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Paul Rowland DipEnvP MRTPI

Greater Cambridge Shared Planning
Greater Cambridge Local Plan: First Proposals Consultation 2021

Online submission

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Dear Sirs,

Response to consultation in relation to Site Reference 40273, Land South of St Neots Road, Hardwick, CB23 7QL

This additional representation relates to the published Appendix 4: Proformas for all HELAA sites (Part B). At page 654 the Council sets out its findings in relation to our clients' site ref 40273. This representation sets out why those findings should be amended to reflect the suitability of the site for inclusion as an allocation in the Local Plan. Each of the headings below refers to the corresponding box on the Council's template.

Site Details - Category of settlement.

The description of the site as being not adjacent to an existing settlement is not agreed. To its east, the site immediately adjoins the site of planning permission 3064/16/OL, where 155 dwellings are currently under construction. To the north the frontage development to St Neots Road clearly comprises a built-up part of the village, whilst the site is physically separated from further open countryside to the west by a substantial tree belt. Its southern boundary aligns with the existing southern extent of Hardwick village to the south of St Neots Road. Development of the site would be contiguous with existing housing within Hardwick and meet the requirement of being adjacent to the settlement.

Site Assessment Summary – Suitable.

The comments below warrant the assessment outcome being adjusted from red to green.

Site Assessment – Adopted Development Plan Policies.

There has been significant development at the western margins of Hardwick, beyond the development framework limits, in recognition of the sustainable location and the ability of the landscape and topography to assimilate it. This should not therefore be seen as a negative factor. Nor should the fact that land to the north of the A428 and east of the village is designated Green Belt should be seen as a negative factor. Development of the site would not be noticeable from the Green Belt and reference to the proximity of the site to the Green Belt is therefore misleading.

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Flood Risk.

The previous submission of this site was supported by a Flood Risk and Surface Water Drainage Strategy which showed 96% of the site area to be 'very low risk' and only a further 4% defined as low risk. The Council's SHELAA assessment criteria suggest a green rating is appropriate for a site which '...is at low risk of flooding (within flood zone 1) and no/limited areas identified as at risk of surface water flooding'. The suggested rating of amber for those sites where there is sufficient land in Flood Zone 1 to accommodate 5 dwellings is clearly inappropriate in this case. This rating should therefore be upgraded from amber to green.

Landscape and Townscape.

The key constraint is said to be that the site is outside the development boundary with no justification for a village extension. This policy consideration is not an appropriate basis on which to begin an assessment of landscape and townscape impact. It also fails to recognise the housing development currently taking place on the land immediately to the east of the site for 155 dwellings. In terms of its landscape setting the site is enclosed to the north by existing frontage development to St Neots Road and to the west by a substantial tree belt. The southern boundary of the site benefits from an established hedgerow and the delivery of a landscape-led designed scheme would have the positive effect of softening the visual edge created by the current development taking place to the east. Taking these factors into account landscape impact would be neutral or positive and the site should not therefore be scored amber.

Biodiversity and Geodiversity.

A Preliminary Ecological Appraisal has been submitted that demonstrates that the site is of low ecological value. It identifies a number of measures which can deliver a net gain in biodiversity alongside the residential led scheme. Inclusion of public open space on the site would mitigate any pressure on the nearby SSSI. An amber rating is therefore not justified and should be replaced by green.

Accessibility to Services and Facilities.

This criterion should be adjusted to reflect the opportunity to walk from the site via footpath links that will be available when development of the adjoining site (currently under construction for 155 dwellings) is completed. Also, the reliance on distances to the city and other service centres should be adjusted to reflect the investment being made by the Council to improve cycling and public transport facilities between Hardwick and Cambridge centre. This includes the Scotland Farm park and ride hub. For these reasons the site is more accessible than many other areas and the rating should reflect this.

Site Access.

The current assessment refers to the need for two points of access and concludes there is no possibility of creating a safe access. The previously submitted highway report includes a main new access from the northwest corner and a secondary (emergency) access from the northeast corner to the site down a track over which the owners have a right of way. This has been discussed with Cambridgeshire Fire and Rescue service (Danny Hans, Fire Protection South Compliance Team) and they are satisfied with the proposed arrangements. This rating should now be green.

Transport and Roads.

Given the inclusion of allocations and continuing support for development at Cambourne and Bourn, including a further proposed 1,950 dwellings at Cambourne, it is difficult to understand the highway comment about the A428 corridor being unable to accommodate the scale of this development at up to 150 dwellings. This site will be on the same public transport corridor into Cambridge from Cambourne and the west. But it will be closer to Cambridge with shorter journey times by bus and distances that make walking to the transport hub or cycling to the city and employment sites more attractive. Even the assessment concludes that any impact on trunk and local roads could be reasonably mitigated. References to Cambourne cycle mode share and linkages with St Neots and Elsworth suggest these comments may have been copied across from other site assessments. The amber rating should be reviewed on the basis that occupiers of new homes here would be unlikely to use private cars at times when the road network is congested.

Conclusion.

Based on the further comments above it is our view that the site should be rated overall green for Suitability and not red as currently shown. It remains available and achievable and should therefore be considered for inclusion as an additional allocation to assist with early delivery of housing that is not reliant on major infrastructure or planning for delivery of strategic scale development.

Yours sincerely

A solid black rectangular redaction box covering the signature of Paul Rowland.

Paul Rowland DipEnvP MRTPI
Director