

LPA Ref: S/4099/17/OL

Appeal Ref: APP/W0530/W/18/3210008

Statement of Case

South Cambridgeshire District Council

S78 Appeal by SmithsonHill Limited

Land to the east of the A1301, south of the A505 near Hinxton and west of the A1301, north of the A505 near Whittlesford, Hinxton, CB10

Outline planning application (all matters reserved) for development of an agri-tech technology park comprising up to 112,000 sqm (gross) employment floorspace, supporting infrastructure, amenities and landscape works including publicly accessible informal open space, enhancements to parkland; vehicle and cycle parking; service areas; bus / cycle interchange on land west of the A1301 / north of A505; and infrastructure works including new vehicular accesses, highway improvement works, pedestrian and cycle links with bridge crossings over A1301 / A505 and River Cam, site re-profiling, drainage works, foul and water pumping stations and primary electricity sub-station; telecommunications infrastructure and other associated works.

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1.0 INTRODUCTION

- 1.1 This Statement of Case (SoC) is prepared under Rule 6 of the Town and Country Planning Appeals (Determination by Inspectors) (Inquiries Procedure) (England) Rules 2000 – Statutory Instrument 2000 No: 1625. It has been written in accordance with Annex J of the Planning Inspectorate (PINS) Procedural Guide (26 September 2018). The following statement sets out the key aspects of the Council's overall case and identifies the general scope of evidence that will be referred to by the Council at the Inquiry.
- 1.2 An appeal has been submitted by SmithsonHill Limited (the appellant) against the decision of the Council to refuse planning permission on 13 March 2018 for an agri-tech technology park on land to the east of the A1301, south of the A505 near Hinxton and west of the A1301, north of the A505 near Whittlesford railway station.
- 1.3 A bespoke timetable for submission of documents has been agreed. The appellants have submitted a draft Statement of Common Ground (SoCG) as part of their appeal. This has not yet been agreed and no reference is made to it in the SoC. The SoCG is due to be submitted no later than 16 April 2019.
- 1.4 The Council reserves the right to expand its evidence beyond the scope of this SoC in direct response to any new matters raised by either the appellants or interested parties during the appeal process.

2.0 BACKGROUND TO THE APPEAL

- 2.1 The proposal was subject to a formal pre-application submission to the Council in March 2017. A pre-application meeting took place in May 2017 and the Council provided a response in July 2017 which confirmed that officers could not support the scheme as a departure from the adopted and emerging local plans.
- 2.2 The proposal constitutes development which is likely to give rise to significant environmental impact and was subject to a scoping request received on 2 February 2017. The Council responded on the 7 April 2017 confirming the scope of the required EIA. A copy of the Council's scoping response is included in Technical Appendix A to the EA of November 2017 (page 97) submitted as part of the appellant's appeal form submission.
- 2.3 The application was submitted on 20 November 2017 and formally registered as valid on 21 November 2017.
- 2.4 The application description was for:

'Outline planning application (all matters reserved) for development of an agri-tech technology park comprising up to 112,000 sqm (gross) employment floorspace, supporting infrastructure, amenities and landscape works including publicly accessible informal open space, enhancements to parkland; vehicle and cycle parking; service areas; bus / cycle interchange on land west of the A1301 / north of A505; and infrastructure works including new vehicular accesses, highway improvement works, pedestrian and cycle links with bridge crossings over A1301 / A505 and River Cam, site re-profiling, drainage works, foul and water pumping stations and primary electricity sub-station; telecommunications infrastructure and other associated works.'

2.5 The application was amended on 13 February 2018 by cover letter from Terence O'Rourke to provide:

- Updated section 8 and revised appendix G of the Flood Risk Assessment and Drainage Strategy (including foul drainage assessment) replacing section 8 and appendix G of Technical Appendix E2 of the ES (November 2017).
- Revised Transport Assessment including proposed transport related conditions and detailed section 106 Heads of Terms (appendix 11) – replacing Technical Appendix J of the ES (November 2017).

2.6 The amendments were subject to further consultation.

2.7 The planning application was presented to Planning Committee on 7 March 2018 with an officer recommendation of refusal. A copy of the officer report, the update sheet and the minutes has been sent to PINS as part of the Council's appeal questionnaire.

2.8 Planning Committee resolved to refuse the application on 9 of the 10 grounds recommended, removing a proposed reason for refusal in relation to flood risk.

2.9 The decision notice refusing outline planning permission was issued on 13 March 2018. The decision notice forms part of the Appellant's appeal form submission.

3.0 DEVELOPMENT PLAN

- 3.1 Section 70(2) of the Town and Country Planning Act 1990 and Section 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that any application for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 3.2 The application was made in the context of the adopted South Cambridgeshire Development Control Policies DPD (2007), the South Cambridgeshire Core Strategy DPD (2007) and the draft South Cambridgeshire Local Plan 2014, the latter of which had been submitted to the Planning Inspectorate for Examination in March 2014. This examination was conducted between March 2014 and August 2018. The Inspectors' Report was received on 29 August 2018 and concluded that, with the recommended main modifications, the South Cambridgeshire Local Plan satisfied the requirements of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) and met the criteria for soundness in the National Planning Policy Framework.
- 3.3 The Council gave notice in accordance Regulations 17, 26 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) that the South Cambridgeshire Local Plan 2018 was adopted by South Cambridgeshire District Council on 27 September 2018.
- 3.4 As such, the adopted development plan for South Cambridgeshire District Council consists of the following:
- South Cambridgeshire Local Plan (September 2018)

- Northstowe Area Action Plan 2007 (excluding Policy NS/3(1g), which is replaced by Local Plan Policy SS/5: Northstowe Extension);
- Cambridge Southern Fringe Area Action Plan 2008;
- Cambridge East Area Action Plan 2008 (excluding policies CE/3 and CE/35, which are replaced by Local Plan Policy SS/3: Cambridge East);
- North West Cambridge Area Action Plan 2009; and
- Cambridgeshire and Peterborough Minerals and Waste Local Development Framework 2011 (prepared by Cambridgeshire County Council and Peterborough City Council) – Core Strategy and Proposals Map C 2011, Site Specific Proposals Plan and Proposals Map A and B 2012

3.5 For the purposes of the appeal, of the plans referenced above, it is only the South Cambridgeshire Local Plan (2018) – hereinafter referred to as the SCLP (2018) - which is relevant to the determination of the appeal.

3.6 For the avoidance of doubt, South Cambridgeshire Development Control Policies DPD (2007) and South Cambridgeshire Core Strategy DPD (2007) have been superseded by the adoption of the Local Plan and therefore are no longer of effect.

3.7 The Council is of the view that the original reasons for refusal are supported by newly adopted policies. In relation to each reason for refusal, the relevant policies are set out in table 1 below.

3.8 The Council has forwarded all relevant newly adopted and published policies to PINS as part of the appeal questionnaire. However, as part of the SoC the cover and introductory text to chapters 2 and 8 ('Spatial Strategy' and 'Building a Strong and Competitive Economy') of the SCLP (2018) together with the relevant policies have been included as separate documents for completeness and ease of reference at appendices 9 and 10. Whilst not expressly referred to in this SoC, the

relevant spatial and employment chapters of the Cambridge Local Plan (2018) – adopted on the 18 October 2018 - are attached at appendix 11 as they are likely to form part of the Council’s evidence in respect of employment and housing need/provision and spatial policy jointly agreed between Cambridge City and South Cambridgeshire Councils. Both local plans, adopted in September and October 2018, were prepared simultaneously and used joint evidence bases, including the Employment Land Review (2012). They were examined jointly by the Inspectors as part of the EIP and the final reports for both Councils were issued on the 29 August 2018.

- 3.9 The Council is of the view that the SCLP (2018) and the relevant policies to this appeal should attract considerable weight in the determination of the appeal. The local plan has been recently adopted and has been found to be sound by the Inspectors in their report of August 2018 and contains policies and proposals which will meet the objectively assessed housing and employment needs of the district over the plan period 2011-2031.

Table1, Old and New Adopted Policies

Refusal No.	SCDC Core Strategy DPD (January 2007)	SCDC Development Control Policies DPD (January 2007)	South Cambridgeshire Local Plan 2018
1	ST/8 (Employment Provision) <i>Note R4R 1 includes a typographical error and refers to S7/8</i>	DP/7 (Development Frameworks) ET/3 (Development in Established Employment Areas in the Countryside)	S/5 (Provision of New Jobs and Homes) S/6 (The Development Strategy to 2031) S/7 (Development Frameworks) E/9 (Promotion of Clusters) E/15 (Established Employment Areas) E/16 (Expansion of Existing Businesses in the Countryside)
2	-	-	S/5 (Provision of New Jobs and Homes) S/6 (The Development Strategy to 2031)
3	ST/1 (Green Belt)	GB/1 (Development in the Green Belt) GB/2 (Mitigating the Impact of Development in the Green Belt)	S/4 (Cambridge Green Belt) NH/8 (Mitigating the Impact of Development in and adjoining the Green Belt)
4		DP/1 (Sustainable Development) DP/2 (Design of New Development) DP/3 (Development Criteria) NE/4 (Landscape Character Areas)	HQ/1 (Design Principles) NH/2 (Protecting and Enhancing Landscape Character) SC/9 (Lighting Proposals)
5		DP/1 (Sustainable Development) DP/4 (Infrastructure and New Developments)	TI/2 (Planning for Sustainable Travel) TI/8 (Infrastructure and New Developments)
6		DP/1 (Sustainable Development)	TI/2 (Planning for Sustainable Travel)

		DP/3 (Development Criteria) DP/4 (Infrastructure and New Developments) TR/2 (Car and Cycle Parking Standards)	TI/3 (Parking Provision) TI/8 (Infrastructure and New Developments)
7		DP/1 (Sustainable Development) DP/3 (Development Criteria) DP/4 (Infrastructure and New Developments) TR/2 (Car and Cycle Parking Standards)	TI/2 (Planning for Sustainable Travel) TI/3 (Parking Provision) TI/8 (Infrastructure and New Developments)
8		CH/1 (Historic Landscapes) CH/4 (Development within the Curtilage or Setting of a Listed Building)	NH/14 (Heritage Assets) HQ/1 (Design Principles)
9		NE/17 (Protecting High Quality Agricultural Land)	NH/3 (Protecting Agricultural Land) HQ/1 (Design Principles)

4.0 CASE FOR THE LOCAL PLANNING AUTHORITY

4.1 The site description, planning history, a summary of the consultation and third party responses received and the officer assessment in relation to those representations are set out in the Planning Officer's Committee report of 7 March 2018 and associated Up-Date reports, attached as appendices 1, 2 and 3 to the SoC. The Council does not intend to replicate these parts of its assessment of the application within the main body of the SoC.

Refusal Reason 1

4.2 The Council will demonstrate in its evidence why the proposal represents an unsustainable form of development that is contrary in particular to the Council's spatial and employment strategies and policies S/5, S/6, S/7 and E/9 of the SCLP (2018) and that the economic benefits associated with the proposal are overstated and do not outweigh the harm that would arise from allowing the proposal.

Policy and Employment Need

Development Framework

4.3 Policy S/7 concerns development within and outside Development Frameworks. It sets out what is permissible outside of Development Frameworks which includes uses which need to be located in the countryside or where supported by other policies in the plan. The Development Frameworks are defined through the adopted policies maps which form part of the SCLP (2018). The maps illustrate geographically the application of spatial policies and the justification for their location is set out in the supporting text at paras. 2.51 - 2.52 to the policy.

- 4.4 The appeal site is significantly outside the nearest development frameworks of both Hinxton (appendix 14) and Whittlesford (appendix 4). It is within the open countryside, on agricultural land and is unallocated. The proposal would represent a significant encroachment of built development - a business park - onto open agricultural land and is in direct conflict with S/7.
- 4.5 The Council is of the view that a need for this type and scale of development to be located in the countryside and beyond settlement limits has not been demonstrated. Whilst land will be required for field trials/demonstration plots, no technical assessment has been put forward to suggest what level of the agri-tech floorspace sought would require direct access to the agricultural land.
- 4.6 Policy S/7 sets out to ensure that in the countryside, development is restricted to uses that need to be located there. The need for the countryside location is unproven and the location of the site is not supported by other policies in the adopted plan.

Employment Need

- 4.7 The Cambridge and South Cambridgeshire Local Plan Employment Land Review 2012 (LPER 2012) informed the preparation of the spatial and employment policies and allocations over the plan period 2011-2031 within the SCLP (2018) and CLP (2018). It considered growth across all sectors, including agriculture and technology.
- 4.8 The Local Plans respond to the evidence of employment need with a flexible employment supply, beyond the needs identified, in order to respond to changing circumstances including the growth of sectors as they emerge. The Inspectors' reports into the Local Plans found the employment provision for growth to be sound. Policy S/5 defines the

objectively assessed need for the district for jobs and homes for the period 2011 – 2031.

- 4.9 Land supply is continually monitored through the Annual Monitoring Report and there continues to be a flexible supply of land available for employment uses.
- 4.10 The Council is of the view that existing clusters or allocated employment sites in Cambridge and South Cambridgeshire can appropriately accommodate synergistic growth in agri-tech, being eminently more suitable in terms of location and sustainability than the appeal site.

Spatial Strategy

- 4.11 Adopted policy S/6 defines the spatial strategy and the sequential and spatial preference for how the need for jobs and homes is to be met. In order of preference, the need is to be met on the edge of Cambridge; at new settlements; and in the rural area at Rural Centres and Minor Rural Centres, with development in rural areas being limited. The Council is of the view that if granted, the proposal would represent a significant departure from the spatial strategy contrary to policy S/6.

Policy E9

- 4.12 Policy E/9 'Promotion of Clusters' sets out that development proposals in suitable locations will be permitted which support the development of employment clusters, drawing on the specialisms of the Cambridge area in a range of sectors. The context of the policy is set out in the accompanying text.
- 4.13 Chapter 5, para. 5.26 of the appellant's EIA, defines a broad scope of industry that encompass the agri-tech sector. The scope of industry involved in agri-tech is so wide-ranging that it has not been established that the proposal would support the employment specialisms that exist

within the Cambridge area. This uncertainty is compounded by the fact that the number and scale of firms expressing an interest in locating on the site is extremely small in comparison with the scale of the proposal.

- 4.14 The policy provides support for other locally driven clusters as they emerge provided that they come forward in suitable locations. The supporting text to the policy does not set out to define what a suitable location is. The Council is of the view that it must be the case that suitable locations are those defined by the adopted spatial and employment policies and specific policy allocations set out in the Local Plan. These policies do not lend any support for the proposal whatsoever.

Policies E/15 and E/16

- 4.15 Whilst the proposal is not directly engaged by either policy E/15 or E/16, they are relevant in further defining the spatial strategy and the suitability of land for further employment development outside of Cambridge and new allocations.

Engagement in the SCLP (2018)

- 4.16 The appellants did not promote the allocation of the site through either the call for sites or as an omission site as part of the EIP into the SCLP (2018). That notwithstanding, an opportunity to promote an allocation of the site is available to the appellants following the conclusions of the Inspectors (see para. 31 of the Inspectors' Report) that an early review of the SCLP (2018), to take account of the latest Government household projections, is necessary. The Council is firmly of the view that an employment site of this scale and in this location is most appropriately pursued through the LP review.

Benefits of the Proposal

- 4.17 The proposal is not in accordance with the development plan, being on a site that is not allocated for development and contrary to the adopted Local Plan, as discussed above. To gain planning permission, the appellant would need to demonstrate that this is outweighed by material considerations in favour of the development. On the appellant's evidence, such material considerations include exceptional economic benefits that would be generated by the proposal.
- 4.18 In the Council's view there is no evidence that the development would generate the alleged exceptional benefits, let alone benefits exceptional enough to justify granting permission given the substantial conflict with policy to which the proposal gives rise. The reasons for this conclusion include the following matters:

Economic impacts

- 4.19 The appellant's evidence asserts positive economic impacts of the proposed agri-tech park, such as jobs created, output generated, exports, innovation, contribution to local economic strategy etc. The Council agrees that, if delivered successfully, it will produce impacts of these kinds. But it considers that such impacts would be no greater than what would normally be expected from any employment scheme of comparable scale and quality in South Cambridgeshire.
- 4.20 Additionally, as mentioned earlier, the Council considers that an employment site of this scale and in this location should be promoted through a Local Plan review, rather than speculative application. There is no evidence that the opportunity that the proposal responds to is time-limited. Therefore, if the appeal site is promoted successfully through the forthcoming plan review, it will provide the same benefits as it would if granted planning permission now, only they would accrue a few years later. In the Council's view, bringing forward those claimed benefits does not justify development against adopted development plan policies.

Need

- 4.21 In the Council's view, there is no convincing evidence of need or demand for a development of the scale and specification proposed. The appellant has not demonstrated that the proposed park would attract enough agri-tech businesses, paying sufficient prices or rents, to make it deliverable. Nor have they shown that these potential occupiers could not operate or grow just as successfully in other types of property, such as business / research parks that are smaller, or house a wider range of activities.
- 4.22 If the development is granted permission, but cannot be successfully developed and occupied by businesses in the agri-tech sector, it will likely evolve into a more general business park or science / research park.

Location

- 4.23 There is no valid evidence that the potential occupiers of the agri-tech park will want or need to locate in South Cambridgeshire. On the appellant's own evidence the industry is widely spread across the East of England, and it is not one of the specific clusters in which South Cambridgeshire has specialised. This is why it is not specifically identified in policy E/9 'Promotion of Clusters'.
- 4.24 For those agri-tech businesses that do choose South Cambridgeshire, the appellant has not demonstrated a specific need to locate at the appeal site as opposed to other locations in the District which are consistent with policy. Their evidence does maintain that such businesses need direct access to the countryside for field trials, but in the Council's view, this is not supported by valid evidence.

4.25 Of any agri-tech businesses that look for accommodation in South Cambridgeshire, some will take up existing employment space. For those that want new buildings, the adopted Local Plan has allocated employment land beyond the quantitative need identified in the Employment Land Review 2012, and to meet needs across all sectors, including agriculture and technology. The adopted plan sets no policy restriction to prevent agri-tech firms co-locating with existing technology / life science clusters. It also states that, where such restrictions were imposed under previous development plans, the Council will consider the case for removing them (para 8.10).

4.26 As such, it is the Council's view is that:

- The appellant has not demonstrated that agri-tech businesses will demand need for the proposed agri-tech park;
- Any such businesses that would be attracted to the park could operate equally successfully at more sustainable locations, where they would generate the same benefits.

Summary

4.27 The Council's position is that, at its core, the proposed agri-tech park does not constitute a sustainable form of development as defined by para. 8 of the NPPF.

4.28 It will not generate exceptional economic benefits that would justify granting planning permission against the development plan. Sufficient land is provided within South Cambridgeshire and Cambridge City adopted Local Plans to support the economic growth of all sectors, including agri-tech.

4.29 Neither are the social or environmental objectives of para. 8 of the NPPF met. The location of the site is not planned for as part of the

spatial strategy and by order of preference, the location is neither on the edge of Cambridge, at a new settlement, or at a Rural Centre or Minor Rural Centre. In fact, the appeal site comprises agricultural land which is remote from existing and planned land for homes and jobs. It is 9km from the edge of Cambridge and would generate a significant number of car borne journeys onto a part of the transport network which is already severely congested. The proposal is thus sequentially out of step and incompatible with the spatial strategy for meeting employment need and would represent a significant encroachment into the open rural countryside and is contrary to policies S/6, S/7 and E/9 of the SCLP (2018).

- 4.30 The proposal would therefore fail to achieve sustainable development with reference to the economic, social and environmental objectives as set out in the NPPF at para.8 (criteria a, b and c). It would give rise to a substantial conflict with recently adopted and up-to-date development plan policies and there are no exceptional economic benefits to suggest that the proposal should be allowed contrary to adopted policy. To grant planning permission would not accord with the presumption in favour of sustainable development.

Refusal Reason 2

- 4.31 Subsequent to the refusal of planning permission, the SCLP (2018) has been adopted. The Council is therefore of the view that para. 49 of the NPPF (2018) is no longer engaged and prematurity falls away as an issue. Given the adoption of the Local Plan the Council will not be pursuing this reason for refusal as part of the Inquiry.

Refusal Reason 3

- 4.32 This reason for refusal concerns itself with those elements of the scheme's proposed transport infrastructure that lie within the Green Belt.

- 4.33 The Council is of the view that this element of the proposal is in conflict with policies S/4 and NH/8 of the SCLP (2018) and NPPF guidance paras.133 - 147 regarding proposals within the Green Belt. Plans at different scales showing the exact extent of the Green Belt within this part of South Cambridgeshire are attached at appendices 4, 7 and 8. These plans have been taken from the Council's adopted policies maps and on-line mapping tool.
- 4.34 The main part of the appeal site is located outside the Cambridge Green Belt. The outer boundary of the Green Belt follows the northern boundary of the A505 which is defined by a pathway. The Green Belt alignment can be seen to peel away from the boundary of the A505 and is positioned to the north of the old Whittlesford Road and to the north of a triangular shaped area of woodland plantation as shown on the last of the three plans to appendix 7. The boundary of the Green Belt can then be seen to extend northwards wrapping around the back of the County Council Highways Depot and then westwards around the northern side of Whittlesford-Bridge.
- 4.35 The proposed site for the bus and cycle interchange, shared user route to the north of the A505 and northernmost end of the foot, cycle and equestrian bridge north of the A505 with associated earth bunding and planting would fall within the Cambridge Green Belt wherein there is a presumption against inappropriate development for purposes other than those categories specified in paras. 145 and 146 of the NPPF.

Local Transport Infrastructure

- 4.36 The Council does not accept that the parts of the proposal which fall within the Green Belt amount to "local transport infrastructure" within the meaning of para. 146 of the NPPF (criterion C). The transport interchange and bridge are proposed solely for the purpose of enabling access to the development, would not have a wider economic benefit and are not promoted by the Local Highway Authority. The proposal therefore amounts to inappropriate development.

Requirement for a Green Belt location

4.37 Notwithstanding whether the development within the Green Belt amounts to “local transport infrastructure”, the Council is of the view that the appellants have not demonstrated a requirement for a Green Belt location as per NPPF para. 146 (criterion C). This is because: firstly, the development of the agri-tech park itself is not required for the reasons as set out under reason for refusal 1; secondly, a sequential assessment of potential alternative sites outside the Green Belt has not been satisfactorily undertaken; and thirdly, the Council is not satisfied that the particular requirements for the significant enhancements for access to the station of the type proposed are required.

Preservation of Openness

4.38 Para. 146 of the NPPF states that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. The supporting text to policy S/4 at para. 2.31 sets out a number of factors which define the special character of Cambridge and its setting. These include but are not limited to:

- Green corridors penetrating into the City
- The distribution, physical separation, setting, scale and character of Green Belt villages; and
- A landscape that retains a strong rural character

4.39 The proposed site for the transport works located within the Green Belt comprises open farmland and has a strong rural character. The proposed development would comprise of structures to serve the bus and cycle shelters and hire facilities up to a maximum height of 3.5

metres and part of the proposed foot, cycle and equestrian bridge at 7.5 metres to platform level and 4 metres in width. Proposed earth bunding and native species woodland planting would be incorporated around the proposed foot, cycle and equestrian bridge.

- 4.40 These landscaping proposals are not considered to mitigate the impact of the development on the Green Belt - they are significant features of themselves - and the proposal would result in substantial harm to the openness of the Green Belt contrary to NPPF para. 146.

Conflict with Purposes

- 4.41 Para 134 of the NPPF states:

‘Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.’

- 4.42 The proposals would add built form into the open arable landscape and would change the approach to Whittlesford Parkway Station along the A505 from the east which is rural and open in character, with built form encroaching into the countryside.

- 4.43 The location and scale of the development would result in a significant encroachment of the countryside, and would thus be contrary to para. 134, criterion c) and to criterion 1 of policy NH/8 of the SCLP (2018). Furthermore, because other potential alternative sites – comprising urban land – may be available for transport improvements which lie outside the Green Belt (such as the Whittlesford Station Greater Anglia

car park), the proposal would fail to assist in urban regeneration and would be contrary to para. 134 criterion e). The proposal thus conflicts with the above Green Belt purposes.

- 4.44 Furthermore, if the Inspector was to find that the proposal did amount to 'local transport infrastructure' as per NPPF paragraph 146 (c) it is the Council's position that it would amount to inappropriate development for the above reasons.

Very Special Circumstances

- 4.45 The development proposal is considered, for the reasons set out above, to be inappropriate development in the Green Belt. As such and in accordance with para. 143 of the NPPF by definition, the proposal would be harmful to the Green Belt and should not be approved except in very special circumstances.
- 4.46 Therefore para. 144 of the NPPF is engaged and there is a need to determine whether there are very special circumstances which justify planning permission being granted notwithstanding the harm to the Green Belt and any other harm resulting from the proposal. This paragraph also states that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. This should also be applied in this appeal.
- 4.47 Other harm arising from the proposal can be summarised in terms of the spatial and unsustainable economic aspects of the scheme together with landscaping, transport, highway safety, heritage and agricultural harm identified in the reasons for refusal and as part of the Council's SoC. The Council does not accept that very special circumstances exist - as per para. 5.94 of the appellant's SoC - that is that there are no other considerations such as to clearly outweigh the overall harm arising from the proposal. The proposal is therefore

contrary to adopted policies S/4 and NH/8 of the SCLP (2018) and chapter 13 of the NPPF.

Refusal Reason 4

- 4.48 Reason for refusal 4 alleges two landscape issues associated with the proposal. The issues arise from a review of the application by the Council's Landscape Officer and are set out in summary form within the Committee Report of 7 March 2018 and more fully within the Landscape Officer's consultation response to the planning application.
- 4.49 The first issue concerns insufficient information associated with the LVIA, including but not limited to: a lack of assessment of how re-profiled land would affect the landscape character; concerns regarding the Zone of Theoretical Visibility (ZVI); and landscape and visual impacts of the proposed bridge at the A505/A1301 junction and adjacent bus and cycle interchange, cumulative landscape and visual effects and the setting of Hinxton not being adequately assessed.
- 4.50 The second issue concerns harm to the open rural landscape from the agri-tech park, the transport interchange and the proposed bridge and abutments. The Council is of the view that mitigation could not overcome the harm that has been identified. The relevant SCLP (2018) policies are HQ/1, NH/2 and SC/9.
- 4.51 Policy NH/2 'Protecting and Enhancing Landscape Character' states:
- 'Development will only be permitted where it respects and retains, or enhances the local character and distinctiveness of the local landscape and of the individual National Character Area in which is it located.'*
- 4.52 The supporting text to NH/2 at paras. 6.9 - 6.10 sets out the pressure on the type of agricultural landscape within which the agri-tech park would sit and highlights the need to enhance and protect this landscape.

4.53 Policy HQ/1 supplements the strong policy position established by NH/2 by providing a 'preserve or enhance' provision for development in a rural area and a requirement at criterion a) for development to respond to its context in the wider landscape. In particular, HQ/1 criterion d) sets out that development must:

'd) Be compatible with its location and appropriate in terms of scale, density, mass, form, siting, design, proportion, materials, texture and colour in relation to the surrounding area;'

4.54 Policy SC/9 provides advice regarding lighting proposals. The Council is of the view that this policy is relevant in terms of the harmful visual impact the proposal would cause at night time on the surrounding open and rural countryside.

4.55 In terms of national guidance, paras. 127 and 170 of the NPPF are relevant.

The Site

4.56 An assessment of the scale of the site, its topography, visibility and overall landscape setting are set out within the Committee Report at para.152 (see appendix 1). The overall impression of the site is one that is set within an open, rural landscape, with limited views of the domestic and commercial buildings which lie adjacent.

Landscape and Visual Harm

4.57 The Council is of the view that, in terms of the visual and landscape effects, the proposal for the agri-tech park by virtue of its location, scale, height, size, bulk and mass together with the increase in land levels to the east of the site, significant bunding, proposed transport interchange including bridge structure and abutments, would result in the introduction of substantial incongruous built form into the rural countryside. The proposal would be excessively prominent, resulting in

the loss of open, rural countryside and harm to the visual amenity of the area. The proposal, given its significant visual impact and encroachment on the countryside and rural area, would fail to be sufficiently mitigated.

- 4.58 The Council will demonstrate that the application is contrary to SCLP (2018) policies HQ/1, NH/2 and SC/9 and paras. 127 and 170 of the NPPF. The Council will present landscape and visual impact evidence in support of this reason for refusal.
- 4.59 The Council's evidence will describe the baseline landscape and visual character of the site and its local context by reference to published character studies, amplified and expanded as may be appropriate to accurately describe the local character.
- 4.60 The appeal proposal will be described concentrating on those aspects that are considered would give rise to harmful landscape and visual effects. The evidence will set out a landscape and visual assessment of the effects that the Council consider would arise from the implementation of the appeal proposal. This assessment will also consider various parts of the landscape, visual and related information presented in the ES that accompanied the application and highlight areas where it is considered that the original assessment was flawed or inaccurate, resulting in the predicted effects reported being unduly benign.
- 4.61 It will be demonstrated that there would be significant harmful effects to landscape character and visual amenity arising from the appeal proposals. It will be concluded that the development would fail to preserve or enhance the local character of the area and would have an unacceptable adverse impact on the countryside and landscape character that could not be mitigated by appropriate in character mitigation.

Refusal Reasons 5, 6 and 7

- 4.62 The relevant policies of the SCLP (2018) in relation to these reasons for the refusal are TI/2, TI/3 and TI/8. The relevant paras. of the NPPF are 108 – 111.
- 4.63 Reasons for refusal 5, 6 and 7 relate to insufficient information in relation to the Transport Assessment, the comprehensiveness of the Road Safety Audit and insufficient information to demonstrate that the levels of car and cycle parking and non-car travel would be sufficient to meet demand and would not result in inappropriate parking and highway safety impacts.
- 4.64 The concerns raised by the Local Highway Authority (LHA) are set out fully with their response of 1 March 2018 and are attached for ease of reference at appendix 12 to the SoC. The response concluded as follows:

'Insufficient information has been provided at this stage for the County Council to consider and respond on the acceptability of the Transport Assessment. Fundamental aspects of the TA including Trip Generation, and distribution are not agreed at this stage, and therefore the assessment outcomes cannot be verified. It is disappointing that a number of these points were raised by the County Council at the pre-application stage and have not been addressed in the current submission. The County Council recommend a holding objection at this stage as insufficient information has been provided.'

- 4.65 The Council notes that the Appellant has attached a review of the TA and a traffic modelling report which has been undertaken by Transport Planning Associates (TPA) attached as appendix 1 to their SoC. The TPA report was not shared with the LHA prior to the submission of the appeal and no formal or informal discussions or meetings have

subsequently taken place between the appellants and the LHA to discuss the TPA report.

- 4.66 The purpose of the review by TPA is to verify the TA undertaken by Alan Baxter Associates in association with the planning application. Paras. 6.10 - 6.28 of the appellant's SoC set out a summary of the TPA review. Whilst it is noted that the summary of the review provided by the appellant's SoC concludes that a robust analysis of the transport planning evidence was undertaken, this conclusion at this stage is not agreed.
- 4.67 The Council notes the SoC at para. 6.28 states that the appellants will continue to work with both the LHA and Highways England in order to seek agreement and remove the objections prior to determination of the appeal. The LHA has confirmed that they will engage with the appellant and discuss the means by which a review of the TPA report could take place in order to inform, narrow or remove the reasons for refusal as appropriate. The Statement of Common Ground (SoCG) will confirm progress in this regard.
- 4.68 However, at this stage and on the basis of the information submitted in support of the application, in line with the advice from the LHA, the Council is of the view that the proposal is contrary to SCLP (2018) policies TI/2, TI/3 and TI/8 and paras. 108 - 111 of the NPPF.

Other Matters

- 4.69 Reason for refusal 6 is incomplete and is missing text within the middle of the third sentence. The missing text is not fundamental to the basis of the objection or meaning of the refusal reason. The reason for refusal, with additional text underlined, should read as follows.

Motorists would access the proposed development via the A1301 and a single access junction. The road network in this locality is already congested, as acknowledged in the submitted Transport Assessment

(TA). A stage 1/2 Road Safety Audit has not been carried out on all the submitted drawings to allow the Local Highway Authority to fully assess the scheme and the proposal would therefore be contrary to: paragraphs 7, 17 and 32 of the National Planning Policy Framework 2012 and Policies DP/1, DP/3 (1b), DP/4 and TR/2 of the South Cambridgeshire Development Control Policies DPD 2007.

- 4.70 The Council does not consider that the appellants are in any way prejudiced by the insertion of the relevant text.

Refusal Reason 8

- 4.71 This reason for refusal pertains to the harm that would arise from the impact of the proposed development on the setting and significance of Hinxton Grange, a Grade II listed building (List Entry Number: 1318298), its Grade II listed (List Entry Number: 1128074) stable and coach house to the north east, and its associated designed landscape, which is a non-designated heritage asset recorded on the Cambridgeshire Historic Environment Record (Record Number: 12121) (appendix 13).
- 4.72 The special architectural and historic interest and significance of Hinxton Grange, and its associated stables and coach house, is drawn from their historic and architectural importance as a high status 19th century (c.1835) country house and ancillary buildings, sited within designed gardens and parkland - a composition created by Wedd William Nash. The buildings embody historic, architectural, evidential and aesthetic values and interests in their design, appearance, materials, grouping and associations. The setting of Hinxton Grange, and its associated stables and coach house, comprise its own designed landscape (non-designated heritage asset), and the surrounding enclosure period farmland of its agricultural estate. As discussed below, the setting is considered to make an important contribution to the significance of the assets.

- 4.73 The designed landscape components include: pleasure grounds and walled garden, square parkland, wooded boundaries, an approach avenue and drive. The significance of these landscape components is also drawn from the fact that they have not been subject to significant or intrusive changes. This setting makes a fundamental contribution to the significance of Hinxton Grange, and its associated stable and coach house, providing evidence of the high status of the house at the centre of its large estate. Furthermore, in consideration of setting the views across the parkland from and to the house are particularly important to the listed building's significance.
- 4.74 The special historic interest of the designed landscape around Hinxton Grange, which is a non-designated heritage asset, lies in the historic, evidential and aesthetic values and interests of its formal design, including: layout and planting, views, appearance and associations. The designed landscape shares the wider setting of Hinxton Grange, and its associated stable and coach house, comprising the enclosure period farmland of the estate, which also contributes to its significance; the agricultural land contrasts sharply with the managed parkland's pasture and planting, and forms part of the borrowed landscape of wider countryside. Cumulatively, setting is of high value to both the designated and non-designated heritage assets, forming part of an integrated whole of country house, formal gardens and parkland, set within the landscape of its associated agricultural estate.
- 4.75 The proposed development will have direct impacts on the designed landscape at Hinxton Grange, including the removal of individual trees, creation of breaks in the existing vegetation, and new boundary planting. The proposed development will also have indirect impacts on the listed buildings of Hinxton Grange, its stable and coach house, and its associated designed landscape. The development will introduce substantial built development on agricultural land that contributes to the setting and significance of the heritage assets. These heritage assets

are experienced and understood as a composition, set in a wider estate. The proposed development will harm the setting and significance of the heritage assets, and how the heritage assets are experienced and understood.

4.76 Paragraph 193 of the NPPF requires that when considering the impact of a proposed development on the significance of a designated heritage asset, 'great weight' should be given to the asset's conservation. The Council is of the view that in this case, the harm to the heritage assets would be less than substantial. Therefore, the test set out in para. 196 of the NPPF is engaged and in this case the Council contends that the public benefit does not outweigh the harm. Given the harm to the significance of the designed landscape (non-designated heritage asset), para 197 of the NPPF is relevant and should be given appropriate weight in the decision-making process.

4.77 Case law has clarified how development affecting the setting of a listed building should be considered e.g. East Northamptonshire DC v SSCLG [2014] EWCA Civ 137 (Barnwell Manor wind turbine case). The Courts have confirmed that, even where the harm to setting and significance is found to be less than substantial, a decision maker who follows the balancing approach recommended in para 134 of NPPF, to be undertaken in respect of harm to the significance of heritage assets, should give "considerable importance and weight" to any harm to the setting and significance of a listed building and to the desirability of preserving that setting without harm, and should start with a "strong presumption" that harm to the setting and significance of a listed building should lead to a refusal of planning permission, and not ignore the statutory duty under S.66(1) of the 1990 Act.

4.78 The Council's evidence will assess the significance of the affected heritage assets with reference to their heritage values, and the contribution of setting to their significance, following the stepped approach set out in Historic England's guidance 'The Setting of

Heritage Assets' (2017). The Council will describe the effects of the proposed agri-tech park upon the setting and significance of the heritage assets.

- 4.79 The Council will demonstrate within its evidence that the proposal is contrary to policy NH/14 and by extension HQ/1 criterion b (which includes a similar policy requirement to NH/14), the NPPF and guidance, and that to grant the proposal would be in conflict with the statutory duty under the Planning (Listed Buildings and Conservation Areas) Act (1990) to give special regard to the desirability of preserving the setting of the listed buildings.

Refusal Reason 9

- 4.80 This reason for refusal relates to the loss of agricultural land as a result of the proposed agri-tech park. The relevant adopted policies are NH/3 and HQ/1 of the SCLP (2018) whereas the relevant NPPF para. is 170 (criterion b).
- 4.81 NH/3 states:

'Policy NH/3: Protecting Agricultural Land

1. *Planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land unless:*
 - a. *Land is allocated for development in the Local Plan;*
 - b. *Sustainability considerations and the need for the development are sufficient to override the need to protect the agricultural value of the land.*

2. *Uses not involving substantial built development but which take agricultural land will be regarded as permanent unless restricted specifically by condition.*

3. *When considering proposals for the change of use or diversification of farmland, particular consideration shall be given to the potential for impact upon Priority Species and Habitats1.*

- 4.82 The development would result in the loss of circa 33 hectares of grade 2 'very good' and 3a 'good to moderate' and 38 hectares of grade 3b 'moderate quality' and 4 'poor quality' agricultural land. Approximately 10.9 hectares of land to the south of the main site will continue in agricultural use with topsoil from the development being redistributed over these fields to improve their agricultural land quality. The proposal given its purpose as an agri-tech park with a focus on productivity and sustainability is expected to increase global physical and economic output of agriculture through promoting increased agricultural production technologies and new methods of delivering more sustainable food chains. The argument put forward by the appellants at para. 5.60 of the SoC is that the loss of land only amounts to some 0.1% of land dedicated to farming at the district level and any reduction in agricultural production on the site would be compensated for by even a very minor increase in agricultural production elsewhere due to the work conducted at the site.
- 4.83 The Council contends that the proposal is considered to represent a significant loss of *'the best and most versatile agricultural land'* as defined in the glossary to the NPPF. Through its evidence pertaining to reasons for refusal 1 and 2, the Council will contend that the application does not demonstrate that sustainability considerations and the need for development in this location are sufficient to override the need to protect the agricultural value of the land.
- 4.84 Consequently, the development would cause significant and irreversible loss of agricultural land contrary to policies NH/3 and HQ/1 of the SCLP (2018) and para. 170.

5.0 PLANNING CONDITIONS AND PLANNING OBLIGATIONS

- 5.1 The appellant's SoC at 7.2 sets out that a list of conditions – in the event the appeal is allowed - will be prepared jointly with the Council and submitted prior to the start of the Inquiry. The Council is in agreement with this approach and suggests that this is progressed and attached to the SoCG.
- 5.2 The Council notes the appellant's intention of submitting a draft planning agreement or undertaking prior to the start of the Inquiry. The Council is of the view – on a without prejudice basis – that the SoCG should seek agreement first on the scope of Heads of Terms (HoT's) set out briefly at 7.4 to the appellant's SoC. Subject to agreement of the HoT's, the Council and the LHA will liaise with the appellant's in the preparation of a draft planning agreement.

6.0 CONCLUSION

- 6.1 The appellant has failed to demonstrate that an agri-tech development of this scale is needed in this location. The proposal is outside the Development Framework and would represent a significant encroachment of built development onto open agricultural land and is in direct conflict with policy S/7. The functional need for the level of floorspace sought in relation to the proximity of the agricultural land is unproven.
- 6.2 Land for employment growth, encompassing agri-tech, is sufficient to meet the demand for the plan period and provides flexibility. The proposal is therefore not needed and would in any case represent a significant breach of the Council's spatial strategy as defined by policy S/6. Furthermore, policy E/9 does not provide support to the proposal because the location is not suitable, being contrary to relevant adopted spatial and employment focussed policies found elsewhere within the local plan.
- 6.3 Other more sustainably located sites in and around Cambridge could accommodate significant and synergistic growth in the agri-tech industry. It has not been demonstrated that: there is a particular need for the proposal, that the sector would fail to grow if the scheme was not allowed, or that its delivery is assured. Overall there is a lack of evidence to support the scale, location and need for a specific agri-tech site.
- 6.4 These issues aside, part of the proposal lies within the Green Belt and is considered by the Council to constitute inappropriate development. It would cause substantial harm to the openness of this part of the Green Belt and would conflict with its purposes. There are no very special circumstances, individually or cumulatively, which outweigh the overall harm caused by the proposal to allow it to be granted permission. As

such, the proposal conflicts with policies S/4 and NH/8 of the SCLP (2018) and NPPF Green Belt guidance.

- 6.5 There would be significant harmful effects to landscape character and visual amenity arising from the appeal proposals and this harm could not be appropriately mitigated. The proposal is contrary to policies HQ/1, NH/2 and SC/9.
- 6.6 Insufficient information has been provided for the LHA to consider and respond on the acceptability of the TA. Further information has been submitted as part of the appellant's SoC and the LHA will make contact with the appellants to discuss the transport evidence. The SoCG will confirm progress in this regard.
- 6.7 Less than substantial harm would arise to the setting and significance of the heritage assets identified. Great weight should be given to the assets' conservation. Para. 196 of the NPPF is engaged and in this case the Council contends that the public benefit does not outweigh the harm. The proposal is contrary to policies NH/14 and HQ/1 of the SCLP (2018) and NPPF guidance.
- 6.8 The development would cause significant and irreversible loss of best and most versatile agricultural land, contrary to policies NH/3 and HQ/1 of the SCLP (2018) and para. 170 of the NPPF.
- 6.9 Overall, the proposal would fail to achieve sustainable development with reference to the economic, social and environmental objectives as set out in the NPPF (para. 8). It would give rise to a substantial conflict with recently adopted and up-to-date development plan policies and there are no exceptional economic or other benefits arising to suggest that the proposal should be allowed contrary to adopted policy. To grant planning permission would not accord with the presumption in favour of sustainable development. The Council will provide evidence to

support each of the reasons for refusal as part of the Inquiry proceedings.

7.0 LIST OF DOCUMENTS

7.1 The Council intends to refer to at least the following documents at Inquiry.

7.2 If not submitted as part of the appeal questionnaire or attached to this SoC, these documents – where appropriate - will form part of the Core Documents library.

Planning

- Town and Country Planning Act 1990 (as amended) & the Planning and Compulsory Purchase Act 2004 (as amended)
- National Planning Policy Framework, Ministry of Housing, Communities and Local Government (July 2018)
- National Planning Practice Guidance, Ministry of Housing, Communities and Local Government (internet resource)
- South Cambridgeshire Local Plan (2018)
- Cambridge Local Plan (2018)
- Emerging Cambridgeshire and Peterborough Non-Statutory Strategic Spatial Framework (phase 2)
- Planning officer's Committee Report, Update Sheet and Minutes in respect of the application
- Relevant officer reports and council decisions in respect of other sites (e.g. Sawston Trade Park, NIAB Headquarters and Field Research applications)
- Relevant appeal decisions and court judgements
- The planning application, together with its supporting documents, drawings and other material
- Inspectors' Report into the SCDC Local Plan 2018
- Inspectors' Report into the CCC Local Plan 2018
- Local Plan examination hearing statements re. employment SCDC and objectors (Matter 4) including representation prepared by Terence O'Rourke on behalf of Hinxtion Land Ltd (M4/23548)
- Response to matters and issues raised by the Inspector

- Cambridge and South Cambridgeshire Local Plan - Consideration of the National Planning Policy Guidance with respect of Employment and Retail (RD/Strat/380)
- EIA scoping opinion

AgriTech / Need / Economic Benefits

- Government statements, publications and ministerial speeches related to economic growth, agriculture and the agri-tech sector
- UK Strategy for Agricultural Technologies, HM Government (2013)
- Industrial Strategy – Building a Britain fit for the future, HM Government (November 2017)
- Technology and Innovation Futures 2017, Government Office for Science (2017)
- East of England Science and Innovation Audit sponsored by the Department for Business, Energy and Industrial Strategy (September 2017)
- Health and Harmony: the future for food, farming and the environment in a Green Brexit, Department for Environment Food and Rural Affairs (February 2018)
- The Clean Growth Strategy, HM Government (October 2017)
- London Stansted Cambridge Consortium Sector profile on agrifood (2015)
- Findings and recommendations of the London Stansted Cambridge Corridor Growth Commission – The next global knowledge region: setting the ambitions and delivering the vision (July 2016)
- Emerging Cambridgeshire and Peterborough Local Industrial Strategy
- South Cambridgeshire & Cambridge City Employment Land Review (2012)
- South Cambridgeshire & Cambridge City Employment Land Review Update - Addendum 2013
- HM Government, 'Our Plan for Growth: Science and Innovation' December (2014)
- SQW, Cambridge high tech cluster growth, opportunities to the south of Cambridge 2014
- Strategic Economic Plan (Greater Cambridge Greater Peterborough Local Enterprise Partnership) 2014
- Cambridgeshire & Peterborough Independent Economic Review Sept 2018.
- Norwich Research Park website, including directory and sectors, 2018
- Cambridge-Norwich Tech Corridor website, 2018
<http://www.techcorridor.co.uk/>

- Cambridge Econometrics, Sept 2018. East Of England Forecasting Model 2017 baseline forecast
- SQW, 2011. Cambridge Cluster at 50 Study
- Department for Business Innovation & Skills, July 2016. Agri-tech industrial strategy: evaluation scoping study and baseline
- Cambridge Ahead, 2018. Cambridge Cluster Map
- SCDC Annual Monitoring Reports

Heritage

- Planning (Listed Buildings and Conservation Areas) Act 1990
- Conservation Principles for the sustainable management of the historic environment (consultation draft November 2017)
- Barker, Dr. N. 2015 'Heritage assets and their setting: Views from a practitioner' Joint planning law conference Oxford
- Historic England 2015 'Historic environment Good Practice Advice in Planning 3: The setting of heritage assets'
- English Heritage, 2008, Conservation principles – policies and guidance for the sustainable management of the historic environment
- Historic England, 2015, Good Practice Advice notes (GPA1 Local plan making, GPA2 Managing significance in decision-taking in the historic environment, GPA3 The setting of heritage assets)
- Historic England (National Heritage List)
- Relevant Case Law, including but not limited to East Northamptonshire DC v SSCLG [2014] EWCA Civ. 137
- Terence O'Rourke, 2016, Land at Hinxton, desk-based heritage assessment
- EIA Chapters 6 and 9 and supporting appendices
- Statutory list descriptions
- Historic Environment Record (Record Number: 12121)

Landscape

- Cambridgeshire Landscape Guidelines: A Manual for Management and Change in the Rural Landscape, Cambridgeshire County Council (1991)
- Essex Landscape Character Assessment Final Report, Essex & South-end-on- Sea Replacement Structure Plan Review, Chris Blandford Associates (2003)
- Cambridge Inner Green Belt Boundary Study, Landscape Design Associates for South Cambridgeshire District Council (2015)

- Guidelines for Landscape and Visual Assessment (3rd Edition), Institute and Institute of Environmental Management and Assessment (2013)
- National Character Area Profiles 87 East Anglian Chalk, Natural England website www.naturalengland.org.uk
- An Approach to Landscape Character Assessment, Natural England (2014)
- SCDC District Design Guide SPD - 2 March 2010
- SCDC Landscape in New Developments SPD - 2 March 2010

Highways

- Design Manual for Roads and Bridges, Highways England (2018)
- Designing for Deliveries, Freight Transport Association Limited (2006)
- Guidelines for Planning for Public Transport in Developments, The Institution of Highways and Transportation (1999)
- Guidelines for Providing for Journeys on Foot, The Institution of Highways and Transportation (2000)
- Junctions 9 User Guide, TRL Limited (2017)
- LinSig 3.2 User Guide, JCT Consultancy Ltd (2014)
- Manual for Streets, Thomas Telford Publishing (2007)
- Manual for Streets 2, Wider Application of the Principles
- Chartered Institution of Highways and Transportation (2010)
- The Traffic Signs Regulations and General Directions 2016, Statutory Instruments 2016 No. 362 (2016)
- Traffic Advisory Leaflets, Department for Transport (various dates).
- Traffic Modelling Guidelines, TfL Traffic Manager and Network Performance Best Practice Version 3.0, Transport for London 2010
- Paramics Microsimulation Knowledgebase, <https://paramics.freshdesk.com/support/home> , Systra (2018)
- Cambridgeshire Local Transport Plan 2011-2031, Cambridgeshire County Council (July 2015)
- Cambridge City and South Cambridgeshire Transport Strategy: Cambridge City Transport Plan
- Transport Strategy for Cambridge and South Cambridgeshire: TSCSC Transport Strategy and High Level Programme, Cambridgeshire County Council (March 2014)
- TSCSC Consultation Report , 22 JULY – 14 OCTOBER 2013, Cambridgeshire County Council
- CSRM Modelling Summary Report for Cambridge and South Cambridgeshire Local Plans, Cambridgeshire County Council, (July 2013)

- Cambridgeshire Transport Investment Plan, Cambridgeshire County Council (December 2017)
- Uttlesford Local Plan Transport Study Addendum Report, WYG Environment Planning Transport (2 May 2018)
- A505 Corridor Improvement, Feasibility Study: A10 to the A11, Uttlesford District Council (29 January 2018)
- Uttlesford Local Plan, Cambridgeshire County Council Comments Position Statement, Cambridgeshire County Council (June 2018)
- Cambridge South East Transport Study (CSETS) Summary Report of Consultation Findings , Cambridgeshire County Council (May 2018)

7.3 The Council reserves the right to call upon other material evidence that becomes available prior to the start of the Inquiry pursuant to the refusal reasons.

Appendices

Appendix 1	Appendix 1 Planning Officer's Committee Report S-4099-17-OL 7 March 18
Appendix 2	Appendix 2 Planning Officer's Update Report S-4099-17-OL 7 March 18
Appendix 3	Planning Officer's Update Report Following Committee S-4099-17-OL 13 March 18
Appendix 4	Inset-110-whittlesford-bridge adopted policies map SCLP (2018)
Appendix 5	Key-to-district-wide-maps adopted policies map SCLP 2018
Appendix 6	Key-to-village-inset-maps adopted policies map SCLP 2018
Appendix 7	Map of Green Belt, from SCDC on-line mapping
Appendix 8	South-east-quadrant adopted policies map SCLP 2018
Appendix 9	SCLP 2018, chapter 8, Economy, pages 171-188 policies E1-E16
Appendix 10	SCLP 2018, chapter 2, Spatial Strategy, pages 11-33, policies S1-S7
Appendix 11	CLP 2018, chapters 2 and 5, Employment and Spatial Strategy policies as reported to and agreed by Committee for adoption (published version not available at time of issuing SoC).
Appendix 12	CCC Transport Assessment Team, 1 March 2018
Appendix 13 (a, b)	a) Historic Environment Record (Record Number: 12121) and b) Hinxton Grange and associated map
Appendix 14	Inset-57-hinxton adopted policies map SCLP 2018