



Date: 7 March 2025

Ref: 33313503100/A5/PD

Greater Cambridge Planning Authority

Dear Sirs,

GREATER CAMBRIDGE LOCAL PLAN: SITE SUBMISSIONS UPDATE 2025

The following comments are made on behalf of Hill Residential Ltd (HRL) pursuant to their land interests on Land east of Cambridge Road, Hardwick. The site was put forward through the initial Call for Sites (CfS) proposal in 2019 and is referenced within the Housing and Economic Land Availability Assessment (HELAA) 2021 as site 40414.

These representations are supported by the following updated information:

- Delivering Sustainable Growth 2025
- Framework Masterplan
- Green Belt Review
- Landscape and Visual Appraisal
- Demand and Need Market Review

The purpose of the comments below is to update the Council on changes to site context, supporting technical information and the illustrative masterplan since the original CfS and First Proposals consultation in 2021. HRL has undertaken a variety of public/stakeholder events and technical studies, that have informed the evolution of the illustrative masterplan. On the basis of this work, the site is considered to be largely free from any technical constraints which would preclude development coming forward. The site continues therefore to be available and can be readily delivered early in the plan period. It is situated in a highly sustainable location (see transport comments below) and can bring forward up to 400 dwellings plus essential community uses bringing forward public benefits to support the village.

HELAA Assessment

The HELAA sets out the Council's own assessment of the site at the original CfS and First Proposals stage. This confirms the site scores well in terms of availability, but scored 'amber' in terms of suitability.

Criteria	Outcome
Suitable	Amber
Available	Green
Achievable	Green

As part of this submission, an exercise has been undertaken to assess the HELAA scoring undertaken by the Council based on the above updated information. This is set out in full in **Appendix 1**.

With regards to the 'development potential' of the site, the information within the HELAA has been reviewed and some changes are proposed. Given the site is in single ownership and available without delay, it is anticipated that the estimated start date would be within the 0-5 year range. A build out period of approximately 5 years would be needed at a completion rate of 86dpa. As such, it is anticipated that the development could be completed within 6-10 years. The 'development potential' table should therefore be updated as per below:

Capacity and Delivery	HELAA Response	Updated Response
Estimated dwellings per hectare	19	15
Estimated dwelling units	500	400
Estimated employment space (m2)		tbc
Estimated start date	6-10 years	0-5 years
Estimated annual build-out rate (pa)	86	86
Development completion timescales (years)	11-15 years	6-10 years

Within the HELAA assessment, the 'proposed development' sets out a number of types of development that could come forward on the site. No changes are proposed to the list provided at this stage. Given the masterplan is at an early stage, the precise mix of appropriate land uses will be agreed as the scheme moves forward.

A significant amount of technical work has been undertaken at the site. Combined with the results of the public and stakeholder events this has allowed the masterplan vision to evolve. Attached alongside these representations is a 'Delivering Sustainable Growth' summary document. This seeks to compress some of the information from the wider Vision Document into a more concise document, taking into account the changes to the illustrative masterplan. Further details are also provided below.

Of note, the capacity of residential development at the site is considered to be 400 dwellings. This has allowed additional space to come forward for uses such as a retail, employment and community facilities. It also allows for the provision of extensive area of public open space, particularly relating to the proposed country park and the boundary planting along the east and southern boundaries that create a formal edge to the settlement.

Additional Documentation

Delivering Sustainable Growth 2025 – Undertaken by Tor & Co, this document provides a summary of the Vision Document that supports the scheme. It is a summarised version of the latest thoughts, meaning it does not repeat the background matters set out in the originally submitted Vision. The document has been updated following reforms to the planning system, and makes references to the change in policy, Green Belt guidance and the requirement for Green Belt release to meet the 'golden rules' set out within the 2024 National Planning Policy Framework.

The document also includes an updated Framework Masterplan. This has evolved some of the thinking around the local centre aspect of the development, how connections may work and aspect into the development and Hardwick itself. It has been informed by technical input as well as discussions with the Parish Council and local stakeholders.

Framework Masterplan – This document is set out within the Delivering Sustainable Growth 2025 document described above, but is also provided as a standalone document for ease of reference.

Green Belt Review – A Green Belt Review dated December 2021 was submitted with the First Proposals consultation. Accompanying this letter is an updated Green Belt Review by Tor & Co dated February 2025. This builds upon the original review document and is updated in terms of new national guidance.

The Review assesses the contribution of the wider plot HA4 (where the vast majority of the site is located) to the Green Belt functions as set out within the Council's own Green Belt Assessment. The summary from table 3.2 of the Review is shown below, which concludes there is a moderate level of harm should the land be released from the Green Belt. It should be noted that any harm identified can in part be mitigated through design and layout and the proposed landscaping and boundary treatments set out within the Delivering Sustainable Growth 2025 document, including strong woodland buffers and the provision of a country park.

Green Belt Purposes	LUC (on behalf of Council) Assessment of Parcel HA4	Tor & Co Assessment of the Hardwick site within Parcel HA4
Openness	Mostly open	Mostly open
Distinction	Strong distinction between parcel and inset village	Moderate distinction between parcel and inset village
Cambridge Purpose 1	No contribution	No contribution
Cambridge Purpose 2	Moderate contribution	Relatively limited contribution
Cambridge Purpose 3	Relatively significant contribution	Relatively limited contribution
Impact on adjacent Green Belt land	Minor-Moderate	Minor-moderate
Overall harm of Green Belt release	High	Moderate

Landscape and Visual Appraisal – A Landscape and Visual Appraisal dated December 2021 was submitted with the First Proposals consultation. Accompanying this letter is an updated Landscape and Visual Appraisal by Tor & Co dated February 2025. This has been informed by the updated masterplan work and associated technical input. The report concludes that, with effective mitigation, 'there is no overriding landscape or visual effect that should preclude the development of the site as proposed'. It also highlights some longer term landscape benefits that would result.

Demand and Need Market Review – The proposed development includes a new local centre for the village, in close proximity to the retail unit along Cambridge Road. In order to support some of the potential uses that could be utilised within this area, a Demand and Need Market Review has been undertaken by Carter Jonas dated September 2023. The findings of the report will help inform the future layout and opportunities available within this central area in order to provide any appropriate employment use within the newly created local centre.

These documents support the view that the site remains an opportunity to bring forward a sustainable form of development. This view is strengthened by the expanding transport projects that are proposed in and around Hardwick. Projects of note are:

- Cambourne to Cambridge Busway – In November 2024, the Greater Cambridge Partnership applied for a Transport and Work Act Order to the Department of Transport for a new busway, travel hub and cyclist/pedestrian path between Cambridge and Cambourne. The proposals include a bus stop on St Neots Road adjacent to the junction with Cambridge Road. This is within simple walking distance of the proposed site.
- Comberton Greenway – Work has commenced on the Greenway, which seeks to link Comberton and Hardwick to Cambridge. The proposal would allow a cycle journey from Hardwick to the Cambridge University West Campus of 24 minutes by cycle.
- East-West Rail – The proposed East-West Rail route seeks to include a new railway station at Cambourne. This will provide direct links to Bedford, Milton Keynes and Oxford, as well as to Cambridge and further eastwards in the future. Hardwick will be directly linked to Cambourne by the Busway described above,

To conclude, this letter is supported by updated technical information to support the promotion of site 40414 on land east of Cambridge Road, Hardwick on behalf of HRL. This seeks to update the

documentation in line with the evolving masterplan at the site, as well as updating reports given changes to national planning policy. Comments are also made in response to the assessment of the site within the 2021 HELAA. HRL agree with the 'green' score for 'availability and achievability'. Appendix 1 provides further information regarding the suitability of the site which we consider would result in a number of issues previously identified as 'amber' moving to 'green'.

This Call for Sites response reiterates the previous position that the site is in one ownership, immediately available and would bring forward development in a sustainable location with excellent public transport links to Cambridge, Cambourne and beyond. The development provides an opportunity to bring forward significant benefits to the village of Hardwick, including significant open space, infrastructure improvements and new employment/retail opportunities.

HRL welcomes the opportunity to submit the referenced updated information and would welcome an opportunity to discuss the site and its potential with officers at your convenience.

Yours faithfully,



STANTEC UK LIMITED

Paul Derry

Associate Planner
Mobile: +44 7467 482274
Paul.Derry@Stantec.com

Issue/ Question	Greater Cambridge HELAA 2021 Result	Greater Cambridge HELAA 2021 Comments/ Response	2025 Result	2025 Response
<i>Site Assessment: Suitable</i>				
Flood Risk	Amber	Flood zone: Wholly in Flood Zone 1 Surface water flooding: 2% lies in a 1 in 100 year event 11% lies in a 1 in 1000 year event	Green	The methodology states green is applicable where there are 'limited' areas at risk of surface water flooding, It is acknowledged that a small area of the site is within the surface water flood area, but this is considered to only represent a 'limited' amount.
Biodiversity & Geodiversity	Amber	All new housing developments will require assessment of increased visitor pressure on nearby SSSI, and any agricultural/industrial development that could cause air pollution, or general combustion process above 20 MW energy input will require consultation with Natural England. The Bin Brook runs adjacent to the southern boundary and will require surveys and probable mitigation. There are no other apparent priority habitats within the site; however, there are buildings, grasslands, wooded areas, hedges, and wooded boundaries on site that are likely to have ecological value. Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.	Green	<p>The closest SSSI's are at Madingley Wood (2.1km to the east) and Hardwick Wood (2.3km to the southwest). Access to Madingley Wood would require crossing the A428 and walking along busy roads. Hardwick Wood is generally related to the neighbouring settlement of Caldecote.</p> <p>The site will include a new extensive country park that will assist in meeting demand from the new development as well as attracting existing residents. The site has the potential to relieve pressure on the SSSI's by providing significant levels of public open space on site. It is therefore considered the proposal would not have a detrimental impact upon any designated site.</p> <p>The framework masterplan suggests no built form in proximity to the Bin Brook. The scheme does provide opportunities along the northern bank and can ensure complementary planting is used.</p>
Historic Environment	Amber	Within 100m of a Listed Asset Within a Conservation Area The green corridor proposed in the south west corner of the site would avoid impacts to the Conservation Area and the setting of the Listed	Green	It is acknowledged the site is within close proximity to a listed building and a small part of the site (less than 1%) in the very southwest corner lies within the Conservation Area. However, the proposed illustrative masterplan shows that there is a design approach that would result

		Building. Alternative layout could be more harmful.		in a neutral impact on these heritage assets, taking account of their location relative to the proposed new development. Any impact could be mitigated by the introduction of additional planting within the site
Archaeology	Amber	Cropmarks of late prehistoric and Roman settlement are recorded in the area	Green	An archaeological Desk-Based Assessment has been undertaken for the site, which was submitted alongside the First Proposals response in 2021. It concludes <i>'there is no evidence to suggest that the study site contains any archaeological remains of sufficient importance to preclude or constrain development. Given the archaeological potential of the study site it is considered that further assessment of the archaeological potential should not be necessary to inform the allocation of the study site for residential development'</i> .
Accessibility to Services and Facilities	Amber	Distance to Primary School: Less than or Equal to 450m Distance to Secondary School: Greater than 2,000m Distance to Healthcare Service: Greater than 2,000m Distance to City, District or Rural Centre: Greater than 2,000m Distance to Local, Neighbourhood or Minor Rural Centre: Greater than 2,000m Distance to Employment Opportunities: Greater than 1,800m Distance to Public Transport: Less than or Equal to 450m Distance to Rapid Public Transport: Greater than 1,800m Distance to proposed Rapid Public Transport: Less than or Equal to 1,800m Distance to Cycle Network: Less than or Equal to 800m Adequate accessibility to key local services, transport, and employment opportunities	Green	The site location of the site allows for significant opportunities to improve accessibility given the provision of on-site facilities. For example, a key aim for Hardwick parish Council is to provide health facilities within the village. The application includes an opportunity to bring this forward. The RAG system should therefore take into account elements of the proposed development. As such, utilising the RAG system set out in the methodology, the proposal is considered to meet the following: Distance to primary school (Hardwick Community Primary School) – 2 points Distance to healthcare – on-site option – 2 points Distance to Local Neighbourhood or Minor Rural Centre – on site provision – 2 points Distance to Public Transport (bus stops along St Neots Road) – 2 points Distance to Rapid Public Transport – Future Cambourne to Cambridge busway – 2 points Distance to Cycle Network (St Neots Road adjacent to the site) – 2 points

		Proposed development would not require delivery of accompanying key services		A reassessment in line with proposed on-site facilities demonstrates the site could achieve 12 points, which would therefore be 'green'.
Site Access	Amber	The proposed site is acceptable in principle subject to detailed design. There are potential access constraints, but these could be overcome through development.	Green	The methodology notes that to score green, access by all means must be possible. Whilst detailed drawings have yet to be finalised, the access points proposed ensure that the safe access points can be provided at the proposed vehicles access points and the pedestrian/cycle connections proposed, and there are no known matters that would preclude those coming forward. The access points have been subject to ongoing pre-application discussions with Cambridgeshire County Council and will be the result of collaborative discussions as a result. It is therefore considered that the site would meet the criteria within the HELAA to be scored 'green'.
Transport and Roads	Amber	The A428 corridor cannot accommodate large levels of growth. Multi-modal strategic solutions are required to unlock growth. The Highway Authority will, therefore, not allow a development which generates a severe impact on the Highway Network. This development is also likely to increase the level of traffic on the B1046 which has existing capacity issues due to the level of rat running caused by the A428. Local capacity assessments are likely to show local junctions are over capacity without the development. Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.	Green	The methodology research is considered out of date, given reference to the Cambridgeshire Autonomous Metro. Local transport matters have evolved with the Cambourne to Cambridge Busway and Scotland Farm Park and Ride coming forward, and Hardwick also being connected to the Comberton Greenway now under development. Both allow for sustainable links to Cambridge and Cambourne. It is also anticipated that Cambourne will benefit from an EWR railway station in the future, allowing for good links to the west of the country. These sustainability options will reduce impact upon the B1046.
Air Quality	Amber	Reasonably large site and lots of residential units - potential for AQMA traffic impact without mitigation	Green	The site is not located in an AQMA area. The evidence of harm is not available, but it is considered the site is at low risk in regard to air quality.

Contamination and Ground Stability	Amber	Potential for historic contamination, conditions required	Green	<p>A Phase 1 Geo-Environmental Report has been undertaken, which was submitted alongside the First Proposals response in 2021. It concludes <i>'the site is considered to present negligible contamination risk, associated with current and potentially infilled ponds, which can be easily addressed through development'</i>.</p> <p>In line with the green score, the site is considered capable of being developed as there are unlikely to be any contamination/ground stability issues.</p>
------------------------------------	-------	---	-------	--