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Agent number:

Representor number:

Representation number:



# 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](mailto: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 Notices](#). 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](http://www.greatercambridgeplanning.org/local-plan)

<b>Name:</b>	Mr Tim Harvey & Others	<b>Agent's name:</b>	Brian Flynn
<b>Name of organisation:</b> (if applicable)		<b>Name of Agent's organisation:</b> (if applicable)	Carter Jonas LLP
<b>Address:</b>	C/o Agent	<b>Agent's Address:</b>	
<b>Postcode:</b>		<b>Postcode:</b>	
<b>Email:</b>		<b>Email:</b>	
<b>Tel:</b>		<b>Tel:</b>	

<b>Signature:</b>	<b>Date:</b>
If you are submitting the form electronically, no signature is required.	

## Part B – Your Response

Document details:	
<p><b>Which document are you commenting on?</b> (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><b>Question / Paragraph / Figure</b> (Please state)</p>	<p>See below</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). <b>Please use a separate response form for each question you are responding to.</b></p>
<p>Introduction</p> <p>This note sets out the final representations to the Issues &amp; Options consultation to the Greater Cambridge Local Plan.</p> <p>Questions</p> <p>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.</p> <p>A call for sites submission has been made for land off Hall Lane in Great Chishill on behalf of Mr Tim Harvey &amp; Others. The representations to the Issues &amp; Options consultation document will refer to that promoted site where relevant.</p> <p>14. How do we achieve biodiversity net gain through new developments?</p> <p>Natural Cambridgeshire's Developing with Nature Toolkit seeks to achieve a net gain in biodiversity through new development. It is agreed that development 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 is requested that sites which can deliver a 10% net gain in biodiversity should be considered favourably in the site selection process for emerging GCLP. However, it should be acknowledged that in some instances net biodiversity gains could be more appropriately provided on alternative or existing nature conservation sites rather than within a development site. It is suggested that the emerging GCLP should also include a policy mechanism that</p>

allows for net biodiversity gains to be delivered on alternative sites. A larger biodiversity/greenspace area would also be beneficial for recreation and health and wellbeing.

The form and content of the promoted development at land off Hall Lane in Great Chishill has not been determined at this stage, but it could include new green infrastructure for environmental enhancement in conjunction with residential development. The existing hedges and trees at the boundary of the sites would be retained and protected.

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 market and affordable housing, self-build plots, and housing for older people, are accessible to services and facilities or can provide additional services and facilities, include open space and recreation facilities. It is considered that the emerging GCLP should seek to make the villages more sustainable by supporting development that can sustain the existing facilities in a village or provide additional services and facilities, and which can deliver affordable housing; Great Chishill is a village that could be made more sustainable and which has a local need for affordable housing.

The promoted development at land off Hall Lane in Great Chishill would include market and affordable housing, self-build plots, and housing for older people, open space and other green infrastructure.

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. There is also an identified local need for affordable housing in Great Chishill. It is considered that the emerging GCLP should include a development strategy that seeks to meet housing and affordable housing needs.

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 off Hall Lane in Great Chishill would be consistent with guidance and initiatives to support healthy lifestyles. The promoted development would include green infrastructure including open space. It is located adjacent to the existing sport and recreation area for the village.

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 off Hall Lane in Great Chishill would include housing and affordable housing. It would provide affordable housing to meet local needs of the village; in 2018 there was an identified need for 10 affordable dwellings in Great/Little Chishill for those with a local connection to the village – see South Cambridgeshire District Council's 'Housing Statistical Information Leaflet' (December 2018). As set out in the response to Qu.40, the current development site size threshold limit of two dwellings for infill villages will not provide for those local affordable housing needs.

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

It is noted that the existing defined settlement boundaries for most villages in South Cambridgeshire have remained largely unchanged since the Local Plan 2004; although sites were allocated within and on the edge of some villages in the Site Specific Allocations DPD in 2010 and for the adopted South Cambridgeshire Local Plan 2018. It is very likely that most of the development opportunities within existing village boundaries would have been taken up by now. It is also likely that heritage assets within some villages, such as conservation areas and listed buildings, will constrain development opportunities. It is not clear whether the Councils have undertaken an assessment of the capacity of villages to accommodate additional development; it is likely that such an assessment would demonstrate that the capacity is limited.

On the basis of the above, it is considered that the current site size threshold limits in the adopted South Cambridgeshire Local Plan 2018 are largely irrelevant and ineffective e.g. there are few outstanding development opportunities for up to two dwellings within existing framework boundaries in Infill Villages, and Great Chishill is an example where there are few opportunities within the boundary. In addition, developments of up to two dwellings would not be required to provide affordable housing or make any other planning obligations; as set out in Paragraph 63 of the NPPF and Paragraph 023 of Id.23b of the Planning Practice Guidance. In these circumstances, it is very unlikely that any affordable housing would be provided in Great Chishill during the plan period, and the current affordable housing needs would remain unmet.

Therefore, it is considered that the emerging GCLP should seek to allocate suitable sites on the edge of existing sustainable villages, in conjunction with a general policy that supports development within existing framework boundaries but without specifying any size limits. This suggested approach would ensure that sufficient land is allocated for development at villages to support services and facilities and ensure that sufficient physical and community infrastructure can be planned, and would provide some flexibility about development within village boundaries so that the form and scale of development reflects site specific characteristics.

47. What do you think about growing our villages?

It is considered that the growth of villages must be part of the development strategy for emerging GCLP, and there is national guidance that supports this approach.

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. Great Chishill contains a limited range of services including places of worship, a village hall, sports and recreation grounds. The public house closed last year. There is no convenience store. It is considered that it would be beneficial to make Great Chishill more sustainable by providing additional services and facilities in conjunction with development. The form and content of the promoted development at land off Hall Lane in Great Chishill has not been determined at this stage, but it is suggested that the site could deliver market and affordable housing, self-build plots, and housing for older people, a new village hall/community facility, and a convenience store/village shop for the village. The location of these facilities within land owned by Mr Tim Harvey would need to be determined and subject to discussion with the Parish Council. It is considered that additional residents for the village might support the re-opening of the public house.

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 Cambridgeshire. Therefore, it is requested that sites such as land off Hall Lane in Great Chishill are allocated to meet the requirement for a mix of sites including small sites that are easily deliverable.

As set out in the call for sites submission, there are no significant constraints to development at land off Hall Lane in Great Chishill, and there are numerous potential benefits for the local community. The trees and hedges on the site that contribute to the landscape character would be retained as part of the promoted development, and additional planting would be provided to protect and enhance that character.

**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](mailto:Localplan@greatercambridgeplanning.org) or post it to:

Greater Cambridge Shared Planning Policy Team  
c/o South Cambridgeshire District Council  
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