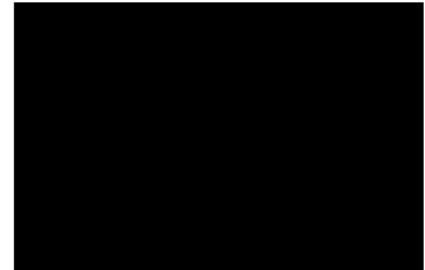


21st February 2020

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Planning Policy Team
Planning Services
Cambridge City Council
PO Box 700
Cambridge
CB1 0JH

By email only: localplan@greatercambridgeplanning.org



Dear Sir/Madam,

RE: GREATER CAMBRIDGE LOCAL PLAN ISSUES AND OPTIONS CONSULTATION 2020

Introduction

We welcome the opportunity to respond to the consultation on the Greater Cambridge Local Plan Regulation Issues and Options document, on behalf of our client, Mr Tim Elbourn, who has two sites with development potential, one in Melbourn and one in Meldreth, which we are promoting for residential development.

Land at the Moor, Melbourn was submitted to the Councils in the 2019 Call for Sites and could accommodate up to 19 new homes. A further site in Meldreth is submitted for consideration by the Councils through the Call for Sites associated with this consultation. This site, Land at Chiswick End, could potentially accommodate approximately up to 6 residential units.

We note that the Greater Cambridge Local Plan will replace the Cambridge City and South Cambridgeshire Local Plans, and that the new Plan will cover the period 2017 – 2041. The Issues and Options document presents high level themes and seeks opinions on each of those. We have not sought to answer all of the questions, but have responded to those most relevant to our client's interests.



Housing Requirement

Section 4.6 – Homes

Q32: 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?

We strongly agree that the Councils should plan for a higher number of homes than the minimum required by Government. Currently, the adopted Plans make provision for 1,675 new homes per annum.

Figure 19 of the Plan demonstrates that the affordability ratio of lower quartile house prices to income ratio in Greater Cambridge is x 14.3. (The national average is x 7.3). The Government's standard methodology for calculating the housing requirement, which takes account of affordability, requires the delivery of 1,800 new homes per annum in Greater Cambridge over the new Plan period.

However, a study by the Cambridgeshire and Peterborough Independent Economic Review (CPIER) shows that recent employment growth in the region has been faster than previously forecast. The study considered future scenarios regarding continuation of that growth, including those that achieve the goal to double GVA over 25 years.

On the basis of the jobs generated by this significant employment growth, the Plan should make provision for sufficient homes to meet the potential job growth over the Plan period.

If homes are not available, unsustainable commuting patterns will be established as economic migrants are forced to travel into Greater Cambridge every day, because there are insufficient homes to meet the demand.

Further, if homes are not built to meet the demand generated by the employment growth, the affordability of new homes will worsen and in-migrants to the area will be deterred from re-locating to Greater Cambridge, potentially causing a recruitment problem which itself could stifle further growth.

The importance of economic growth is particularly relevant in the context that Greater Cambridge plays a pivotal role within the Oxford-Cambridge Arc, the UK Innovation Corridor and the Cambridge Tech Corridor. Each of these designated areas is focusing growth in and around Cambridge and the Greater Cambridge area.

We acknowledge that the Councils have yet to undertake further work to determine the most appropriate housing requirement, and as a result of that work, the housing requirement for which the Plan makes provision could increase or decrease, but we strongly recommend that the success that has been achieved in job growth is underpinned by the delivery of housing to meet the associated demand for new homes.



Spatial Strategy - Section 5 – Where to Build

The spatial distribution of the planned level of growth, whether that is at a level which is guided by the Government's methodology or by ambitious economic growth, is clearly extremely important to ensure that the correct infrastructure supports planned growth, that good placemaking remains a priority, and that the resulting settlement pattern is sustainable and still provides for an excellent quality of life for existing and new residents.

The adopted Plans already make provision for housing growth in new settlements and on the Cambridge Urban Fringe, although growth in villages in these Plans is relatively limited. The preparation of this new Plan provides the opportunity to complement existing provision with a strategy which allocates an increased amount of land adjacent to sustainable villages, to capitalise on the sustainable lifestyle they already offer, and also to identify villages where new development could contribute to improving sustainability either by contributing to a new school, public transport provision, or community facilities for example.

Paragraph 5.1 notes that the adopted Cambridge City and South Cambridgeshire Local Plans allocate 35% of planned new development to rural areas. Para 2.5 of the Plan notes that, in preparing the new Plan,

'The next Local Plan could re-examine the approach to village growth... this could include looking again at the village categories, being more flexible to the scale of development within the village framework, and/or allowing a more flexible approach to development on the edge of villages.'

We support this approach. Melbourn is currently identified as a Minor Rural Centre in Policy S/9 of the adopted South Cambridgeshire Local Plan 2018. Paragraph 2.59 of the South Cambridgeshire Plan notes that:

'Minor rural centres have a lower level of services, facilities and employment than Rural Centres, but a greater level than most other villages in South Cambridgeshire, and often perform a role in terms of providing services and facilities for a small rural hinterland.'

Meldreth is identified as a Group Village in the adopted Plan: all Group Villages have at least a primary School, and Meldreth also has a shop. Both settlements therefore have the services to meet local needs, and also have the benefit of the train station at Meldreth which offers services to Cambridge and London.

The importance of sustainable transport is recognised as a key influence in the spatial distribution of development in the Plan.

Q39: 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 impact?



As set out above in paragraph 137 of the NPPF, national planning guidance states that all alternatives should be considered before sites are released from the Green Belt. The Council should therefore first fully assess the option of delivering sites on the edge of non-Green Belt settlements, and should prioritise the allocation of these ahead of Green Belt release.

A balance will need to be struck in some cases between release of Green Belt sites in proximity to Cambridge and allocation of sites which may incur shorter journeys. These decisions should be supported by identification of improvements to train and bus services

Settlements outside the Green Belt in Greater Cambridge such as Meldreth and Melbourn which offer opportunities for walking and cycling to local shops and services, and to access excellent train and bus public transport provision, should be prioritised before Green Belt settlements for allocating new sites.

Q 40: How flexible should the Local Plan be towards development on the edge of villages?

The Plan should in principle be open to development on the edge of villages, subject to criteria which protect environmental and heritage assets, and if those villages are sustainable, or could be made more so by the development taking place. The proposed development should also be of a appropriate scale in relation to the existing settlement. The Plan should recognise the benefits such developments can bring to villages, and the contribution that planned sites can make to local infrastructure projects, for the benefit of new and existing residents.

Q 41: Do you think the Local Plan should be more flexible about the size of development of both jobs and homes on the edge of villages?

The Plan should recognise the opportunities which appropriately sized development can bring. It should not be prescriptive about the number of units which are appropriate in particular settlements, but rather should set the principle that appropriate growth will be considered, and the Council should then be prepared to discuss with the applicant what that specific number will be.

Paragraph 5.3 of the Plan sets out six potential options for growth and Q42 asks where new development should be sited.

The question asks us to rank the six options provided in order of preference. Our preference, recognising that the final strategy may comprise a mix of a number of options, is:

1. Dispersal – villages
2. Edge of Cambridge – outside Green Belt
3. Public Transport Corridors
4. Densification of existing urban areas
5. Dispersal – new settlements
6. Edge of Cambridge – Green Belt.



Below, we address the advantages and challenges associated with our preferred option, identified in the Plan.

Q 47: What do you think about growing our villages?

Advantages

- 1. Can help to sustain existing facilities and infrastructure in the village.*

We agree that new development in villages can achieve this objective.

- 2. Can help provide for a diversity of population in the village.*

We agree that new development in villages can achieve this objective.

Additional advantages which should be recognised in the Plan are that:

- Such developments help to meet local housing need and often incorporate an element of affordable housing which helps local families to stay in the area;
- New development may not just sustain existing facilities but also offers opportunities for increasing choice and capacity of facilities, enabling villages not to stay the same but to grow and thrive; and
- Growing the villages will take some of pressure off urban areas, and spreads the impacts of development more fairly across a given area. Clearly such an approach needs to be supported by infrastructure in the form of school places, health and community facilities, and improvements to highways and public transport.

Challenges

- 1. Can result in increased commuting by car and travel to services and facilities, particularly if the village is away from main transport corridors.*

Although this may be the case in some settlements, Melbourn and Meldreth are highly sustainable settlements which provide for everyday needs and are well serviced by the train service at Meldreth which connects the villages to Cambridge and London.

- 2. Small sites are unlikely to significantly contribute to infrastructure so services capacity within or accessible to a particular village is important.*

This may be the case for speculative, unplanned development, but if smaller sites are allocated as part of a clear spatial strategy in the Plan, and the Infrastructure Delivery Plan clearly sets out what is required, smaller sites can contribute on a proportional and reasonable basis to local infrastructure requirements, subject to those contributions passing the obligations tests set out in paragraph 56 of the NPPF.

- 3. Potential impact on village character needs to be considered.*



Village character is an important consideration. However, the majority of new developments are located on edges of villages away from the historic core. My client's sites are all located in areas where they would not have a detrimental impact on the historic character of either Melbourn or Meldreth.

The site at 'The Moor', lies some 400m north of the Conservation Area in Melbourn and is opposite post war, 1960's housing. In Meldreth, my client's site lies some 800m from the historic village core. Development of each site would be read in the context of other recent development, on Chiswick End adjacent to 1980s and recent housing development.

4. Some of the larger, better served villages are surrounded by the Green Belt.

This is not a reason to discount this option. The assessment of the sites around villages should be undertaken initially on a 'policy off' basis, to objectively assess each site, but then the Council needs to take decisions about whether in light of guidance which states that 'all reasonable alternatives' are explored before land is released from the Green Belt, sites adjacent to non Green Belt villages are allocated.

Although some of the villages in the Green Belt may be well served by services and facilities, development adjacent to them would result in loss of land which fulfils the purposes of the Green Belt. There are many villages which lie outside the Green Belt, such as Melbourn and Meldreth, which are also well served by local shops, facilities, employment opportunities and public transport provision.

Summary

We welcome the opportunity to respond to the consultation on the Regulation Issues and Options document. Our client owns two sites in Melbourn and Meldreth which are being promoted for residential development.

The Plan should make provision for sufficient housing to meet the needs associated with the significant economic growth which has taken place and continues to do so in Greater Cambridge. A failure to provide sufficient housing would undermine the sustainability of the plan by encouraging in-commuting and by further inflating house prices due to increased demand and lack of supply.

Sites adjacent to villages which lie outside the Green Belt should be considered, where those village can offer local shops and services, public transport provision and a wide range of community facilities. Melbourn and Meldreth are good examples of these types of villages.



The existing development plan focuses development in new settlements around the Cambridge Urban Fringe. Through the preparation of this new Plan, there should be a step change in the allocation of housing in villages, recognising that well planned development in villages can help to improve transport infrastructure, support services and strengthen the social capital of communities.

Yours faithfully

