Greater Cambridge Local Plan – Regulation 18: Issues and Options Consultation 2020 Land at Frog End, Shepreth M Scott Properties Ltd February 2020



LAND AT FROG END, SHEPRETH GREATER CAMBRIDGE LOCAL PLAN – ISSUES AND OPTIONS CONSULTATION 2020

## **Quality Assurance**

Site name: Land at Frog End, Shepreth

Client name: M Scott Properties Ltd

**Type of report:** Regulation 18: Issues and Options Consultation 2020

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Signed

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Signed

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### **Executive Summary**

M Scott Properties Ltd has a proven track record of delivering development that meets the particular needs of communities, securing environmental improvements and community infrastructure that delivers tangible benefits. They are at an early stage in considering potential development options for Land at Frog End, Shepreth and are keen to engage with the Council, stakeholders and the local community to refine and discuss the proposals further as part of the ongoing consultation.

Shepreth lies within a key public transport corridor, with a railway station providing direct links to Cambridge (a journey time of just 12 minutes), excellent cycle connections by dedicated cycle paths to Melbourn and Cambridge and the A10 running to the east of the village where numerous transport improvements are planned to deliver high quality public transport infrastructure. Shepreth also lies outside of the Cambridge Green Belt.

Shepreth therefore represents a sustainable location to accommodate some of the growth needed over the new plan period to 2040.

These representations are accompanied by a suite of technical appraisals that have assessed the site in terms of its capacity to accommodate the proposed development and its relationship with the surrounding area; all of which demonstrate that there are **no insurmountable constraints to development of the Site.** As such, the Site is capable of being sensitively designed so as to develop as a distinct place within its own character, responding appropriately to its landscape and heritage setting. There is also scope to provide improvements to existing community infrastructure provision for Shepreth residents.

The significant public benefits that development of the Site could deliver are:

- An enhanced level of affordable housing (45%), addressing specific local needs and providing new homes across a variety of types and tenures, potentially to include for key worker accommodation. There is also scope to explore a new innovative affordable housing concept where properties are built to a certain specification, with the capability for simple expansion to a specified size to prevent people having to move home as their family expands;
- Provision of approximately 200 new homes to meet local needs, including:
  - single-storey bungalows (LifeLong Homes<sup>™</sup>) and almshouse-style properties to address the needs of people aged over 60 as well as those with or supporting someone with a disability. The properties can be designed to respond to people's changing lifestyles and needs as they age, encouraging people to 'rightsize' earlier in later life;
  - provision of self or custom build housing;
  - opportunities for a Community Land Trust;
- Provision of approximately 36,000 sq ft of modern, high quality, flexible commercial floorspace at the entrance to the Site to accommodate enterprises at a range of scales and provide new job opportunities for existing and new residents and those living nearby;
- Provision of approximately 6,000 sq ft of land for community use, providing a serviced plot
  with the full flexibility for the local community to decide which type of facility is required
- Transformation of over 14ha of privately owned agricultural land into publicly accessible areas of open space and woodland, together with new and enhanced opportunities for informal and formal recreation to promote health and wellbeing;

- Provision in excess of 10% Net Environmental Gain as a result of the extensive network
  of retained and proposed green spaces providing opportunities for an increase in natural
  habitat and ecological features, including the potential to double the L-Moor Shepreth SSSI
  that lies to the south-west of the site through consultation with the Wildlife Trust;
- Provision of new homes and commercial accommodation set within an extensive network of open spaces and within walking and cycling distances of key facilities and public transport infrastructure to promote active, healthy living and facilitate sustainable commuting patterns to Shepreth railway station;
- A development capable of aiming for 'zero carbon', through a combination of efficiency, solar generation, heat pumps and electric vehicles;
- Enhancing and maintaining the vitality of Shepreth and the local rural economy by supporting local services and facilities, especially at a time when villages are seeing a reduction in services levels; and
- A sustainable development delivered by a responsible developer who takes a long term view and prioritises delivering community and environmental benefits that meet the needs of local communities. For example, M Scott Properties Ltd is a member of the Natural Cambridgeshire Developers' Forum seeking to understand best practice and to understand where opportunities exist to increase biodiversity on sites. Their sites are assessed against the Developing with Nature Toolkit, with a view to exceeding the proposed 'Charter Mark' threshold. M Scott Properties Ltd are also committed to the 'doubling with nature' initiative promoted by Natural Cambridgeshire.

### 1.0 Introduction

- 1.1 These representations have been prepared by Bidwells LLP on behalf of M Scott Properties Ltd who control Land at Frog End, Shepreth ("the Site"). They are in response to the Greater Cambridge Local Plan Regulation 18: Issues and Options 2020 consultation ("the consultation document"). Please refer to **Appendix 1** for site location plan.
- 1.2 These representations follow those submitted in March 2019 as part of the 'Call for Sites' consultation and provide greater detail on the significant opportunity that the site presents, informed by additional site assessment work.
- 1.3 The site is under an Option Agreement with M Scott Properties Ltd.
- 1.4 The consultation document has been published by Cambridge City Council and South Cambridgeshire District Council as the first formal stage of consultation towards preparing the new joint Local Plan for Cambridge and South Cambridgeshire; the Greater Cambridge Local Plan. Consultation took place from 13 January 2020 to 24 February 2020.
- 1.5 The Greater Cambridge Local Plan is proposed to set out future land use and planning policies for the Greater Cambridge area to 2040 in respect of accommodating growth for new homes, jobs and infrastructure.
- 1.6 The consultation document explores four 'big themes' that will influence how homes, jobs and infrastructure are planned. The big themes are:
  - Climate change how the plan should contribute to achieving <u>net zero carbon</u>, and the mitigation and adaptation measures that should be required through developments;
  - **Biodiversity and green spaces** how the plan can contribute to our 'doubling nature' vision, the improvement of existing green spaces and the creation of more;
  - **Wellbeing and social inclusion** how the plan can help spread the benefits of growth, helping to create healthy and inclusive communities; and
  - **Great places** how the plan can protect what is already great about the area, and design new developments to create special places and spaces.
- 1.7 Within the above four big themes, the consultation document then identifies what the Councils' consider are the key issues and options for where future growth (jobs and homes) might go. A combination of approaches to the distribution of spatial growth are considered likely to be necessary in order to allow for sufficient flexibility when considering the locations of new housing and employment development in the district.
- 1.8 However, the principle of spreading some new homes and jobs out to the villages (the 'Dispersal: Villages' option) is supported. Land at Frog End presents an ideal opportunity to accommodate housing and employment land to meet identified need and help enhance the vitality of the existing community and support local services.
- 1.9 The principle of focusing some homes and jobs along key public transport corridors and around transport hubs (the '**Public Transport Corridors**' option) is also supported. In order to reduce

climate change impacts, the Local Plan will need to promote sustainable development in rural areas in locations that allow existing villages to grow and thrive but also enable travel by low-carbon modes such as walking, cycling and public transport. Land at Frog End would achieve both of these measures, being located immediately adjoining the existing built up area of Shepreth, being of a size able to accommodate a sustainable level of growth for the village and within the A10 strategic growth corridor and its associated active travel and public transport opportunities.

- M Scott Properties Ltd are at an early stage in considering potential development concepts for the site and currently consider that a mix of residential, commercial and flexible community uses would be appropriate. M Scott Properties Ltd are however keen to engage with the Council, stakeholders and the local community to refine and discuss the proposals further as part of the ongoing consultation on the emerging Greater Cambridge Local Plan.
- 1.11 These representations respond to the relevant questions within the consultation document in respect to the development opportunity at land at Frog End, Shepreth and within the context of the four big themes and options for growth. They should be read in conjunction with the following standalone documents:
  - Vision Document (Bidwells LLP);
  - Emerging Concept Plan (Bidwells LLP)
  - Initial Heritage Assessment (Bidwells LLP);
  - Shepreth Village Assessment (Bidwells LLP);
  - Housing Needs Report (Bidwells LLP);
  - Greater Cambridge Housing Needs Report (Bidwells LLP).
  - Phase 1 Desk Study and Preliminary Risk Assessment (Geosphere Environmental);
  - Phase 1 Ecology Appraisal (Geosphere Environmental);
  - Arboricultural Survey (Geosphere Environmental); and
  - Transport Technical Note (Cannon Consulting Engineers).

### 2.0 Land at Frog End, Shepreth

Question 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.

- 2.1 Land at Frog End, Shepreth, is submitted as a potential allocation for mixed use residential and employment in the Local Plan. The extent of the site is shown on the site location plan at Appendix 1.
- 2.2 The Site is located on the south-western edge of Shepreth and is currently in agricultural use. It is relatively flat and well contained by existing tree planting. The railway line runs along the western boundary of the Site.
- 2.3 There is an existing agricultural access to the site from Meldreth Road to the north, between two properties. There is a second access to the site via the existing farm and Moor End Lane, which forms a junction with Frog End and the High Street
- 2.4 The site is immediately adjoining the existing development framework boundary of Shepreth. It is bound by existing residential properties to the north and north-east, by areas of open space and Manor Farm to the east and open countryside to the south and west.
- 2.5 The L-Moor Shepreth SSSI lies to the south-west of the Site.
- 2.6 The Shepreth Conservation Area lies to the east of the Site, which includes the Grade II\* Listed Church of All Saints, together with a number of other Grade II Listed Buildings. In addition, two further Grade II Listed Buildings lie to the south of the Site. The Initial Heritage Assessment prepared by Bidwells LLP and accompanying these representations identifies and assesses the significance of these heritage assets.
- 2.7 A network of Public Rights of Ways run through and adjacent to the site including Footpath 200/1 that runs through the site from the High Street to the east to the railway line where it meets and diverges from Footpath 200/2 through to Meldreth Road and Footpath 200/12 that runs to the south of the site.
- 2.8 The site is within the Environment Agency defined Flood Zone 1 in terms of flooding from rivers and surface water (very low risk of flooding).

### **Existing Planning Policy Context**

- 2.9 National Planning Policy advises that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It adds that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby (NPPF, Paragraph 78).
- 2.10 National Planning Policy also confirms that planning policies should help create the conditions in which businesses can invest, expand and adapt (NPPF, paragraph 80). The NPPF specifically

states that "Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development"

- 2.11 The Cambridgeshire and Peterborough Independent Economic Review (CPIER) (2018) and the Cambridgeshire and Peterborough Industrial Strategy (2019) have each outlined ambitious plans for growth over the next 20 years.
- Furthermore, the Cambridgeshire and Peterborough Combined Authority (CPCA) has set a target of doubling the regional economic growth (GVA) over the next 25 years. This requires the area going beyond what it has achieved in the past (to double an economy over twenty-five years requires an average annual growth rate of 2.81%. Historically, since 1998, the local economy has only grown at around 2.5%.). Achieving this requires employment growth and more importantly productivity growth, as we are already at comparatively high levels of employment.
- 2.13 In order to deliver this 'step change' in economic performance, the Consultation document states that around 2,900 homes a year would need to be built in Greater Cambridge if the jobs growth is achieved an indicative total of 66,700 homes over 2017 2040. This compares with 1,800 homes per year to meet local needs using the Government's standard method.
- 2.14 The Housing Needs Report by Bidwells LLP also confirms there is a need to provide for an amount of housing above the standard methodology to take account of the pressing and worsening affordability issue and to support the aspiration to grow the Greater Cambridge economy and double the GVA across the Greater Cambridgeshire and Peterborough area.

### **The Opportunity**

- 2.15 Shepreth lies within a key public transport corridor, with a railway station providing direct links to Cambridge (a journey time of just 12 minutes) and beyond to London. There are off road cycle links to Melbourn and Cambridge. The Site is located within 800m of Shepreth railway station, which equates to an 8-minute walk or 2-minute cycle ride. The proximity of the Site to the station therefore makes it readily accessible by active modes of travel, particularly cycling.
- 2.16 Furthermore, the A10 runs to the east of the village, which is a strategic transport corridor within Greater Cambridge, where numerous transport improvements are planned to deliver a high quality public transport corridor, including:
  - Proposed improved transport interchange at Trumpington A10/M11 junction (approximately 8.5km from the Site); and
  - Park and ride and potential CAM station site at Hauxton (approximately 8km from the Site).
- 2.17 The nearest bus stop to the Site is located on the A10 to the east of the Site. Stagecoach operates bus service D/A from the stop which provides an hourly service between Cambridge and Royston. The accompanying Transport Appraisal confirms that this stop is within a 3-minute cycle ride from the Site and a 14-minute walk.
- 2.18 There are also excellent local cycle connections from the Site to Melbourn and Cambridge.

  Furthermore, Shepreth is closely associated with the neighbouring villages of Foxton, Barrington,
  Meldreth and Melbourn. These settlements are within walking and cycling distance from Shepreth

and linked by the public footpath network, thus providing a further range of services and facilities as well as extensive employment opportunities at Melbourn Science Park.

- 2.19 As such, the Site is well located to reduce the need to travel by car, and can promote sustainable travel. Further public transport enhancements are also proposed that will improve connectivity to Shepreth by sustainable and active modes of transport.
- A variety of facilities and services are also currently available within walking distance of the Site including a village hall, a pre-school, a church, two pubs with dining and a tearoom. The village is also home to Docwra's Manor Garden (Shepreth) and Shepreth Wildlife Park, which offer formal outdoor recreation activities. Shepreth also has a Recreation Ground, which has a senior football pitch and cricket pitch; an area of informal open space known as 'Old School Field'; community growing space, which includes an allotment and a community orchard; a burial ground; and a network of public rights of way, providing access to local countryside and beauty spots such as the River Shep.
- 2.21 Land at Frog End, Shepreth provides an ideal opportunity to create a sustainable extension to the village. There is an opportunity to deliver a diverse range of accommodation types, community infrastructure and initiatives to meet the needs of those within the locality, and within the wider district, on the Site.
- 2.22 To that end, the emerging concept proposal for the Site has been informed by a 'Village Assessment'; a high level socio-economic assessment of Shepreth, covering open space, community infrastructure and employment. It has been prepared by Bidwells LLP to understand the opportunities and benefits that development in the village can bring, based on desk top research.
- 2.23 The Village Assessment has concluded the following potential opportunities for the Site in terms of open space, community facilities, education and employment. These have in turn informed the emerging concept proposal for the Site.

#### **Open Space**

- Additional Local Areas of Play (LAPs) to serve residents of both existing and new homes.
   Theme of each lap to provide a broader range of opportunity for young children than currently exists in the village, thereby improving both the quality and quantity of play experiences;
- Provision of a Neighbourhood Equipped Area of Play (NEAP), imaginative play and youth
  facilities including a range of play equipment and play space that offers a choice of play
  experience beyond that provided by typical play equipment. They would be located to serve
  both the current population and new development, to ensure maximum walking accessibility
  for all and help integrate new and existing families;
- Onsite provision of informal open space to meet SCDC standards for new development and make up the deficit of existing provision. Its location and accessibility via new walking / cycling routes that integrate the new and existing residents maximises the opportunity for informal socialising when people 'bump' into each other;
- Opportunities to contribute towards offsite improvements in the quality of the changing facilities in the village hall or new pavilion on the Recreation Ground;
- Opportunities to contribute towards offsite improvements to sports on offer at the Recreation Ground;

#### **Community Facilities**

 Onsite provision of flexible, mixed-use space that could be used for retail by a local entrepreneur, to serve residents, employees and tourists;

#### Education

- Improvements to public footpaths / cycleways to local schools, particularly Barrington and Foxton and expansion of cycle infrastructure at Shepreth railway station;
- Explore options to expand current pre-school provision including the need for additional space. This could be incorporated as part of a mixed-use area to provide facilities for residents and workers.

#### **Employment**

- Provision of employment land to support local business growth (including incubation units for start-up businesses) and the wider regional / national growth objectives. The site offers a more affordable location for businesses, whilst also benefitting from close proximity to the station.
- In addition to the above, M Scott Properties Ltd are committed to delivering an enhanced level of affordable housing (45%) on the Site, in an area of high housing need. This would be delivered as part of a housing mix that responds to both local and District wide needs, providing new homes across a variety of types and tenures, potentially including self and custom build and specialist accommodation (subject to demand).
- 2.25 This rare opportunity to provide 45% affordable housing on the site has only been made available through the balanced views of the Landowner and Promoter associated with the project.
- 2.26 To inform this proposal further, an Affordable Housing Need report has been prepared by Bidwells LLP and accompanies these representations. The report seeks to identify the need for affordable housing in South Cambridgeshire, and the role of the Site in meeting that need. The report confirms that affordability is a significant issue in the District, particularly for those in the lowest percentile of earnings. At present there is a limited supply of smaller properties, which typically are desired by those wishing to downsize, starting out on the property ladder or in housing need. Land at Frog End could also potentially help provide housing to meet the needs of particular population groups with specific physical requirements such as those with dementia (particularly those not yet diagnosed), people with physical difficulties and older people.

### Responding to the Four Big Themes

2.27 Since the submission of the 'Call for Sites' representations in March 2019, more detailed analysis of the site constraints and opportunities has been undertaken, informed by further technical assessment work. A summary of this assessment work is provided below. These assessments have specifically sought to respond to the four 'big themes' of the emerging Local Plan and in turn help shape the emerging concept proposals for the Site.

#### **Climate Change**

2.28 The two Councils and the County Council have committed to achieve net zero carbon by 2050. In order to meet this challenge, the Local Plan will need to plan for low-carbon lifestyles and encourage low carbon activities and alternatives to private car use.

- 2.29 The Local Plan will also need to promote highly sustainable patterns for growth, by locating development in sustainable areas such as Shepreth to enable travel by low-carbon modes thus reducing car use to ease congestion and reduce airborne pollutants. The same measures offer opportunities to promote active travel choices (walking, cycling) to enhance health and wellbeing.
- 2.30 Land at Frog End would achieve both of these measures, being located immediately adjoining an existing settlement and within walking distance of a railway station, being of a size able to accommodate a sustainable level of growth for the village and within the A10 strategic growth corridor and its associated active travel and public transport opportunities.
- A Transport Appraisal for the Site has been prepared by Cannon Consulting Engineers and accompanies these representations. This confirms that the site is extremely well located for access to key facilities and services, including transport infrastructure such as Shepreth Railway Station and the A10 which is served by northbound and southbound services. Furthermore, there are a number of strategic schemes coming forward in association with the A10 Strategic Public Transport Corridor which will improve mobility in the area.
- 2.32 A number of climate change mitigation and adaptation measures could also be incorporated in to redevelopment proposals for the Site, such as:
  - Passive design measures which lower the cooling requirement and have shorter lifecycles, such as solar shading and high fabric performance;
  - Improvements to water efficiency, such as water efficient fittings and metering and systems which recover water;
  - Design measures to minimise waste volume as far as possible, through the careful selection
    of materials and the use of techniques such as off-site and modern methods of construction,
    material consumption, waste volumes, and product quality;
  - Improvements to flood resilience through incorporation of a range of future climate scenarios that better manage the water runoff into the wider drainage system;
  - Green infrastructure to offer greater resilience to a warmer and drier climate than currently exists and to provide broader ecosystem services such as forming part of a sustainable drainage system.

#### **Biodiversity and Green Spaces**

- 2.33 Both Councils have declared biodiversity emergencies and, as members of the Natural Cambridgeshire Local Nature Partnership, the Councils support the Partnership's vision to double the area of rich wildlife habitats and natural greenspaces within Cambridgeshire and Peterborough.
- 2.34 M Scott Properties Ltd recognise the importance of improving the natural environment and are committed to achieving in excess of 10% Net Environmental Gain in respect to potential redevelopment proposals at Land at Frog End. The Site in particular presents an opportunity to provide new areas of green infrastructure to mitigate against climate change, through creating resilient new habitats. These new habitats can also create health and wellbeing benefits through improved provision of green spaces to relax and socialise.
- 2.35 M Scott Properties Ltd is a member of the Natural Cambridgeshire Developers' Forum seeking to understand best practice and to understand where opportunities exist to increase biodiversity on

sites. Their sites are assessed against the Developing with Nature Toolkit, with a view to exceeding the proposed 'Charter Mark' threshold. Through the proposed development at Frog End, there is scope to double the L-Moor SSSI adjacent to the site. M Scott Properties Ltd are also committed to the 'doubling with nature' initiative promoted by Natural Cambridgeshire.

- 2.36 A site-wide ecological appraisal and background desk study was completed by Geosphere and accompanies these representations. The key findings from the appraisal are summarised below:
  - There are no overriding ecological constraints to development of the Site;
  - There are no statutory or non-statutory designated sites within the Site;
  - L-Moor SSSI (Site of Special Scientific Interest) is adjacent to the site but subject to provision
    of an appropriate buffer zone this would not preclude development on the Site;
  - The habitats within the site are of limited intrinsic ecological interest;
  - The site presents opportunities to achieve a minimum of 10% biodiversity net gain on site through a sensitively designed, landscape-led scheme which would incorporate, wherever possible, native species of local provenance and those of known value to native wildlife to offer biodiversity gains post-development.
- 2.37 A Tree Survey and Constraints Plan was prepared by Geosphere Environmental in February 2020 and accompanies these representations. This confirms that there are a number of Category A trees and trees subject to TPO but these are largely located around the boundaries of the site and as such are able to be retained.
- 2.38 There are some Category A and B trees located as lines of trees separating the arable fields and small sections of these groups may have to be removed to facilitate development. However, where possible the least vegetated areas will be targeted for removal. The emerging concept proposal also illustrates that the scheme will be able to deliver extensive new landscaping and trees in compensation for any loss.
- 2.39 In addition to the above, a Phase 1 Desk Study and Preliminary Risk Assessment has been completed by Geosphere Environmental and accompanies these representations. This confirms that the site has been largely open, undeveloped agricultural land over the historical period studied (1886 2020), with the exception of the southern field where a number of properties were noted to exist from the earliest map until their removal in the 1970's. As such, it concluded that no contaminants were identified that may impact upon the site.

#### **Wellbeing and Social Inclusion**

- 2.40 National Planning Policy requires that Local Plans should aim to achieve healthy, inclusive and safe places.
- As referred to above, the Local Plan will need to promote sustainable development in rural areas in locations that allow existing villages to grow and thrive but also enable travel by low-carbon modes such as walking, cycling and public transport, thus reducing car use to ease congestion and reduce airborne pollutants. The same measure offers opportunities to promote active travel choices (walking, cycling) to enhance health, wellbeing and social inclusion.

- 2.42 Land at Frog End, Shepreth is one such example of sustainable development that can positively influence individual's health and lifestyle. Further measures of how the Site could achieve 'good growth' that promotes wellbeing and social inclusion, is outlined below:
  - Securing improvements in air quality through promotion of a low car use development thus reducing car use to ease congestion and reducing airborne pollutants;
  - Encouraging healthy lifestyles through provision of employment opportunities in a highly accessible location by low-carbon modes, thus encouraging active travel;
  - Proximity to local services and amenities bringing opportunities for social interaction and community development;
  - Opportunities for new build design to provide all-electric heating and hot water systems to avoid the on-site combustion of fossil fuels;
  - Creation of a safe and inclusive community through provision of a wide range of jobs; and
  - Creation of high quality buildings and public realm.

#### **Great Places**

- 2.43 A key issue for Land at Frog End will be how to balance heritage and countryside protection with the demands of growth.
- In terms of heritage protection, the Site lies to the south of Shepreth Conservation Area, which includes the Grade II\* Listed Church of All Saints, together with a number of other Grade II Listed Buildings. In addition, two further Grade II Listed Buildings lie to the south of the Site. In order to protect the significance and setting of the Conservation Area and the Church in particular, the proposed layout seeks to incorporate a significant area of retained open space within the centre of the Site. This will ensure that views of the Church of All Saints are retained from Meldreth Road to the west and from public rights of way to the south.
- An initial Heritage Assessment has been prepared by Bidwells LLP which has informed the emerging concept proposal and accompanies these representations. As the design proposals progress, a detailed Heritage Appraisal will be required in order to ensure impacts are mitigated as much as possible through the location, form, scale and design of the scheme. However, at this stage it is considered that there would be minor adverse impact caused to the setting of the nearby heritage assets. This is at the level of "less than substantial" harm.
- 2.46 Ultimately, a balanced judgement would be required for any development proposals in terms of the impact on the significance of designated heritage assets and the public benefits arising. The Site has the potential to deliver significant public benefits, as outlined below:
  - The opportunity to deliver housing, employment and community infrastructure to help meet the needs of Shepreth and the local area;
  - Supporting Shepreth's economy and community, including local shops and services at a time when villages are seeing a reduction in services and facilities;
  - Housing development in a sustainable travel location: high (and improving) public transport accessibility; cycling accessibility to transport interchanges and Cambridge;
  - Development that brings health and wellbeing benefits to its residents and the wider community through:
    - high quality housing design;

- additional public open space which offers mental and physical wellbeing benefits;
- opportunity to travel sustainably helping to tackle air pollution as well as bring physical benefits:
- Helping to maximise the benefits arising from major investment in the A10 corridor associated with sustainable transport and active travel; and
- A promoter who wishes to work with the community in order to shape a proposal which meets the needs of and can provide wider benefits to the village.
- 2.47 Details on the emerging concept proposal is provided below and within the accompanying Vision Document. The intention is to create a sustainable, mixed-use village extension, incorporating a series of distinctive character areas and with extensive areas of high quality public open space for existing and proposed new residents.

### The Emerging Concept Proposals

- 2.48 A suite of technical appraisals has been undertaken that have assessed the Site in terms of its capacity to accommodate the proposed development and its relationship with the surrounding area; all of which demonstrate that there are no insurmountable constraints to development of the Site.
- 2.49 As such, the Site is capable of being sensitively designed so as to develop as a distinct place within its own character, responding appropriately to its landscape and heritage setting. There is also scope to provide improvements to existing community infrastructure provision for Shepreth residents.
- 2.50 The supporting Vision Document includes further details for the proposed development on the Site, which includes a mixed-use development comprising the following elements:
  - An enhanced level of affordable housing (45%), addressing specific local needs and providing new homes across a variety of types and tenures, potentially to include for key worker accommodation;
  - Residential development for approximately 200 new homes to meet local needs, including:
    - single-storey bungalows (LifeLong Homes<sup>TM</sup>) and almshouse-style properties to address the needs of people aged over 60 as well as those with or supporting someone with a disability;
    - provision of self or custom build housing;
    - opportunities for a Community Land Trust;
  - The residential developable area comprises approximately 7.8 ha, which equates to an average density of 31 dwellings per hectare (dph) which is considered suitable for an edge of village extension;
  - Provision of approximately 36,000 sq ft of modern, high quality, flexible commercial floorspace at the entrance to the Site to accommodate enterprises at a range of scales and provide new job opportunities for existing and new residents and those living nearby;
  - Provision of approximately 6,000 sq ft of land for community use, providing a serviced plot with the full flexibility for the local community to decide which type of facility is required;

- Transformation of over 14ha of privately owned agricultural land into publicly accessible
  areas of open space and woodland, together with new and enhanced opportunities for
  informal and formal recreation to promote health and wellbeing (as identified in the Village
  Assessment the areas of informal play could include for a LAP, NEAP, imaginative play
  and/or youth facilities);
- Provision in excess of 10% Net Environmental Gain as a result of the extensive network of retained and proposed green spaces providing opportunities for an increase in natural habitat and ecological features, including the potential to double the L-Moor Shepreth SSSI that lies to the south-west of the site through consultation with the Wildlife Trust;
- Provision of a new vehicular access road from Frog End to the south, in the form of a priority junction. This would be the main vehicular access to the proposed development and would serve the existing farm;
- The existing northern farm access from Meldreth Road is proposed to be upgraded to a shared pedestrian and cycleway, providing a link to the existing footway network and onward journeys towards Shepreth railway station;
- The existing Moor End Lane footpath from Frog End will be maintained and could provide a secondary point of access.
- 2.51 The site is under an Option Agreement with M Scott Properties Ltd. The site has market potential and expert residential agency advice has been sought to ensure that the proposal is deliverable.

### 3.0 General

Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? Please choose from the following options:

Strongly agree / Agree / Neither agree nor disagree / Disagree / Strongly disagree

If not, what would be a more appropriate date and why?

- 3.1 Agree.
- 3.2 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).

### 4.0 Themes

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

- 4.1 Agree.
- 4.2 The four big themes for the Local Plan are considered suitable and all are considered to be important in the consideration of the spatial distribution of growth in the district, and for the determination of planning applications. 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 in order 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.

# Question 7. How do you think we should prioritise these big themes? Rank the options below 1-4 (1-Most Preferred 4-Least Preferred)

4.3 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?

- 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 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.
- A needlessly stringent policy may inadvertently impede progress towards later years in the plan, or undermine results by not allowing for site-specific refinement. For example, policy for electric vehicle charging points should be sufficiently flexible to accommodate that quickly changing technology, as well the current grid challenges in implemented EV charging places. 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.
- 4.6 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.

4.7 The local plan Sustainability Appraisal (SA) should address variable climate change scenarios, as we would expect that different climate changes scenarios will be of interest at examination. Lack of rigorous assessment of these scenarios in the SA is could lead to the plan being found unsound.

# Question 9. How do you think we should be reducing our impact on the climate? Have we missed any key actions?

4.8 Greater Cambridge is a leading local authority on climate change policy, such as through the early declaration of a climate change emergency and also through the newly adopted Sustainable Development SPD. This leadership should continue, as it is central to the sustainable development of Cambridge, leading to better development for humans, the environment, and for economic development. It should be borne in mind that Cambridge's knowledge economy increasingly demands high sustainability standards: sustainability, health and wellbeing, with climate change at the heart, is a key part of continuing Cambridge's economic development. This should remain a priority as part of a policy framework the recognises climate change as a key part of sustainable development across social, environmental and economic objectives.

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

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 Plan progresses and must build in flexibility.

# Question 11. Are there any other things we should be doing to adapt to climate change? We want to hear your ideas!

- 4.10 The Local Plan should form a flexible policy framework, so as not to stifle the benefits of new technology or modern methods of construction.
- 4.11 For reference as to how Land at Frog End could contribute towards adapting to climate change and achieving net zero carbon, please refer to Section 2 of these representations.

### Theme 2 Biodiversity and Green Spaces

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

4.12 This Local Plan must deliver effective policy which protects and enhances natural capital. We support delivery of net gain for new development. 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. 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 taken into account.

4.13 For reference as to how Land at Frog End could improve the natural environment, please refer to Section 2 of these representations, the Vision Document prepared by Bidwells, the Transport Appraisal prepared by Cannon Consulting Engineers, the Preliminary Ecological Appraisal prepared by Geosphere and the Arboricultural Survey prepared by Geosphere.

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

4.14 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?

- 4.15 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.
- 4.16 M Scott Properties Ltd is a member of the Natural Cambridgeshire Developers' Forum, seeking to understand the best practice and to understand where opportunities exist to increase biodiversity on sites. Their sites are assessed against the Developing with Nature Toolkit, with a view to exceeding the proposed 'Charter Mark' threshold. Through the proposed development at Frog End, Shepreth, there is scope to work with the Wildlife Trust and double the SSSI adjacent to the site. M Scott Properties Ltd are also committed to the 'doubling with nature' initiative promoted by Natural Cambridgeshire.

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

- 4.17 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.
- 4.18 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?

- 4.19 The Local plan should include a spatial strategy that connects homes with jobs; good quality public transport; facilities/services and high-quality open spaces. Policies should also highlight wellbeing and social inclusion as a key priority for new developments.
- 4.20 Good growth that promotes wellbeing (including health) should be inclusive and include antipoverty measures. The allocation of Land at Frog End, Shepreth would help to promote measures to improve wellbeing by including of anti-poverty measures including:
  - Energy efficient homes that deliver low energy and water bills;
  - Access and walkability to local services;
  - Access to key cycle routes to enable healthy means of travel to employment areas;
  - Promotion of commercial development and job creation that offers the Living Wage and opportunities for those on lower incomes to increase wages to easily access jobs;
  - Provision of social infrastructure including community use land and a large area of open space to provide opportunities for improved health outcomes;
  - Promotion of low-cost housing proportionate to income in the area; and
  - Promotion of 'fully accessible' social housing, within active travel of employment.
- 4.21 The Local Plan should include for a policy framework that requires a Health Impact Assessment (HIA) throughout the Greater Cambridge area, using a Health Impact Assessment (HIA) methodology that reflects best practice. Thresholds for HIAs should reflect the scale of the scheme and its ability to effect health outcomes.
- 4.22 The Local Plan should ensure a policy framework is developed that is based on empirical evidence of how good growth is delivered, rather than rely on policies based on perceived, and sometimes unproven, determinants of wellbeing and social inclusion. Policies should focus on what really makes a difference.
- 4.23 Engagement with the combined authority, county council and Clinical Commissioning Group (CCG) will also be required to understand community care and primary health care issues and needs, and to ensure facilities are available to deliver funded services.
- 4.24 For reference as to how Land at Frog End could help achieve 'good growth', please refer to Section 2 of these representations and the Village Assessment prepared by Bidwells.

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

4.25 The Local Plan could help enable communities to shape new development proposals through creating policies and procedures that encourage meaningful consultation and require developers to demonstrate how schemes have been influenced by local communities.

- 4.26 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), particularly in circumstances where unforeseen consequences emerge.
- 4.27 M Scott Properties Ltd is committed to providing a positive legacy from the development that it promotes, and this can be achieved from meaningful engagement with the local community to gain their input into the design of the proposed development, including the site layout and provision of specific local infrastructure or contributions towards this.

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

- 4.28 First and foremost, the Local Plan can achieve socially inclusive communities when planning new development by forming a spatial strategy that ensures that new development is accessible or can be made accessible. Providing everyone with the opportunity to walk, bus and cycle to jobs, schools, shops, services and social activities will be vital.
- 4.29 Socially inclusive communities are created by people, but it helps if infrastructure is provided in time for first residents, either as a temporary facility or a smaller version of the final product. It will be important to ensure that support systems and management strategies are in place for community infrastructure.
- 4.30 Social inclusion can also be delivered by building in public realm to all forms of development (housing, employment and leisure) that encourages informal meeting and 'bumping' into people.
- 4.31 Providing a mix of housing types including a range of dwellings sizes and a proportion of affordable is key to achieving socially inclusive communities. Allocating Land at Frog End for mixed use development would provide opportunities to promote social inclusion as it is proposed to provide an enhanced level of affordable housing. The proposed homes would also be designed to form a suitable site layout and to provide a broad mix of housing types, based on local need. It is recognised that homes need to be designed to be accessible for disabled people, either by achieving Lifetime Homes standards or being able to be easily adapted for disability access, and it is considered that this can be explored in more detail as design proposals advance for Land at Frog End in order to deliver housing that is suitable for a range of people with varying needs.

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

- 4.32 New developments should support healthy lifestyles by creating a spatial strategy that can support connected spaces where people do not have to rely on the private car for their daily routine of school, work, shopping and leisure. Enabling active lifestyles and opportunities for social interaction is a priority.
- 4.33 The Local Plan should provide open space within developments where possible, alongside a policy framework to allow for off-site enhancements where appropriate, particularly when they can improve provision for existing communities. Standards within policies that determine the quantity and quality of provision should reflect an evidence-based assessment of need and benefits delivered.

- 4.34 A further measure to ensure new developments should support healthy lifestyles is for them to consider the needs of all age ranges and abilities in the detailed design of open spaces and public realm. New developments should also encourage healthy eating choices through the provision of healthy options and minimising/preventing fast food outlets.
- 4.35 With respect to Land at Frog End, Shepreth, the Site is able to provide in excess of 10% Net Environmental Gain as a result of the extensive network of retained and proposed green spaces providing opportunities for an increase in natural habitat and ecological features, including the potential to double the L-Moor Shepreth SSSI that lies to the south-west of the site through consultation with the Wildlife Trust.
- 4.36 Access to open space on site provides opportunities for exercise and recreation to help promote healthy lifestyles. Not only are there physical benefits to having a large proportion of open space within close proximity of homes, there are also benefits in terms of mental wellbeing by providing areas for residents to relax and enjoy outdoor activities.

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

- 4.37 Improvements in air quality should be achieved principally through the reduced use of polluting vehicles by:
  - Locating development, particularly schools, places of work and other facilities that have a
    high footfall, close to existing public transport corridors, where there is good access to active
    travel and affordable, frequent, reliable and high quality public transport options;
  - Better cycle lanes, parking and cycle security achieved by developments directly and through a coordinated s106 infrastructure programme;
  - Reducing the volume of HGV movements in the city;
  - Encouraging the use of less polluting vehicles, particularly during peak hours when emissions from stationary traffic makes conditions for pedestrians and cyclists and other vulnerable groups particularly bad;
  - Tree planting along road frontages: species selected for their pollution absorbing properties;
     and
  - Encouraging the provision of electric car and cycle parking infrastructure in new developments.

### **Theme 4 Great Places**

# Question 21. How should the Local Plan protect our heritage and ensure new development is well-designed?

- 4.38 The Local Plan should include for a policy framework that sets out a positive strategy for the conservation and enjoyment of the historic environment. New development within or in proximity to heritage assets can be appropriate and make a positive contribution to local character and distinctiveness. This is supported by the NPPF (paragraph 185).
- 4.39 An Initial Heritage Assessment has been prepared in respect of Land at Frog End, Shepreth and accompanies these representations. This has informed the emerging proposals for the site to ensure the significance of the Shepreth Conservation Area and nearby Listed Buildings is

protected through careful and sensitive design. Further detail on this assessment and how it has informed the site design is included in Section 2 of these representations.

# Question 22. How do you think we should protect, enhance and adapt our historic buildings and landscapes?

4.40 New development can provide opportunities for improvements in the quality of the historic environment. For example, the setting of heritage assets often has elements that detract from the significance of the asset. However, it will be important for the Local Plan to balance heritage protection with the demands of growth and proposals affecting heritage assets should continue to be required to include for an assessment of significance of any heritage assets affected.

# Question 23. How do you think we could ensure that new development is as well-designed as possible?

- 4.41 'Place-making' creating and sustaining a positive and distinctive character in an area is important to the economic success of the Greater Cambridge area, as identified by the CPIER. This is also supported by the NPPF (paragraph 124) which confirms that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- The NPPF continues by advising that plans should set out a clear design vision and expectations and design policies should be developed with local communities so they reflect local aspirations. To provide maximum clarity about design expectations at an early stage, plans or SPDs should use visual tools such as design guides and codes. The Cambridgeshire Quality Charter for Growth sets out core principles of the level of quality to be expected in new developments in Cambridgeshire and the four 'C's' of Community, Connectivity, Climate and Character align well with the four big themes of the emerging Local Plan. This forms a good basis to set out a design vision for the new Local Plan.
- 4.43 M Scott Properties Ltd has experience of working with the local community and Local Planning Authorities in preparing design briefs and design codes for Sites to agree the design principles prior to a more detailed scheme coming forward. M Scott Properties Ltd would be keen to explore the potential for this approach to be taken in respect of the emerging development proposals at Land at Frog End, Shepreth.

### 5.0 Jobs / Economy

## Question 24. How important do you think continuing economic growth is for the next Local Plan?

- As referred to in Section 2 of these representations, National Planning Policy confirms "Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development" (NPPF, paragraph 80). The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.
- 5.2 Cambridge's hi-technology clusters, particularly in AI, bio-tech and agri-tech are recognised in the UK Industrial Strategy as an essential element of the UK economy to support "...towns such as MK, Oxford and Cambridge (that) have been hot spots for job creation. We must promote growth through fostering clusters and connectivity across cities, towns and surrounding areas."
- Growth relies on increases in employment and productivity and the Cambridge and Peterborough Independent Economic Review (CPIER) emphasises the need for productivity growth in this region as employment rates are so high. Economic growth is therefore essential for the next Local Plan. As part of the devolution contract to Cambridgeshire and Peterborough is a commitment to doubling the economic output of the area (Gross Value Added) over 25 years. This is a challenging target and needs to factor at the heart of the Plan.
- 5.4 Allocating Land at Frog End, Shepreth would facilitate a sustainable pattern of growth by providing a range of residential accommodation to meet local needs, alongside new space for employment provision and community infrastructure.

## Question 25. What kind of business and industrial space do you think is most needed in the area?

A wide variety of business and industrial space is most needed in Greater Cambridge, in terms of location, size, function and price, in order to support the growth of the economy, offering choice to meet an occupier's individual needs:

"The requirements for physical space, like finance, have stages. What a business needs in its start-up phase is different to its needs as it matures and grows. It is vital, if an innovation ecosystem is to be effective for there to be variety and availability at every stage<sup>1</sup>.

5.6 Flexible commercial space in urban and rural areas supports the growth of local business and strengthens opportunities for local supply chains to engage in the growth industries of the region. Local supply chains are recognised by the UK Government as a means of delivering 'clean growth' (UK Industrial Strategy) as they contribute to the Strategy's mission to halve energy use in new buildings, partly by facilitation of local supply chains.

<sup>&</sup>lt;sup>1</sup> Cambridgeshire and Peterborough Industrial Strategy 2019 p 41

All new employment space should be located and built to maximise the health and wellbeing of employees and visitors. Healthy buildings in locations that reduce commute times and improve the sleep and wellbeing of its occupants contribute significantly to their productivity. Improving productivity is a primary route through which the Greater Cambridgeshire economic expansion objectives of doubling GVA and inclusive growth will be achieved.

"If workers can be more productive, they can bring home more take home pay, which will flow into the local economy. And they will be able to enjoy a higher standard of life. It is this, before anything else, which needs to be looked at to create an inclusive economic future." CPIER p38

In terms of local need for Shepreth, these representations support the case for provision of employment land that can accommodate a range of uses and occupiers, from incubation units for start-up businesses, as well as larger units for those already established. The Site offers a more affordable location for businesses, whilst also benefitting from close proximity to Shepreth railway station.

# Question 26. Do you think we should be protecting existing business and industrial space?

A broad range of employment opportunities accessible by active modes of transport (including public transport) needs to be maintained in urban and rural areas to ensure local jobs are available. All existing space and allocations should be assessed to understand their suitability for employment uses in the current climate of energy use reduction, the need for local employment, access for the workforce by public transport or active means of travel, which locations can deliver the highest health and wellbeing for workers and surrounding people.

Question 27. How should we balance supporting our knowledge intensive sectors, with creating a wide range of different jobs? What kind of jobs would you like to see created in the area?

Whilst the focus of Cambridge is the Science and Technology sector as the driving force of the economy, there is a requirement for a range of job opportunities, in urban and more rural areas. The Local Plan policy framework needs to provide for a full range of opportunities; as planned allocations and windfall employment opportunities.

Question 28. In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry?

5.11 The UK industrial Strategy advocates focusing on our strengths, "fostering clusters and connectivity across cities, towns and surrounding areas" <sup>2</sup> Sites which support these clusters are necessary and could be urban, edge of town or rural.

<sup>&</sup>lt;sup>2</sup> UK Industrial Strategy 2017 p18

5.12 Locations with high levels of public transport access should be identified for businesses with high employment densities. This would include sites within walking distance of train stations, travel hubs and along transport corridors.

"by ensuring good quality public transport is in place before development, the number of those new residents who will use the transport is maximised. This is also likely to be the best way to stretch some of the high-value businesses based within and around Cambridge out into wider Cambridgeshire and Peterborough. These companies will not want to be distant from the city, but these clusters could 'grow' out along the transportation links, providing connection to other market towns." <sup>3</sup>

Non-knowledge intensive companies tend to be more footloose and typically locate where premises are provided rather than through bespoke development, while some companies expand from humbler often rural beginnings in converted buildings. To enable this growth, dynamic employment locations in settlements of all sizes and classification should be allocated or be permissible, with larger concentrations of floorspace in areas with better public transport and access to active modes of travel. CPIER supports this position noting that deeper networks on smaller clusters on the periphery of Cambridge could help spread the 'Cambridge effect'.

# Question 29. How flexible should we be about the uses we allow in our city, town, district, local and village centres?

- All uses of an appropriate scale could be included in every settlement. Mixed use site allocations are particularly appropriate in rural settlements and new settlements / urban expansions to enable local commercial and retail businesses to grow organically.
- 5.14 An overly prescriptive policy framework can harm the viability and vitality of centres; sometimes forcing units to be vacant for 12 months to satisfy a policy requirement. A modern, responsive policy approach is welcomed to allow for a wider range of services and facilities.

<sup>3</sup> CPIER p41			
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### 6.0 Homes

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

- 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 NPPF also advises that strategic policies in Local Plans should be informed by a local housing need assessment. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes (NPPF Para. 60-61).

# 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?

- 6.3 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.
- 6.4 Furthermore, housing requirements are minimums, not maximums to stay under at all costs. There is a well-evidenced affordability problem in Greater Cambridge; a greater supply of homes will be part of the solution. "Too many of the people working in Cambridge have commutes that are difficult, long and growing: not out of choice, but necessity due to high housing costs."
- 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. This is also supported in the Housing Market Report prepared by Bidwells LLP that accompanies these representations.
- The Greater Cambridge area has experienced economic success which generates a need for a labour greater than its resident population can serve, and so places an increasing pressure on the housing market. A lack of housing supply in the face of such demand has reduced the affordability of homes, particularly for those in lower incomes.
- 6.7 The housing requirement for the Greater Cambridge area for the next Local Plan period must take into account the economic and affordability context; to reflect the housing-pressure already in the system arising from economic growth already experienced and to take account of the

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<sup>&</sup>lt;sup>4</sup> Cambridgeshire and Peterborough Industrial Strategy 2019, p13

aspiration to see that economic growth continue, which is most clearly expressed by the CPIER to double the GVA of the Combined Authority area, which itself is driven by the success of Greater Cambridge. This will be further fuelled by the extensive infrastructure improvements planned or committed for the area.

6.8 Without a significant increase in the volume of house building, to serve all employment locations, economic growth in Greater Cambridge will stall. In the words of the IEC:

"it is indisputable that high rates of employment growth have put great strain on the housing market in Cambridgeshire and Peterborough, particularly around Cambridge. The result is exceedingly high living costs, longer commutes, social stratification, and extra cost for business. Ambitions for house building should be increased to deal with a housing deficit that has grown up following under-projections of growth." (CPIER, p 77)

6.9 It is clear from a number of different and objective housing studies and models that the quantum of land required for new housing must be significantly above that currently planned for; this is certainly the case to be able to meaningfully address the worsening affordability issue and to support the planned economic growth.

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

- 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.
- 6.11 Flexibility will be key to a successful Local Plan; through market housing, low-cost and affordable housing.
- A housing needs survey has not been specifically conducted for Shepreth. It is recognised that engagement with the local community and Housing Officers will be required in respect of emerging proposals at Land at Frog End, Shepreth to achieve a suitable mix of dwellings on site to meet the housing need of the local community.

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

6.13 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 insultation 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. A high standard of housing can also be achieved through requiring Health Impact Assessments on developments of a scale that can deliver meaningful health improvements to the built environment.

6.14	M Scott Properties Ltd has experience of working with the local community and Local Planning Authorities in preparing design briefs and design codes for Sites to agree the design principles prior to a more detailed scheme coming forward. M Scott Properties Ltd would be keen to explore the potential for this approach to be taken in respect of the emerging development proposals at Land at Frog End, Shepreth.		

### 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 National Planning Policy advises (paragraph 102) that transport issues should be considered from the earliest stages of plan-making and development proposals so that:
  - a) the potential impacts of development on transport networks can be addressed;
  - b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
  - c) opportunities to promote walking, cycling and public transport use are identified and pursued;
  - d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
  - e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
- 7.2 The NPPF continues, at paragraph 103, in stating that the planning system should actively manage patterns of growth in support of the above objectives. "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."
- 7.3 It is therefore important for the Local Plan 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.
- 7.4 Land at Frog End is an ideal example of a site that has the opportunities to accommodate additional growth and encourage a shift away from car use and towards more sustainable modes of transport. Further detail is provided in Section 2 of these representations and in the supporting Transport Appraisal prepared by Cannon Consulting Engineers.

### 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 presumption in favour of sustainable development is recognised, however there should be a degree of flexibility in terms of allowing 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.
- 8.2 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 41. Do you think the Local Plan should be more flexible about the size of developments allowed within village boundaries (frameworks), allowing more homes on sites that become available?

- There should be more flexibility when considering the scale and size of developments that are permitted within village boundaries. The Local Plan currently restricts the amount of development that is permitted in Minor Rural Centres (Policy S/9) to 30 dwellings; in Group Villages (Policy S10) to eight dwellings and in exceptional circumstances to 15 dwellings; and in Infill Villages (Policy S/11) to two dwellings and in exceptional circumstances to eight dwellings. These policies should not restrict development to a certain number of dwellings and should instead encourage an appropriate density depending on the context of the site that is being considered for development. Some sites might be capable of accommodating higher density development which can enable a more sustainable distribution of growth, particularly in the case of some villages within the district which are well connected in terms of being located on key transport corridors with access to rail, bus and cycleway links, thereby making them sustainable locations for development. A more flexible approach towards considering development in villages should therefore be used when allocating development sites and in the determination of planning applications.
- 8.4 There should also be more flexibility in terms of considering applications which are located outside village boundaries, provided the site is suitable in other terms including its access to transport and village services and provided it is not overly constrained in terms of other environmental designations.

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

A combination of approaches to the distribution of spatial growth are considered likely to be necessary in order to allow for sufficient flexibility when considering the locations of new housing and employment development in the Greater Cambridge area. It is therefore not considered necessary to rank the options in order of preference.

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

- The principle of spreading some growth (new homes and jobs) out to the villages is supported. The NPPF advises, at paragraph 78, that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It adds that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.
- 8.7 The ability of new development to support rural communities is especially important given the loss of rural services experienced in recent years. The impact of these service losses on rural communities is accentuated when considering pre-existing low service levels compared to better served, urban areas. The 'Dispersal: Villages' option therefore presents an opportunity for sustainability enhancements within rural communities.
- 8.8 The approach of directing some growth to the villages should also take account of existing and proposed public transport improvements. With reference to Shepreth, whilst it is a relatively small village, it benefits from a railway station and being within the A10 corridor, plus close proximity to further facilities and services available in nearby villages.

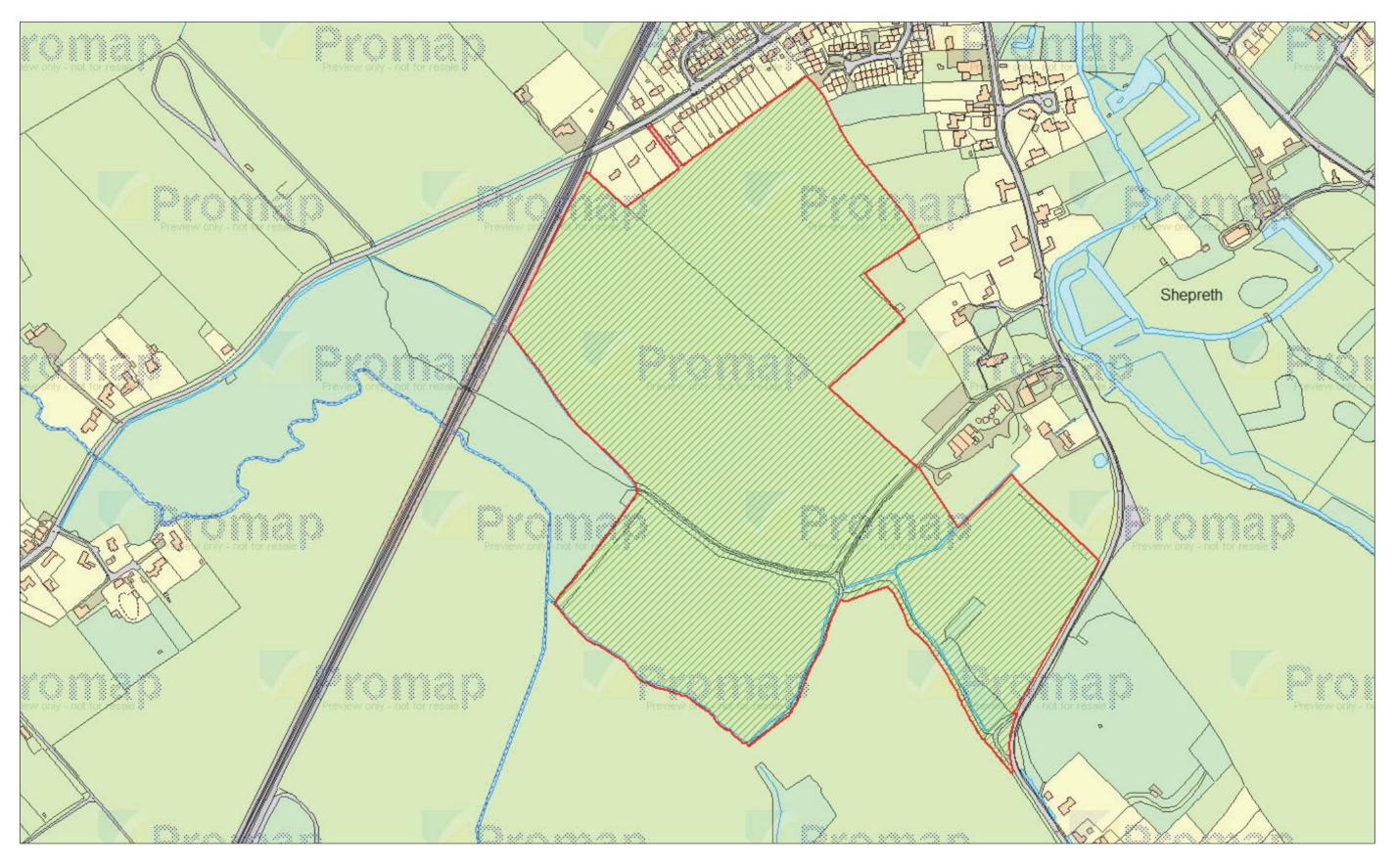
#### Question 48. What do you think about siting development along transport corridors?

- 8.9 Development is best suited to being located along transport corridors to promote sustainable development and transport issues should be considered from the earliest in accordance with Para. 102 of the NPPF.
- 8.10 M Scott Properties Ltd support the principle of siting development along transport corridors, in accordance with national planning policy and guidance which encourages development to 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.
- 8.11 Land at Frog End, Shepreth is located within a key public transport corridor, being within easy walking distance of Shepreth railway station providing direct links to Cambridge (a journey time of just 12 minutes), excellent cycle connections by dedicated cycle paths to Melbourn and Cambridge and the A10 running to the east of the village where numerous transport improvements are planned to deliver high quality public transport infrastructure. It is in a highly sustainable location for growth.

## **APPENDIX 1**

# **SITE LOCATION PLAN**

## Land at Shepreth – Site Location Plan



Total site area: 59.357 acres



