

**LAND TO THE EAST OF
BOXWORTH END,
SWAVESEY
GREATER CAMBRIDGE
LOCAL PLAN – ISSUES
AND OPTIONS
CONSULTATION 2020**

Quality Assurance

Site name: Land to the East of Boxworth End, Swavesey
Client name: Axis Land Partnerships Ltd
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Prepared by: Matthew Wilson BA (Hons) MSc MRTPI
Signed

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Reviewed by: Rob Hopwood MRTPI
Signed

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1.0 Introduction

- 1.1 These representations are made on behalf of Axis Land Partnerships (“Axis”) and in response to the Greater Cambridge Local Plan Issues and Options 2020 consultation. These representations follow those previously submitted in respect of the 2019 Call for Sites consultation.
- 1.2 These responses set out the support of **Land to the East of Boxworth End, Swavesey** (hereafter “the Site”) for a sustainable extension of the existing settlement of Swavesey. These responses are further supported by our accompanying Vision Document prepared by Mosaic Urban Design and Masterplanning and a suite of technical assessments.
- 1.3 The Site is not in the Green Belt. The Site is also well located on the edge of Swavesey, a Minor Rural Centre with a greater level of services, facilities and employment compared with other villages in South Cambridgeshire. It is considered that Swavesey is a sustainable location for residential growth as part of the new Local Plan.
- 1.4 The Site will bring a number of benefits to support the delivery of a sound and sustainable spatial strategy as part of the Local Plan, including:
- Delivery of affordable housing;
 - Locating residential development within a sustainable village. The Site is located within walking and cycling distance of the village centre, reducing the need to travel by private car;
 - A landowner who wishes to retain and enhance existing ecological assets and work with stakeholders to shape a proposal which meets the needs of the village, for example housing types and tenures, open space provision;
 - Supporting Swavesey’s local economy, including shops and services; and,
 - Incorporating green links across the Site to encourage ecological corridors, helping to increase bio-diversity.
- 1.5 These representations are accompanied by the following documents:
- Vision Document (Mosaic Urban Design and Masterplanning);
 - Preliminary Ecology Appraisal (BSG Ecology);
 - Flood Risk Assessment (Stantec); and,
 - Transport Access Review (Stantec).
- 1.6 These representations respond to the following questions in the Issues and Options consultation document:
- Question 2: Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan.
 - Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?
 - Question 6. Do you agree with the potential big themes for the Local Plan?
 - Question 7. How do you think we should prioritise these big themes? Allocate 10 points across the following four themes:

- Question 8. How should the Local Plan help us achieve net zero carbon by 2050?
- Question 10. Do you think we should require extra climate adaptation and resilience features to new developments?
- Question 12. How should the Local Plan help us improve the natural environment?
- Question 13. How do you think we should improve the green space network?
- Question 14. How do we achieve biodiversity net gain through new developments?
- Question 15. Do you agree that we should aim to increase tree cover across the area?
- Question 16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?
- Question 18. How do you think we can make sure that we achieve socially inclusive communities when planning new development?
- Question 17. How do you think our plan could help enable communities to shape new development proposals?
- Question 19. How do you think new developments should support healthy lifestyles?
- Question 20. How do you think we should achieve improvements in air quality?
- Question 31. How should the Local Plan help to meet our needs for the amount and types of new homes?
- Question 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?
- Question 33. What kind of housing do you think we should provide?
- Question 35. How should we ensure a high standard of housing is built in our area?
- Question 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?
- Question 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?
- Question 40. How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages?
- Question 42. Where should we site new development? Rank the options below 1-6 (1 Most Preferred 6-Least Preferred)
- Question 47. What do you think about growing our villages?
- Question 50. What do you think should be in the next Local Plan? Are there issues, ideas or themes that you don't feel we have yet explored?

2.0 Site Context and Background

Site Location

- 2.1 Swavesey is a village on the edge of the Fens close to the River Great Ouse located approximately nine miles to the north west of Cambridge and three miles south east of St Ives. It is north of the major arterial road, the A14, which links Swavesey and the surrounding towns and villages to the wider road network. Junction 28 of the A14 can be easily accessed via Boxworth End, which provides good road links to London via the A1 and M11, and the north.
- 2.2 The nearest train station to the settlement is in Huntingdon, approximately 16km to the west. Huntingdon railway station provides a main line service to London Kings Cross, accessible within an hour, and Peterborough, reachable within approximately 15 minutes.
- 2.3 Axis is submitting Land to the East of Boxworth End for allocation in the new Greater Cambridge Local Plan. The Site to the south of the village is an agricultural field currently used for grazing cattle. The Site features a pond and woodland to the west. Agricultural fields are to the east, and a residential park of bungalows is to the north. The existing woodland and pond present a unique opportunity to create a development focused on the principles of ecological design, sustainability and the enhancement of biodiversity.
- 2.4 The location is sustainable when considering access to and from the Site by modes of travel other than the private car, particularly walking, cycling and public transport. Education, local amenities and local centres of employment are within walking and cycling distances. The bus stops close to the Site and the proximity of the busway stop to the north of Swavesey provide connections to main urban centres in the area making bus travel a viable option for residents.
- 2.5 The Site is approximately 1.6km south of the village centre (taken as Market Place) and is within walking distance of a range of amenities, Post Office, convenience store, public house, place of worship, and sports facilities. The nearest primary school (Swavesey Primary School) and secondary school (Swavesey Village College) are both walkable from the Site.
- 2.6 Any supplementary facilities required are easily accessible via car or regular bus services to Cambridge City Centre to the south east and Huntingdon Town Centre to the north west. Additionally, the A14 provides a link to the M1 which connects Cambridgeshire with the national motorway network.

Planning History

- 2.7 The Site has no relevant planning history. The land immediately adjacent to the south, 'The Farm' Boxworth End, benefits from planning permission for a new grain store with area of hardstanding to be located adjacent to the existing agricultural buildings (application reference S/2265/18/FL). This proposal will further enclose the Site on its southern boundary.

Suitability of the Site for Development

2.8 The following is relevant in terms of the Site's suitability and sustainability for development:

- The Site is well related to the urban edge and contained by physical features on three sides, to the north by the caravan park, the east by trees and the south by 'The Farm', Boxworth End;
- The Site is well related to the existing built form and is in a sustainable location with good access to local services and facilities;
- The Site is well contained within the landscape and important trees and landscape features are retained;
- The local highway network has capacity to accommodate the additional traffic associated with the development, without adverse impact; and,
- Outside the existing woodland and pond, the Site has a low ecological value and on the basis of the evidence submitted with the application –loss of habitat would therefore not be significant and mitigation and net biodiversity gains can be readily achieved.

2.9 The Site is not within the Green Belt.

2.10 The adopted Local Plan classes Swavesey as a Minor Rural Centre. Some housing growth is directed to this tier by virtue of the greater level of services, facilities and employment compared with other villages in South Cambridgeshire and their role in terms of providing services and facilities for small rural hinterlands. It is considered that Swavesey is a sustainable location for residential growth as part of the new Local Plan.

3.0 Development Proposals

Question 2: Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan.

- 3.1 The Site was submitted as part of the Call for Sites consultation in 2019 and Axis are continuing to promote the Site for allocation in the Local Plan. This submission comprises additional information clearly demonstrating the Site's suitability and deliverability for residential development early in the plan period.
- 3.2 The Site is not in the Green Belt, it is on the edge of the settlement and currently lies outside of the existing development framework. A residential allocation is sought through the emerging new Local Plan. The Site offers the potential to create a high quality and sustainable residential development for Swavesey though the provision of approximately 70 market and affordable new homes. Axis is seeking to develop approximately 3.3ha of land.
- 3.3 Our accompanying Vision Document provides detail on the key principles for our proposed development. The approach has been to retain and enhance existing natural features including woodland, the pond and watercourse for the benefit of flora and fauna. The retention of trees and hedgerows provides mature planting with aesthetic value that helps to mitigate the visual impact of the development.
- 3.4 Unique to this Site is the opportunity for the existing landscape features to create new public open space and consolidate the character of the proposed development. New houses will front into the new public open space created for the new and existing community.
- 3.5 Rural gaps and views identified in the Swavesey Village Design Guide can be retained and enhanced. In doing so, these connections with the open countryside will help to maintain the rural character of the village.
- 3.6 The Site also offers the opportunity to provide a landscape corridor connecting landscape assets. These landscape corridors provide conduits for local wildlife and safe and attractive routes for pedestrians and cyclists. The landscape corridors connect the existing pond and woodland to the wider landscape and provide an attractive outlook for new homes, in doing so, addressing one of the priorities for Swavesey Village Design Guide
- 3.7 The Site has the ability to provide up to 70 new market and affordable homes which will help address the local housing need with a range of housing types.
- 3.8 The principles can be summarised as follows:
- Achieve 35 dph which equates to approximately 70 new dwellings (Inc. affordable housing);
 - Retain and enhance existing natural features including woodland, the pond and watercourse for the benefit of flora and fauna;
 - Retention of trees and hedgerows provides mature planting with aesthetic value that helps to mitigate the visual impact of future development;
 - Creation of homes that are in keeping with the historic architectural character of Swavesey;

- Rural gaps and views identified to be retained and enhanced providing connections with the open countryside helping to maintain the rural character of the village (key requirement of the Swavesey Village Design Guide); and,
- Provision of green infrastructure to encourage ecological corridors and increase bio-diversity.

Benefits to be delivered by the proposals

3.9 The Site has the potential to deliver sustainable development in accordance with the three dimensions of sustainable development identified at paragraph 7 of the NPPF, whilst also securing a number of benefits to both Swavesey and the wider Greater Cambridge area, including the following:

Economic Benefits

- New jobs will be created through the construction phase of the development, both directly and through supply chains;
- New residents will help to sustain existing shops, services and facilities within Swavesey due to higher footfall and patronage once the development is occupied, reinforcing the role of Swavesey as 'District Centres';
- Unlike a series of smaller scale developments, a Site of this size is likely to generate Section 106 contributions towards improving local infrastructure;
- Additional revenue will be generated through the New Homes Bonus.

Social Benefits

- The potential to deliver approximately 70 market and affordable new homes to assist Greater Cambridge in meeting their objectively assessed housing needs;
- The potential to deliver a range of dwelling size, type and tenure to meet locally identified housing need and creating a mixed and sustainable community;
- The Site is well connected in terms of public transport, with direct access to a range of locations and their associated services and facilities;
- There is potential to create a high quality accessible open space. The provision of such a large area of open space is unlikely to be feasible on smaller scale or constrained brownfield sites;
- There is potential to deliver play facilities on the Site to meet an identified local need. Again, the provision of play facilities is unlikely to be feasible on smaller scale or constrained brownfield sites.;

Environmental Benefits

- The Site is well located to promote pedestrian, cycle and public transport trips, thus reducing carbon emissions;
- A sensitive design approach can be achieved which ensures that development will not encroach into areas at risk from flooding;
- The majority of the existing tree and hedgerow planting around the periphery of the Site and along the internal field boundary can be retained;
- Significant additional tree planting can be incorporated throughout the Site. This will also contribute towards biodiversity enhancements.

Responding to the four key themes

- 3.10 The development Site would contribute to the four big themes as follows:
- Climate Change – new dwellings will be designed and constructed in a manner to be energy efficient and incorporate renewable technologies where appropriate. The site will also see an increase in tree planting that would act as a source of carbon capture and reduce the effect of climate change. The Site is also in a sustainable location, providing alternatives to private car use for residents to meet their daily needs;
 - Biodiversity and Green Space – through the provision of on-site green infrastructure and retaining and enhancing vegetation this can create an ecological and recreational asset to be enjoyed by future and existing residents;
 - Wellbeing and Social Inclusion – the Site would incorporate a mix of housing sizes, types and tenures, to help meet the needs of the District and local community. The proposals would also promote healthy lifestyles and wellbeing through the provision of on-site recreation and the Site's accessibility to education, shops and public transport by active modes of travel such as walking, cycling or rollerblading; and
 - Great Places – a landscape-led approach is central to the design and layout of the scheme, as shown in the Illustrative Masterplan which shows how the Site could come forward.

Summary of Technical Assessments

- 3.11 A series of technical assessments have been prepared to demonstrate the deliverability of the Site, these reports should be read alongside this document.
- 3.12 A Preliminary Ecological Appraisal has been prepared by BSG Ecology and has informed the Illustrative Masterplan that has been prepared as part of the Vision Document. The report notes that the Site is dominated by grassland which is of a low ecological value and there are no designated sites of wildlife value within its boundary. Ecological value of the Site is limited to the woodland, hedgerow and pond habitats.
- 3.13 A high-level transport strategy has been prepared by Stantec and is submitted in support of this response. The strategy notes that the Site has good accessibility to key destinations by non-car modes, within footway provision through Swavesey providing non-car access to Swavesey Primary School, Swavesey Village College and a wide range of other local services and facilities that would meet many of the day-to-day needs of local residents. Most of the village is within a one mile walk of the Site, and there is also good non-car connection with the nearby Buckingham Business Park.
- 3.14 In the wider context, Highways England's A14 improvement between Milton and Ellington is nearing completion. A new local access road will run parallel between the Swavesey junction at the Buckingham Business Park and Huntingdon Road in Cambridge. This will have a high-quality pedestrian and cycle route alongside it, which would be an extension of the existing shared footway / cycleway along Bucking Way Road, south of Swavesey. This means there would be a continuous shared footway / cycleway between the Site and key destinations including Bar Hill and its Business Park at about 3.4 miles, Eddington at about 7 miles, West Cambridge at about 8 miles and Cambridge City Centre at about 8.5 miles (travelling distances). These are reasonable distances for regular cyclists, therefore providing further opportunities for the development to promote non-car means of travel.

- 3.15 The Site is close to bus stops in Boxworth End which are served by the Citi 5 service about every 2 hours during weekdays, linking the Site with Bar Hill and Cambridge City Centre. The Site is also about 1.4 miles south of the Swavesey stop for the Cambridgeshire Guided Bus, which provides fast and frequent services to Cambridge Science Park and Cambridge City Centre, along with St Ives. The Site therefore has good public transport accessibility with Cambridge City Centre and the key employment location of the Cambridge Northern Fringe.
- 3.16 It is proposed that the Site be accessed by a new priority T-junction onto Boxworth End. A preliminary design of this access has been prepared in accordance with highways design guidance.
- 3.17 It is considered that the Site is deliverable, accords with national and local transport policy guidance, and that therefore there are no transport or highways reasons why Land East of Boxworth End, Swavesey should not be allocated for residential development in the Greater Cambridge Local Plan.
- 3.18 A drainage and flood risk assessment has informed the proposal. Drainage features have been designed to not only accommodate the 1 in 100 year plus climate change event but also assessed the impact if no discharge occurs in 14 days. Should the Site be allocated then further discussions and consultation with Lead Local Flood Authority (LLFA) will continue to refine the proposal. Drainage and flooding have been carefully considered and measures to facilitate residential development on the Site.

Deliverability

- 3.19 This Site is considered “deliverable” as defined by the NPPF (Glossary). Specifically, the Site is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing will be delivered on the Site within five years of adoption of the new Local Plan.
- 3.20 The Site is located in a sustainable location, whereby future residents would not be reliant on the private car for their daily needs. Swavesey is a sustainable settlement with a range of services and facilities which are within walking and cycling distance of the Site.
- 3.21 As demonstrated by the supporting technical assessments, there are no ‘show stopping’ matters which would prevent the Site being allocated for development in the new Local Plan.

4.0 General

Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?

- 4.1 Agree - The proposed Local Plan period up to 2040 is considered appropriate and to accord with the requirements set out within the NPPF for local authorities to identify a sufficient supply and mix of sites between years 1-15 of the plan (Para 67).
- 4.2 As recognised, Greater Cambridge falls at the crossroads of a number of key economic corridors, including the Oxford-Cambridge Arc, London-Stansted Corridor and the Cambridge-Norwich tech corridor. The Oxford-Cambridge Arc in particular is a key economic priority as recognised by Central Government. Further work on the delivery of these initiatives will take place including the need for cooperation between authorities and stakeholders.
- 4.3 It is imperative that the New Local Plan has flexibility to allow for additional growth to come forward to meet the needs of these important initiatives as they develop through cross boundary and national discussions, potentially within the early/mid stages of the plan period.

5.0 Themes

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

- 5.1 Agree - The four big themes for the Local Plan are considered suitable and all are important in the consideration of the spatial distribution of growth in Greater Cambridge, and for the determination of planning applications.
- 5.2 The four big themes will generate a new way of planning, this may require a different way to make decisions; to allow other impacts to happen to achieve these four priorities. The Local Plan policy framework will need to allow for a clear planning balance to take place to assess and prioritise impacts. The need for homes and jobs remains as does the need to ensure development is viable and can come forward.

Question 7. How do you think we should prioritise these big themes? Allocate 10 points across the following four themes:

- 5.3 The four big themes are all considered to be important aspects to achieving positive development. All four themes should be used to inform the spatial strategy within the Local Plan in terms of distributing growth and determining planning applications to deliver growth. It is therefore not considered necessary to rank the options in order of preference.

Theme 1 Climate Change

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

- 5.4 The increased focus on climate change is welcomed. Climate change policy and good practice is changing quickly, and the plan will need to build in suitable flexibility to accommodate these changes within the lifetime of the new Local Plan. Climate change scenarios predict extensive changes by 2050, much of which is dependent on government and human action so there is substantial uncertainty over outcomes.
- 5.5 A needlessly stringent policy may inadvertently impede progress towards later years in the plan, or undermine results by not allowing for site-specific refinement. Energy policies should include flexibility for changing legislation, and technology, as well as the opportunity to refine a plan-wide policy for site specifics. As the Zero Carbon Futures Symposium Report (2019) submitted within the evidence base notes on page 10: where targets are too limited, and without consideration of project contexts, policy can drive dysfunctional behaviour such as photovoltaic solar panels being installed on North facing roofs merely to achieve policy compliance not to produce effective carbon reductions.
- 5.6 If the new Local Plan is to achieve its ambitious targets on climate change, the Councils should consider new ways of achieving net zero. It should recognise that seeking to achieve net zero on all sites regardless of their location and site-specific factors may not be feasible. Linked initiatives such as an offsetting scheme, secured through S106 financial contributions, could be an appropriate way of achieving net zero for small and medium developments. As recognised in the NPPF, small and medium developments, with their ability to be delivered early in the plan period at pace, will play an important role in meeting the Councils housing requirements and the needs of existing villages. Such sites may best secure net zero by contributing to an offsite initiative as well as minimising their own carbon dioxide emissions. This can be done through measures such as high insulation standards and the use of solar panels.
- 5.7 If an offsetting scheme is the preferred mechanism, then the Councils will need to set out a clear, appropriate and practical way to implement this, which will mean identifying strategic off-setting projects with Greater Cambridge, and potentially beyond, in collaboration with other key stakeholders. Any financial obligations towards an offsetting scheme will need to meet the statutory tests and considered in the context of viability.
- 5.8 Allowing for changing technologies and approaches should also help with viability as technology and approaches improve and are more widely adopted, thereby reducing costs. Escalating targets and policies may be able to accommodate these changes, while providing clarity to developers on the costs of development over time.
- 5.9 The local plan Sustainability Appraisal (SA) should address variable climate change scenarios, as we would expect that different climate change scenarios will be of interest at examination. Lack of rigorous assessment of these scenarios in the SA could lead to the plan being found unsound.

Question 10. Do you think we should require extra climate adaptation and resilience features to new developments?

- 5.10 A policy approach with multiple options for delivering net zero carbon is likely to be most effective in delivering development, as well as carbon neutrality. A multi-pronged approach should allow different solutions for different developments, reflecting context. For example, for some developments, Passivhaus energy standards may be achievable (going well above and beyond minimums set out in the Building Regulations), but for others, Building Regulations may need to be followed but an offset solution, such as a green bond or offset fund, could be used to achieve a net carbon reduction. Possible options need to be worked up in more detail as the new Local Plan progresses and must build in flexibility.

Theme 2 Biodiversity and Green Spaces

Question 12. How should the Local Plan help us improve the natural environment?

- 5.11 This Local Plan must deliver effective policy which protects and enhances natural capital. We support delivery of net gain for new developments. Such policy must be flexible enough to enable creative and cost-effective solutions for the delivery of net gain and support the Vision for the Natural Future of Cambridgeshire in 2050 as outlined by Natural Cambridgeshire and affiliated organisations.
- 5.12 An **off-site net gain** solution should be clearly allowed for by policy. While it is a Local Plan priority as a part of one of the four big themes, the Local Plan policy must allow for a planning judgement and balanced decision to allow for site and development specific issues to be considered. A policy basis to facilitate off-site biodiversity net gain is essential for smaller and medium sized developments. As recognised in the NPPF, small and medium developments, with their ability to be delivered early in the plan period at pace, will play an important role in meeting housing requirements and supporting existing villages. Such sites may best secure biodiversity net gain by contributing to an offsite initiative. A strategy for the delivery of off-site biodiversity net gain funded through development contributions would allow the Council new green infrastructure and biodiversity habitats to be strategically planned, which in turn, would provide greater benefit than the provision of small, uncoordinated and connected new habitats across a range of new developments. Nonetheless on-site measures are also possible at many sites such as suitable hedge habitats, green spaces, wildlife corridors and enabling hedgehogs to move freely between plots.

Question 13. How do you think we should improve the green space network?

- 5.13 This should come through from an up-to-date base assessment of Greater Cambridge assets, which leads to a Local Plan wide (and beyond) strategy. Development proposals can then be shaped around the identified priorities. As part of a policy framework that allows for off-site mitigation and off-site net gain enhancements can be used to improve the wider green space network.

Question 14. How do we achieve biodiversity net gain through new developments?

- 5.14 The new Local Plan must ensure that policy in this matter is sufficiently flexible to accommodate the required biodiversity net gain in the most effective and efficient way for each development, with both on-site and off-site solutions possible.
- 5.15 The Council should develop a strategic offsetting mechanism. This would allow for new green infrastructure and biodiversity habitats to be strategically planned to provide greater benefit than the provision of small, uncoordinated and connected new habitats across a range of new developments.

Question 15. Do you agree that we should aim to increase tree cover across the area?

- 5.16 Yes. With the right trees, in the right areas. A policy framework to seek tree cover increase, but allows for a planning balance within decision-making to enable the benefits and impacts of each development to be assessed. This could be part of an on-site/off-site solution, which could generate notable s106 funds to achieve significant, meaningful and long-term planted and ecological areas. Ecological outcomes rather than an unconditional focus on native species should be considered in new planting.

Theme 3 Wellbeing and Social Inclusion

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

- 5.17 The Local Plan should deliver a spatial strategy that connects homes with accessibility to good quality public transport, facilities and services and high quality green spaces.
- 5.18 The Local Plan should also establish a policy framework that allows for innovative ways to deliver 'affordable housing' across tenure types. Housing mix policies should also be flexible to allow for the right homes to come forward in the right location.
- 5.19 As stated in our response to Question 2. The proposed sustainable extension at Land East of Boxworth End, Swavesey is an example of how a development can contribute to achieving 'good growth'. The Site is within walking and cycling distance of a range of services, facilities and public transport modes. Future residents would benefit from easy access to on-site green space, shops and education and community facilities, maximising opportunities for positive influences on their overall health and lifestyle. The proposals also seek to deliver affordable housing which would be tenure blind, providing a significant amount of affordable housing in a sustainable location. These principles should be used to assess the merits of proposed development sites.

Question 17. How do you think our plan could help enable communities to shape new development proposals?

- 5.20 The community at all levels should be encouraged to engage in the development process to help shape new proposals. Policies and procedures should encourage meaningful consultation and require Parish Councils to engage with developers in advance of planning applications being submitted. Community engagement should be sought during the design process, during

construction and through opportunities to influence the scheme and /or be engaged in its management and maintenance after completion (where relevant).

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

- 5.21 New development should include a range of new homes and associated infrastructure which can be accessed and enjoyed by all groups in society.
- 5.22 To achieve this, the Local Plan should include policies which allow for innovative ways to deliver 'affordable housing' across a range of tenure types. It should include a clearer policy framework to support housing for elderly persons.
- 5.23 New policies should carefully consider the necessary infrastructure to create socially inclusive communities, these policies could cover open spaces, play areas, community buildings, street design, travel management and technology requirements (Wifi, 5g and beyond).

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

- 5.24 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
- 5.25 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.

Question 20. How do you think we should achieve improvements in air quality?

- 5.26 This can principally be achieved through the reduced use of polluting vehicles by:
- Locating development where there is good access to active travel, coupled with access to affordable, frequent, reliable and high-quality public transport options;
 - Better cycle and pedestrian connectivity – achieved by developments directly and through a coordinated s106 infrastructure programme;

6.0 Homes

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

- 6.1 There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. It is important to identify a baseline housing need but there should be scope for further development to come forward if it meets a particular housing need. This would support the Government's objective of significantly boosting the supply of homes to ensure that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are addressed (NPPF Para. 59).
- 6.2 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.
- 6.3 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.
- 6.4 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

Question 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?

- 6.5 Greater Cambridge is an area with strong economic growth and with an aspiration to maintain that growth. The affordability of housing is also a major issue. The new Local Plan must be able to address both of these concerns.
- 6.6 To support the Government's objective of significantly boosting the supply of homes, a sufficient amount and variety of land needs to be identified to meeting housing needs within the Joint Local

Plan area. The Cambridge and Peterborough Independent Economic Review (CPIER) (September 2018) suggests that higher housing target numbers are likely to be needed in Cambridgeshire if the potential for higher growth in employment is to be met. As is widely recognised, the economy of Cambridge is too important nationally for the Council to plan for the minimum number of homes required by the standard method.

- 6.7 The increased demand for housing arising from the economic success of Cambridge also makes the area increasingly unaffordable. In addition to being a concern to residents, affordability will impact upon the businesses looking to locate in the area. There is a danger that if there is an insufficient supply of housing, the economic growth plans will not be realised. The role of housing in attracting and retaining skilled employees is widely recognised and should be adequately addressed in the Plan.

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

- 6.8 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, older people, students, renters and self-builders.
- 6.9 There should be flexibility within the Local Plan to respond to changing housing needs over the Local Plan period. Consideration of individual site circumstances and the circumstances of a local area should be taken into account to determine the appropriate type of housing for development sites. Separate housing needs assessments should be used to inform the appropriate size, type and tenure of housing needed for different sections of the community, as set out within the Greater Cambridge Housing Strategy 2019-2023. Flexibility will be key to a successful Local Plan; through market and affordable housing.

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

- 6.10 Local Plan policies can require a high standard of design for new residential development, leading from Government policy and guidance. Appropriately worded design policies should require a high-quality design for new dwellings. This could include sustainable design principles including measures to improve the energy efficiency of new homes, water saving measures, use of efficient insulation material and heating systems, the reduction and recycling of construction materials, provision of appropriate amenity space and accessibility. Policy should not be prescriptive for precisely how it will be accomplished, it can set a policy-level, but developers should be able to use a host of options to achieve the target.

7.0 Infrastructure

Question 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?

- 7.1 The NPPF states that “*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.*”
- 7.2 The NPPF also advocates the advantages of planning new settlements by: “*Considering opportunities provided by existing or planned transport improvements (such as public transport stops) when determining where future development should take place*”, “*Assessing how potential development sites could provide new opportunities for transport infrastructure improvements*” and “*By locating new homes and jobs which have easy access to reliable sustainable transport modes.*”
- 7.3 The Local Plan needs to ensure developments create an environment where accessibility to day to day services and other facilities is easy and a choice of transport modes is available. This will enable the local community to choose the more socially inclusive and sustainable methods of travel. New developments need to be designed so that this can happen from first occupation when habits start to form.

Question 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?

- 7.4 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
- 7.5 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.
- 7.6 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.
- 7.7 Paragraph 141 seeks the beneficial use of Green Belt land including to provide access, for outdoor sport and recreation, and to retain and enhance landscapes and biodiversity. It is

considered that open space, strategic landscaping and ecological enhancements are examples that would represent a beneficial use of Green Belt land.

8.0 Where to Build?

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

- 8.1 The most effective approach to delivering the levels of development required is to ensure a wide variety of sites are allocated both in terms of size and location. This will ensure consistent delivery across the plan period by not concentrating all development in a specific area or resulting in an over reliance on large strategic sites.
- 8.2 While a range of development scenarios are outlined, the Council should not rely on one strategy; a combination is required to ensure a sound plan. This should allow appropriate development outside of the settlement boundaries of villages, in particular, if development meets a particular local business or community need as set out within Para. 84 of the NPPF. Sustainable development in rural areas is also supported under Para. 78 of the NPPF, which requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services.

Question 42. Where should we site new development? Rank the options below 1-6 (1 Most Preferred 6-Least Preferred)

- 8.3 It is recognised that no single solution will deliver a sound Local Plan; rather, a combination of approaches to the distribution of spatial growth will be necessary to establish the appropriate locations of new housing and employment development in the district. A hybrid approach will be required but should be underpinned by a focus on accessibility to public transport, employment and other daily needs.
- 8.4 It is considered that a dispersal to villages should form part of a hybrid spatial strategy. Development within villages is essential to support a prosperous rural economy. Paragraph 84 of the NPPF (2019) notes that:

Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

Question 47. What do you think about growing our villages?

- 8.5 Strongly agree. It should be noted that some villages are also located in the Green Belt and are on transport corridors, and as such development options that include these locations are also supported.
- 8.6 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, affordable housing and housing for older people in Greater Cambridge. 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 around Cambridge is a realistic option.

- 8.7 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.
- 8.8 Paragraph 68 of the NPPF 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.

9.0 Sustainability Appraisal Scoping Report

Question 50. What do you think should be in the next Local Plan? Are there issues, ideas or themes that you don't feel we have yet explored?

- 9.1 In reviewing the documentation prepared by the Council, we recognise that this is an early stage in the plan's preparation and that an SA is an iterative process. At the outset we would note that recent challenges at examination of local plans have included substantive criticisms of the SA which goes well beyond the legal tests and into professional planning judgement. For example, examiners in the North Uttlesford Local Plan, North Essex Local Plan and St Albans Local Plan have recently requested information on alternatives that goes beyond the legal position of "reasonable alternatives" selected by the local authority using broad questions of judgement.
- 9.2 The Issues and Options Report is assessed in a SA report dated November 2019. The Issues and Options Report is largely of general content without spatial or specific focus, and consequently much of the assessment is general commentary.
- 9.3 Six spatially discernible options are provided in the "Towards a Spatial Plan" Section, which are:
- Option 1: Densification.
 - Option 2: Edge of Cambridge – Outside the Green Belt.
 - Option 3: Edge of Cambridge – Green Belt.
 - Option 4: Dispersal – new settlements.
 - Option 5: Dispersal – villages.
 - Option 6: Public transport corridors.
- 9.4 With only high-level options assessed at this stage, there is substantial uncertainty over the outcomes of these options. As such, the conclusions of the SA also are substantially uncertain, and more assessment is required with specific details provided on the deliverable projects which will make up these options.
- 9.5 There is a possibility that a preferred option will be advanced with an equally valid alternative discarded at this early stage due to lack of information. Additional assessment should take place at another local plan stage, with full assessments within the SA Framework, before any options are fully dismissed. Without a full consideration of all these options which considers substantive detail of deliverable sites, there is a risk of the plan's selected alternative not being properly justified, and the plan being found unsound at examination.
- 9.6 The options assessed in the issues and options report will likely only be achievable in combination with other options (e.g. some density within existing development, with some expansion to villages, etc). For transparency, the extent to which these options are likely to be combined in ultimate implementation should be made explicit in any future local plan documents which discuss these strategic options.
- 9.7 None of the options put forward in the Issues and Options Report are reasonable alternatives capable of meeting the objectives of the plan, as none of them is shown to be capable of meeting housing need and economic potential on their own. As none of the options are reasonable in

current form, they will need to be re-assessed at a subsequent stage when sufficient detail is available to robustly evidence the selection of a preferred option.

- 9.8 The significant negative or positive effects given within the SA report are at this stage based on the limited information available misleading due to assumptions used and uncertainty attendant with such high level options. The SA Report notes a large number of points of uncertainty, but still identifies a number of significant effects (both positive and negative). However, there are assumptions for the significant effects identified which aren't clearly explained and which can be questioned. For example, Option 5 (Dispersal – villages) is attributed a significant negative effect to SA Objective 6 (distinctiveness of landscapes) as it is assumed that expansion of these villages could have an adverse effect on the open countryside and landscape surrounding these villages, as well as village character. As recognised in paragraph 3.61, the actual effect will depend on the final design, scale and layout of the proposed development.
- 9.9 We recognise that SA is an iterative process which will evolve as a Local Plan progresses. More information should be provided on the approach to considering alternatives. The most substantive point we raise is that the options set out in the Issues and Options Report should all be taken forward to subsequent local plan stages, where deliverable options should be assessed in detail, and transparent and objective assessment of these options provided at a subsequent SA stage. This will help ensure the Local Plan process and SA would support a hybrid of development scenarios which would underpin all development proposals at this stage.

APPENDIX 1



Mosaic



BIDWELLS