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Agent number:

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Greater Cambridge Local Plan Issues and Options 2020 Consultation

Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or Localplan@greatercambridgeplanning.org

All comments must be received by 5pm on Monday 24 February 2020.

Data Protection

We will treat your data in accordance with our [Privacy Notice](#). Information will be used by South Cambridgeshire District Council and Cambridge City Council solely in relation to the Greater Cambridge Local Plan Issues and Options 2020. Please note that all responses will be available for public inspection and cannot be treated as confidential. Comments, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed about future stages of the Greater Cambridge Local Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot formally register your comments without your details.

Note: If you wish to make quick comments without providing your details, at this early stage in the plan making process you can do so directly on the website, providing just an email contact if you would like to be kept informed of further stages in the process, at www.greatercambridgeplanning.org/local-plan

Name:		Agent's name:	██████████
Name of organisation: (if applicable)	Carlton Homes (Southern) Ltd	Name of Agent's organisation: (if applicable)	Carter Jonas
Address:	C/o Agent	Agent's Address:	██████████ ██████████
Postcode:		Postcode:	██████████
Email:		Email:	██
Tel:		Tel:	██████████

Signature:	Date:	24/02/2020
If you are submitting the form electronically, no signature is required.		

Part B – Your Response

Document details:	
<p>Which document are you commenting on? (please tick)</p>	<p><input checked="" type="checkbox"/> Greater Cambridge Local Plan Issues and Options 2020</p> <p><input type="checkbox"/> Sustainability Appraisal of Issues and Options</p> <p><input type="checkbox"/> Sustainability Appraisal Scoping Report</p> <p><input type="checkbox"/> Habitat Regulation Assessment Scoping Report</p>
<p>Question / Paragraph / Figure (Please state)</p>	<p>Full Response covering questions; 2,14,16,18,19,31,32,33,37,39,42,47</p>

Comments:
<p>Please provide your response to the Issues and Options question, or views on the section of the other document you are commenting on. Where the question suggests options for the answers please start with indicating your choice (continue on separate A4 sheets(s) if necessary). Please use a separate response form for each question you are responding to.</p>
<p>Greater Cambridge Local Plan – Issues & Options Consultation (January 2020) Final Representations Carlton Homes (Southern) Ltd – Land north of Common Lane, Sawston</p> <p>Introduction This note sets out the draft representations to the Issues & Options consultation to the Greater Cambridge Local Plan. The final version of the representations will be uploaded to the Councils online consultation system. An Opportunities & Constraints Plan and Illustrative Masterplan will be submitted with the call for sites response.</p> <p>Questions 2. Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan. Provide as much information and supporting evidence as possible. A separate call for sites submission has been made for the land north of Common Lane in Sawston on behalf of Carlton Homes (Southern) Ltd. The representations to the Issues & Options consultation document will refer to that promoted site where relevant.</p> <p>14. How do we achieve biodiversity net gain through new developments? Natural Cambridgeshire’s Developing with Nature Toolkit seeks to achieve a net gain in biodiversity through new development. It is agreed that development, and in particular large-scale development with sufficient land available, can deliver significant biodiversity enhancements. It is suggested that in deciding sites to allocate for development the emerging GCLP assesses not only whether the potential impacts on protected species and habitats can be mitigated but also whether development can deliver biodiversity enhancements. It should be acknowledged that net biodiversity gains would be more appropriately provided on alternative or existing sites rather than within a development site. It is suggested that the</p>

emerging GCLP should also include a policy mechanism that allows for net biodiversity gains to be delivered on alternative sites.

The promoted development at land north of Common Lane in Sawston would retain any ecological features on site and seek to provide ecological enhancements. It should be noted that there is sufficient space within the site to include those ecological enhancement measures on site in conjunction with development.

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

It is considered that meeting housing and affordable housing needs is part of the well-being and social inclusion theme because housing falls within the social objective of sustainable development (as set out in Paragraph 8 of the NPPF). There are substantial affordability issues in Greater Cambridge associated with the high cost of buying and renting housing, and those that cannot afford to live in Cambridge or South Cambridgeshire close to employment opportunities having to endure longer commuting. Paragraph 8 and Chapter 8 of the NPPF identifies the other factors that relate to the wellbeing and social inclusion theme, which are about creating well-designed and safe developments, providing access to services and facilities, and providing open space. It is suggested that to achieve 'good growth' the emerging GCLP will need to allocate suitable sites that deliver housing and affordable housing, are accessible to services and facilities, include open space and recreation facilities.

The promoted development at land north of Common Lane in Sawston would include housing and affordable housing, open space and other green infrastructure. The promoted development would support the existing services and facilities within Sawston.

18. How do you think we can make sure that we achieve safe and inclusive communities when planning new development?

Section 4.3.3 of the Issues & Options consultation document identifies the factors that are relevant to the creation of safe and inclusive communities. As set out in the response to Question 16, there are substantial affordability issues in Greater Cambridge associated with the high cost of buying and renting housing, and those that cannot afford to live in Cambridge or South Cambridgeshire close to employment opportunities having to endure longer commuting. It is considered that the emerging GCLP should include a development strategy that seeks to meet housing and affordable housing needs and locate housing closer to employment opportunities to reduce in-commuting.

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

Paragraph 91 of the NPPF seeks to deliver healthy, inclusive and safe places, and identifies a number of approaches to support healthy lifestyles. It promotes social interaction through mixed-use developments, strong neighbourhood centres, street layouts that include pedestrian and cycle connections, and active street frontages for example. It enables and supports healthy lifestyles, by providing green infrastructure, sports facilities, local shops, access to healthier food, allotments, and layouts that encourage walking and cycling for example.

NHS England Healthy Towns Initiatives identified ten principles to deliver healthy places, which relate to the provision of health services, meeting local and community health needs, and development design matters. In terms of design matters it is suggested that compact neighbourhoods, active travel, healthy eating opportunities, play and leisure facilities would contribute towards the delivery of healthy places. It is considered that the promoted development at land north of Common Lane in Sawston would be consistent with guidance and initiatives to support healthy lifestyles. The promoted development would include open space and recreation areas. The site is accessible by walking and cycling to the services and facilities within Sawston, including the outdoor sport and recreation areas. The Greater Cambridge Partnership is promoting a greenway and cycle routes within and through Sawston, which would provide cycle connections to Granta Park, Babraham Research Campus, Stapleford and Great Shelford, Cambridge and planned public transport routes. The site is accessible to the good range of services and

facilities provided in Sawston, including the supermarkets and other small convenience stores, and health services, which are all related to supporting healthy lifestyles.

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

The emerging GCLP will need to be consistent with national guidance on meeting housing needs. Paragraph 59 of the NPPF confirms the Government's objective to significantly boost the supply of housing, and to achieve this by ensuring that a sufficient amount and variety of land for housing is identified. Paragraph 60 expects the standard method to be used to determine the minimum number of houses needed. Paragraph 61 expects the size, type and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need, students, renters and self-builders. Section Id.2a of the Planning Practice Guidance explains how housing and economic needs assessments should be undertaken, including how to calculate local housing needs using the standard method. Paragraph 010 of Id.2a makes it clear that the standard method is the minimum starting point for determining local housing needs, and acknowledges that there may be circumstances where actual housing need is higher than the standard method indicates. As set out in Paragraph 010 the circumstances where increases to housing need that exceed past trends are as follows: there is a growth strategy in place to promote and facilitate additional growth; strategic infrastructure improvements are likely to lead to an increase in the number of homes needed locally; and, an authority has agreed to accommodate unmet housing needs from a neighbouring area. The first two circumstances are relevant to Greater Cambridge. Paragraph 024 of Id.2a explains how the need for affordable housing is calculated, and it is suggested that the overall housing target should be increased where it could help deliver the required number of affordable homes. There is an urgent need to improve the affordability of housing and to boost affordable housing delivery in Greater Cambridge. Therefore, the emerging GCLP should use the standard method to calculate the minimum local housing need, and then make appropriate adjustments taking into account the growth strategies and strategic infrastructure improvements identified for Greater Cambridge, and a further adjustment to ensure affordable housing needs are met.

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

Yes. As set out in the response to Question 31, upward adjustments to the minimum figure derived from the standard method are required to take into account growth strategies, strategic infrastructure improvements and housing affordability in Greater Cambridgeshire. The National Infrastructure Commission, the Cambridge and Peterborough Combined Authority and the Greater Cambridge Greater Peterborough Enterprise Partnership acknowledge and support the economic growth potential of the Greater Cambridge area, and consider that there is a need to substantially increase housing delivery in order to support that economic growth and address the significant housing affordability issues that exist.

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

Paragraph 61 of NPPF expects the size, type and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need, students, renters and self-builders. It is noted that the existing and planned new settlements in South Cambridgeshire and some of the strategic sites are not delivering policy compliant levels of affordable housing. As such, it is considered that emerging GCLP should seek to allocate sites which are capable of delivering policy compliant levels of affordable housing.

The promoted development at land north of Common Lane in Swaston would deliver housing and affordable housing, and provide a mix of dwelling types and sizes. The promoted development would provide affordable housing to meet local needs of the village; in 2018 there was an identified need for 169 affordable dwellings in Sawston for those with a local connection to the village – see South Cambridgeshire District Council's 'Housing Statistical Information Leaflet' (December 2018).

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?

Paragraph 103 of the NPPF seeks to ensure that development is located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Therefore, the site selection process for potential allocations in emerging CGLP will be an important part of increasing travel by sustainable modes of transport.

Sawston is defined as a Rural Centre in the settlement hierarchy for South Cambridgeshire. The village contains a variety of convenience stores, a post office, a bank, library, primary schools, secondary school, health services including doctors and dentist, public houses and restaurants, and numerous employment sites and other local businesses. Sawston is on numerous bus routes, providing services towards Cambridge. The Greater Cambridge Partnership is promoting a new public transport route from Haverhill and Cambridge with a stop at Sawston, and a new greenway and cycle routes through the village providing connections to neighbouring settlements, employment opportunities and railway stations. Therefore, the promoted development at land north of Common Lane in Sawston would be accessible to the services and facilities in the village by a range of modes of transport. For all these reasons it is requested that the promoted development should be allocated in the emerging GCLP. In addition, it is noted that Paragraph 138 of the NPPF suggests that sites which are accessible by public transport should be one of the preferred locations to be released from the Green Belt, where it is has been assessed that a release is necessary; the promoted development would meet this requirement.

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 respond to climate change?

Yes. Paragraph 136 of the NPPF allows Green Belt boundaries to be altered through the plan-making process provided exceptional circumstances exist, and those exceptional circumstances should be based on evidence and justified. Therefore, it is appropriate to consider whether to review Green Belt boundaries through the emerging GCLP. It is considered that exceptional circumstances exist to release land from the Green Belt, which are related to the significant need for housing and affordable housing in Greater Cambridge and the need to support economic growth.

Paragraph 137 requires plan-making authorities to examine all other reasonable options to meet identified development needs before considering whether exceptional circumstances exist to justify changes to Green Belt boundaries i.e. make as much use of previously developed land, increase the density of development, and consider whether development needs could be accommodated in neighbouring areas. In the case of Cambridge increasing densities and reusing previously developed land is not straightforward and may be inappropriate because of heritage assets and the difficulty of finding alternative sites for existing uses.

Paragraph 138 requires any review of Green Belt boundaries to consider the need to promote sustainable patterns of development, and that where the release of land from the Green Belt is necessary that priority is given to previously developed land or sites that are well-served by public transport. The land north of Common Lane in Sawston is currently occupied by a riding school, comprising stable buildings, ancillary buildings, floodlit all weather outdoor arenas, paddocks and riding areas, and areas of hardstanding. The parts of the site that contain buildings, the outdoor riding arenas, and areas of hardstanding would fall within the definition of previously developed land. Sawston is very well served by public transport, and is would also be well connected by future cycle and greenway routes.

The site at land north of Common Lane in Sawston is currently located within the Green Belt, and as set out above it is used as a riding school. The promoted development would seek to retain and enhance the existing trees and hedgerows at the site boundary, and would include additional planting within the development. The approach to landscaping at the site would seek to reduce impacts on landscape character and important views of the site, and to enhance the setting of the village. It is noted that the A1301 and a railway line are located to the west of Sawston, and as such development at the land off Common Lane would not lead to the merging of villages. As such, it is considered that development at the site would have no adverse impact on the compactness or setting of Cambridge and it would not lead to

the merging of villages. Therefore, it is considered that the site makes a limited contribution to the purposes for including land within the Green Belt, and in any event part of the site would remain open as part of a green infrastructure and landscape strategy for the promoted development.

It is requested that the land north of Common Lane in Sawston should be released from the Green Belt in emerging GCLP to meet needs for housing and affordable housing.

42. Where should we site new development?

There are limited opportunities and constraints to development within the urban area of Cambridge, there are limited opportunities for development on the edge of Cambridge which are not in the Green Belt and those opportunities require the relocation of existing uses, and new settlements are complex and typically do not provide policy compliant levels of affordable housing. The options of focussing development in the Green Belt and along public transport corridors are preferred; the promoted development at land north of Common Lane in Sawston would be consistent with both of these approaches.

47. What do you think about growing our villages?

Strongly agree. It should be noted that some villages, including Sawston, are also located in the Green Belt and are on transport corridors, and as such development options that include these locations are also supported. It is considered that in reality the development strategy will be based on a combination of spatial distribution options.

As set out in the response to Question 39 national guidance allows the release of land from the Green Belt through the plan-making process, and that exceptional circumstances exist to release land which is related to the significant need for housing and affordable housing in Greater Cambridge and the need to support economic growth. The experience of new settlements and the redevelopment of previously developed land on the edge of Cambridge demonstrates that these options do not deliver policy compliant levels of affordable housing, and in the case of new settlements these types of development typically have much longer lead-in times than originally predicted. Therefore, releasing land from the Green Belt at the villages surrounding Cambridge, including Sawston, is a realistic option.

Paragraph 78 of the NPPF seeks to promote sustainable development in rural areas and acknowledges that housing can enhance or maintain the vitality of rural communities and support local services. The promoted development at land north of Common Lane in Fulbourn would support the existing good range of services and facilities available in the village.

Paragraph 68 acknowledges the role that small and medium sized sites can make towards meeting the housing requirements, and that such sites are often built-out relatively quickly. Small and medium sized sites typically only require limited new physical infrastructure and amendments to the access arrangements. The housing monitoring data from Cambridge and South Cambridgeshire confirms that small and medium sites are delivered quickly i.e. within two to three years. It is considered that small and medium sized sites make a significant contribution towards the short term housing land supply and the five year housing land supply position in Greater Cambridge. Therefore, it is requested that small/medium sized sites such as land north of Common Lane in Sawston are allocated to meet the requirement for a mix of sites including those that are easily deliverable.

Paragraph 102 expects transport issues to be considered at the earliest stages of plan-making. Those issues include opportunities created by existing or proposed transport infrastructure in terms of the scale, location and density of development, and opportunities to promote walking, cycling and public transport use. Paragraph 103 expects significant development to be focused on locations which are or can be made sustainable. As set out in the response to Qu.37, Sawston is accessible by walking, cycling and public transport, and the promoted development is well-related to the services and facilities in the village by sustainable modes of transport, and planned improvements to walking and cycling routes proposed by Greater Cambridge Partnership.

As set out in the call for site submission, there are no significant constraints to development at land north of Common Lane in Sawston. The parts of the site that contain buildings, the outdoor riding arenas, and

areas of hardstanding would fall within the definition of previously developed land. There are no heritage assets that would be affected by development at the site. The site is located within Flood Zone 1 which means it has a low probability of flooding. The site makes a limited contribution to the Green Belt, and could be released to meet the needs for housing and affordable housing. The promoted development would include green infrastructure and strategic landscaping to avoid impacts on landscape character and important views, and to enhance the setting of the village. As such, parts of the promoted development would remain open. Overall, Sawston is a suitable village for additional development.
Carter Jonas – February 2020

Summary of Comments:

If your comments are longer than 100 words, please summarise the main issues raised.

Completed response forms must be received by 5pm on Monday 24 February 2020.

Email: Localplan@greatercambridgeplanning.org or post it to:

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