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Sent by email only to: Localplan@greatercambridgeplanning.org

Dear Sir or Madam

**Greater Cambridge Local Plan: The First Conversation
Regulation 18: Issues & Options Submission: Histon, Impington and Girton**

I write on behalf of my client, The NIAB Trust in relation to the following sites:

- Land north-east of Villa Road, Histon
- Land west of South Road, Impington
- Land east of Redgate Road, Girton

This submission follows my client's various submissions in March 2019 as part of the Greater Cambridge Local Plan 'Call for Sites and Broad Locations' exercise.

My client welcomes the opportunity to comment on the Greater Cambridge Local Plan: The First Conversation, which explores a series of big themes that will underpin the decisions about where homes, jobs, and infrastructure should be located, and consequently what spatial development strategy the Greater Cambridge Shared Planning Service should adopt.

This submission comprises completed forms, which respond to the following questions:

- Q4: 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?
- Q6: Do you agree with the potential big themes for the Local Plan?
- Q7: How do you think we should prioritise these big themes?
- Q24: How important do you think continuing economic growth is for the next Local Plan?
- Q25: What kind of business and industrial space do you think is most needed in the area?
- Q28: 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?
- Q32: Do you think we should plan for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?
- Q37: How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?
- Q39: Should we look to remove land from the Green Belt if evidence shows it provides a more sustainable development options by reducing travel distances, helping us to reduce our climate impacts?
- Q40: How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages?
- Q42: Where should we site new development?

- Q45: What do you think about developing around the edge of Cambridge in the Green Belt?
- Q47: What do you think about growing our villages?
- Q48: What do you think about siting development along transport corridors?
- Q49: Question 49. Do you have any views on any specific policies in the two adopted 2018 Local Plans?
If so, what are they?

Of particular significance is the level of housing that will be required, which should be set at a level that seeks to meet the demand created by the concentration of jobs in the Greater Cambridge area. The spatial strategy should be a blended strategy but one that focuses on sustainable locations that are well-connected or have the potential to be connected to high quality public transport, while recognizing that a range of sites are required to aid deliverability and to ensure that all villages can grow in a sustainable manner appropriate to their size and scale.

The housing market area for Greater Cambridge is a very challenging one. Affordable housing delivery is a significant problem with high levels of demand for affordable and key worker housing. The ageing population will also add significantly to the demand for specialist housing. Consequently, the new plan needs to be very ambitious in terms housing delivery to ensure that there is a significant supply and mix of deliverable housing sites across the plan area, in excess of the levels of identified need, to boost delivery and help maintain competition in market and drive affordability.

The joint Inspector's Report on the Examination of the South Cambridgeshire Local Plan (August 2018) noted at paragraph 21:

"The Plan proposes that development needs will be met at two new settlements at Waterbeach and Bourn Airfield. We have some concerns regarding the challenges of delivering new development at Waterbeach and Bourn..."

However, because these development sites were not required to deliver housing in the early part of the plan period, the Inspectors concluded that due to the plans commitment to an early review there would be an opportunity to review progress as part of the preparation of the new joint local plan.

We consider the Inspector's concerns to be justified and that the new plan should include a range of allocations including small and medium size sites throughout the area to ensure that rural settlements have the opportunity to grow and thrive in line with National Planning Policy advice.

It is also important to note that the Inspector for the Uttlesford Local Plan Examination recently wrote to the Council on the 10th January 2020 raising significant concerns in relation to the soundness of the plan, in particular in respect of the overall spatial strategy which relies on the development of three Garden Communities.

At paragraph 31 of their letter they stated:

"...the scale of the need for housing for the next plan period is currently unknown and uncertain. We are concerned that the Council's chosen strategy (reliance on three Garden Communities) would mean that other sites in the district would not be developed or permitted for a significant period of time in the future. This would be likely to adversely affect the vitality and viability of services in existing towns and villages and result in a lack of housing choice in the market. It would also be difficult to accommodate changes in demand for certain types of development/services required over the very long period being committed to within the current strategy."

The Inspectors went on to state that the reliance on Garden Communities carried with it significant risks and a lack of flexibility. Furthermore, it would result in a worsening of affordability problems as it would delay delivery of housing to meet an identified need for a number of years. They concluded (paragraph 114) that:

“In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5-year HLS, until the Garden Communities begin to deliver housing. This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing...”

This reinforces the essential need for the new Greater Cambridge Local Plan to be based on a blended strategy which builds on the existing urban extensions already allocated around Cambridge and the strategic growth proposed at Cambourne, Northstowe, Waterbeach and Bourn Airfield through the allocation small and medium sized sites across the plan area. This is imperative to not only maintain supply and flexibility but to ensure that the rural areas can prosper and thrive and are not left behind.

NIAB Trust's sites propose both residential and employment at the following sites which we consider to be ideal sites to be allocated in the new local plan.

- Land west of South Road, Impington: Residential
- Land east of Redgate Road, Girton: Residential
- Land north-east of Villa Road, Histon: Employment

Site Description

The sites are located to the south west and west of Histon and Impington and to the east of Girton. The three sites are located within the Green Belt, to the north of the A14. Their location between Girton, Histon and Impington which are settlements on the edge of Cambridge means they have excellent public transport links into Cambridge City Centre, which are also accessible by cycling and walking, however linkage could further be improved, and could be done so through the development of land within my client's ownership to the south west of Impington in line with the emerging Neighbourhood Plan aspirations.

Histon and Impington are identified in the current South Cambridgeshire Local Plan as a Rural Centre (Policy S/8) and are described as *'the largest, most sustainable villages of the District.'* Due to this, there is no strategic constraint on the amount of development land for housing within their development frameworks.

Girton however, is identified as a Minor Rural Centre (Policy S/9), the next level down from Rural Centre's within the hierarchy which are considered to have *'a lower level of services, facilities, and employment than Rural Centres, but a greater level than most other villages in South Cambridgeshire, and often perform a role in terms of providing services and facilities for a small rural hinterland'*. The current policy (Policy S/9) permits *'Residential development and redevelopment up to an indicative maximum scheme size of 30 dwellings...within the development frameworks of Minor Rural Centres'*.

The *"presumption in favour of sustainable development"* is at the heart of the National Planning Policy Framework 2019 (NPPF). The Planning and Compulsory Purchase Act 2004 (Section 39(2)) establishes a legal requirement for plans to be prepared with the objective of contributing to the achievement of sustainable development.

Paragraph 16 of the NPPF requires plans to be prepared positively in a way that is aspirational but deliverable. Paragraph 59 reminds Local Planning Authorities that the Government's objective is to significantly boost the supply of homes and that it is therefore important that a sufficient amount and variety of land comes forward where it is needed.

Planning Policies are required to identify a supply of specific, deliverable sites for the first 5 years of the plan period and specific, developable sites (or locations for growth) for the next 5 to 10 years. Paragraph 68 recognises the important contribution that small and medium sized sites can make to meet the housing requirement of an area as they can be built out relatively quickly and Neighbourhood Planning groups are encouraged to allocate small and medium sized sites, suitable for housing, in their area. It is considered that our client's sites would fulfil all these National Planning policy objectives. It is acknowledged that the site known as

Land west of South Road, Impington put forward by my client is large in scale and depending on the Council's development strategy could be used to deliver large scale development or alternatively a smaller scale scheme in line with the emerging Neighbourhood Plan aspirations for sites of 50 units or less.

Furthermore, in order to ensure that Local Authorities have specific deliverable sites they are required to maintain a 5 Year Housing Land Supply with an appropriate buffer. In addition, to ensure supply is maintained, they are also required to monitor the progress in building out sites, to comply with the housing delivery test. Currently, the supply of housing in South Cambridgeshire is only marginally above the 5-year requirement (5.05 years – Appeal Reference APP/W0530/W/19/3220761) and the Government's recently published housing delivery figures for 2019 indicate delivery to be at 95% which while not significantly below the target is still falling short.

In developing the new Local Plan, it will be important that an adequate mix of sites is promoted including a proportion of smaller and medium sized sites, such as our client's sites on the edge of, and in between Histon and Impington and Girton to meet the needs of the Local Plan Housing Area and to support the delivery of additional employment sites. This approach was advocated by the Inspector in the 2018.

The Council will be aware of the recent outcome of the Uttlesford Local Plan Examination, where the inspector was concerned that an overreliance had been placed on the development of three new garden communities and that insufficient smaller sites had been identified throughout the rural area to ensure that a 5-year supply could be maintained.

Furthermore, there is increasing evidence (such as that set out in the Cambridge & Peterborough Independent Economic Review) that exceptional circumstances exist – namely that the recent *'Growth in employment has not been matched by corresponding house-building, or developments infrastructure'*, and that *'We are rapidly approaching the point where even high-value businesses may decide that being based in Cambridge is no longer attractive. If nothing is done, the damage to society from the continuing drift away of less well-paid workers may become irreparable'*.

As previously stated, the sites are located within the Green Belt and therefore the Council will need to amend the boundary to accommodate the allocation of any of the sites. Paragraph 136 of the NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation and updating of plans. The preparation of the new Local Plan therefore represents an opportunity to review the Green Belt boundary. Paragraph 138 of the NPPF indicates that Green Belt release should be targeted at sustainable locations well served by public transport such as Histon and Impington, which benefits from the guided busway, and Girton. It goes on to state that compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land should be included. The NIAB Trust extensive land holding at Park Farm would allow these objectives to be fulfilled.

Public open space could be provided for the enjoyment of both new and existing residents through the development of my client's sites. There is the opportunity expand the connectivity of the footway/cycleway network via the A14 bridge to Darwin Green, broadly in line with the aspirations of the Histon and Impington Neighbourhood Plan. It will be possible to deliver net biodiversity gains compared to the current agricultural use through the provision of green infrastructure, wildlife corridors and dedicated ecology areas which would also contribute to the big themes that are proposed to be included within the new Local Plan. We therefore conclude that the new local plan should take the opportunity to review the Green Belt boundaries around Park Farm and allocate these additional development sites.

This letter should be read in conjunction with the completed forms and site location plans that accompany this submission. I trust that the information submitted is sufficient for your purpose but should you require any additional information, please do not hesitate to contact me.

Yours faithfully

Adam Davies
Associate Director
Cambridge Planning

Enc: Completed Forms
Site Location Plans