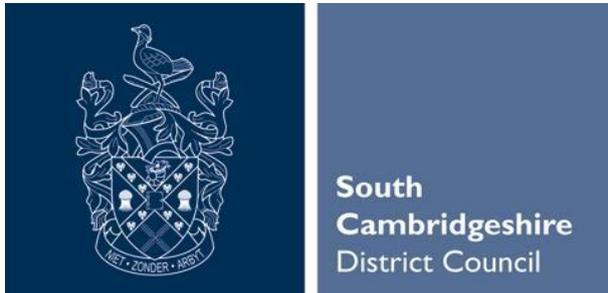


SC9/SCDC



Examination into the Soundness of the
South Cambridgeshire Local Plan

**Matter SC9 – South Cambridgeshire Local Plan
Omission Sites**

SC9.1 Land North of A428, Cambourne

South Cambridgeshire District Council

June 2017

Contents

	Page
Introduction	1
Matter SC9: South Cambs LP Omission Sites	1
SC9.1 – Land north of A428, Cambourne	3
Is the Plan unsound without the allocation of this site for development, as proposed in the relevant representations, and if so why?	3

	Page
Appendices	
Appendix 1: List of Reference Documents	16
Appendix 2: Map showing omission site – Land north of A428, Cambourne	18
Appendix 3: Map showing 8 new settlement proposals in the A45 corridor considered at a local inquiry	20

Introduction

1. This statement sets out the Council's response in relation to the Inspectors' Matter SC9 relating to South Cambridgeshire Local Plan Omission Sites.
2. All the documents referred to in this statement are listed in Appendix 1, and examination library document reference numbers are used throughout the statement for convenience.

Matter SC9: South Cambs LP Omission Sites

Background

3. It is important that the approach to development in new settlements is seen in the context of the wider development strategy for the Greater Cambridge area.
4. The current development strategy for the Greater Cambridge area in submitted Local Plans carries forward and builds on the sustainable development strategy contained in the Cambridgeshire and Peterborough Structure Plan (2003)¹ and East of England Plan (2008)², and incorporated into the Cambridge Local Plan (adopted 2006)³ and South Cambridgeshire Local Development Framework (adopted between 2007-2010)⁴. The strategy retains a Cambridge-focus; the development sequence maximises use of land within the urban area of Cambridge and on the edge of Cambridge compatible with protecting the Green Belt setting of the historic city, and then in new settlements linked to Cambridge by sustainable transport corridors and finally in the larger and more sustainable villages.
5. The Council addressed the development strategy for Greater Cambridge in their joint statement to Matter 2: Overall Spatial Vision and General Issues (M2-CCC&SCDC) and Topic Paper – Joint Working and Development Strategy (2014) (RD/Top/010). Following receipt of the Inspectors' letter of May 2015 setting out their preliminary conclusions, further work was undertaken to review the development strategy. In particular this is drawn together in the Development Strategy Update (November 2015, RD/MC/060).
6. The additional work, including the Development Strategy Update⁵, and Sustainability Appraisal Addendum⁶, concluded that that the development strategy in the submitted plans remains a sound approach for the Greater Cambridge area and whilst recognising the locational sustainability merits of sites on the edge of Cambridge,

¹ Cambridgeshire and Peterborough Structure Plan 2003 (RD/AD/010)

² East of England Plan (2008) (RD/NP/130)

³ Cambridge Local Plan

⁴ South Cambridgeshire Local Development Framework – RD/AD/100 – RD/AD/150, RD/AD/280, RD/AD/290

⁵ Development Strategy Update (RD/MC/060)

⁶ Cambridge and South Cambridgeshire Local Plans Sustainability Appraisal Addendum Report (November 2015) (RD/MC/021)

these are outweighed by the extent of Green Belt harm to the purposes of the Cambridge Green Belt.

7. The preferred development strategy of both Councils for Greater Cambridge included in the submission Local Plans and confirmed by the additional work and Development Strategy Update:
 - maximises development within the urban area of Cambridge focusing on previously developed land
 - includes the existing major developments on the edge of Cambridge identified in the adopted plans through previous Green Belt releases
 - releases limited land for development on the edge of Cambridge weighing in each case the sustainability merits of such locations with extent of harm to the purposes of the Cambridge Green Belt
 - focuses growth at new settlements on two key strategic growth corridors, supported by transport improvements to achieve sustainable high quality public transport and other infrastructure provision such as education, with potential to support longer term sustainable growth outside the Green Belt;
 - continues to limit the amount of new development in villages, whilst providing for new development focused at the more sustainable villages to provide some flexibility to meet local needs
 - supports the recycling of land at villages and schemes to meet local needs, with the scale of schemes guided by the rural settlement hierarchy.

8. It should be noted that this statement does not repeat matters and issues dealt with at previous examination hearings, including in relation to overall strategy (Matter 2), housing need (Matter 3), and housing land supply and housing delivery (Matter 8).

SC9.1 Land north of A428, Cambourne

**Martin Grant Homes Ltd & Harcourt Developments (UK) Ltd represented by Mr Andrew Raven Savills Reps:
61594 (Policy S/6),
61600 (Policy S/12),
61601 (Para. 3.1)**

Is the Plan unsound without the allocation of this site for development, as proposed in the relevant representations, and if so why?

Summary of promoters' proposal

9. The site was originally proposed as a new village or linked village extension to Cambourne for up to around 2,500 dwellings with employment, education, leisure and retail uses. This was later amended to 3,600 home expansion to Cambourne with employment, retail, leisure and community facilities and open space.
10. The omission site is shown on the map in Appendix 2.

Council's initial assessment

11. The site was submitted through the 'Call for Sites' in 2011 and was considered as a new settlement proposal through the SHLAA⁷ (Site 265) and SA⁸ process and assessed as a site with no development potential (scored Red).
12. The SHLAA and SA identified the main planning constraints on the site:
 - **SSSIs:** Elsworth Wood SSSI lies approximately 500m to the northwest of the site.
 - **Heritage:**
 - **Listed Buildings** - New Inn Farm and associated barns are grade II listed and are adjacent to the site on its southern boundary. Impact on the historic setting and character of this group of farm buildings would need to be carefully assessed and mitigated to ensure that the wider development was not harmful to it. It may be possible, through masterplanning and layout design, to ensure that the site's rural agricultural setting is preserved.
 - **Non-statutory archaeological site** - Archaeological excavations to the south, ahead of the Cambourne new settlement and A428 improvement schemes, have revealed extensive evidence for prehistoric and Roman settlement. Further information would be necessary in advance of any planning application for this site.
 - **Environmental and wildlife designations and considerations:**
 - **County Wildlife Site** – the site is adjacent to two sections of Knapwell Roadside Verge which support nationally scarce vascular plant species (*Primula elatior*). Knapwell Wood CWS is located on the eastern edge of the site – this woodland is listed in the Cambridgeshire Inventory of ancient woodland, which retains more than 25% semi natural cover and the wood also supports nationally scarce vascular plant species (*Primula elatior*) and a plant

⁷ Strategic Housing Land Availability Assessment (RD/Strat/120), pages 202-12.

⁸ Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex B: Site Assessment Matrices, pages 1289-95.

species rare in the county (*Quercus petraea*). Brockley End Meadow lies 540m to the west of the site, which supports populations of a nationally scarce vascular plant species (*Trifolium ochroleucon*). Mitigation measures will need to be considered.

- **Tree Preservation Orders** – there are a considerable number of trees with Tree Preservation Orders within the site area, including Knapwell Wood. A separate table of these is attached as an appendix. They are situated on the northern area, eastern edge, western area and small groupings in the northern central part the site.
- **Public Rights of Way** – there are three public footpaths crossing the site: footpaths 5 & 8 Knapwell and 4 Elsworth. These routes would have to be accommodated into any development.
- **Agricultural land of high grade** – the site is Grade 2 agricultural land. Permanent loss of agricultural land would need to be considered.

Physical considerations:

- **Air quality issues** – despite this site not being adjacent to an Air Quality Management Area, it is of a significant size and therefore, there is a potential for an increase in traffic and static emissions that could affect local air quality. More information is required for this location, particularly details for air quality assessment and a low emission strategy.
- **Noise issues** – sources of noise include:
 1. Elsworth Moto Parc (Motocross Circuit) lies 600m to the west – development of the site would bring noise sensitive premises closer to the circuit, which is currently relatively remote. These are unlikely to be considered compatible uses.
 2. Vehicle repair workshop at New Inn Farm lies adjacent to the site's southern boundary and commercial units at Glebe Farm lie to the north of the site – sources of commercial noise.
 3. A428 and A1198 – noise from road traffic on adjacent roads.

Commercial and Motocross Noise – Mitigation:

Current noise has not been quantified. If noise is an issue it is unlikely that mitigation measures on the proposed development site alone can provide an acceptable ambient noise environment.

Environmental Health currently object to this site and before any consideration is given to allocating this site for residential development it is recommended that these noise constraints are thoroughly investigated and duly considered / addressed by undertaking noise impact / risk assessments and consideration is given to possible on or offsite mitigation in accordance with PPG 24 and associated guidance and viability.

- **Landscape and Townscape:** It will be difficult to view this development an extension of Cambourne given the separation by the A428, other roads and structural landscaping to the south. If developed it would be best seen as a new village.

Due to its elevation and relatively open character, particularly to the west and south of the site development, this area would form a new built skyline when viewed from the A428 and St Neots Road and particularly from Knapwell Road.

The deeply rural approach to Knapwell would be urbanised and the village itself completely dominated by the development.

The detailed and layered landscape to the north of the site would become obscured by the development. Given the likely scale of the development and types of buildings proposed, integration of the development into the local landscape would be very difficult.

Landscape effects on existing settlements (Cambourne, Elsworth and Papworth Everard) - Development would be large in relation to the existing village settlements and would dominate the skyline and have a significant adverse effect on existing settlements.

Impact on visual amenity and character of the landscape (Bedfordshire and Cambridgeshire Claylands) - The development is at odds with the local landscape character and would have a significant adverse effect on the local landscape.

- **Highways access**⁹: The Highway Agency has advised that the A428 corridor is seriously limited in capacity between the A1 and A1198. At present there is no realistic prospect of resolving this.

This development would have a direct impact on A428 Trunk Road with potential capacity issues at the Cambourne Junction and on corridor between Cambridge and St. Neots / Bedford, particularly junctions at either end of this section of A428 (A1198 roundabout and M11 Junction 14). A1303 Madingley Road corridor into Cambridge has capacity problems (especially at M11 Junction 13). The site has no rail access.

Poor access to services by walking, with potential to create walk and cycle routes to Cambourne constrained by severance impact of A428 dual carriageway. Potential for strategic cycle route to Cambridge (East – via Highfields and Coton) with suitable new and improved provision. Opportunity to strengthen bus services on corridor between Cambourne and Cambridge (Service 4) through appropriate enhancement of capacity, although location of site would add time penalty, abortive routing and extra costs to existing services. Madingley Park and Ride capacity may need upgrading.

13. The planning constraints identified for this site were considered so significant as to warrant the rejection of the site at that early stage. It was identified as a 'site with no development potential'.

Issues and Options consultations 2012 & 2013

14. The Council did not include the site as an option in the Issues and Options Report that was subject to public consultation in July-September 2012.¹⁰

⁹ Note that this highways assessment was the advice of the highway authorities (Highways England and Cambridgeshire County Council) at the time of the SHLAA assessment and must now be seen in the context of the:

- Highways Agency proposals for the A428 Black Cat to Caxton Gibbet, and
- Greater Cambridge City Deal Cambourne to Cambridge Bus Journeys project

which are addressed in the Assessment and Conclusion section.

¹⁰ South Cambridgeshire Issues and Options Report (RD/LP/030)

15. Objections were received from the site promoter objecting to the rejection of this site. The site promoter's objections (Rep 39859 to Issues and Options 2012 and Reps 55265 and 55261 to Issues and Options 2) can be summarised as follows:

"The development could deliver circa 2,500 dwellings (with opportunities to increase this to 4,000 dwellings over the longer term) as well as new jobs, education facilities (including primary and secondary provision), a park & ride site, improved public transport services, new leisure and recreation facilities and footway and cycle links to the existing villages to the south. The land is not subject to any landscape designations, and provides opportunities for landscape and habitat creation linking woodland, copses and hedges that will also contribute to the overall enhanced sustainability of the expanded community at Cambourne. Traversing the A428 and connecting the existing and proposed new communities at Cambourne will be a key aspect to delivering an integrated settlement. Connections can be achieved through highway, cycleway, footpath and public transport. The location sits logically within the wider village grouping in the countryside, and would not therefore read merely as an extension of the existing three villages.

The initial SHLAA assessment did not assess the site on a comparable basis with other sites such as Bourn Airfield or extensions of Cambourne to the west and therefore a reassessment should be carried out.

- **Highways:** potential impacts on the A428 would be significantly less than a similar quantum of development on Bourn Airfield as that site would form a linear extension along the A428 which is less sustainable because journeys are extended over greater distances.
- **Access to facilities:** would create better opportunities for walking and cycling to existing facilities because closer to key services including new secondary school, and most direct link via pedestrian or cycle bridges over A428 would be inaccessible for motor users.
- **Landscape:** this development is a garden suburb with a high proportion of the site for landscaping and open space. Existing landscape of hedgerows, trees and woodland provides considerable visual enclosure which prevents many long views. A comprehensive range of mitigation measures has been incorporated including extensive tree planting to screen key viewpoints. Not within a protected landscape."

Council's review following Issues and Options consultations

16. The Council's response to representations received during the Issues and Options consultation on rejected SHLAA sites is outlined in the Sustainability Appraisal Annex A Audit Trail Appendix 3¹¹.
17. Council's response:

¹¹ Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A Appendix 3 (page A1208)

“The Highways Agency advised that development on this site is likely to be largely Cambridge focussed but that there is also likely to be a significant number of trips to St Neots. The A428 corridor between the A1 and the A1198 is severely limited in capacity. There is some scope for larger sites to enhance the overall transport sustainability this area through better integration with the potential to offset some of the new demand. The capacity to accommodate new development on this corridor is directly related to this scope, which will need to be demonstrated by the promoters. Although the promoters have indicated that the development would include a park and ride site and improved public transport services, the development will still generate a significant number of car journeys.

The centre point of the proposed site is more than 1km from the existing services and facilities provided in Cambourne, although the proposed development would provide some new facilities. Even with pedestrian and cycle bridges across the A428, it would be difficult to view this development as an extension of Cambourne given the separation from the existing settlement by the A428, other roads and structural landscaping. If the site were to be developed, it would be best seen as a new village.

The site is part of a layered landscape that consists of fairly open and rolling land that falls away to the north towards Knapwell and contains areas of mature woodlands often in the valley bottoms of small streams which cut through the site. This layered landscape means that long views are not so frequent as adjacent areas. Although the proposal includes open space and landscaping, and other mitigation measures to reduce the impact on the landscape, the existing detailed and layered landscape would become obscured by the development. The scale of the development proposed would also make integration of the development into this landscape very difficult and the new built skyline would be viewable from local roads and villages changing the rural character of the area. This development alongside the existing Cambourne development would create a significant built up area that is at odds with the local landscape.

Housing capacity exists in more sustainable locations, closer to Cambridge, with better transport links, with a closer relationship to Cambourne, with less environmental and landscape impact and with a greater use of brownfield land. The site has no development potential.”

Proposed Submission Local Plan 2013

18. The site was not included in the Proposed Submission Local Plan.

Representations Received on Proposed Submission Local Plan

19. Objection was received from the site promoter objecting to the non-inclusion of the site in the Local Plan. The site promoter raised the following issues in their representations (Reps 61594, 61600, 61601):

- Propose land north of the A428 and St Neots Road for a 3,600 home expansion to Cambourne with employment, retail, leisure and community facilities and open space as a more sustainable and deliverable option than the development of Bourn Airfield which should be removed from the plan.
- The SHLAA and SA assessments are flawed and no comparative assessment has been done of Harbourne (as an extension to Cambourne) and Bourn Airfield.
- Object to Bourn Airfield policy SS/6 as not sustainable, ribbon development, compete with Cambourne and not complement it. Poor links to Cambourne, poor public transport integration.
- Bourn Airfield is more vulnerable to delays as a new settlement than Harbourne is as an expansion of Cambourne. Harbourne development could start in 2019/2020.
- The promoter submitted following studies:
 - Landscape and Visual Appraisal
 - Harbourne New Village Vision Statement
 - Ecological Appraisal
 - Preliminary Transport Strategy

Note: the promoter revised the site boundary in these representations to include additional land to the west.

20. The Council's response to representations received to sites not included in the Proposed Submission Local Plan is outlined in the Sustainability Appraisal Annex A Audit Trail Appendix 8¹².
21. Council's response:

"The land north of Cambourne has been assessed through the SHLAA and SA processes and rejected. No compelling reasons to change the plan have been put forward. The development would have significant negative impacts on landscape character incapable of effective mitigation. Development, due to the elevation of the site, and its open character would form a new built skyline when viewed from local villages and roads and would be very difficult to integrate into the local landscape.

The Council considered the development of the site in 2006 as an objection to the Core Strategy and concluded that the physical expansion of Cambourne as proposed was not appropriate or necessary: "Expansion of Cambourne would completely alter the original concept and character of the three related villages to one of a market town. The Council's view is that this cannot be done successfully given the way in which Cambourne has been and continues to be developed." This remains the case.

The Inspector in the final Inspector's report on the Core Strategy noted this view in 2006."

¹² Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060), Annex A: Audit Trail Appendix 8 page A1615

Submitted Local Plan 2014

22. The site was not included in the submitted South Cambridgeshire Local Plan.

Consideration since the Local Plan was Submitted

Local Plan hearings

23. Matters and issues relevant to Land North of A428, Cambourne have been considered at previous examination hearings. The Council has prepared statements in response to all of these Matters and Issues including in relation to overall strategy (Matter 2), housing need (Matter 3), and housing land supply and housing delivery (Matter 8).

Inspector's letter 20th May 2015

24. The Inspectors wrote to the Council on 20th May 2015¹³ with concerns regarding a number of matters including the overall development strategy, the appraisal of all reasonable alternatives (including sites on the edge of Cambridge), the methodology of the Cambridge Inner Green Belt Boundary Study 2012 and the infrastructure requirements and sustainable transport options for the new settlements. In June 2015¹⁴ the Councils wrote to the Inspectors setting out a programme of work to address these concerns including preparation of a Green Belt review, preparation of a Transport report, and preparation of an addendum to the SA, informing a review of the development strategy. In July 2015¹⁵ the Inspectors formally suspended the examinations until March 2016.

Sustainability Appraisal Addendum Report 2015

25. The Councils prepared an SA Addendum Report that takes account of the additional evidence that has been undertaken in response to the Inspectors' concerns. All sites throughout the development sequence are assessed in a consistent way.
26. An updated Sustainability Appraisal Assessment Proforma of the site is included in the Cambridge and South Cambridgeshire Local Plans SA Addendum Report (November 2015). The Council included a revised assessment of the impact of SHLAA site 265 (revised developer proposal) in the Sustainability Appraisal Addendum Report.¹⁶ The main findings can be summarised as:

¹³ RD/Gen/170

¹⁴ RD/Gen/180

¹⁵ RD/Gen/200

¹⁶ This assessment took into account the larger footprint proposed in representations to the Proposed Submission Local Plan (RD/Sub/SC/010) – Repts 61594, 61600, 61600. See Cambridge and South Cambridgeshire Local Plans SA Addendum Report (December 2015) (RD/MC/020), Annex Part3 .

- **Significant loss of Grade 2 agricultural land** (over 270ha.)
 - **Pollution** – significant negative impacts to or as a result of the development that are incapable of mitigation. The site is close to commercial and industrial units and the Motocross site, and offsite mitigation is likely to be required. Some possible noise and vibration from A428 which should be possible to mitigate.
 - **Landscape** – Significant negative impact (development conflicts with landscape character, with significant negative impacts incapable of mitigation) - due to its elevation and open character, development on this site would form a new built skyline when viewed from local villages and roads. The scale of the development and types of buildings proposed would be very difficult to integrate into the local landscape. The deeply rural approach to Knapwell would be urbanised and the village itself completely dominated by the development, and the detailed and layered landscape to the north of the site would become obscured by the development.
 - **Distance to GP (over 800m)** – 1,462m to Monkfield Medical Centre, Cambourne.
 - **Integration with Existing Communities** - It will be difficult to view this development an extension of Cambourne given the separation by the A428, other roads and structural landscaping to the south.
27. Appendix 10 of the Addendum Report (electronic page 244) shows how the Council has addressed representations from the site promoter regarding the proforma assessment of this site. One change to the proforma assessment scores was found to be justified, however this did not alter the overall assessment of the site as a site with no development potential.¹⁷

Representations received to Proposed Modifications consultation and Sustainability Appraisal Addendum 2015

28. Objection was received from the site promoter to modification PM/SC/2/S.¹⁸ The site promoter raised the following issues in their representations (Rep 66031):
- “The changes proposed do not respond to the inspectors' letter. Clarification was requested as to the delivery of infrastructure and the sustainability of sites, particularly new settlements as opposed to sites on the edge of the urban area. It is unclear what infrastructure can actually be delivered at Bourn Airfield, and the provision of Park and Ride remains optional (i.e. it will not be delivered). There is no clear comparison of land at North Cambourne, linked to the existing settlement, as an alternative, despite clear advantages that this approach offers.”
29. The site promoter also objected to the SA Addendum Report, Annex 1. The following issues were raised in their representation (Rep 66038):

¹⁷ RD/MC/021 Appendix 10: amendment to the site assessment Pollution wording to note the intention to move the motorcross.

¹⁸ PM/SC/2/S relates to paragraph 2.60 of the submitted Local Plan (RD/Sub/SC/010)

“Annex 1: The current Sites Assessment contains illogical and perverse assessments of North Cambourne when compared with Bourn Airfield. We have consistently identified this inconsistency in the way the two Councils have appraised the sites, which gives the appearance of a post-hoc justification for the site selection that the Councils have made rather than a true assessment of their relative merits. The Proposed Modifications and Sustainability Assessment Addendum do not remedy the failings of the Assessment and the changes noted are required in order to fairly demonstrate that a development on land north of Cambourne is far more sustainable than a similar scale of development at Bourn Airfield.”

Council’s review following Proposed Modifications consultation

30. The Council's response to representations received to the Proposed Modifications in the Cambridge and South Cambridgeshire Modifications Consultation Report is outlined in the Cambridge and South Cambridgeshire Modifications – Report on Consultation, Appendix A.¹⁹
31. Council’s response:

“Proposed modification reflects the removal of phasing restrictions regarding the new settlements proposed in modifications to Policy S/6, S/12, SS/5 and SS/6.

No Change. Submit proposed modification PM/SC/2/S to the Examination Inspectors.”

Sustainability Appraisal Addendum 2016

32. The Council reassessed the impact of Site 265 (revised developer proposal) in the Sustainability Appraisal Addendum Report.²⁰ The site scored similarly to that outlined in paragraph 26, but with the following amendments:
- **Pollution** – significant negative impacts to or as a result of the development that are incapable of mitigation. The site is close to commercial and industrial units and the Motocross site, and offsite mitigation is likely to be required. Some possible noise and vibration from A428 which should be possible to mitigate. UPDATE 2016: The promoter proposes to relocate the motocross as part of the proposals for the site; this would improve the score from Red to Amber (Adverse impacts capable of adequate mitigation).
 - **Distance to GP (over 800m)** – 1,462m to Monkfield Medical Centre, Cambourne.

¹⁹ Cambridge and South Cambridgeshire Modifications – Report on Consultation (March 2016) (RD/MC/120). The promoter’s representation (Rep 66031) was to modification PM/SC/2/S which is addressed on pages A178-180.

²⁰ This site assessment takes into account the revisions made by the site promoter in their representations to the Sustainability Appraisal Addendum Report (November 2015) (RD/MC/020) - Rep 66038. Supplement to Cambridge and South Cambridgeshire Local Plans SA Addendum Report (November 2015) (RD/MC/021), pages 675-685.

UPDATE: Existing site at Cambourne over 800m Promoter proposes medical facilities on-site. Would result in a green score. Score changed from Red to Green to reflect on-site provision.

Note: the Council also updated transport criteria, including distance to bus stop / rail and frequency of public transport, which resulted in a revision to the sustainable transport score from Amber to Green. Although the Access criterion was updated to include reference to the A428 Black Cat to Caxton Gibbet scheme (see paragraph 42 below) the score remained Amber.

Cambridge and South Cambridgeshire Development Strategy Update²¹

33. This document describes the key evidence documents related to the alternative development strategies, and provides a summary of key issues in relation to each stage of the development sequence. It summarises the role of sustainability appraisal in the plan making process, and key findings in relation to the development sequence.
34. Drawing on the evidence base, it then considers in Section 3 the consequences and issues related to the strategic choices available to the Council, including the consideration of sustainable patterns of development (as required by NPPF paragraphs 84 and 85) in the context of an area with a tightly drawn Green Belt around the historic city of Cambridge. It identifies the reasons for the preferred approach of the Councils in the submitted plans and having considered the issue afresh, taking account of the additional work undertaken. It concludes that the Councils have carried out or commissioned new studies to review the evidence on objectively assessed housing needs, Green Belt, transport, infrastructure and viability to ensure that the decision on the preferred strategy is based on a full understanding of the implications of the different strategy options. An addendum to the Sustainability Appraisal has also been carried out to ensure that the sustainability issues of the options available to the Councils are understood, in particular of land on the edge of Cambridge and at new settlements.
35. The Councils have been clear that they recognise the merits of land on the edge of Cambridge in accessibility terms and the transport evidence confirms that situation, although it makes clear that major new development on the edge of Cambridge on congested radial routes have their own transport issues and are not necessarily cheap to deliver²². The independent Green Belt evidence supports the findings of the Councils' own evidence that the release of land on the edge of Cambridge can be expected to compromise substantially the purposes of the Cambridge Green Belt, with two exceptions. One to reduce the size of an allocation in the submitted South Cambridgeshire Local Plan and one to allocate a new employment allocation as an extension to the Cambridge Biomedical Campus.
36. The evidence also looks at the potential to deliver sustainable new settlements, as an alternative to sites on the edge of Cambridge. It concludes that they can provide

²¹ Cambridge and South Cambridgeshire Development Strategy Update (RD/MC/060)

²² See for example paragraph 22 of the Councils Matter 7 Transport statement

viable and deliverable developments, that will be able to contribute to strategic off site infrastructure and provide high quality public transport links to Cambridge, that will attract significant levels of patronage and also provide wider benefits to existing communities. The City Deal is a significant opportunity to deliver sustainable transport to serve the wider area and with its focus on supporting the delivery of the development strategy is an important fund intended to assist with any funding shortfalls that might arise.

37. Having weighed all those factors, the Councils maintain their view that the development strategy in the submitted plans, with limited modifications, provides the right balance for this plan period. The strategy will provide a range of deliverable sites for the plan period and beyond, and the Councils consider that sustainability will be secured.

Assessment and Conclusion

38. It is not necessary to allocate this site in order to make the plan sound. It has been demonstrated through the plan making process that there are better alternatives available to meet development needs.
39. The SHLAA and SA provide a robust assessment of the site and comparison with alternatives.
40. The Council considered and rejected some new settlement options after they were identified in the South Cambridgeshire SHLAA and Sustainability Appraisal as having no development potential. These include the extension north east of Northstowe (significant historic environment, townscape and landscape impacts, and the poor relationship with Northstowe being separated by the guided busway) and this site, land North of Cambourne (due to landscape impact and segregation caused by the A428)²³. The site is poorly related to the existing settlement of Cambourne and it would be difficult to consider this proposal as an extension to Cambourne given the physical separation by the A428, other roads and structural landscaping to the south.
41. The promoter states that it would be possible to mitigate some of the noise impacts through the relocation of the motocross.²⁴ It is not clear from the information submitted where the motocross would be relocated to, but provided a suitable alternative location can be found, this would address the noise concerns identified in the original SHLAA assessment.
42. At the time of the SHLAA assessment the Highways Agency (now Highways England) advised that capacity on the A428 was severely limited between the A1 and A1198 and there was no realistic prospect of resolving it. However, Government has

²³ Reasons for rejection of new settlements: South Cambridgeshire SHLAA August 2013 (RD/Strat/120) Appendix 7i; South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060) - Annex A Appendix 3 and Appendix 8, and Annex B.

²⁴ In their representation (Rep 66031) to the Cambridge and South Cambridgeshire Modifications Consultation Report (November 2015) (RD/MC/010) and Rep 66038 to the Sustainability Appraisal Addendum Report (November 2015) (RD/MC/020).

since committed to upgrade to the A428 between the A1 Black Cat roundabout and A1198 Caxton Gibbet roundabout²⁵, as the first phase of the Oxford to Cambridge Expressway.²⁶ The A1 Black Cat to A1198 Caxton Gibbet Improvement scheme is in the early stages of development (having recently undertaken Route Options consultation in March- April 2017) and it is anticipated Highways England will obtain Development Consent Order powers to start building in 2020.

43. The City Deal scheme for Cambourne to Cambridge Better Bus Journeys will provide for high quality bus journeys along the A428 corridor. That scheme has the advantages of following a linear route that running through Bourn Airfield new village. Conversely the omission site north of the A428 would require modification to the currently proposed City Deal schemes (and City Deal has not agreed to any such modifications) and in any event diversion into the omission site would require bus journeys to run off the proposed direct linear alignment and would be likely to give rise to time and distance penalties.
44. A similar site has previously been considered in relation to Policy P20/2(1) of the Cambridgeshire Replacement Structure Plan (1989)²⁷, which states that provision will be made for a new settlement on the A45 corridor²⁸ west or east of Cambridge.²⁹ A local inquiry which considered 8 new settlement proposals (see map in Appendix 3), including Belham Hill (in the location of this omission site) concluded the site known as Great Common Farm most closely met the criteria in Policy P20/2; this site has been developed as is now known as Cambourne. Two further sites have been allocated in the Submitted Local Plan; Swansley Wood (Cambourne West) and Bourn Airfield. With regard to the Belham Hill site, the Secretary of State:

“agrees with the Inspector that there is strong objection arising from harm to the Area of Best Landscape, effects on ancient woodlands and an SSSI and upon the habitats of badgers and bats, the cramped site and marked linearity of the layout along the A45.”³⁰

45. Part of the site was also put forward previously as an objection site to the Site Specific Policies DPD (adopted 2010). The Inspectors considering four possible

²⁵ Road Investment Strategy for 2015/16 to 2019/20 (RD/Gov/320), page 43:

²⁶ Government has committed £27 million in development funding to the Oxford to Cambridge Expressway. Building on the feasibility study already completed, this funding will develop a strategic study focussing on making major improvements to the capacity and connectivity of the strategic route. (RD/Gov/320), pages 42 and 51.

²⁷ Cambridgeshire Replacement Structure Plan (1989) (RD/AD/400)

²⁸ Note: the western part of the A45 corridor, as far as Girton interchange, is now known as the A428 and the eastern part is the A14.

²⁹ Policy P20/2 also states that the site should be capable of accommodating about 3,000 dwellings with some reserve capacity for future extension, 2,000 of which should be available before 2001 (Criterion (vi)).

³⁰ Secretary of State's letter in response to the local inquiry into 8 outline applications for a new settlement in the A45 (now A428) corridor (5 March 1992) (RD/EX/120). Belham Hill is in the location of the omission site.

objection site options for major development in the vicinity of Cambourne commented³¹:

“In respect of the proposal for expansion to the north of the A428 we should be clear: in our view the difficulty of integrating any expansion of Cambourne across this major traffic route in a meaningful way makes this option untenable”

46. Development of the omission site would have significant adverse impact on landscape as it would dominate the skyline, alter the rural character, and detailed layered landscape to the north of the site would become obscured. Development would have significant negative effects on existing settlements in the vicinity, including Knapwell where the strongly rural approach would be lost and settlement would be completely dominated by the development. There would be an adverse impact on a number of ecological and heritage assets, although the SHLAA acknowledged it may be possible to mitigate the impacts on Listed Buildings through masterplanning and layout design. There were better site options to meet the development strategy.
47. The site is not required to meet the objectively assessed need in the Plan. The site does not need to be allocated to make the Plan ‘sound’.

³¹ Report of the Examination into the South Cambridgeshire Site Specific Policies DPD (RD/AD/210), paragraph 30.14, page 77

Appendix 1: List of Reference Documents

The Council's evidence in relation to Matter SC9: SCDC LP Omission Sites not considered elsewhere is set out in the following documents:

General:

- Letter from the Inspectors to the Councils dated 20 May 2015 regarding Preliminary Conclusions (RD/Gen/170)
- Letter from the Councils to the Inspectors dated 30 June 2015 regarding Preliminary Conclusions (RD/Gen/180)
- Letter from the Inspectors to the Councils dated 28 July 2015 regarding the Cambridge and South Cambridgeshire Local Plans Examinations (RD/Gen/200)

National Policy:

- Regional Spatial Strategy - East of England Plan (cancelled) (RD/NP/130)

Government regulations and acts:

- Road Investment Strategy for 2015/16 to 2019/20 (RD/Gov/320)

South Cambridgeshire District Council submission documents:

- Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010)
- Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060)

Earlier stages of plan making:

- South Cambridgeshire Issues and Options Report (RD/LP/030)

Adopted development plan documents:

- Cambridgeshire and Peterborough Structure Plan 2003 (RD/AD/010)
- South Cambridgeshire District Council Core Strategy Development Plan Document (DPD) (RD/AD/100)
- South Cambridgeshire District Council Development Control Policies DPD (RD/AD/110)
- South Cambridgeshire District Council Site Specific Policies(DPD (RD/AD/120)
- South Cambridgeshire District Council Northstowe Area Action Plan (AAP) (RD/AD/130)
- South Cambridgeshire District Council Cambridge Southern Fringe AAP (RD/AD/140)
- South Cambridgeshire District Council Proposals Map (RD/AD/150)
- Cambridge City Council & South Cambridgeshire District Council Cambridge East AAP (RD/AD/280)
- Cambridge City Council & South Cambridgeshire District Council North West Cambridge AAP (RD/AD/290)
- Cambridge Local Plan 2006 (RD/AD/300)
- Cambridgeshire Replacement Structure Plan (1989) (RD/AD/400)

Development strategy:

- Strategic Housing Land Availability Assessment (RD/Strat/120)

Examination Documents:

- Secretary of State's letter in response to the local inquiry into 8 outline applications for a new settlement in the A45 (now A428) corridor (5 March 1992) (RD/EX/120).

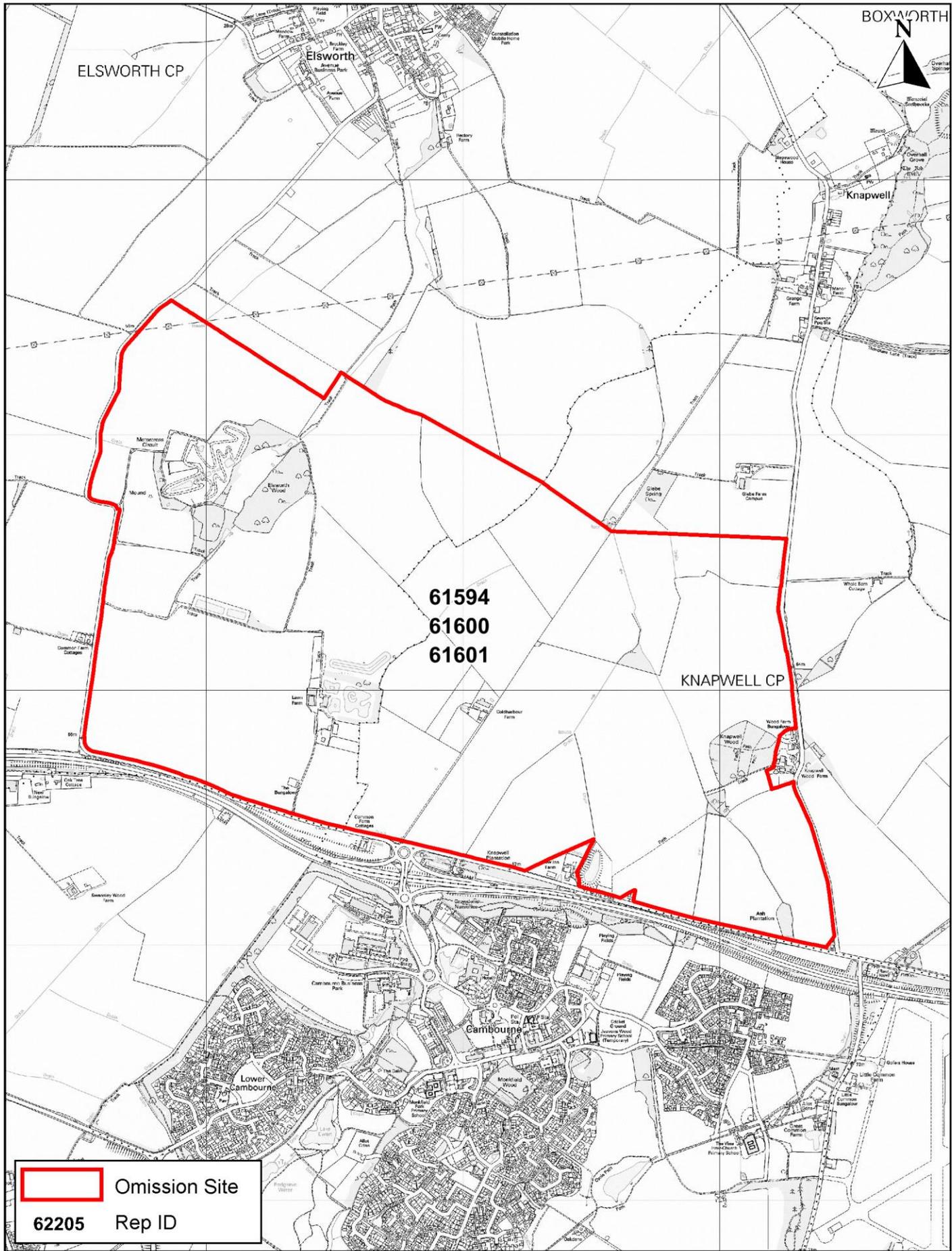
Modifications Consultation:

- Cambridge and South Cambridgeshire Modifications Consultation Report (November 2015) (RD/MC/010)
- Cambridge and South Cambridgeshire Local Plans SA Addendum Report (RD/MC/020)
- Supplement to Cambridge and South Cambridgeshire Local Plans SA Addendum Report (RD/MC/021)
- Development Strategy Update (RD/MC/060)
- Proposed Modifications – Report on Consultation (March 2016) (RD/MC/120)

Hearings Statement:

- Joint Matter Statement by Cambridge City Council and South Cambridgeshire District Council (M7/CCC&SCDC)

Appendix 2: Map showing omission site – Land north of A428, Cambourne



Date:	10/05/2017
Produced by:	Sam Johnston
Service:	Planning Policy
Scale:	1:18,000 @ A4

Omission Sites: SC9.1 - Land North of A428, Cambourne

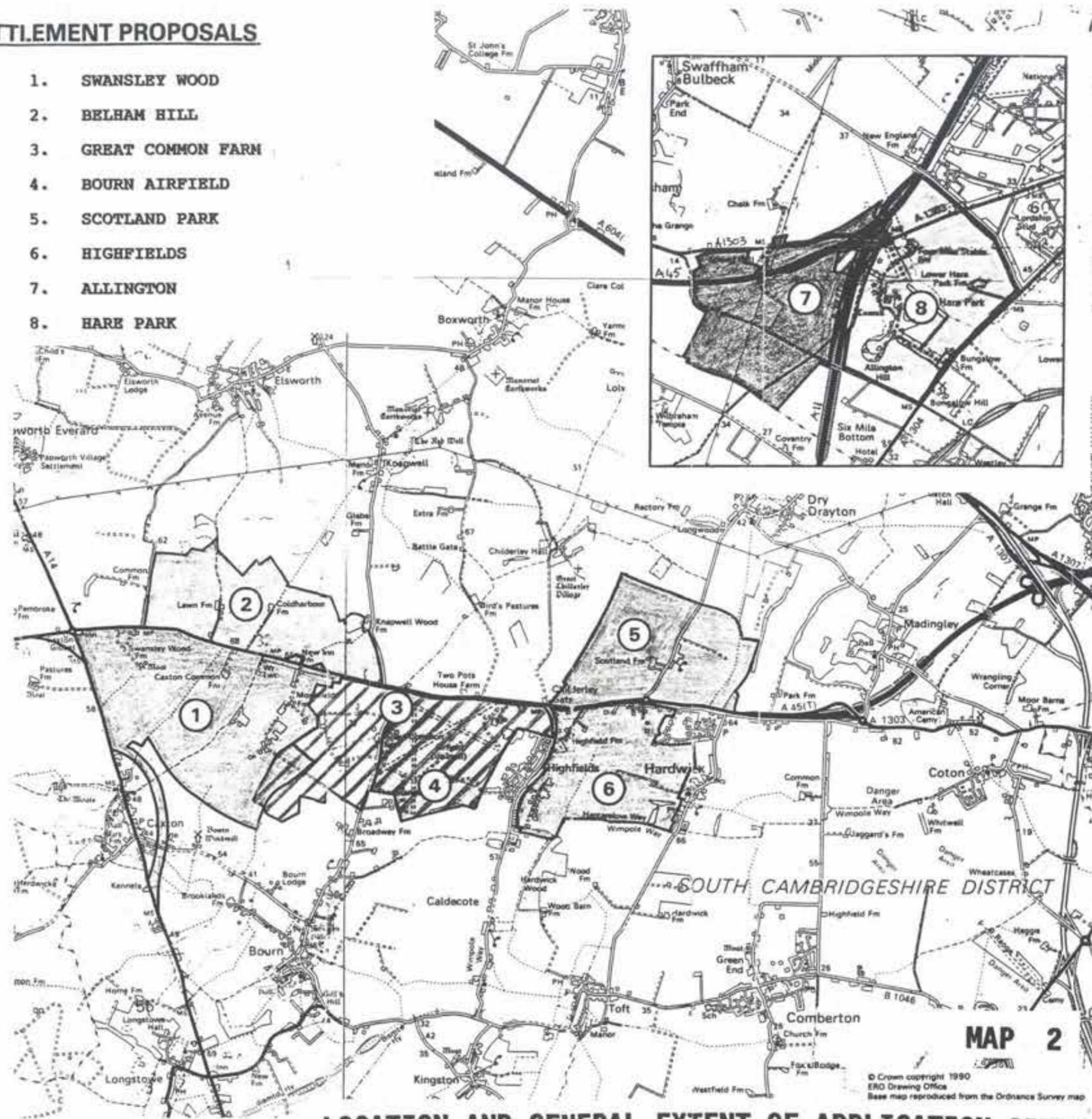
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Appendix 3: Map showing 8 new settlement proposals in the A45 corridor considered at a local inquiry

CAMBRIDGESHIRE NEW SETTLEMENT PROPOSALS

1. SWANSLEY WOOD
2. BELHAM HILL
3. GREAT COMMON FARM
4. BOURN AIRFIELD
5. SCOTLAND PARK
6. HIGHFIELDS
7. ALLINGTON
8. HARE PARK



LOCATION AND GENERAL EXTENT OF APPLICATION SITES