

# **GREATER CAMBRIDGE LOCAL PLAN - ISSUES AND OPTIONS RESPONSE**

**FOR**

**MR PETER BROWN, MS GAIL BROWN AND MR  
MICHAEL BROWN**

**REGARDING**

**LAND AT BRANCH ROAD AND LONG ROAD,  
COMBERTON (SOUTH CAMBRIDGESHIRE)**

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## 1. INTRODUCTION

- 1.1 These representations are submitted on behalf of our clients, Mr Peter Brown, Ms Gail Brown and Mr Michael Brown in response to the Greater Cambridge Local Plan Issues and Options consultation.
- 1.2 In response to the call for sites that the Councils carried out in 2019 we submitted a site promotion document setting out the planning merits of the development of our clients' land at the corner of Branch Road and Long Road. This site is available for development as a stand-alone site or as part of a larger site that is also being promoted to meet the future housing needs of the Greater Cambridge area by Endurance Estates. The site is well enclosed by existing boundary planting and forms a logical northern extension of the village of Comberton. As the site falls within the Cambridge Green Belt it is being promoted in the emerging Greater Cambridge Local Plan as an allocation for approximately 120 to 130 dwellings, as a stand-alone development, or as part of a wider development with the land to the west that will accommodate 150 to 200 dwellings and a retirement village.

### 6. Do you agree with the potential big themes for the Local Plan?

- 1.3 Our clients agree with the proposed big themes and believe that these can be achieved in part by focusing future housing growth in the most sustainable rural settlements in the Greater Cambridge area, especially those near to Cambridge. These higher order settlements contain a range of services and facilities are well served by public transport and are within cycling distance of Cambridge. Our clients' site at Comberton, which is a Minor Rural Centre, offers the opportunity to further develop an enclosed parcel of land that will deliver much needed new homes in this sustainable location. Whether this site is delivered as a medium sized allocation or as part of a larger allocation including land to the west, it performs well against the big themes for the emerging Local Plan as demonstrated below:

**Climate change:** Whilst modern building regulations are increasing the sustainability of new dwellings it is the impact of residents' travel that needs to be addressed when considering where to locate new homes. Our clients' site is within walking distance of the services and facilities of Comberton and within cycling distance of the employment and recreational areas of Cambridge. As part of the application process the walking and cycling infrastructure serving the site has the potential to be enhanced.

Therefore, the site's location will ensure that residents' reliance on the use of the private car will be reduced. This reduction on car dependency will also help reduce the negative impacts that unsustainable modes of travel have on climate change through increased greenhouse gas emissions.

**Wellbeing and Social Inclusion:** As with any development of this scale our clients' site will deliver a range of housing types, including different affordable housing tenures to ensure that a balanced community is created. As a result of the masterplanning of the site any development proposal will include areas of public open space and play space where residents will have the opportunity to interact with each other. Through the promotion of walking, cycling and public transport residents will experience more positive interactions with each other and other residents of Comberton and beyond than if they were reliant on private cars to meet their daily needs.

**Biodiversity and Green Spaces:** The development of our clients' site would result in a northern extension of Comberton and will aim to achieve a net gain in biodiversity through the retention, protection and enhancement of on-site habitats, provision of extensive new public open space and high-quality landscaped areas. The existing boundary landscaping will be retained and enhanced with new planting to further add to the visual amenity of the area, create additional habitats for wildlife and create a landscaped edge to the village. Surface water attention features will be landscaped to create additional habitats that will have a positive impact on the biodiversity of the area. Harbour Avenue to the south of the site has very little natural green space. The development of our clients' site will therefore introduce new green spaces for recreational use by both new and existing residents.

**Great Places:** Our clients are aware of the need for any development proposal to respect the existing vernacular of the village and create a new neighbourhood for Comberton that has place-making at its heart. Comberton is a popular village within the district, which is in part due to the success of the village college that includes modern sporting facilities that are available for use by both students and residents. Residents of our clients' site will be within easy cycling distance of the village college meaning that they will benefit from a range of sporting and social facilities within their own village.

## **8. How should the Local Plan help us achieve net zero carbon by 2050?**

- 1.4 The Greater Cambridge area is consistently ranked as one of the best places to live in the UK with a strong economy that continues to outperform other cities. As a result of the continued job creation in the area Greater Cambridge experiences high levels of in-commuting due to years of persistent under-delivery of new homes. This has resulted in the city and surrounding villages becoming increasingly unaffordable for people employed in the area and those who have grown up here.
- 1.5 The limitations to the existing rail network serving the city means that those who in-commute are increasingly reliant on private modes of transport that are predominantly powered by carbon-based fuels. The increasing number of these vehicles travelling through Cambridge and the outlying villages is creating environmental impacts at both the local and global level. Even with the promotion of electric vehicles, which rely on electricity from a heavily carbon-based national grid, the need to travel into the area will only be reduced once the supply of new homes increases in line with new jobs.
- 1.6 The key for the Greater Cambridge Local Plan is to plan positively for housing growth in areas where residents will have access to existing services and facilities and sustainable travel options to access employment and education whilst minimising the impact on local landscapes. Public transport is a good alternative to the private car but in many areas the service is not convenient enough for all residents. Therefore, by promoting sites that are within cycling distance of Cambridge, such as our clients' site, residents will have greater control over their own travel and can choose sustainable modes to meet their daily needs

## **16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?**

- 1.7 Studies have shown that people experience greater social interactions through use of sustainable modes of travel, particularly walking and cycling, than when using private cars. The delivery of sites where people can walk and cycle to meet their daily needs also helps residents to establish lifestyles that benefit their physical and social health. Therefore, when allocating sites for new homes priority should be given to sites near to the services and facilities of higher order settlements, like Comberton, where residents will have greater opportunities to walk, cycle and use public transport to meet their daily needs.

- 1.8 The Councils' own Issues and Options document acknowledges that Cambridge is one of the most unequal cities in the UK. This view is supported by the Cities Outlook 2019 Report, produced by Centre for Cities, that ranks Cambridge as having the 3rd highest housing affordability ratio (based on average house prices to average wage) in Great Britain.
- 1.9 Inevitably it is the lowest earning people employed in the Greater Cambridge area, or who have grown up here, that are unable to afford to live in the area. These people have no other option than to live in the surrounding areas and commute into the area. To counter this trend, 'good growth' needs to focus the delivery of new homes in the most sustainable locations within the Greater Cambridge area near to jobs so that residents have the option to choose sustainable modes of travel. This 'good growth' also needs to ensure the delivery of affordable housing in these same sustainable locations to meet the growing number of people on the Councils' housing lists.
- 1.10 The delivery of sites that don't achieve the Councils' targets for affordable housing do little address this imbalance. The amount of infrastructure needed to deliver strategic sites like Northstowe, Cambourne West, Waterbeach and Bourn Airfield means that the percentage of affordable housing they deliver is inevitably reduced. Therefore, 'good growth' involves delivering a range of different scale of development sites with a focus on maximising the use of existing social and transport infrastructure.
- 1.11 Given that our clients' site is on the edge of an existing village there are unlikely to be significant infrastructure costs associated with its development. Even if it were to form part of a larger allocation with the land to the west it is likely that the site would still be able to deliver 40% affordable housing. The minor works that have been identified to enhance the pedestrian and cycle connectivity of the site are unlikely to be significant constraints on the viability of any development proposals.
- 1.12 Comberton presently has good cycle infrastructure for those travelling in the direction of Cambridge, though there are areas where it could be improved. The Greater Cambridge Partnership's proposed greenway to serve the village is proposed to the east of the site on Long Road. This route will further enhance the cycle and pedestrian connectivity with Cambridge and the rest of the village making it more attractive for new and existing residents to use sustainable modes of transport.

## **19. How do you think new developments should support healthy lifestyles?**

- 1.13 Our increasingly sedentary lifestyles are compounded by the fact that many people spend large parts of their day travelling to work, principally in private motor vehicles, due to the fact that they cannot afford to live near their places of work. This daily commute can have long term physical and mental health issues especially when travel patterns get interrupted by infrastructure works such those seen recently with the A14 upgrade. With further infrastructure planned for the Greater Cambridge area there is an urgent requirement for the new homes to meet the immediate needs of the area to be built in locations where sustainable modes of travel can easily be used to access the places of employment in and around the city.
- 1.14 The Greater Cambridge area's present overreliance on new settlements and urban extensions means that new homes take longer to come forward and sustainable travel options are not always in place when new residents move in. Our clients' site has no major constraints to its deliver and can be delivered quickly, either as a standalone development or as an early phase of a larger extension of the village. The development of this site, with the enhancements to walking and cycling accessibility that it will bring, will allow new residents the opportunity to access local services and facilities by foot or cycle rather than having to rely on the private car. The proximity of the site to the sporting and leisure facilities within the centre of the village and at Comberton Village College also means that residents will have these facilities within easy walking and cycling distances of their homes to enable them to adopt healthy lifestyles.
- 1.15 The Greater Cambridge Partnership's planned enhancements to the cycle route between Comberton and Cambridge as part of their greenways project will further encourage new and existing residents to cycle in order to access the services, facilities and employment opportunities of Cambridge and beyond. This route will potentially run to the east of the site along Long Road and will further enhance the cycle and pedestrian connectivity of the site.

## **23. How do you think we could ensure that new development is as well-designed as possible?**

- 1.16 Where development is located within or on the edge of existing settlements it is important that it pays attention to the local vernacular so as to best integrate new homes into the existing urban grain of the settlement.

- 1.17 The development of our clients' site will successfully interpret the vernacular of Comberton and ensure that streets and public open space are well overlooked by new homes. The development of our clients' site will build on the design themes of other recent developments in Comberton and the surrounding villages and accommodate new homes in this well screened site in a sustainable location on the edge of this Minor Rural Centre village.
- 1.18 Notwithstanding the above, the introduction of arbitrary design standards has the potential to delay the delivery of sites. Whilst the District Council's Design Guide SPD 2010 is a useful starting point for considering design matters it is now a decade old and does not reflect the policies of the adopted Local Plan. Any successor document to this SPD should clearly identify that the recommendations within it are for guidance only and are not planning policy requirements. Whilst design matters are important there are often other material considerations, such as viability, that need to be taken into account when assessing planning applications. Design guidance that is applied too rigidly without identifiable outcomes can have negative impacts upon the timing and delivery of new developments.

### **31. How should the Local Plan help to meet our needs for the amount and types of new homes?**

- 1.19 If the Councils do not plan for enough homes for the Greater Cambridge area this will worsen the existing affordability issues, limit the benefit that the area has for the local and national economy, damage social inclusion, and have implications for climate change as people travel further to access jobs.
- 1.20 The adopted strategy of large new settlements and urban extensions takes years to deliver and whilst they deliver new housing they have consistently under-delivered on affordable housing due to the significant infrastructure needed to develop the sites. This isn't just the case with brownfield sites like Northstowe and Wing. Large greenfield sites like Cambourne West also under-delivered on affordable housing with only 30% and a tenure split that did not accord with the District Council's affordable housing SPD.
- 1.21 The Councils should look to maximise the use of land in existing sustainable locations, rather than new locations that need significant infrastructure to make them sustainable. The expansion of existing development sites, or the development of land on the edges of the more sustainable rural settlements, will

maximise the use of existing social and transport infrastructure and minimise disruption to existing communities.

- 1.22 Development frameworks are a negative planning tool that are too rigidly enforced without officers being given the ability to use their sound planning judgement. A relaxation of development frameworks would allow for a large number of new homes to come through as windfall sites. If priority were given to self-build plots on the edge of villages, where all other material planning considerations could be satisfied, then this would also help the Councils to address their statutory obligation to deliver self-build plots in the Greater Cambridge area.
- 1.23 There should be a greater focus on small and medium size developments on the edges of the District's more sustainable rural settlements that can be build out quickly and where residents are more easily integrated into existing communities. Our clients site offers the flexibility of being either a stand-alone site or an early phase of a larger allocation for the village. Either way, the site is capable of delivering new homes in this sustainable location that is likely to include a policy compliant level of affordable housing. The proposals for a larger scheme would also include a retirement village to cater for the changing needs of the Greater Cambridge area.

**32. Do you think we should plan for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?**

- 1.24 Our clients strongly agree that the Councils should plan for a higher number of homes than the minimum required by Government. Whilst Paragraph 60 of the National Planning Policy Framework (NPPF) identifies the use of the Government's standard method for assessing local housing need it also acknowledges that an alternative approach can be justified in exceptional circumstances based on demographic trends and market signals.
- 1.25 The Greater Cambridge area has enjoyed years of strong economic growth alongside a persistent under-delivery of new homes. This has resulted in significant issues with affordability of housing in the city and surrounding villages. Therefore, it is essential that the Councils' future housing targets seek to address both the future growth aspirations of the Greater Cambridge area and the acute affordability issues that it presently suffers from.



- 1.26 The Issues and Options document clearly identifies a level of economic growth that will further increase the historical imbalance between the delivery of new homes and jobs in the area. Therefore, our clients strongly believe that the predicted economic growth in the area justifies the Greater Cambridge Local Plan planning for a level of housing growth in excess of the figures identified by using the Government's standard method. This approach would be entirely in accordance with paragraph 60 of the NPPF.
- 1.27 Should housing needs continue to be constrained by the Councils seeking a delivery target based on the standard method alone, without taking into account other material considerations that are unique to the Cambridge area, then the proposed big themes of the Local Plan will never be achieved. The economy of Cambridge is too important both nationally and globally to plan for the minimum number of homes and the Councils will need to be more flexible in the approach they adopt for calculating future housing needs.
- 1.28 It is evident that the Greater Cambridge area has been providing insufficient housing over successive plan periods and therefore a substantial uplift in the level of housing growth is necessary to redress the imbalance between new homes and jobs that has resulted in a housing market where affordability has worsened significantly over the last 10 years.
- 1.29 The implications of a failure to positively plan for the bespoke housing needs of the Greater Cambridge area will be that existing residents will continue to suffer the negative impacts of the widescale daily in-commuting of workers from outside the area. This in-commuting will continue to have wider environmental and health implications that impact negatively on the quality of life of residents of the villages of South Cambridgeshire in particular.
- 1.30 In accordance with the requirements of the NPPF any housing targets, whether they be for the Greater Cambridge area or individual allocations, should be clearly identified as minimum figures in order to stimulate positive growth. This would also accord with paragraph 59 of the NPPF that requires Councils to boost the supply of housing.

### **33. What kind of housing do you think we should provide?**

- 1.31 Whilst there is a statutory requirement to provide self-build plots there should be more of a criteria based approach for when they are required with development viability being a material consideration. This is especially the case for larger sites

where the costs of delivering infrastructure often impact negatively on the percentage of affordable housing that is delivered. A requirement for self-build plots, which generate less revenue for developers than finished homes, has the potential to further reduce the level of affordable housing on these large sites. It seems perverse that the needs of people with the financial means to build their own homes could be prioritised over low earning residents who cannot afford to buy or rent homes in the Greater Cambridge area.

- 1.32 As our clients' site has the potential to form an early phase of a larger extension of Comberton the impact of providing self-build plots, alongside the any necessary enhancements to infrastructure to accommodate the larger site, could impact negatively on the viability of the development. Our clients are committed to the delivery of affordable housing on their site but recognise that for any scheme to come forward it has to be commercially viable for a developer to purchase the site.
- 1.33 Our clients are concerned that the need for self-build plots can be often be overstated by self-build registers. In particular, many registers are rarely updated to remove those no longer in need of a self-build plot or to assess whether there is double counting across registers. Given the attractiveness of the Greater Cambridge area there is also the concern that the self-build register has been inflated by people with aspirations to live in the area, meaning that there is an artificially high number of people on the registers compared to neighbouring authorities.
- 1.34 With the above in mind, it will be important for the Councils to ensure that their evidence on the need for self-build homes has been effectively reviewed if it is to offer a robust position on the demand for this type of development. Whilst South Cambridgeshire is a vanguard for self-build housing Cambridge City has not been as proactive towards promoting its self-build register. This may also have artificially inflated the number of people on South Cambridgeshire's register.
- 1.35 Rather than targeting major developments it is suggested that the Councils look at what opportunities exist to promote self-build plots on the edges of development frameworks. Especially where the development of small sites and residential gardens would not result in wider harm. By including self-build plots in the criteria for a bespoke policy that permits the development of sites on the edges of development frameworks it would help to boost the supply of housing,

address the Councils' self-build registers and provide a continued source of employment for small builders and tradespeople.

- 1.36 The Councils should not adopt overly restrictive policies that require a precise mix of housing to be provided on all sites. The reliance on the Strategic Housing Market Assessment (SHMA) for a plan period of several decades does not give officers the flexibility to take into account other material planning considerations that may make alternative housing mixes more appropriate for specific sites. Therefore, the SHMA figures should be used as a guide only for the mix of housing on sites rather than a requirement. Any new policy should allow officers the flexibility to take into account other material considerations when considering planning applications, especially as they would be used to assess the needs of developments in both urban and rural settings.

### **35. How should we ensure a high standard of housing is built in our area?**

- 1.37 The Government is already implementing significant increases in building regulations standards at a national level and our clients believe that national standards rather than local ones are more appropriate. Moreover, where councils have specific standards for energy efficiency, accessibility and adaptability it can have a negative impact on affordability. This is especially important for an area like Greater Cambridge where affordability issues are already entrenched.
- 1.38 The Councils will need to ensure that they provide the necessary evidence, as set out in the National Planning Policy Guidance, on the need for any increased percentage of adaptable homes and the impact on development viability of such a requirement if it is to be included as a policy in the emerging Local Plan.

### **36. How should the Local Plan ensure the right infrastructure is provided in line with development?**

- 1.39 Within the District's higher order rural settlements there is already capacity to accommodate growth, or capacity can be secured through the enhancement of existing services and facilities. One of the most important pieces of infrastructure, which is often overlooked, is social infrastructure. That is why the Councils need to focus growth on the most sustainable rural settlements where new residents can benefit from established social infrastructure. Our clients' site offers the opportunity to accommodate more homes on the edge of a village where new

residents will be integrated into the existing community and benefit from existing infrastructure.

1.40 If our clients' site were to form an early phase of a wider expansion of Comberton then any new infrastructure would be delivered alongside the delivery of new homes. The wider site has the potential to accommodate extensive areas of open space for recreation that will also act as alternative routes for pedestrians and cyclist to access the facilities at the heart of the village. A development of this scale is unlikely to need wholesale new facilities like new settlements do and capacity is likely to be achievable to meet the needs of new residents by extending or enhancing existing facilities in the village.

1.41 Notwithstanding the above, Comberton will soon benefits from enhanced cycle connectivity with Cambridge as a result of the Greater Cambridge Partnership's greenways projects. The proposed east west rail route is also likely to result in a new station at Cambourne, which would give new residents alternatives to travelling into Cambridge to access rail services.

1.42 The adopted strategy that focuses on new settlements and urban extensions can bring substantial improvements to local infrastructure. However, these take time to deliver and these sites should not come forward at the expense of smaller or medium sized development sites. The development of sites like our clients' site at the corner of Branch Road and Long Road offer the potential to provide financial support for local infrastructure and bring increased use of local services that can be at risk from closure.

### **37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?**

1.43 Public transport is only one part of the solution and for some the infrequency of services is a constraint to its use. Whilst cycling and walking also have their limitations there is clearly merit on focussing growth in where new residents can walk and cycle to facilities and services as well as being able to cycle to higher order settlements, specifically Cambridge, to meet they employment and wider recreational needs.

1.44 As a result of the Greater Cambridge Partnership's greenway proposals Comberton will soon benefit from greater connectivity with Cambridge as a result of an enhanced pedestrian and cycle route, which is proposed to run alongside

Long Road to the east of the site. This greater connectivity by sustainable modes of transport adds further weight to the development of our clients' site, where new homes could be accommodated in one of the District's most sustainable rural settlements.

**39. Should we look to remove land from the Green Belt if evidence shows it provides a more sustainable development option by reducing travel distances, helping us reduce our climate impacts?**

- 1.45 Our clients believe that it is inevitable that further land will need to be removed from the Green Belt to enable the delivery of the most sustainable form of growth for the Greater Cambridge area. However, the release of further sites on the fringes of Cambridge, especially those to the west, will result in substantial harm to the relationship between the historic core of the city and the surrounding countryside. Therefore, it is necessary for the Councils to look towards the most sustainable rural settlements that are still within reach of Cambridge by sustainable modes of travel when considering where to focus future housing growth.
- 1.46 Our clients' site benefits from existing boundary landscaping that has the potential to be enhanced with further landscaping to screen new homes on the edge of the village. By accommodating water attenuation and open space to the north of the site it will provide a soft edge to the village whilst maximising the number of new homes that can be accommodated near to the services and facilities of the village. This will significantly limit any impact upon the openness of this part of the Green Belt. This approach to the development of the site will also mean that new residents will be within easy cycling distance of Cambridge and have access to enhanced cycle connectivity with the city so that their travel needs do not further exacerbate global climate change and other more localised environmental impacts.

**40. How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages?**

- 1.47 Our clients believe that the Councils should be highly flexible towards development of both jobs and homes on the edge of villages. For years development frameworks have constrained development in sustainable locations preventing applications being permitted even where there would not be a significant encroachment into the countryside.

1.48 Other Local Planning Authorities are proposing policies that are more flexible when it comes to considering developments on the edges of settlements. As part of the 2019 review of its Local Plan West Norfolk and Kings Lynn Borough Council has included the following Policy LP26 (Residential Development Adjacent to Existing Settlements). This policy allows greater flexibility to the development of land on the edges of settlements, outside development boundaries, where the criteria of the policy are met. It also attaches weight to the use of such land to accommodate self-build dwellings.

1.49 The Greater Cambridge Local plan should consider a similarly worded policy that identifies the criteria for small-scale developments on the edges of settlements, outside development frameworks, that infill gaps or are sensitive to the locality. By attaching weight to the provision of plots for self-build such a policy could boost the supply of housing and address the needs of people on the Councils' self-build registers.

**41. Do you think the Local Plan should be more flexible about the size of developments allowed within village boundaries (frameworks), allowing more homes on sites that become available?**

1.50 Our clients believe that the Councils should be highly flexible about the size of developments allowed within village boundaries. The Councils need to focus on the delivery of more medium and some larger scale developments in the more sustainable rural locations like Comberton. Our clients' site could easily accommodate a number of new homes in excess of the arbitrary number normally permitted within the development frameworks of Minor Rural Centres. These new homes will have real benefits for the village, including the potential to deliver a policy compliant level of affordable housing. Clearly this is a location where growth of the village should be allocated either as a stand-alone development or as an early phase of a larger extension of the village. The extension of the Comberton development framework to include the larger site would also result in well defined boundaries to the village along Branch Road and Green End.

**42. Where should we site new development?**

1.51 Rather than ranking the development options our clients believe that the Councils should ensure consistent delivery across the plan period by avoiding an over concentration of development in a specific area or an over reliance on large strategic sites. Essentially, the Councils should not base their growth strategy on a single strategy.

- 1.52 Our clients believe that a significant element of the new homes needed to meet the needs of the Greater Cambridge area will need to be accommodated in the higher order settlements near to Cambridge, like Comberton. Therefore, it is inevitable that the Greater Cambridge Local Plan will need to release sites from the Green Belt to allow the most effective form of development to meet the predicted housing needs of the area.

#### **43. What do you think about densification?**

- 1.53 Densification can work well in urban areas but in the villages the focus should be on extending settlement boundaries to accommodate new homes where the necessary infrastructure to accommodate them is already in place, or can easily be enhanced. Our clients' site offers the opportunity for the sensitive extension of Comberton towards the well-defined boundary of Branch Road and should be seen as an area where further housing growth can be accommodated.

#### **44. What do you think about developing around the edge of Cambridge on land outside the Green Belt?**

- 1.54 Given the extent of the Cambridge Green Belt the development of site outside it are inevitably too far out for most residents to cycle to jobs and facilities in Cambridge. Therefore, the development of these sites is reliant on public transport improvements, that require significant upfront costs and are not always delivered in line with new homes.
- 1.55 The implications in making such sites sustainable through the enhancement of public transport infrastructure often impacts negatively on the viability of developments, which inevitably reduces the percentage of affordable housing that they can deliver. This has already been seen with Cambourne West where a significant financial contribution towards the Cambourne to Cambridge public transport route resulted in a level of affordable housing being agreed below the policy requirement of 40%.

#### **45. What do you think about developing around the edge of Cambridge in the Green Belt?**

- 1.56 The NPPF recommends that Green Belt boundaries only be amended in exceptional circumstances once it has been established that all other reasonable options for meeting identified needs have been examined. The NPPF also

identifies the need to promote sustainable patterns of development when reviewing Green Belt boundaries.

- 1.57 Increasing densities in urban or village locations or poorly located new settlements should not be promoted as viable alternatives to amending Green Belt boundaries around Cambridge. The Councils need to take a diverse approach to allocating new sites for residential development, which inevitably will result in amendments of Green Belt boundaries in less sensitive areas in order to deliver the most sustainable patterns of development and be consistent with the requirements of the NPPF.

#### **46. What do you think about creating planned new settlements?**

- 1.58 Our clients believe that new settlements take too long to deliver. Moreover, they generally require a significant level of social infrastructure up front especially if facilities are not delivered in time for when new residents move in. This has been seen with Cambourne where early residents suffered higher levels of depression as the social networks within established settlements were not there. Large new settlements are also more susceptible to national economic downturns as has been seen with the delay in the delivery of homes at the new town of Northstowe.
- 1.59 New settlements can also have greater landscape impacts and require new highways infrastructure, new junctions, roundabouts, etc, to serve them, which also have significant landscape impacts. All the new settlements that have been permitted in South Cambridgeshire have resulted in reduced levels of affordable housing as a direct result of the significant expenditure on infrastructure needed to develop the sites. Even where they are greenfield sites like Cambourne West this is still the case.

#### **47. What do you think about growing our villages?**

- 1.60 Our clients strongly believe that the growth of villages is one of the most sustainable options for the delivery of new homes to meet the existing and future needs of the Greater Cambridge area. Sites on the edges of villages can often be delivered with limited landscape impacts or loss of Green Belt function, especially where sites are defined by existing landscaped boundaries.
- 1.61 The development of sites on the edges of villages can also help to sustain existing facilities and social infrastructure in the village as well as providing a more diverse population.



1.62 By focusing growth on the District's most sustainable rural settlements, like Comberton, the negative impacts of in-commuting by car that are presently experienced by the area can be reduced. New residents will have greater travel options with the enhancement of the cycle route between Comberton and Cambridge that will ultimately lead to more sustainable modes of travel by new and existing residents.

#### **48. What do you think about siting development along transport corridors?**

1.63 Development along highway corridors results in heavily car dependent developments such as Cambourne. The financial implications of then retrofitting these developments with public transport is significant and often results in suboptimal routes. Public transport corridors are better but can still be too heavily dependent on the level of certainty over delivery and timing of enhanced public transport infrastructure. Cambourne and Bourn Airfield demonstrate this with the considerable delay to the Cambourne to Cambridge Better Bus Journeys proposals as a result of concerns about routing options.

1.64 Cycle infrastructure is often faster and easier to deliver. The proposed Comberton greenway is a good example of what can be delivered within the majority of existing highways land. The proposed greenways that are to be delivered across the district add further weight to the development of sites along these cycle corridors, sites like our clients' at Branch Road.

#### **49. Do you have any views on any specific policies?**

##### **S/7: Development Frameworks**

1.65 Policy S/7 is overly restrictive and can prevent small windfall sites on the edges of some of the districts more sustainable rural locations from coming forward. The approach to directing new residential development to the most sustainable locations in the district is a sound planning principle. However, as presently worded Policy S/7 does not allow for the most effective use of land in sustainable locations where the impact upon the countryside would be limited.

1.66 For example, an application for a dwelling outside the development framework of Cottenham, which could be outside the Green Belt and in close proximity to the services of this Rural Centre, would be refused under Policy S/7. Whereas, a dwelling within the development framework of Knapwell, an Infill Village with no

services, would be approved. The need to prevent gradual encroachment into the countryside is acknowledged but where edge of village development is sensitive to its locality then planners should have greater flexibility to look at the individual merits of a site based on proximity to services, degree of enclosure, etc. This would allow them to exercise their own planning judgement as to whether the proposal result in a sustainable form of development that would outweigh any impact upon the rural landscape.

- 1.67 Other Local Planning Authorities are proposing policies that are more flexible when it comes to considering developments on the edges of settlements. As part of the 2019 review of its Local Plan West Norfolk and Kings Lynn Borough Council has included the following Policy LP26 (Residential Development Adjacent to Existing Settlements). This policy allows greater flexibility to the development of land on the edges of settlements, outside development boundaries, where the criteria of the policy are met. It also attaches weight to the use of such land to accommodate self-build dwellings.

#### Policy LP26 – Residential Development Adjacent to Existing Settlements

1. Residential development will be permitted adjacent to existing settlements identified in the Settlement Hierarchy Policy LP02 where it involves:
  - a. the sensitive infilling of small gaps either wholly or in part or rounding off the existing development boundary; **and**
  - b. the development is appropriate to the scale and character of the settlement and its surroundings; **and**
  - c. additional weight will be given to proposals for Custom and Self-Build development; **and**
  - d. it will not fill a gap which provides a positive contribution to the street scene or views in/out of the locality.
2. In exceptional circumstances the development of small groups of dwellings may be considered appropriate where the development is of a particularly high quality and would provide significant benefits to the local community.
3. This Policy **does not apply** within the Area of Outstanding Natural Beauty nor for settlements with a made Neighbourhood Plan (unless the relevant Neighbourhood Plan allows this).

- 1.68 The Greater Cambridge Local plan should consider a similarly worded policy that identifies the criteria for small-scale developments on the edges of settlements, outside development frameworks, that infill gaps or are sensitive to the locality. By attaching weight to the provision of plots for self-build such a policy could boost the supply of housing and address the needs of people on the Councils' self-build registers.

### **H/16: Development of Residential Gardens**

- 1.69 The criteria of policy H/16 do not specifically preclude the development of land outside of development frameworks. However, developments within existing gardens, or land last used as residential garden, are being refused based on not being compliant with Policy S/7. Therefore, the wording of this Policy needs to be updated to clarify that the development of existing residential gardens outside of development frameworks, where encroachment of residential uses has already occurred, is acceptable in sustainable locations. These are also ideal locations where an amended wording of the Policy could encourage the effective use of land to accommodate self-build plots.

### **E/14: Loss of Employment Land to Non-Employment Uses**

- 1.70 Policy E/14 is a useful tool in retaining employment sites but there are examples of where the strict interpretation of the criteria of the policy have delayed acceptable developments from coming forward. The former Plumbs Dairy site in Balsham is a site that would never have been suitable as a modern employment site. However, an application for residential use of the site was almost refused due to a lack of marketing of the site (S/0460/17/FL). The site had significant constraints that meant a residential use was the only option for the redevelopment of the site. The case officer successfully argued that the development of the site for residential was acceptable without it being marketed as an employment site. The use of the site for employment had ceased after the dairy relocated to Linton and the site was only viable as a development site with the addition of adjacent garden land. However, if the case officer had blindly adhered to the strict criteria of Policy E/14 the site would not have been developed and would most likely have remained vacant for a further 12 months until it had been marketed as an employment site.
- 1.71 The criteria of Policy E/14 should be amended so that officers have greater flexibility to take other material considerations, such as the commercial viability of redeveloping existing employment sites to meet modern employment requirements, into account when determining planning applications. Where such sites are in sustainable locations a more flexible approach to loss of out-dated and constrained employment sites will help to boost the supply of new homes by making the most efficient use of previously developed land.