

**Matter: SC1**

**SCLP ID: 17620**

**WJ UNWIN and MESSRS BIGGS**

**MATTER SC1**

**Development Frameworks, Strategy for the Rural Area, Omission  
Sites in the Villages**

**1.2 Rural Centres**

**1.2D Histon & Impington i) Omission sites**

**Land north of Impington Lane (ext. to allocation H/1:d)**

Project Ref: 16-1133

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## 1.0 INTRODUCTION

- 1.1 This statement has been prepared by Beacon Planning Ltd on behalf of W J Unwin & Messrs Biggs in response to the questions raised by the Inspector in the Matters and Issues for South Cambridgeshire Local Plan hearing sessions for the joint examination of the draft Local Plans for Cambridge City Council and South Cambridgeshire District Council. At the time representations were made during the Local Plan Proposed Submission consultation in 2013, W J Unwin & Messrs Biggs were represented by Bidwells property consultants. Since then, the landowners have selected Hill Residential Ltd as development partners to take the site forward. Beacon Planning Ltd have been instructed to represent the landowners and Hill and correspondence to that effect has been provided to the Programme Officer to demonstrate all parties agreement.
- 1.2 This statement is specifically in response to the Inspector's questions on Matter SC1:

### **Issue SC1 1.2D Histon and Impington**

#### **i. Omission sites - Land north of Impington Lane (ext. to allocation H/1:d)**

**Site Reference:** Policy H/1.d – Land North of Impington Lane, Histon & Impington relating to the representations made to policy H/1 in the Local Plan Proposed Submission consultation (2013) (ref: 58658) and to matter SC5A.4 H/1:d (refs: 58640 and 58649).

## 2.0 BACKGROUND

- 2.1 Site H/1.d is identified by the Council as a proposed residential allocation of 1.21ha with capacity for 25 dwellings. This is intended to contribute towards South Cambridgeshire District Council's target of 19,500 dwellings between 2011-2031 set by Local Plan Policy S/5: Provision of New Jobs and Homes (as proposed to be modified). The proposed allocation is located within the second most sustainable settlement in the District as identified by the Council's Village Classification Report (June 2012).
- 2.2 Whilst the landowners supported the principle of the draft allocation through the consultation on the Local Plan proposed submission in 2013, a case was made within the

original representation (58658) to enlarge the site and to include the land to the north within the allocation. This was on the grounds that the release of Green Belt for a development of 25 dwellings is considered to be, ineffective and inconsistent with the National Planning Policy Framework. The revised Green Belt boundary does not follow a defined or physical boundary and the additional land could be released for development without compromising the five purposes of the Green Belt as stated in the National Planning Policy Framework (NPPF) nor the purposes of the Cambridge Green Belt.

- 2.3 The Plan's approach is not justified as it is not the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence. There is no difference between the land proposed by the Council as an allocation and the additional and proposed by the landowners in terms of Green Belt purposes. The Plan is unsound as the Council cannot demonstrate a five year housing land supply, currently only 3.7 years, and the draft allocation and enlarged site will contribute to meeting Local Plan housing targets on a sustainable site which is suitable, deliverable and achievable and can be delivered early in the Plan period as identified in the Housing White Paper to be a priority.
- 2.4 When site H/1:d was considered at the Hearing on 29 November 2016 under Matter SC5A.4 H/1d, a number of questions raised by the Inspector were considered. These were in relation to flood risk, access, infrastructure and noise from the A14. These issues have been fully addressed for the allocated and omission site in our previous submission ref: 58658. A copy of this representation for ease of reference is attached in Appendix 1.
- 2.5 This statement will therefore concentrate on why the Plan is unsound without the allocation of the extended site.
- 2.6 For clarification, the enlarged 3.3 ha site was originally proposed by the landowners, W J Unwin & Messrs Biggs through the SHLAA Call for Sites process in 2011. This enlarged site was at that time divided into two sites reflecting ownerships, references 112 & 114 in the Call for Sites (Appendix 2). The Council took forward part of both sites as their proposed allocation H/1:d (hatched in yellow) and rejected the northern part of both sites (coloured in red shading). The landowners have been working together to bring forward the amalgamated sites (112 and 114) as a single site (3.3ha) for the draft Local Plan Submission

consultation and this is reaffirmed in this statement. Working together both landowners have selected Hill to develop the site.

### **3.0 CHANGES REQUIRED TO MAKE THE PLAN SOUND**

3.1 For the Plan to be considered sound the proposed allocation should be amended in line with the site identified in the original representation. In order to make the Plan sound the following changes are required:

- a) Remove the additional land from the Green Belt and re-draw the boundary as show on plan B.11.574 (see Appendix 3); and
- b) Allocate the site for residential development, or
- c) in the event that the Inspector considers there is not a need for the site to meet development needs in this Plan period, reserve the site for future development.

3.2 The Council have proposed site H/1:d for allocation with development potential for approximately 25 dwellings. The site is located in a settlement that the Council identifies as a Rural Centre, the largest and most sustainable settlements within the Council's hierarchy. The Council consider the location to be sustainable and to meet the requirements of the NPPF in being deliverable. The landowners support the allocation but in responding to the Inspectors questions to that site allocation, have also demonstrated that those issues raised could also be satisfactorily addressed on the larger site (3.3ha) identified in the original representation. As such it is considered that this is an opportunity to maximise development in a highly sustainable location which can be delivered early in the Plan period and contribute to addressing the shortfall in the five-year supply. Furthermore, by extending the allocation this makes an efficient use of physical infrastructure such as utility connections and vehicle access.

### **4.0 GREEN BELT**

4.1 The Council has released land from the Green Belt at Histon and Impington in the draft residential allocations and so must accept that the exceptional circumstances exist to justify the release of land from the Green Belt.

4.2 The Council’s SHLAA assessment for the site refers to the Green Belt purposes. The table below sets out the Councils findings and gives our reasons as to why these considerations are flawed.

<b>Councils SHLAA Assessment</b> <b>Tier 1: Strategic Considerations –</b> <b>Green Belt</b> <b>Conclusions</b>	<b>Why this assessment is flawed</b>
<p>This is an area of shrub land and improved grassland to the north of Impington Lane on the northern side of Impington which is situated mostly within the Green Belt. The site falls within an area where development would have some adverse impact on Green Belt purposes and functions:</p>	
<p>Maintains and enhances the quality of Cambridge’s setting</p>	<p>The site is bordered by development on three sides. It is not a prominent location and there are no public rights of way located within the countryside to the north from which views of the site might be gained. From any roads leading into Histon &amp; Impington the site is not visible. The site’s eastern boundary is visible from Clay Lane Close (a narrow road serving handful of properties), however, there are no views at all of Cambridge and the land performs no role whatsoever in maintaining and enhancing the quality of Cambridge’s setting.</p> <p>The retention and enhancement of the significant boundary vegetation would ensure development would not encroach visually and physically into the surrounding open countryside. It would not therefore</p>

	<p>have an adverse impact on the quality of Cambridge's setting.</p>
<p>Prevents coalescence between settlements and with Cambridge</p>	<p>Development will not lead to unrestricted sprawl or coalescence with other settlements owing to the site being well related to the built up area of Impington Lane and residential development at Merrington Place.</p> <p>The site lies on the north side of Histon &amp; Impington. It is approximately 1.65 km (1 mile) in straight line from the site to Cambridge, with built development intervening between the site and Cambridge. The site performs no role whatsoever in preventing coalescence of Cambridge with Histon &amp; Impington.</p> <p>Cottenham lies approximately 2.9km (1.8 miles) (in a straight line) from the northern boundary of the site. Between the site and Cottenham there is built development which forms part of the villages of Histon &amp; Impington. There would be no coalescence of Histon &amp; Impington with Cottenham as a result of development of the site.</p>
<p>The distribution, physical separation setting, scale and character of Green Belt villages</p>	<p>The site is a relatively flat area which is heavily screened by dense vegetation. The development pattern of this part of the settlement has changed significantly since the SHLAA was undertaken with the development of Merrington Place, 66 dwellings immediately to the site to the west. This change to the physical context of the site must be taken into account when considering the suitability of the site for</p>

	<p>development. The proposed allocation and the enlarged site sit comfortably adjacent to the existing built form on Impington Lane and Merrington Place. A development of this scale is entirely appropriate in this part of the village. The northern and eastern boundaries of the enlarged development follow an established field boundary and form a well-defined readily recognised physical feature making a logical edge to the settlement and the Green Belt. The development would be in context with the pattern of development and would be a suitable extension to the village without impinging on the physical separation with neighbouring villages or the character of the Green Belt.</p> <p>Histon &amp; Impington currently comprises some 3,500 households. Adding approximately 50 more dwellings to the village would not impact upon the scale or character of Histon &amp; Impington as a Green Belt village.</p>
<p>A landscape which retains strong rural character</p>	<p>The site is heavily screened by dense hedgerow and trees along the north and eastern boundaries. There are no public rights of way to the north and hence no views of the site from the wider countryside. The site is overgrown with shrubs and was previously used for commercial nurseries and therefore has no special character to retain. As can be seen on site, 3-storey housing has taken place immediately adjacent the site, in Merrington Place. A view from the northern boundary is included in Appendix 4 which clearly shows a defined well established vegetated edge</p>

	<p>adjacent to the properties at Merrington Place. As a result, the land does not retain a strong rural character, but is more closely associated with the built form of the village. There is no difference in terms of rural character between the council's proposed allocation and the additional objection land.</p>
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- 4.3 The revised northern Green Belt boundary for the proposed allocated site H/1:d divides two open fields and does not follow a defined historic or physical boundary. This is contrary to advice within the NPPF which requires local planning authorities in section 9 paragraph 85 to 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent'. Including the omission site would strengthen a clearly defined boundary to existing physical vegetated features. The additional land could be released for development without compromising the five purposes of the Green Belt as set out in the LVIA submitted with the original representation (Appendix 1), specifically paragraph 2.21.
- 4.4 The Plan is unsound as Policy H/1.d does not take account of existing site features, including the natural boundaries of the site and development on the adjacent site at Merrington Place. The site relates better to the built-up part of the village, than the rural character of the surrounding land to the north.
- 4.5 The Plan fails to look beyond the Plan period and take account of longer term requirements, contrary to paragraph 157 of the NPPF. If the Inspector concludes that housing needs are met through the Plan, the land fails to have any role in achieving the five purposes of the Green Belt and should be released from the Green Belt and reserved for the next Plan period. Land in a sustainable location would then also be available for development should the Council find itself without a five year land supply in the future. Without such sites the only way that the five year supply could be remedied would be by settlements lower down the hierarchy thereby compromising the housing strategy to deliver housing in the most sustainable locations.

## 5.0 SUSTAINABILITY

- 5.1 The enlarged site area is approximately 3.3 ha with a capacity of c75 dwellings and associated public open space. The site lies close to the village centre of Histon & Impington which is within easy walking and cycling distance (approximately 375 m) and contains a number of facilities and services that support this important rural centre as set out in the Council's Services and Facilities Study (Reference Document Library Ref: RD/Strat/250). As identified in the Council's Village Classification Report (Reference Document Library Ref: RD/Strat/240) the settlement has a good ratio of workplace population to employed residents.
- 5.2 In addition, the site is within easy cycling distance of the significant employment opportunities available on the northern edge of Cambridge. It is around 1.1km (0.7 miles) to the Guided Bus Stop on Station Road. Histon & Impington is clearly a highly sustainable location, and the Council, by reason of the proposed allocation of the adjacent land, consider that this is a sustainable location for residential development.

## 6.0 HERITAGE

- 6.1 The Council's SHLAA assessment for the site refers to heritage considerations. The table below sets out the Council's findings and gives our response as to why there would be no harm to heritage assets. The heritage assets referred to are shown in the plan in Appendix 5.

<b>Councils SHLAA Assessment</b>	<b>Our response</b>
<b>Tier 2 Significant Local Considerations</b>	
Conservation Area – Histon and Impington Conservation Area lies approximately 163m to the west and Impington St Andrews Conservation Area 150m to the east. Adverse effect due to obscuring relationships and views to and from related Conservation	Views of the site from the Conservation Areas are limited to the western boundary of Impington St Andrew's Conservation Area. Due to the mass and density of the boundary vegetation along the eastern boundary of the site, views of development on the site are unlikely to be significant. In any event, policy

<p>Areas across countryside from east.</p>	<p>does not prevent development but requires that development preserves or enhances the character or appearance of a conservation area. The very limited view from Clay Lane Close, across substantial vegetation is unlikely to have an adverse effect on the character or appearance of the St Andrews Conservation Area.</p> <p>Merrington Place has altered views from the east to the Histon and Impington Conservation Area and the site is not visible from the Conservation Area. Built development lies between the objection site and the Histon &amp; Impington Conservation Area and accordingly there are no views of the countryside from the Conservation Area across this site</p>
<p>Listed Buildings – Grade II Listed 2 Mill Lane and 2 &amp; 4 Glebe Way lie to the south west. Impact on setting limited due to other development and trees.</p>	<p>The proposal site is not visible from the listed buildings due to the intervening residential buildings and there would therefore be no harm to their setting. The presence of the listed buildings did not prevent the development of Merrington Place, which lies between the objection site and the listed buildings.</p>
<p>Non-statutory archaeological site – Archaeological investigations to the west have identified evidence for Roman settlement. County Archaeologists would require archaeological works to be secured by condition of planning permission.</p>	<p>Archaeological investigations can be carried out and secured by planning condition.</p>
<p>The site forms an important part of the setting of the Conservation Areas and</p>	<p>There would be no harm to the setting of the Conservation Areas and Grade II listed Buildings</p>

Grade II Listed Buildings. However, with careful design it may be possible to mitigate any impact on the historic environment with a smaller scale of development.	as set out above.
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6.2 The table above demonstrates that there would be no harm caused by the extended allocation to the heritage assets of Histon and Impington.

## 7.0 FLOOD RISK

7.1 As set out in our representation on Matter SC5A (Appendix 1 – section 3.0) the vast majority of the site is shown as falling within Flood Zone 1 of the Environment Agency’s indicative flood map. A Flood Risk Assessment was carried out for the original submission. A proposed site layout which positioned open space and surface water features within land shown as Flood Zone 2 and 3, thereby utilising the site area within Flood Zone 1 for built development. It is envisaged that in allocating the whole site this would be the approach taken and the indicative capacity for the site takes into account this constraint. The policy already states that no development should take place outside Zone 1.

## 8.0 ACCESS

8.1 The SHLAA identifies that access onto Impington Lane would be acceptable in principle and does not identify any specific requirements for improvements. A further transport appraisal was carried out for submission with Matter SC5A (appendix 1 – section 3.7-3.12) which demonstrates that a safe vehicular access for up to 100 dwellings can be achieved in this location, suitable for the enlarged site.

## 9.0 FIVE YEAR HOUSING LAND SUPPLY

9.1 As set out in the Council’s Annual Monitoring Report (AMR) for 2015/2016 (December 2016) the Council does not have a five year housing land supply. This currently stands at 3.7 years which is a substantial shortfall. This being the case adopted and emerging housing supply policy can be considered out of date in respect of paragraph 49 of the NPPF. As set out in

the AMR the Council do not expect to have a five year supply at least until 2019. In addition, a five year supply is regarded as a minimum to ensure choice and competition in the market, particularly given the acute housing pressures in South Cambridgeshire and Cambridge City.

9.2 The allocation of demonstrably deliverable sites in the most sustainable locations should be a priority for the Council to achieve a managed development strategy through the Local Plan process.

## **10.0 CONCLUSION**

10.1 The Plan is considered unsound without the allocation of the extended site to H/1:d for the following reasons:

- The Council does not have a five-year housing supply and the shortfall at 3.7 years is substantial. The development site at 3.3ha effectively uses the land and the capacity should be increased to 75 dwellings. This makes efficient use of available land in a sustainable location. This will provide an additional 50 homes and a contribute to meeting Local Plan housing targets on a sustainable site which is suitable, deliverable and achievable and can be delivered early in the Plan period, contributing to the shortfall against the five year supply.
- The northern boundary of the site as proposed (1.21 ha) does not take account of paragraph 85 of the NPPF. The Council have drawn the boundary through the middle of an open piece of land, not following any clear physical feature that is readily recognisable or likely to be permanent. Residential development of the additional land would not adversely affect the purposes of the Cambridge Green Belt, nor the five purposes of Green Belt as set out in the NPPF.
- The Council does not place appropriate weight on the highly sustainable location of the site within the second most sustainable settlement in the District nor on its ability to satisfactorily address its constraints through appropriate mitigation measures.

# APPENDIX I

**Matter: SC5**

**SCLP ID: 17620**

**WJ UNWIN and MESSRS BIGGS**

**MATTER SC5**

**Delivering High Quality Homes**

**SC5A Residential Site Allocations**

**SC5A.4 H/1:d Land North of Impington Lane, Histon & Impington**



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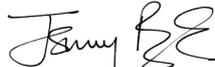
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## 1.0 INTRODUCTION

- 1.1 This statement has been prepared by Beacon Planning Ltd on behalf of W J Unwin & Messrs Biggs in response to the questions raised by the Inspector in the Matters and Issues for South Cambridgeshire Local Plan hearing sessions for the joint examination of the draft Local Plans for Cambridge City Council and South Cambridgeshire District Council. At the time representations were made during the Local Plan Proposed Submission consultation in 2013, W J Unwin & Messrs Biggs were represented by Bidwells property consultants. Since then, the landowners have selected Hill Residential Ltd as development partners to take the site forward. Beacon Planning Ltd have been instructed to represent the landowners and Hill and correspondence to that effect has been provided to the Programme Officer to demonstrate all parties agreement.
- 1.2 This statement is specifically in response to the Inspector's questions on Matter SC5:

**Issue SC5A.41 Site Reference:** Policy H/1.d – Land North of Impington Lane, Histon & Impington relating to the representations made to policy H/1 in the Local Plan Proposed Submission consultation (2013) (ref: 58658).

## 2.0 BACKGROUND

- 2.1 Site H/1.d is identified by the Council as a proposed residential allocation of 1.21ha with capacity for 25 dwellings. This is intended to contribute towards South Cambridgeshire District Council's target of 19,000 dwellings between 2011-2031 set by Local Plan Policy S/5: Provision of New Jobs and Homes. The proposed allocation is located within the second most sustainable settlement in the District as identified by the Council's Village Classification Report (June 2012).
- 2.2 Whilst the landowners supported the principle of the draft allocation through the consultation on the Local Plan proposed submission in 2013, a case was made within their original representation (58658) to enlarge the site and to include the land to the north within the allocation. This was on the grounds that the release of Green Belt for a development of 25 dwellings is considered to be, ineffective and inconsistent with the National Planning Policy Framework. The revised Green Belt boundary does not follow a

defined or physical boundary and the additional land could be released for development without compromising the five purposes of the Green Belt as set out in the LVIA submitted with the original representation, specifically paragraph 2.21 (Appendix 1).

- 2.3 In order for the plan to be considered sound the site should be amended in line with the site identified in the original representation. The enlarged site area is approximately 3.3 ha with a capacity of c75 dwellings and associated public open space. The Council has a shortfall in terms of its five-year supply, and the draft allocation and enlarged site will contribute to meeting Local Plan housing targets on a sustainable site which is suitable, deliverable and achievable and can be delivered early in the Plan period.
- 2.4 As set out in the original representation this site is not only ideally located in terms of its proximity to local services and facilities, but in terms of townscape. The existing development pattern of this part of the settlement has changed significantly since the SHLAA was undertaken with the development of Merrington Place, 66 dwellings immediately to the site to the west. The proposed allocation and the enlarged site sit comfortably adjacent to the existing built form on Impington Lane and Merrington Place. A development of this scale is entirely appropriate in this part of the village. Moreover, the northern and eastern boundaries of the enlarged development follow an established field boundary and form a well-defined edge to the settlement and the Green Belt.
- 2.5 For clarification the enlarged 3.3 ha site was originally proposed by the landowners, W J Unwin & Messrs Biggs through the SHLAA Call for Sites process in 2011. This enlarged site was at that time divided into two sites reflecting ownerships, references 112 & 114 in the Call for Sites (Appendix 2). The Council took forward part of both sites as their proposed allocation H/1:d (hatched in yellow) and rejected the northern part of both sites (coloured in red shading). The landowners have been working together to bring forward the amalgamated sites (112 and 114) as a single site (3.3ha) for the draft Local Plan Submission consultation and this is reaffirmed in this statement. Working together both landowners have selected to develop the site.
- 2.6 The Council have proposed site H/1:d for allocation with development potential for approximately 25 dwellings. They consider the site to be sustainable and to meet the requirements of the NPPF in being deliverable. The landowners support the allocation but in

responding to the Inspectors questions, this statement also demonstrates that those issues raised could also be satisfactorily addressed on the larger site (3.3ha) identified in the original representation. As such it is considered that this is an opportunity to maximise development in a highly sustainable location which can be delivered early in the Plan period and contribute to addressing the shortfall in the five-year supply.

### **3.0 RESPONSE TO INSPECTORS QUESTIONS**

*Question (i): What proportion of the site is within flood zone 1?*

- 3.1 Referring to the Environment Agency's (EA) indicative flood map (Appendix 3), the proposed site allocation, is completely located within Flood Zone 1 as can be seen on the plan below. The Council's policy H/1.d states that 'no built development should take place in Flood Zones 2 and 3', but no part of the proposed allocation falls within these zones.
- 3.2 In respect to the enlarged site area identified in our representation (3.3ha), the vast majority of the site is shown by the indicative flood risk map as falling within Flood Zone 1. A small part of the enlarged site is shown as within Zones 2 and 3. However, the flood zone maps in the area need updating following new information produced in relation to nearby applications, namely the Merrington Place scheme to the west of the site. Consequently, the land is not at significant risk from flooding.
- 3.3 The original representation, for the 3.3ha site, was accompanied by a Flood Risk Assessment (FRA) and included a proposed site layout at Appendix C, which positioned open space and surface water features within land shown as Flood Zone 2 and 3, thereby utilising the site area within flood zone 1 for built development. It is envisaged that in allocating the whole site this would be the approach taken and the indicative capacity for the site takes into account this constraint.
- 3.4 Notwithstanding the above, the FRA that supported the original representation refers to the approach taken on the Merrington Place scheme. In considering that scheme, the EA identified that no part of that site, despite being shown on the flood maps as within Flood Zone 3, was part of the functional floodplain or at risk from ground water issues.

3.5 Appendix 4 reproduces the relevant sections of the submitted FRA including correspondence from the EA. It identifies that the highest local historic flood level was observed at Histon Pond in September 2005, where it reached 10.05 AOD. Paragraph 3.12 of the FRA explains that the majority of the enlarged site is above 10.05m AOD, as such the EA considers that the enlarged site is not at risk from flooding nor will it displace floodwaters which may cause flooding elsewhere. As such, whilst part of the site is shown on the indicative flood risk maps as being within Flood Zones 2 and 3, a detailed assessment has shown that the entire site is considered to be located outside of the floodplain and not at significant risk from fluvial flooding, nor will it displace flood water and cause flooding downstream.

3.6 It is a commonly accepted means of mitigation that landscaping, surface water attenuation features and open space are incorporated together as areas of multifunctional greenspace and located on land which may be prone to surface water flooding. As such, this approach could be adopted on this site towards the north west corner of the site, thereby leaving the remainder of the site for built development.

*Question (ii): Would the location and configuration of the site enable the creation of an acceptable access arrangement in the context of highway safety?*

3.7 As set out in the Transport Assessment that supported the earlier representation to the draft submitted Local Plan, it was the transport consultant's view that a safe access could be achieved from Impington Lane utilising land between 51-67 Impington Lane.

3.8 In order to demonstrate that a safe access is feasible, a further transport appraisal has been undertaken and can be found at Appendix 5 of this statement, which includes designs to demonstrate that a vehicle access for up to 100 dwellings can be achieved in this location. Cambridgeshire Highways Authority recommend that highway designs should embrace the principles in 'Manual for Streets.' Therefore, in line with this recommendation, the proposed access has been designed in accordance with guidance provided in this manual.

3.9 The Inspector's attention is drawn to paragraphs 3.2 to 3.10 of the appraisal where it identifies that a priority junction in this location can be designed to local design standards incorporating a 5.5 m wide access road, 1.8 m wide footways to each site and a 6 m kerb radii.

- 3.10 Furthermore, in accordance with speed survey data collected in June 2016 along Impington Lane, appropriate visibility splays (2.4 m x 43 m) can be achieved in both directions either within land under control of the applicant or within the adopted public highway and in accordance with the guidance present in Manual for Streets. For reference, the speed survey identified that heading in both directions, the average vehicle speed along Impington Lane, a 30 mph road, was approximately 18 mph. This is likely to be due to the existing traffic calming measures along the road.
- 3.11 In addition to the vehicle access, a pedestrian and cycle link could also be established to the east of the site (between 83 and 87 Impington Lane) linking the site with Impington Lane, if required.
- 3.12 The proposed junction design is in accordance with best practice guidance and in line with the priority junction approved to Merrington Place, a residential development of 66 dwellings to the west of the site. The junction is capable of serving up to 100 dwellings and as such, a safe access can be created for both the draft allocation and the enlarged site.

*Part (iii): Could the impacts on the existing physical, social and educational infrastructure in Histon & Impington as a consequence of the development of the site be adequately mitigated?*

- 3.13 As set out in the original representation, the site is located in a settlement that the Council identifies as a Rural Centre, the largest and most sustainable settlements within the Council's hierarchy. The site lies close to the village centre of Histon within easy walking and cycling distance (approximately 375 m) and contains a number of facilities and services that support this important rural centre as set out in the Council's Services and Facilities Study (Reference Document Library Ref: RD/Strat/250). As identified in the Council's Village Classification Report (Reference Document Library Ref: RD/Strat/240) the settlement has a good ratio of workplace population to employed residents. In addition, the site is within easy cycling distance of the significant employment opportunities available on the northern edge of Cambridge.

### Physical Infrastructure

- 3.14 As identified in the SHLAA (relevant extract at Appendix 6) in relation to all sites at Histon and Impington, the impacts of the development upon utilities can be mitigated. It is common practice for these upgrades to be borne by the developer following pre-development assessments being carried out. This is the approach that would be adopted in relation to both the site as allocated (1.21 ha) and the enlarged site (3.3 ha).
- 3.15 The SHLAA identifies that access onto Impington Lane would be acceptable in principle and does not identify any specific requirements for improvements. The planning application process can identify any specific detailed improvements to highways infrastructure that would need to be carried out to mitigate any impacts of either the site as allocated (1.21 ha) or the site as enlarged (3.3 ha). These can be secured via S278 or by S106 Agreement or condition to be carried out at the appropriate time in the development programme. The site is served by bus (Citi 8, departures every day from Impington Lane every 20 minutes (Mon-Sat) and every 30 minutes (Sundays and BH)) and is within easy walking and cycling distance of schools, services, shops and community facilities.

### Social Infrastructure

- 3.16 NHS England have been engaged during the Council's production of the Local Plan. In general, the NHS have identified capacity pressures within the District, including the doctors practice in Histon, which also serves residents of Impington.
- 3.17 The proposed development will generate additional demand on local health care facilities and this additional demand will be proportionate to whether there are 25 dwellings or 75 dwellings on the site. Within the draft Local Plan, this site is the only proposed allocation within Histon and Impington, other sites that may come forward during the course of the Plan period are likely to be smaller windfall sites, which are difficult to plan for and whose impact can be harder to mitigate.
- 3.18 There is no set standard for GPs per head of population. The NHS (Appendix 7) identifies that for every 1,000 patients there are 0.58 GPs, or 1,724 patients per GP. The NHS website (Appendix 7) also identifies that at The Firs Surgery in Histon there are 12,282 patients and 8

GPs, equating to 1,535 patients per GP, below the national average. That suggests that health infrastructure is not a barrier to development. In preparing a planning application for the site, NHS England and the local surgery will be engaged in discussions. If at that stage a need for contributions is identified, that can be dealt with either through the Community Infrastructure Levy 123 List once it is adopted, or a Section 106 Agreement.

- 3.19 Histon and Impington contains a large (6.7 ha) recreation ground of good quality. The Council has allocated a site SC/1 2g at Bypass Farm, west of Cottenham Road, Histon of 3.5 ha to improve recreation provision. This development can help to bring that site forward through S106 contributions. Indicative layouts for the site have demonstrated that children's play space and informal open space can be provided for on site in accordance with Council standards and that in respect of formal sports provision, this would be dealt with either through the Community Infrastructure Levy 123 List once it is adopted, or a Section 106 Agreement.

#### Education Infrastructure

- 3.20 The NPPF at paragraph 72 places great importance on ensuring that there is a sufficient choice of school places available to meet the needs of existing and new communities.
- 3.21 In meeting the needs of this draft allocation and others in the emerging Local Plan, strategic enhancements to school provision are programmed for by Cambridgeshire County Council. Cambridgeshire County Council consulted on options for additional primary School capacity at Histon & Impington earlier this year. The summary of that consultation can be found at Appendix 8. As part of their Capital Build Programme, the County Council is due to commence improvements in 2020 to increase primary capacity in Histon & Impington. Giving consideration to the future build programme, it is not likely that this proposed development will trigger the need for primary school places until 2019 at the earliest. As such, the development of the site will be at a time when improvements to capacity are being undertaken. No improvements are set out within the County Council's Build Programme for Impington Village College. Whilst the SHLAA identifies that the school is at or close to capacity, the school draws children from Cambridge. Given a new secondary school is proposed at North West Cambridge and there is capacity at North Cambridge Academy, and

a further secondary school is to be placed within Cambridge, it is unlikely that education capacity is a barrier to development.

- 3.22 Naturally, the larger site would generate the need for additional school places, depending on housing mix, but it is envisaged that as is normal practice this could be addressed through CIL/S106.

*Question (iv): Would future occupiers of the site be adversely affected by traffic noise emanating from the A14?*

- 3.23 As the crow flies, the site is located 1 mile to the north of the A14. Situated between the site and the A14 is a substantial area of residential development.

- 3.24 Reviewing the planning application(s) to the west of the site at Merrington Place for 66 dwellings, a noise assessment was not required nor did the Council consider that noise from the A14 would impact on the amenity of the future residents. Closer to the A14, the former SCA Packing Plant on Villa Road, Impington received approval from the Council in 2012 for the development of 72 homes. These properties are visible from the A14, being no more than 0.6 miles to the north across fields used by NIAB for agricultural crop testing. There is no intervening built form between the A14 and the site. Reviewing the Committee report for that application, again, no mitigation measures were considered necessary to ensure that the future residents of that development would be protected. Please see Appendix 9 for locations of sites referred to in this paragraph.

- 3.25 More recently, the A14 between junctions 31 (Girton Interchange with M11) and 32 (Histon) which stretches along the southern extent of Histon and Impington has been upgraded from a 2 lane carriageway to 3 lanes. As part of the Environmental Statement submitted for this Nationally Significant Infrastructure project the noise chapter concludes that the increase in road noise would not impact negatively in any way on existing residential properties between these two junctions. In order to ensure this, the proposals included improving the existing noise barriers at Impington. Para 9.4.12 of the Councils' assessment of the A14 widening from Cambridge to Huntingdon states there will be no or negligible impacts.

- 3.26 As part of the SLHAA Assessment, none of the sites within Histon and Impington, including those located in closer proximity to the A14 were rejected by the Council on the basis that the traffic noise from the A14 would be harmful to the future occupants.
- 3.27 Therefore, it is concluded that the development of this site would not be adversely affected by traffic noise from the A14.

## 4.0 CONCLUSION

4.1 Policy H/1.d and accompanying site map of the emerging Local Plan is considered to be unsound.

4.2 The policy is not considered to be sound for the following reasons:

**Unjustified:** Impington is a sustainable location for development, but the boundaries of the proposed allocation are not justified. The boundary is not drawn along natural features as shown in Appendix 10. It is not logical. There is a defensible boundary as shown in Appendix 11. Developing the additional land as proposed in the representations would not adversely affect the purposes of the Cambridge Green Belt.

Impact on Conservation Area and listed buildings would be addressed through heritage and townscape policies elsewhere within the development plan and as such bullet point 2 is not needed.

**Inconsistent:** The northern boundary of the site as proposed (1.21 ha) does not take account of paragraph 85 of the NPPF. The Council have drawn the boundary through the middle of an open piece of land, not following any clear physical feature that is readily recognisable or likely to be permanent.

4.3 The policy erroneously refers to the (1.21 ha) land as being within Flood Zones 2 and 3. The entire site, including the additional land, is not at significant risk of flooding. As such bullet point three of the policy is redundant. In any event this would be covered by policies elsewhere within the development plan and other legislation.

4.4 The site as proposed (1.21 ha) does not place appropriate weight on the highly sustainable location of the site within the second most sustainable settlement in the District and its ability to satisfactorily address its constraints through appropriate mitigation measures.

4.5 In order to make the Local Plan sound, the following changes (in bold and underlined) are required:

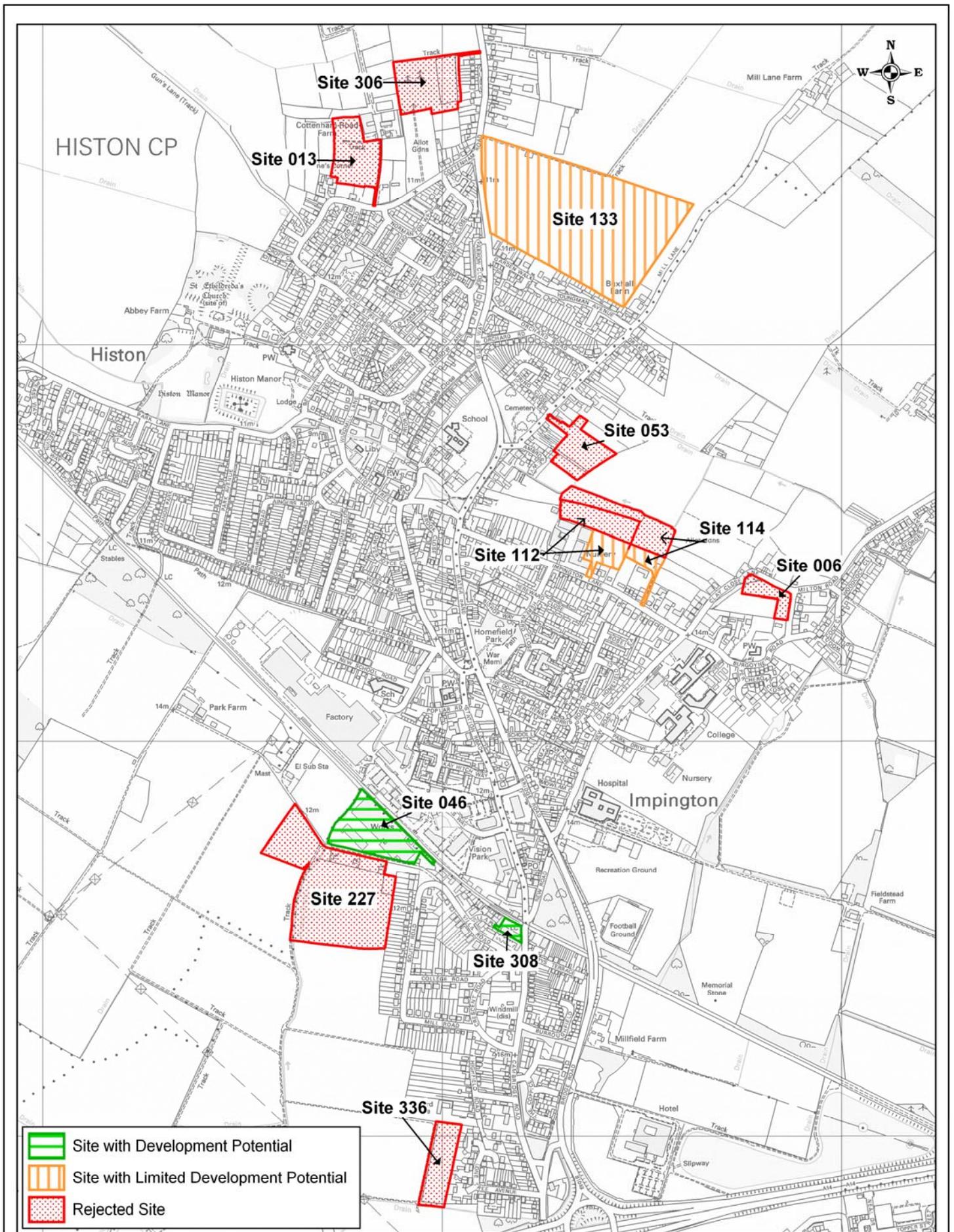
Site Reference	Area (ha) and indicative capacity	Development Requirements
H/1.d	<p><b><u>3.30 ha</u></b></p> <p><b><u>75 dwellings</u></b></p>	<ul style="list-style-type: none"> <li>• Creation of a significant landscape buffer along the boundary of the site where it adjoins or could be seen from open countryside to provide a soft green village edge;</li> <li>• Design to mitigate impact on the conservation area and nearby listed buildings;</li> <li>• <del>No built development to take place in flood zones</del></li> <li><b><u>2 or 3.</u></b></li> </ul>

4.4 The development site at 3.3ha effectively uses the land and the capacity within the wording of policy H/1.d should be increased to 75 dwellings. This will provide an additional 50 homes and a contribute to meeting Local Plan housing targets on a sustainable site which is suitable, deliverable and achievable and can be delivered early in the Plan period, contributing to the shortfall against the five year supply.

4.5 The Inspectors attention is drawn to Appendix 4, which demonstrates the precise change that is required to the proposed allocation H/1.d plan increasing the area to 3.30 ha, the development framework and the Green Belt boundary.



## APPENDIX 2



Created:	June 2013
Last Updated:	August 2013
Service:	Planning Policy
Scale:	1:12500 @ A4

## Strategic Housing Land Availability Assessment: Histon & Impington Village Sites

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## APPENDIX 3



## Land at Impington Lane, Histon

South Cambridgeshire  
District Council Proposed  
Submission Policies Map  
July 2013 Designations

**Figure 1**

### Legend

-  Proposed Site Boundary
-  H/1 (d)  
- Housing Allocation
-  Greenbelt

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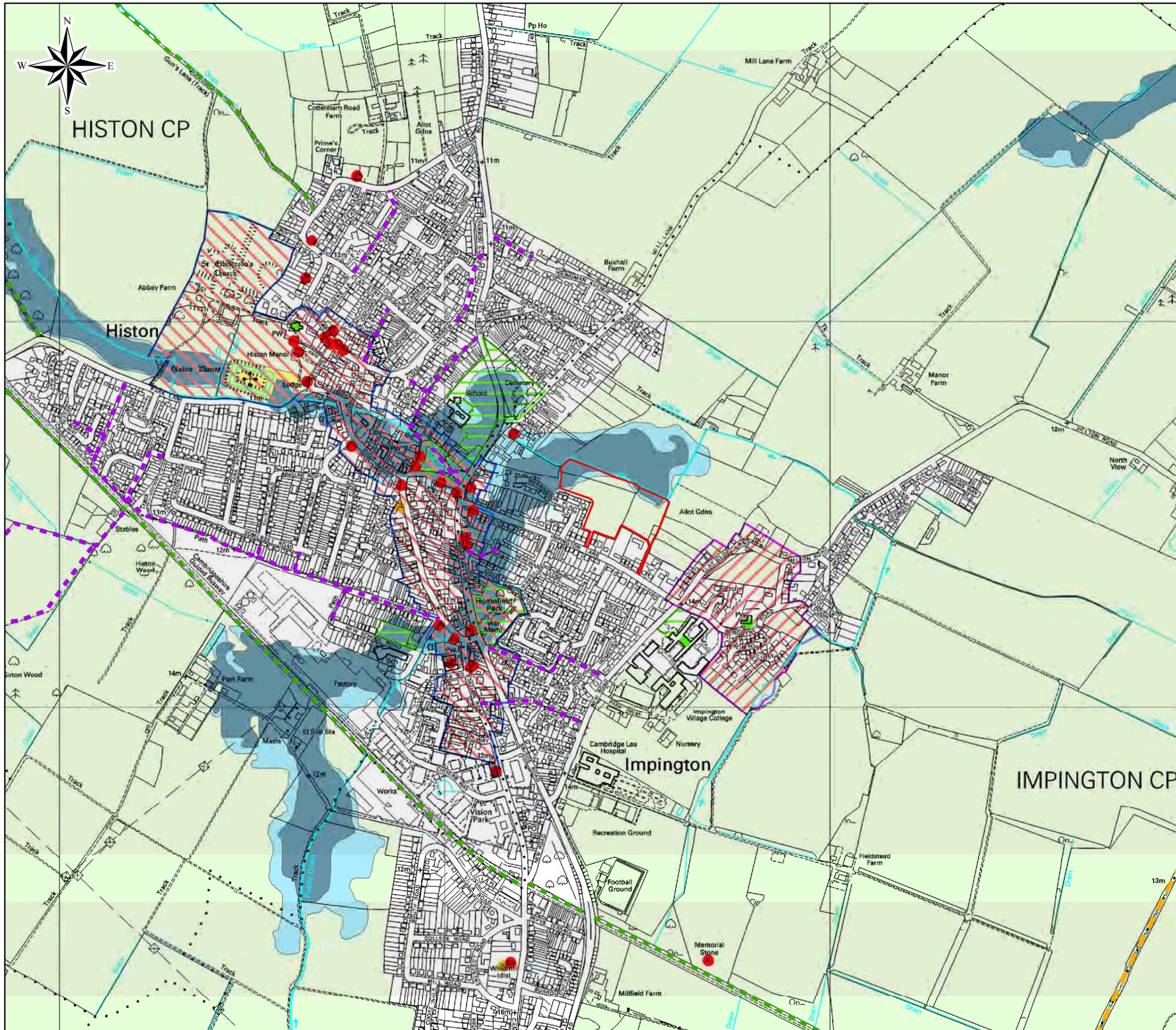


## APPENDIX 4





## APPENDIX 5



**Land at  
Impington Lane, Histon**  
Environmental Designations

**Figure 4**

**Legend**

- Proposed Site Boundary
- Grade I Listed Building
- Grade II\* Listed Building
- Grade II Listed Building
- Public Footpath
- Public Bridleway
- Byway Open to All Traffic
- Protected Amenity Area
- Histon Village Centre & Station Road Conservation Area
- St Andrew's, Impington Conservation Area
- Scheduled Ancient Monument
- Greenbelt
- Extent of Extreme Flood
- Flooding from Rivers without Defences



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