7.3 In terms of access, North Cambourne offers to potential to tie into the existing roundabout junction of the A428 with St Neots Road as well as offering potential to take further access from the A428 to the east and the creation of a number of green connections over the A428 thereby reducing severance and improving connectivity. This strategy again accords with NPPF and, subject to the design of any new junctions and connections, the development can similarly satisfy the test of NPPF where it relates to safe access for all.

7.7.4 In terms of traffic impact, the central approach to North Cambourne is a desire to reduce the need to travel at all, to create a sustainable and most importantly walkable neighbourhood, thus traffic impacts associated with North Cambourne will be far less than compared to a scenario where allocations for growth are made in either an entirely linear, or more spread out, way. As such, it is considered that North Cambourne also meets the test of NPPF where it relates to traffic impact.

SECTION 8 Summary and Conclusions

8.1 Summary

- 8.1.1 Expansion of Cambourne by the provision of a new community on North Cambourne offers the opportunity to deliver much needed housing, to expand Cambourne in a coherent and comprehensive way, delivers a settlement that radiates out from its urban centre and avoids linear development south of the A428 thus increasing opportunities for sustainable travel for existing and new residents at the same time as facilitating a new public transport hub should infrastructure schemes including EWR and C2C come forward.
- 8.1.2 Expansion to North Cambourne will deliver a settlement that is almost entirely within walking distance of its own urban centre offering the opportunity to reduce car travel within and to and from the settlement of Cambourne. A complementary mix of uses will offer the potential to create a sustainable 15-minute neighbourhood where people choose to live and work within the same place.
- 8.1.3 There is evidence that many of those who currently live in Cambourne, work in Cambridge but also that vice versa a significant proportion of those who work in Cambourne, travel from Cambridge. Thus, there is demand for travel east-west between Cambridge and Cambourne. Creation of a new transport hub combining EWR, C2C and a new P&R site would offer real potential to remove car-based trips from the network between Cambourne and Cambridge reducing congestion on the A428 west of Cambridge.
- 8.1.4 North Cambourne delivers entirely against the transport objectives of the SA, as well as delivery against those additional objectives which are not directly associated with transport but are related.
- 8.1.5 Similarly, North Cambourne delivers against the goals of the LTP through delivering a settlement which reduces the need to travel at all by focussing on self-containment of trips as far as possible and certainly to a degree far greater than the existing settlement of Cambourne achieves today. For those journeys that are necessary, the focus will be on provision for active modes to reinforce the sustainability of movement throughout the expanded settlement of Cambourne.

8.2 Conclusions

8.2.1 In conclusion, development of North Cambourne for mixed employment and residential uses to create a highly sustainable new community on the edge of Cambourne:

- meets the transport 'tests' of NPPF;
- aligns to the transport and wider objectives of the SA;
- will deliver more sustainable travel characteristics for both existing and new residents; and
- has comparable public transport accessibility to other allocated sites.

8.2.2 In addition, North Cambourne can offer real opportunity to create an enlarged, but more sustainable settlement of Cambourne which will be to the benefit of both existing and future residents. In effect, delivery of North Cambourne offers the potential to right the 'wrongs' of the past regardless of whether EWR or C2C come forward. In the event that EWR and C2C are delivered, then this establishes a multi-modal hub at the heart of a new expanded Cambourne, providing access to sustainable modes of travel for journeys into Cambridge and indeed across the region.

8.2.3 Thus, in transport terms this site is an entirely suitable and highly sustainable site for a future allocation to achieve a mixed use new community that will add critical mass to the existing communities to the south of the A428 and in doing so introduce a greater range of services and facilities that will meet the needs of the whole of Cambourne.



Appendix 2 – L&V Appraisal by Cooper Landscape

COOPER

landscapeplanning.net

Martin Grant Homes and Harcourt Developments

Updated December 2021

NORTH CAMBOURNE

LANDSCAPE AND VISUAL ASSESMENT

DOCUMENT CONTROL

Reference	Date	Prepared	Authorised
Second Update/ Draft	3 December 2021	JC/ CK	JC
Final version	10 December 2021	JC/ CK	CK

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1.0 INTRODUCTION

- 1.1 A Landscape and Visual Appraisal was carried out for North Cambourne in 2013 and subsequently updated in 2020. This formed part of a submission by Savills on behalf of Martin Grant Homes and Harcourt Developments.
- 1.2 Since that submission, the area of Camborne has been selected as a potential broad location for growth, but with landscape issues still requiring clarification.
- 1.3 The purpose of this updated landscape and visual assessment appendix is to allay concerns about the landscape issues and to show that the proposals for North Camborne are suited to the landscape character of the area, and that mitigation will satisfactorily respond to the site, as part of the planning balance.
- 1.4 Reference should be made to the 2020 Landscape and Visual Assessment for which this is a supplementary update.

2.0 THE NORTH CAMBOURNE LANDSCAPE

Site Description

- 2.1 North Cambourne lies to the north of the A428(T) adjacent and to the north of the new settlement of Cambourne. The site is bounded to the west by the A1198, the major road leading to Papworth Everard and the business park that defines the site’s northwest corner. Agricultural land also adjoins the site to the north. Most of the land is in agricultural use, including four farmsteads (Lawn Farm, Coldharbour Farm, New Inn Farm and (Knapwell) Wood Farm). Glebe Farm Campus lies a short distance to the north-west of the site. The eastern extension now proposed lies in a more visually open area, which has less trees and hedgerows than the central and western parcels.

Topography

- 2.2 North Cambourne lies on the northern margin of a broad plateau 65-70m AOD, which falls from the mid part of the site to 55-40m AOD on the northern boundary. The northern part of the site comprises a series of gentle, but pronounced ridges and valleys, orientated on a north-easterly alignment. The valleys are drained by narrow but deeply cut watercourses, which contained shallow running water. Several ponds are also present on the site, notably at Lawn Farm and Glebe Spring, the latter at the confluence of two of the site valleys.

Existing Vegetation

- 2.3 Existing vegetation principally comprises the hedgerows defining the typically large-scale arable fields, hedgerow trees, occasional copses and the two large Ancient Semi-Natural Woodlands of Elsworth Wood and Knapwell Wood.

Public Rights of Way

- 2.4 Three public rights of way (PROW) cross North Cambourne, in a north-south orientation, footpaths 4-7. The first footpath, on the west part of the site, also a bridleway, follows the bottom of a valley from Lawn Farm and skirts Elsworth Wood, and beyond the site continues to the village of Elsworth. The middle PROW follows a straight alignment over 2km, continuing beyond the site to the village of Knapwell in a north-easterly direction. The third PROW on the east part of the site connects St. Neots Road at New Inn Farm to the minor road leading to Knapwell at Wood Farm.
- 2.5 The Pathfinder Long Distance Path passes 1km to the north of the site, taking in the two Conservation Areas at Elsworth and Knapwell. The Pathfinder Walk (46 miles) was designed by the RAF as a heritage trail in memory of the RAF Pathfinder Force and links up the four airfields (Wyton, Graveley, Oakington and Warboys) used by the Pathfinders when they were set up in 1942.

Landscape Character

National Landscape Character

2.6 The site lies within the Bedfordshire and Cambridgeshire Claylands Character Area 88. Key characteristics of this character area, of relevance to the site and locality, which include:

- ‘Gently undulating, lowland plateau divided by shallow river valleys that gradually widen as they approach The Fens NCA in the east...
- Predominantly open, arable landscape of planned and regular fields bounded by open ditches and trimmed, often species-poor hedgerows which contrast with those fields that are irregular and piecemeal....
- Variable, scattered woodland cover comprising smaller plantations, secondary woodland, pollarded willows and poplar along river valleys, and clusters of ancient woodland....’

Regional Landscape Character

2.7 The Cambridgeshire Landscape Guidelines characterise the site as part of the Western Claylands Landscape Character Area, which extends between Cambridge and St. Neots. The Western Claylands is a gently undulating lowland landscape, typically comprising large-scale open arable farmland defined by trimmed hedgerows and woodlands.

2.8 The Cambridgeshire Landscape Guidelines set out key principles for landscape improvement and management in the Western Claylands, as follows:

‘...The vision is one of a fairly large-scale landscape with large rolling fields enclosed by and sweeping around blocks and belts of woodland and broad hedgerows. In the valley bottoms, the objective should be to create small-scaled streamside landscape zones with trees, copses, meadows and other features...’

2.9 The new landscape structure should be directed towards management of existing woodlands, the careful management of ancient semi-natural woodlands and the elective re-stocking and creation of ‘edge areas’ elsewhere.

2.10 New woodlands should be at least two hectares in size and located so that they make a major impact in relation to:

- viewpoints:
- wildlife potential; and
- landform and skylines.

2.11 The new woodland blocks should be planted to reflect the landform, thereby providing an enhanced character of wooded skylines, distinctive clumps and woodlands which follow the folds in the land. Elsewhere, woodlands may be planted to reflect the existing or former field patterns, thus being derived from the inherited pattern. In

practice, a combination of these two approaches would emerge, reflecting both old and new landscape patterns.

- 2.12 Planting of woodland belts: should be based on existing hedgerows, with linking woodland blocks, these being aligned to reinforce landforms, and enclosing large areas of rolling farmland (see Farmland Model A4b).
- 2.13 Creation of landscape corridors in valley bottoms will necessitate setting aside 5-15m or more either side of streams to create semi-wooded corridors of diverse habitats.
- 2.14 Selected hedgerows should be reinforced and managed for significant impact, based upon their visual and wildlife potential. Historically significant hedgerows should be conserved, and new hedges planted to emphasise the existing landscape:
 - road verges should be managed for floral diversity; hedgerows with trees should be concentrated on lower slopes to prevent loss of views from higher land and planted to create a bold sequence of enclosed and open characters appropriate to the large scale of the landscape;
 - footpath corridors should be improved, with long-distance routes and circular/linking routes related to villages provided with landscape improvements integrated with other new features; and
 - village approaches should be provided with increased tree cover with trees along road margins, woodland belts alongside roads, planting at edges of villages and hedgerow planting is desirable, and ensuring that key views are not lost.

Local Landscape Character

- 2.15 The local landscape character of the site is typical of the key characteristics of the National landscape character of the Bedfordshire and Cambridgeshire Claylands described above and the regional landscape character of the Western Claylands, also set out above.
- 2.16 The large-scale and open, gently undulating ridge and valley landscape can be clearly seen from the road between Elsworth Wood and the village of Elsworth, and from the Pathfinder Long Distance Walk. The southern part of the site comprises more of a plateau landform following the St. Neots Road and the A428(T) which border the site to the south.

Trends

- 2.17 A change in the landscape which is already becoming evident is the establishment and maturing of the native tree belt recently planted along the north side of the A428(T) dual carriageway adjacent to the southern boundary of the site and continuing westwards to the roundabout junction with the A1198. This and other woodland planting in Cambourne are developing into prominent tree belts, already enclosing views into the site and into Cambourne.

- 2.18 Another key change is that of the urban fabric which has taken place over the last 10 years. Not only has Cambourne continued to grow, but new development is planned at Bourn Airfield. And the area has been provided with a draft allocation for further housing. Papworth Everard has also grown, and new development has taken place on its southern approach leading down to the A428, where there is a service station and other roadside facilities. This urban development pattern has changed the landscape and the perception of that landscape has also changed. For the east bound traveller on the A428 Cambourne effectively starts at the Papworth roundabout. These changes will continue in the future with the A428 being part of the Oxford Cambridge Expressway, subject to infrastructure improvements and further urbanising influences. Cambourne is on the preferred route of East West Rail, which includes a new station at Cambourne.
- 2.19 Ongoing changes that are occurring to Cambourne, Bourn Airfield and other urban developments. More rural changes will include future farming practices and land management. Without positive management, for example periodic hedge laying, there is a tendency for the condition of hedgerows to gradually decline over time. There is also a tendency towards larger field sizes and the removal of unprotected hedgerows to achieve greater farming efficiencies, including the removal or culverting of open watercourses to maximise farming yields.
- 2.20 This is a changing landscape which will change further. This change must be managed.

Historic Landscape Character

- 2.21 The 1891 OS map provides guidance as to the historic landscape character of the area. This shows the site to have comprised an intricate pattern of smaller field parcels, many of which have been removed to form larger agricultural areas, with a consequential loss of character.

Conclusions

- 2.22 The key internal landscape elements of the site which must be protected are the valley landform, hedgerows, trees and woodland, PROWs, arable fields, and the landscape character of the Western Claylands landscape character area.
- 2.23 Landscape features of the highest value are the two Ancient Woodlands of Elsworth Wood and Knapwell Wood. Other areas of trees and copses are of medium landscape value. Hedgerow and field boundaries on the site are of variable quality, ranging from high to low landscape value. The high value hedgerows are those assessed as important under the ecology/landscape criteria of the Hedgerow Regulations.
- 2.24 Valley watercourses should be retained along the more pronounced valleys, and those contributing to recreational value.
- 2.25 The value of footpaths relates to their recreational value and historic associations. The Pathfinder Long Distance Path to the north of the site is of high value and the two

routes across the site leading to Elsworth and Knapwell are also important.

- 2.26 The intensively used arable fields is typical of the locality. The variety of ponds on the site are inconspicuous features within the overall landscape and are of low to medium landscape value, although their ecological value may be greater.

3.0 THE 2020 LVIA

3.1 The LVIA conducted in 2020 concluded that:

- *The North Cambourne site currently comprises agricultural land bounded to the south by the old St. Neots Road, to the east by the minor road leading to Knapwell, and to the west by the minor road leading to Elsworth. Agricultural land adjoins the site to the north.*
- *The northern margin follows a broad plateau, which falls from the mid part of the site to a series of gentle ridges and valleys to the south. The valleys are drained by narrow, deep valleys and ditches.*
- *Existing vegetation principally comprises boundary hedgerows enclosing the typically large-scale arable fields, hedgerow trees, occasional copses and the two large ancient woodlands of Elsworth Wood and Knapwell Wood. The site is crossed by a bridleway and two public footpaths. The Pathfinder Long Distance Walk passes approximately 1km to the north of the site.*
- *Landscape features considered to be of the highest value include the two Ancient Woodlands and the more pronounced valley bottoms. Hedgerow and field boundaries on the site are of variable quality, ranging from high to low landscape value, with high value hedgerows also assessed as 'Important' under the Hedgerow Regulations.*
- *There are no landscape planning designations applicable to North Cambourne, although Tree Preservation Orders apply to several significant hedgerow trees within the site. Elsworth Wood and Knapwell Wood are designated Ancient Woodlands and Elsworth Wood is also designated as a Site of Special Scientific Interest. All need to be retained as part of the potential new layout.*
- *The Cambridgeshire Landscape Guidelines include North Cambourne within the extensive Western Claylands landscape character area, characterised by a gently undulating lowland landscape, typically comprising large-scale open arable farmland defined by trimmed hedgerows and woodlands. The guidelines for this character area set out several key principles for landscape improvement, including a vision of a large-scale landscape with large rolling fields enclosed by blocks and belts of woodland and broad hedgerows. In the valley bottoms, the objective is to create small-scaled streamside landscapes with trees, copses, meadows, and other features.*
- *The First Edition OS map provides guidance as to the historic landscape character of the area in the late 19th Century, showing the site to have comprised an intricate pattern of smaller field parcels, many of which have subsequently been removed to form larger fields.*
- *Visually, North Cambourne is largely inconspicuous in view from the surrounding landscape. This is in part due to the flat nature of the topography adjoining the north part of the site, where visibility is readily curtailed by*

intervening features such as hedgerows, woodland, and trees. Another factor contributing to the lack of views is the scarcity of publicly accessible viewpoints from roads and other public rights of way within the surrounding landscape, few elevated viewpoints providing views over the site. The principal views of the site are afforded from parts of the Pathfinder Long Distance Path and the minor road between Elsworth and Elsworth Wood.

- *Views are mostly experienced by users of paths crossing the site, travellers on adjacent roads, those bordering the site, potentially workers at the Glebe Farm Campus and occasional agricultural workers. Walkers and to a lesser extent horse riders are likely to place the highest value on views, since the character of the landscape typically forms an important part of the recreational experience.*
- *Landscape opportunities for the site include relatively few publicly accessible views of the site from the surrounding landscape, creation of a distinctive sense of place for new development, which respects the existing landscape characteristics of the site, for example, the creation of green corridors along the series of small-scale valleys and associated watercourses and substantial areas of new woodland planting, and other measures to enhance the existing landscape character of the Western Claylands in keeping with the Cambridgeshire Landscape Guidelines.*
- *Landscape constraints require retention and protection of the higher value landscape elements on the site, including existing trees and woodland, important hedgerows and characteristic valley floors, avoidance of development on the visually more exposed parts of the site on key ridgelines and the outward facing valley slopes in the north-west part of the site and retention of the rural character of the minor roads bordering the site to the east and west leading to Knapwell and Elsworth respectively.*
- *The landscape and visual appraisal show that there are constraints to development at North Cambourne but that these constraints can be successfully accommodated by sensitive master planning, which respects key landscape characteristics and views. The site therefore offers potential for high quality development, and an example is provided of how this could work.*
- *The illustrative masterplan provides a garden city layout based on strong green corridors, open spaces, retention and enhancement of woodland and respect for views, including the creation of new views. This layout has been tested in the appraisal.*
- *Subsequent planning applications for proposed development would be accompanied by a full landscape and visual impact assessment as part of an Environmental Statement. However, this landscape and visual appraisal has shown that the site has the capacity to accommodate the proposed sensitively designed and sustainable development shown indicatively on the illustrative masterplan, without undue harm to the existing landscape and visual amenity of the site and the surrounding area.'*

4.0 THE UPDATED ASSESSMENT

4.1 The master plan for North Cambourne has now been extended to the east to allow for an appropriate number of dwellings which correspond to the numbers in the draft allocation. The extent of the potential development areas submitted by Savills in their previous representations has also been adjusted to follow a landscape led approach that makes use of the enclosure afforded by:

- the existing site woodland and its extensive hedgerow network in the central and western parcels, which affords visual enclosure for those areas, when seen from the north;
- restored and forward planted tree / woodland bands, to mitigate the extension area in the east; and
- retention of the relationship between the open landscaper character and that of the ancient and other woodlands.

Landscape Assessment

4.2 The key landscape features of the area are:

- the valley landforms;
- the remaining hedges and trees, and how they can be supplemented; and
- the network of footpaths and bridleways and how they can be improved.

4.3 The landscape character of the Western Claylands focuses on the contrast between the open agricultural landscape to the remaining ancient woodlands, and it is important that this should be retained and enhanced. The historical character was comprised an intricate pattern of smaller field parcels, many of which have subsequently been removed to form larger agricultural areas, with a consequential loss of character.

4.4 It follows from the above that the proposal at North Cambourne has been based on a positive landscape vision, which is as follows:

- retention of the open agricultural landscape, and its relationship with the woodlands;
- providing a strong woodland to create the framework for development; and
- forward planning the eastern area to allow for the growth of planting for development commencing in the west.

4.5 It is obvious that development will change the local landscape character of any site, and North Cambourne is no different. Nevertheless, the design approach adopted of retaining an open landscape, with development enclosed behind strong woodland blocks is an approach that will work well in this landscape.

Visual assessment

- 4.6 The extended North Cambourne proposal has been modelled as an electronic 3D model to provide an illustrative representation of how the new housing would look from key viewpoints. This includes the location of the new woodlands, and reaching up to 10-15m by the time the western and central parcels have been built out.
- 4.7 Two viewpoints have been chosen from the previous LVIA to illustrate the long-term visual effects of the expanded scheme from these key locations, as follows
- Elsworth, Viewpoint 5; and
 - High Street, Viewpoint 7A.
- 4.8 These views have been modelled to show the view with mitigation or planting, around fifteen years after work commences on the western and central blocks. The following comments explain the existing view, and the degree of additional visual effects arising from development.

Viewpoint 5 Elsworth, Rogues Lane

- 4.9 This view is from the lane just to the south of Ellsworth, in a visible location with potentially good views of the whole of North Cambourne. There are two views: the top view is as existing, the bottom is the proposed wireline view with development and mitigation with the proposed woodland emulate the historical character of the central and western areas.
- 4.10 This view demonstrates that it would be easy to enclose the eastern extension of North Cambourne if the new trees/woodland blocks were to be planted at the outset. These new woodlands are shown on the Savills illustrative masterplan, and would be planted in sensitive locations to emulate the landscape character and the existing woodland pattern.
- 4.11 A further view has been checked (Viewpoint 4, located further south along the road from Viewpoint 5). Our initial modelling work (without mitigation) shows that from this location the proposed development is unlikely to be visible, owing to the undulating rolling valley landform.

Viewpoint 7A Knapwell, High Street

- 4.12 Viewpoint 7A has been taken from a similar location, along the road, south of Glebe Farm, also in a visible location with potentially good views of North Cambourne. As before, the top view is as existing, the bottom is the proposed view with the woodland planting after 15 years, assumed to be at 10m high. In this location the additional woodland planting would appear in the foreground, and form part of existing woodland groups located within the central and western parcels.

- 4.13 This view reinforces that it would be relatively easy to enclose the eastern extension of North Cambourne if the new woodland shown on the Savills master plan were planted at the outset. The new planting would be in sensitive locations which would emulate the landscape character and the existing woodland pattern.

5.0 CONCLUSIONS

5.1 This is a changing landscape which will change further. This change must be managed.

5.2 The conclusions of the 2020 remain valid for the extended master plan area. These included the following statement:

'The Cambridgeshire Landscape Guidelines include North Cambourne within the extensive Western Claylands landscape character area, characterised by a gently undulating lowland landscape, typically comprising large-scale open arable farmland defined by trimmed hedgerows and woodlands. The guidelines for this character area set out several key principles for landscape improvement, including a vision of a large-scale landscape with large rolling fields enclosed by blocks and belts of woodland and broad hedgerows. In the valley bottoms, the objective is to create small-scaled streamside landscapes with trees, copses, meadows, and other features.'

5.3 It is obvious that development will change the local landscape character of this or any site, and North Cambourne is no exception. Nevertheless, the design approach adopted of retaining an open landscape, with development enclosed behind clearly defined woodlands is an approach that will work well in this landscape.

5.4 Accordingly, the proposal at North Cambourne has been based on a positive landscape vision, which is as follows:

- retaining an open agricultural landscape, as well as accommodating a new settlement;
- providing a series of significantly strong woodland to create the framework for development; and
- forward planning the eastern area to allow for the growth of planting for development commencing in the west.

5.5 The extended North Cambourne proposal has been modelled to provide a visual representation of how the housing blocks would look from key viewpoints. This includes the location of the new woodland in the east, planted in advance and reaching up to 10-15m by the time in the western and central parcels have been built out.

5.6 The sketch photomontages provided demonstrate that the area extended to the east will not produce unacceptable visual effects when seen from the local villages of Elsworth and Knapwell.

5.7 The proposals will become assimilated into this landscape, and the design adopted will follow the landscape character principles set out in guidance.

EXISTING VIEW



VIEWPOINT:5 SOUTH-EAST TOWARDS SITE FROM ROAD TO ELSWORTH.
 GRID REFERENCE:
 CAMERA ELEVATION:
 DISTANCE FROM NEAREST EDGE OF PROPOSED DEVELOPMENT SITE:

ELEVATION:
 DIRECTION OF VIEW:



GOOGLE EARTH STREET VIEW



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JOB NO. 416 09819 00019
 DATE: 09-12-2021 DRAWN: CK CHECKED: CK APPROVED: CK
 VIEWPOINT 5 DRAWING NO: NC-101

ILLUSTRATIVE WIRELINE VIEW WITH DEVELOPMENT AND MITIGATION



VIEWPOINT:5 SOUTH-EAST TOWARDS SITE FROM ROAD TO ELSWORTH.

GRID REFERENCE:
 CAMERA ELEVATION:
 DISTANCE FROM NEAREST EDGE OF PROPOSED DEVELOPMENT SITE:

DIRECTION OF VIEW:
 HORIZONTAL FIELD OF VIEW: 90°



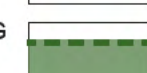
LEGEND

PROPOSED HOUSING NOT VISIBLE



BASED ON ILLUSTRATIVE MASTERPLAN SK16A

MITIGATION PLANTING ASSUMED HEIGHT AT MATURE 10M



GOOGLE EARTH STREET VIEW



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 DATE: 09-12-2021 DRAWN: CK CHECKED: CK APPROVED: CK
 VIEWPOINT 5 DRAWING NO: NC-102

EXISTING VIEW



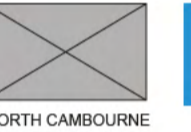
VIEWPOINT:7A WEST ACROSS SITE FROM HIGH STREET.

GRID REFERENCE:
CAMERA ELEVATION:
DISTANCE FROM NEAREST EDGE OF PROPOSED DEVELOPMENT SITE:

ELEVATION:
DIRECTION OF VIEW:



GOOGLE EARTH STREET VIEW



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JOB NO: 416 09819 00019
DATE: 09-12-2021 DRAWN: CK CHECKED: CK APPROVED: CK
VIEWPOINT 7A DRAWING NO: NC-103

ILLUSTRATIVE WIRELINE VIEW WITH DEVELOPMENT AND MITIGATION



VIEWPOINT:7A WEST ACROSS SITE FROM HIGH STREET.

GRID REFERENCE:
CAMERA ELEVATION:
DISTANCE FROM NEAREST EDGE OF PROPOSED DEVELOPMENT SITE:

ELEVATION:
DIRECTION OF VIEW:
HORIZONTAL FIELD OF VIEW: 90°



LEGEND

PROPOSED HOUSING NOT VISIBLE



BASED ON ILLUSTRATIVE MASTERPLAN SK16A

MITIGATION PLANTING ASSUMED HEIGHT AT MATURITY 10M



GOOGLE EARTH STREET VIEW

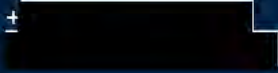


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JOB NO: 416 09819 00019
DATE: 09-12-2021 DRAWN: CK CHECKED: CK APPROVED: CK
VIEWPOINT 7A DRAWING NO: NC-104

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