

Greater Cambridge Shared Planning Policy Team  
c/o South Cambridgeshire District Council  
Cambourne Business Park  
Cambourne  
Cambridge  
CB23 6EA

24<sup>th</sup> February 2020

**Greater Cambridge Local Plan  
Issues and Options 2020 Consultation**

Further to the above consultation Abbey Properties Cambridgeshire Limited has land interests with regard to four sites within the Greater Cambridge Local Plan area. Three of the sites:

- i) Land at and to the rear of Nos. 30 and 32 New Road and to the east of the recreation ground, Over;
- ii) Land to the west of Oakington Road, Girton; and
- iii) Land north of Elbourn Way and The Limes, Bassingbourn

have already been put forward in the previous Call for Sites and we note that the consultation confirms that no further information need be presented in relation to such sites. We continue to consider that these sites would create sustainable housing developments that could be developed within the early part of the Plan period.

The Councils will be aware of the dismissed appeal at the Over site – however when taking a balanced review of that decision it is clear that the site is within a sustainable location and that housing development would have been permitted there had the Council not had a 5-year supply of housing. Should the strategy in relation to the delivery of housing within village locations change then it follows that the site would be appropriate location for new housing.

A further site – land east of Caxton Gibbet services – is hereby put forward as a suitable employment allocation. The relevant form is attached.

We wish to make the following comments in respect of the Issues and Options Consultation which we firstly set out under topic headings below. We then provide our responses to the 50 questions contained within Appendix 1 of the Plan.

**Housing Requirements within Greater Cambridge**

We note the potential housing requirements which appear to range from 41,000 to 66,700 new homes. Paragraph 59 of the NPPF requires that the provision of new housing is significantly boosted and given the anticipated high level of employment coupled with the improving and improved transport linkages it is wholly appropriate to maximise housing delivery within Greater Cambridge. We consider therefore that the starting point for the Councils should be to aim to deliver 66,700 new homes across the plan period.

Only if there are significant and valid reasons to depart from this figure then should an alternative lower figure be proposed.

We have put forward three sustainable locations where housing could be located as part of the plans for new housing.

### **Options for Growth**

We note the potential options for the location of growth on page 6 of the consultation plan.

Given the substantial investment in road infrastructure which has been undertaken already within the plan period (including the A14 re-alignment) and is proposed (including the A428); together with rail infrastructure (including the proposed Oxford-Cambridge route and the potential Metro system) improvements we consider that it is appropriate to spread development across multiple locations.

In our view this should include development within the villages in order to assist with the sustainability of those locations. Paragraph 72 of the NPPF permits new housing development as extensions to villages with paragraph 78 requiring planning policies to identify opportunities for villages to grow. While villages within South Cambridgeshire have seen some unplanned growth (as a result of South Cambridgeshire District Council being unable to maintain a 5-year supply of housing) planned growth would be appropriate in those locations given the sustainable transport options available to future residents. Without growth in the villages, which would also deliver affordable housing, the villages are likely to be less sustainable locations such that services will dwindle away.

We do not consider that further new large scale settlements should be developed within Greater Cambridge albeit a satellite development of say 1,000-1,500 homes may be appropriate in the latter part of the plan period either as an extension to an existing location which will be well served by new public transport or a stand-alone location in a similarly well connected location.

We consider therefore that the options for growth should provide a balanced allocation of new housing across all of the six options listed on page 6 of the consultation plan but that the majority of the growth should be focussed upon a range of villages in order to plan for their sustainable growth. Those village locations should include Over, Girton and Bassingbourn.

In terms of the promoted employment land at Caxton Gibbet this represents a logical location for growth given the proximity to the A428 and the approved mixed use development to the south.

### **Requirement for Utilities**

We are concerned about the delivery of electricity to serve the housing development. In our experience the electricity grid network requires significant planned upgrading. The delivery of new large scale renewable energy will also be required in order to serve the energy requirements arising across the plan period. We would urge the Councils to meet with UKPN.

### **Responses to Questions in Appendix 1 of the Consultation Plan**

| <b>Question N<sup>o</sup></b> | <b>Response</b>  |
|-------------------------------|--|
| 1                             | The plan should be the subject of detailed in-depth consultations with key stakeholders (such as UKPN, the County Council and the Environment Agency) and positive discussions with local communities through a range of measures. Reaching out to young people is vitally important.  |
| 2                             | We have attached our proposed Employment Allocation at Caxton Gibbet<br>We have referred to three proposed Housing Allocations at Over, Girton and Bassingbourn. These have been set out within our previous Call for Sites response and those remain relevant. We have referred to the situation with the site in Over above. |
| 3                             | None proposed.   |

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| 4  | Yes we agree that 2040 is an appropriate date.  |
| 5  | Yes but we reserve the right to make further representations.   |
| 6  | Yes but we reserve the right to make further representations.   |
| 7  | Climate change is the single biggest consideration and this requires innovative thought. The delivery of large scale renewable energy projects will be important and these should be planned in order to ensure that infrastructure is available to serve the needs of new development. Biodiversity and net gain could be incorporated with large developments including solar farm developments which may offer an opportunity to maximise the delivery of new housing. |
| 8  | By allocating new renewable energy schemes and ensuring that housing developments provide a balanced strategy for renewable energy.   |
| 9  | By allocating new renewable energy schemes.   |
| 10 | No. The delivery of large scale renewable energy projects can deliver a balanced grid system which would provide for energy needs.  |
| 11 | Promoting sustainable transport schemes (along with the Combined Authority if appropriate).   |
| 12 | Through delivering high quality developments with appropriate contributions to biodiversity.  |
| 13 | By safeguarding appropriate sites without over emphasising the importance of other land.  |
| 14 | The opportunity to contribute towards off-site biodiversity net gain should be positively planned with community or Council owned land being available for such benefits.   |
| 15 | Yes.  |
| 16 | By delivering a wider choice of locations to live – see our response above in terms of the Options for Growth. The delivery of new housing within villages will also assist with the provision of new affordable housing in such locations.   |
| 17 | By actively involving them within the process but by being realistic from the outset that new housing growth is required across the District.   |
| 18 | By having appropriate detailed planning policies and a collaborated approach to phasing of housing and infrastructure.  |
| 19 | By providing appropriate public open space to serve new development whilst also facilitating access to more strategic locations across the County.  |
| 20 | Through appropriate construction activities and through requiring electricity charging points for all new development.  |
| 21 | Yes. The strategy needs to embrace growth with some impacts being tolerable to facilitate this.   |
| 22 | Through a responsible approach albeit with a balancing mechanism as per the response to Q21 above.  |
| 23 | By having appropriate design policies which enable viable development to take place.  |
| 24 | Vital. The Councils have a responsibility to maximise job growth across the area in the national interest.  |
| 25 | A mixture of employment uses, new retail development and hotel accommodation.   |
| 26 | Yes where this is viable.   |
| 27 | By providing a range of employment needs.   |
| 28 | By maximising locations with sustainable transport links – along major existing and proposed road and rail linkages.  |
| 29 | Given the permitted development rights for converting existing town centre type uses a high degree of flexibility is required. It is also very likely that retail habits will change over the plan period so a flexible approach is also required in this regard.   |
| 30 | A positive approach which maximises the use of public transport and promotes strategic locations for leisure use.   |
| 31 | By providing for the full quota of intended housing across the plan period in order to significantly boost the supply of housing (as required by NPPF paragraph 59).  |

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| 32 | Yes – see the response above in respect of Housing Requirements.  |
| 33 | All housing types as required by the NPPF paragraph 61.   |
| 34 | By delivering land as required.   |
| 35 | By having appropriate viable policies.  |
| 36 | By actively involving key stakeholders and working with them to deliver a phased approach.  |
| 37 | By ensuring that new development is located in sustainable locations close to existing and proposed transport links. Also by ensuring that appropriate facilities are in place to serve the transport links – such as bicycle storage etc.  |
| 38 | Electricity will be the key requirement.  |
| 39 | Yes some Green Belt land should be removed within sustainable locations and where any impacts can be appropriately mitigated.   |
| 40 | Very flexible in order to provide for a planned strategy for new housing and in order to ensure that villages are sustainable.  |
| 41 | Yes the existing limits upon the numbers of new housing permissible within village settlement boundaries appear arbitrary.  |
| 42 | We have promoted four locations – see above. We have also commented on the Options for Growth – see above also.   |
| 43 | In appropriate locations this would be acceptable. However factors such as biodiversity net gain will require a strategic approach in order to remove barriers.   |
| 44 | Some development would be appropriate.  |
| 45 | Some development would be appropriate.  |
| 46 | See our comments above in relation to the Options for Growth.   |
| 47 | This should be an integral approach to housing growth. See our comments under the Options for Growth.   |
| 48 | This should be incorporated as appropriate.   |
| 49 | The existing South Cambridgeshire Local Plan policies in respect of the settlement hierarchy are overly restrictive as they prevent new growth from occurring within sustainable village locations. All policies require a more rigorous review of the viability of policies given the potential resulting impacts. |
| 50 | The issues have been largely correctly identified. The plan will need to be flexible given the work being undertaken by the Combined Authority.   |

## Summary

We look forward to working with the Councils in respect of this matter throughout the consultation on the plan. We consider that the approach identified within our representations above would lead to a balanced delivery of growth which maximises the opportunities available which result from the delivery of infrastructure.

Yours Faithfully



Andy Brand MRTPI  
Planning Director