
Greater Cambridge Local Plan Issues and Options Response

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1. Introduction

- 1.1. Savills is instructed by Redrow Homes Ltd (Redrow) to respond to the current Greater Cambridge Issues and Options Consultation. Redrow is a major housebuilder with a track record of delivering new homes within the area.
- 1.2. In March 2019 'Land south of High Street, Hauxton' (Appendix 1) was submitted in response to the 'Call for Sites' and was promoted for residential use with associated infrastructure. Additional technical information has now been prepared is appended to this submission to inform the forthcoming Strategic Housing Land Availability Assessment and the next stage of local plan consultation.
- 1.3. These representations are structured in such a way that they respond to relevant sections of the Regulation 18 Issues and Options consultation. It is clear that the emerging Local Plan has an important role in shaping the future for Greater Cambridge as well supporting the national aspirations for both economic and housing growth within the Oxford to Cambridge corridor.

2. Issues and Options

Section 2 – Involving our communities

- 2.1. It is acknowledged that South Cambridgeshire Council and Cambridge City Council have taken a proactive approach towards encouraging engagement in the plan making process through the use of social media and holding various local plan events. Support is given to this inclusive approach.

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

- 2.2. 'Land south of High Street, Hauxton' was submitted in response to the 'Call for Sites' in March 2019 on behalf of Redrow Homes Ltd. This site represents an opportunity for sustainable expansion of Hauxton immediately adjacent to existing housing and Hauxton Primary School. The site is also well related to existing public transport links, including Shelford Railway Station and bus stops connected by bus routes into the city centre.
- 2.3. The site is promoted with an indicative density range of 30 to 35 dwelling per hectare, as such the site has an indicative capacity of 240 and 280 dwellings.
- 2.4. Additional technical information has now been prepared is appended to this submission to inform the forthcoming Strategic Housing Land Availability Assessment and the next stage of local plan consultation.
- 2.5. A Landscape and Visual Appraisal and Green Belt Review can be found at Appendix 2.
- Paragraph 2.14 of the LVA report explains that the sites is considered to be of 'Moderate-Low Landscape value'. It is noted that *"the site is of simple composition with few defining elements to distinguish it, it is relatively well enclosed by established off-site vegetation with a relatively intact historic field pattern that presently provides and defines the settlement edge of Hauxton."*
 - Section 7 of the LVA report assesses the contribution the site makes to the five functions of Green Belt as set out at paragraph 134 of the National Planning Policy Framework. Paragraph 7.11 concludes that the site is considered to be of 'Moderate-Low value' in terms of the functions and use of the Green Belt.
 - It is acknowledged at paragraph 7.11 that the site does have a Moderate – High openness but that, principally due to its noted sense of enclosure along its eastern and western boundaries, it is not located within a strategically important part of the Green Belt. It makes a limited contribution to the functions of the Green Belt in checking unrestricted sprawl and partial contribution to preventing settlements from merging into each other and safeguarding the countryside from encroachment.
 - Additional consideration has been given to how the site contributes towards the purposes of the Cambridge Green Belt. Paragraph 7.25 notes that overall the site has a 'negligible role' in contributing to the perceived setting of Cambridge.
 - Paragraph 8.1 of LVA report lists the key landscape opportunities associated with residential development at the site which include:

- *“The Site is generally well-contained visually by a combination of existing vegetation, motorway embankment and built development meaning there are relatively few visual receptors likely to be affected by the introduction of development on the Site.”*
 - *“The opportunity to present a stronger, defined eastern edge to Hauxton village”*
 - *“Proximity to the existing village edge which provides the opportunity to integrate new development with the existing village fabric, with a connection to the existing road network via a new entrance close to the last property of Hauxton to the south of the High Street”.*
 - *“A broader opportunity to build upon the wooded and well-treed character of the area and to strengthen local landscape character whilst also addressing the more visually exposed areas of the Site, principally to the south.”*
- 2.6. An indicative ‘Landscape Design Strategy’ accompanies the LVA report which illustrates how the key landscape features can be successfully accommodated as part of residential development at the site. This includes new areas of public open space and enhanced planting throughout the site with a particular focus along the western and southern boundaries of the site.
- 2.7. Given the proximity of the site to the raised M11 motorway an Air Quality Assessment (Appendix 3) and Acoustic Impact Assessment (Appendix 4) have been produced. Both reports conclude that the baseline acoustic and air quality results would not preclude residential development at the site.
- 2.8. In addition to the existing site context, it is worth considering the potential of the site in the context of emerging strategic public transport schemes.
- ‘East-West Rail’ is a proposal by the East West Rail Company for a new railway line linking Bedford and Cambridge. On 30th January 2020 the Government announced the preferred route for the new rail line was consultation ‘Route Option E’¹. Hauxton is located within the ‘preferred route option area’ with connectivity to Shelford Rail Station.
 - ‘Cambridgeshire Autonomous Metro’ is a vision for an expansive metro-style network proposed by the Cambridgeshire and Peterborough Combined Authority. On 27th February a public consultation was launched seeking views about the proposal and the indicative route map for the ‘Cambridgeshire Autonomous Metro’ network². ‘Hauxton Park and Ride’ is identified as part of the indicative network route with connections to the new Cambridge South Rail Station.
 - ‘Cambridge South Rail Station’ is a proposal for a new rail station to the south of Cambridge to better integrate southern Cambridge to the rail network to primarily benefit Addenbrooke’s and Royal Papworth hospitals and the Cambridge Biomedical Campus but this will also benefit local residents. Network Rail launched a public consultation on 20th January 2020 about three site options for the new station. The consultation information identifies the delivery of the new station in 2025. As

¹https://eastwestrail-production.s3.eu-west-2.amazonaws.com/public/Preferred-Route-Option-Announcement/Files/f8983a114f/RouteOption_Web_Map_Full-002.pdf

² <https://cam.consultationonline.co.uk/the-proposals/>

identified above, 'Hauxton Park and Ride' is identified as part of the indicative Cambridgeshire Autonomous Metro network route with connections to the new Cambridge South Rail Station.

Question 3. Please submit any sites for green space and wildlife habitats you wish to suggest for consideration through the Local Plan.

- 2.9. An indicative 'Landscape Design Strategy' accompanies the LVA report (Appendix 2), this sets out some key landscape principles for residential development at this site including areas of public open space. Development would provide opportunities for the enhancement of existing features and creation of new habitats, provision of green infrastructure, including net biodiversity gain that is envisaged with these proposals.
- 2.10. Larger scale proposals clearly offer the greater opportunity for strategic green infrastructure than smaller individual sites, where often local requirements for green open space are not triggered, or are not possible due to site constraints.

Section 3 – About the plan

Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for?

- 2.11. The Planning Practice Guidance states: "...*The National Planning Policy Framework requires strategic policies to look ahead over a minimum 15 year period from adoption, although authorities are required to keep their policies under review...*" (Paragraph: 012 Reference ID: 2a-012-20190220).
- 2.12. It is acknowledged that both the adopted Cambridge City Local Plan (2018) and the adopted South Cambridgeshire Local Plan (2018), include policy commitments to undertake an early reviews of the respective Local Plans to commence before the end of 2019 with submission taking place by the end of Summer 2022.
- 2.13. A Greater Cambridge Local Development Scheme has been produced (as updated in November 2019) which identifies the key stages of the emerging Greater Cambridge Local Plan. A further Draft Local Plan (Reg 18) is to be published in Autumn 2020 and the Regulation 19 Proposed Submission Local Plan is due to be the subject of consultation in Autumn 2021. The Councils anticipate adoption of the emerging Local Plan in Summer 2023.
- 2.14. In light of the Council's anticipated timescales, the emerging Local Plan could be adopted in 2023 and would therefore policies it would contain would have 17 year longevity, exceeding the minimum requirement for a 15 year longevity is supported. The additional flexibility allows for potential delays at Examination stage.
- 2.15. The Plan makes sensible assumptions about the timescales to be considered for growth. There will be substantial change in the period to 2040, including those relating to the carbon zero agenda and the development of new public transport schemes, but this length of time is necessary both to meet the requirements of the NPPF and to properly consider how strategic infrastructure will work.

Question 5. Do you think we have identified the right cross-boundary issues and initiatives that affect ourselves and neighbouring areas?

- 2.16. It is essential not just for the prosperity of those living in the area, but also for the wider region, that Greater Cambridge plays its part in delivering economic and housing growth.
- 2.17. Support is given to the approach to consultation with wider partnerships, and places particular emphasis on the need to deliver the growth associated with the Oxford Cambridge Arc. Engagement with key cross boundary stakeholders will require co-ordination with the combined Cambridgeshire and Peterborough Authority together with the County Council and other Local Authority neighbours.

Section 4 – The big themes

Questions 6 and 7. Do you agree with the potential big themes for the Local Plan? How do you think we should prioritise these big themes?

- 2.18. Sustainable development is defined within the National Planning Policy Framework. Paragraph 8 explains that achieving sustainable development means pursuing the three objectives of economic, social and environmental in mutually supportive ways. Whilst these are interdependent they need to be pursued in mutually supportive ways.
- 2.19. The big themes are an excellent way to progress the underpinning principles for growth in Greater Cambridge. Care needs to be used in prioritising each of these themes, as informed by the supporting evidence base, in particular the Sustainability Appraisal. It is clear that the location of new development will play a key part in sustainability principles, including impacts on traffic movements, which are a key factor affecting climate change, wellbeing, social inclusion and place making.

Questions 12: How should the Local Plan help us improve the natural environment? How do you think we should improve the green space network?

- 2.20. New development provides significant opportunities for improvements to the natural environment, particularly with larger scale development sites. Often, agricultural land provides little in terms of biodiversity except for in the field margins, whereas new developments are able to target specific biodiversity issues, and provide well planned green infrastructure that relates and connects to existing natural features. The Local Plan should require net biodiversity gains to be fully explored and provided.

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

- 2.21. Green Infrastructure is intrinsic to good design and should be planned as part of all new developments. Evidence shows that small green spaces provided throughout development increase the amounts of physical activity that residents carry out and, and that these spaces are encourage social interaction. Support should be given to development opportunities which connect with the existing green space network.

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

- 2.22. The Issues and Options report correctly identifies that net gains can be achieved at building design level through to strategic landscape management level. Net gain can also be achieved through off-site measures, although it would seem appropriate that mitigation is carried out on site where applicable.

- 2.23. In carrying out biodiversity assessments, value should be placed on the longevity of new communities and new natural habitats associated with them. These habitats are designed for perpetuity. Existing trees and hedgerows may be given high biodiversity value because of their longevity, but it should also be recognised that older trees will eventually die. New environmental features and natural habitats can have significant ecological value as they mature over a period of decades following construction.
- 2.24. It is acknowledged that DEFRA is piloting a 'biodiversity net gain calculator' and there is the ability for Local Authorities to prepare their own calculator, it is highly recommended that there is a clear, transparent and consistent guide to assist in the application of such a tool. This will be of benefit to Developers, the Councils and the local community.

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

- 2.25. We neither agree nor disagree that this particular measure should be included in the Local Plan, until specific evidence has been considered. Whilst it would seem beneficial to increase tree cover across the area, but care should be used in determining how net biodiversity gains are maximised (as noted in response to question 14 above).

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

- 2.26. The promotion of social inclusion in Cambridgeshire is an important consideration. The provision of larger housing sites which deliver a range of house types, including affordable housing, provides opportunities for new inclusive neighbourhoods. Particularly if new residential development is well related to existing community facilities such as schools and in accessible locations. Access to public transport is a key measure for social inclusion. In less affluent households, a second car is often not available, limiting the ability of the household to access additional jobs.

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

- 2.27. New proposals should include a strong element of public consultation with the local community. Pre-application engagement is encouraged by the National Planning Policy Framework as it is recognised that it can help to gain buy-in from the community
- 2.28. Engagement the Council's Officers is also an important part of the process to shaping the delivery of new development.

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

- 2.29. This is a key question for new development and is achieved through various strands of consideration (as listed at page 43) throughout the planning process. In respect of residential development, inclusivity is achieved by planning for a range of homes for all parts of the community and ensuring that infrastructure, services and facilities are provided alongside development. Detailed design also plays a vital role in the safety of the new residential schemes.

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

- 2.30. There is a significant body of evidence emerging³ that shows healthy lifestyles are best supported by developments that are able to provide:
- 'Gentle density' that is only achievable in more urban areas;
 - Where public transport is available;
 - Walkable neighbourhoods;
 - Shops, services and places to meet;
 - Leafy and with regular green spaces.

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

- 2.31. It is acknowledged that air quality is a key consideration for Greater Cambridge. In seeking to improvements in air quality the Councils need to be informed by robust technical evidence base. Additionally it is noted that the Councils have recently introduced the Sustainable Design and Construction SPD, a review of the successes of this document should inform emerging policy.

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

- 2.32. Existing landscape and settlement patterns should inform new development, in conjunction with other environmental constraints, potential opportunities and public consultation.

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

- 2.33. The National Planning Policy Framework and National Design Guide reiterate the importance of good design. There are various opportunities throughout the development process to shape design ranging from pre-application consultation to detailed material considerations.
- 2.34. Where applicants have taken to the time to seek pre-application advice it is crucial that the advice provided is aspirational but pragmatic to enable the timely delivery of development.

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

- 2.35. The Issues and Options report identifies at page 50 that the Greater Cambridge economy is of national importance. It is clear that Greater Cambridge has a crucial role to play in the Oxford to Cambridge Arc, the London-Stansted-Cambridge corridor; as well as the Cambridge – Norwich tech corridor. Supporting the continued growth of the economy is a crucial role for the emerging Local Plan. Planning for sufficient housing to support such economic growth is therefore also critical.
- 2.36. The ability for Greater Cambridge to provide economic growth, and therefore improvements in standards of living for those in the area, are highlighted thought the Cambridgeshire and Peterborough Independent Economic Review (CPIER), September 2018. The CPIER indicates that employment growth has been faster

³ [Spatial Planning for Health – an evidence resource for planning and designing healthier places, Public Health England, 2017](#)

than envisaged. The Councils should look to draw on this opportunity to deliver better lifestyles for all those living and working in the wider region, and in particular to deliver benefits across the communities of Greater Cambridge.

Question 31: How should the Local Plan help to meet our needs for the amount and types of new homes? and Question 32: 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?

- 2.37. It is acknowledged that the local housing need as informed by the Standard Method calculation identifies a need for a minimum of 1,800 homes per year within Cambridge and South Cambridgeshire. It is strongly recommended to the Councils that the emerging Local Plan should be planning for an increased supply of housing in order to support economic growth aspirations for the area and to ensure the full range of housing is provided to meet the needs of the area particularly with regard to student accommodation.
- 2.38. The CPIER indicates that in order to realise the growth that could be delivered, a total of some 2,900 homes per year will be needed. If such levels cannot be reached, the Local Plan will fail in its ambitions to deliver other key aspects of the Local Plan, which necessarily need to be accompanied by housing growth.
- 2.39. It is also recommended that the emerging Local Plan is informed by a robust evidence base to establish the size, type, and tenure of housing needed in the area.

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

- 2.40. To ensure the Local Plan is inclusive there is a need for the Local Plan to provide for a wide range of housing including a diverse range of tenures. It is also recommended that the emerging Local Plan is informed by a robust evidence base to establish the size, type, and tenure of housing needed in the area.

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

- 2.41. The emerging Local Plan should aspire to a high standard of design whilst taking a pragmatic approach to specific site considerations. Specific policy requirements, such as the incorporation of minimum space standards and the energy efficiency measures, need to be appropriately justified as part of the supporting evidence base.

Question 36: How should the Local Plan ensure the right infrastructure is provided in line with development? and Question 38. What do you think the priorities are for new infrastructure?

- 2.42. Local infrastructure such as schools, health facilities and leisure facilities are key elements of new development. The Issues and Options report identifies at page 67 the importance of the timing of infrastructure delivery and this is considered to be a priority. It is recommended the Councils are informed by robust technical studies including the Local Transport Plan, planning for school places, and viability assessments to consider how and when key infrastructure is delivered.
- 2.43. Consideration should also be given to the potential development has to unlock opportunities for expansion of existing infrastructure, in particular schools.

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?

- 2.44. In preparing the Local Plan, consideration needs to be given to existing and planned transport improvements within the area and how these could encourage a shift away from car use. In recent weeks there have been a number of key announcements and public consultations in respect of strategic transport schemes including East West Rail and Cambridgeshire Autonomous Metro.
- 'East-West Rail' is a proposal by the East West Rail Company for a new railway line linking Bedford and Cambridge. On 30th January 2020 the Government announced the preferred route for the new rail line was consultation 'Route Option E'. Hauxton is located within the 'preferred route option area'.
 - 'Cambridgeshire Autonomous Metro' is a vision for an expansive metro-style network proposed by the Cambridgeshire and Peterborough Combined Authority. On 27th February a public consultation was launched seeking views about the proposal and the indicative route map for the 'Cambridgeshire Autonomous Metro' network. 'Hauxton Park and Ride' is identified as part of the indicative network route with connections to the new Cambridge South Rail Station.
 - 'Cambridge South Rail Station' is a proposal for a new rail station to the south of Cambridge to better integrate southern Cambridge to the rail network to primarily benefit Addenbrooke's and Royal Papworth hospitals and the Cambridge Biomedical Campus but this will also benefit local residents. Network Rail launched a public consultation on 20th January 2020 about three site options for the new station. The consultation information identifies the delivery of the new station in 2025. As identified above, 'Hauxton Park and Ride' is identified as part of the indicative CAM network route with connections to the new Cambridge South Rail Station.
- 2.45. Consideration should also be given to the potential development has to act as a catalyst to encourage the use of more sustainable modes of transport through well integrated footways and cycleways, and accessibility to public transport.

Section 5 – Where to build

Question 39: Should we look to remove land from the Green Belt if evidence shows it provides a more sustainable development option by reducing travel distances, helping us reduce our climate impacts

- 2.46. Yes, strong support is given to a Green Belt Review.
- 2.47. The release of sites from the Green Belt will unlock the potential for sustainable sites such as 'Land South of High Street, Hauxton'. The site was submitted in response to the 'Call for Sites' in March 2019 on behalf of Redrow Homes Ltd. It represents an opportunity for sustainable expansion of Hauxton immediately adjacent to existing housing and Hauxton Primary School. The site is also well related to existing public transport links, including Shelford Railway Station and bus stops connected by bus routes into the city centre.
- 2.48. This submission is supported by a Landscape and Visual Appraisal and Green Belt Review Report (Appendix 2) for which identifies the site has a '*Moderate-Low value*' in terms of the functions and use of the Green Belt.
- 2.49. As highlighted elsewhere in this submission, consideration needs to be given to existing and planned

transport improvements within the area and how these could encourage a shift away from car use. In recent weeks there have been a number of key announcements and public consultations in respect of strategic transport schemes including East West Rail and Cambridgeshire Autonomous Metro.

- 'East-West Rail' is a proposal by the East West Rail Company for a new railway line linking Bedford and Cambridge. On 30th January 2020 the Government announced the preferred route for the new rail line was consultation 'Route Option E'. Hauxton is located within the 'preferred route option area'.
- 'Cambridgeshire Autonomous Metro' is a vision for an expansive metro-style network proposed by the Cambridgeshire and Peterborough Combined Authority. On 27th February a public consultation was launched seeking views about the proposal and the indicative route map for the 'Cambridgeshire Autonomous Metro' (CAM) network. 'Hauxton Park and Ride' is identified as part of the indicative network route with connections to the new Cambridge South Rail Station.
- 'Cambridge South Rail Station' is a proposal for a new rail station to the south of Cambridge to better integrate southern Cambridge to the rail network to primarily benefit Addenbrooke's and Royal Papworth hospitals and the Cambridge Biomedical Campus but this will also benefit local residents. Network Rail launched a public consultation on 20th January 2020 about three site options for the new station. The consultation information identifies the delivery of the new station in 2025. As identified above, 'Hauxton Park and Ride' is identified as part of the indicative CAM network route with connections to the new Cambridge South Rail Station.

Question 40 and 41: How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages? 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?

- 2.50. The South Cambridgeshire Local Plan classifies villages into four categories dependent on the availability of local services and public transport connectivity. Whilst broad support is given to this approach it discourages larger scale proposals which could incorporate or unlock the delivery of key facilities. As such the amount of housing (and number of jobs) to be delivered in villages should be considered more positively going forward.
- 2.51. It is strongly recommended that South Cambridgeshire District Council commissions an up to date settlement assessment identifying key facilities at each settlement taking into consideration planned transport improvements within the area.

Question 42. Where should we site new development?

- 2.52. There needs to be a balanced approach to the location for new development across Greater Cambridge to support the area as a whole. Of the options presented at Fig 26 (page 81), none of the options should be pursued in isolation. Instead a blended option, favouring sustainable and accessible locations should be supported.
- 2.53. It is crucial that the emerging Local Plan does not limit development at villages in such a way that they stagnate. Development is often critical to continued viability of villages and maintenance of existing services and incorporation of new open space and play facilities to the benefit of new and existing residents.

- 2.54. 'Land south of High Street' is a site which represents an opportunity for sustainable expansion of Hauxton, immediately adjacent to existing housing and Hauxton Primary School. The site is also well related to existing public transport links, including Shelford Railway Station and bus stops connected by bus routes into the city centre. The documents appended to these representations identify how development could be successfully accommodated at the site following its release from the Green Belt.
- 2.55. In addition to the existing site context, it is worth considering the potential of the site in the context of emerging strategic public transport schemes. In respect of 'East-West Rail', Hauxton is located within the preferred route area for the new rail line connection between Bedford and Shelford Rail Station. Most recently 'Hauxton Park and Ride' is identified as part of the indicative 'Cambridgeshire Autonomous Metro' network route with connections to the new Cambridge South Rail Station.
- 2.56. We welcome further opportunity for engagement in the Local Plan making process to highlight the potential for sustainable residential development at 'Land south of High Street, Hauxton'.



Appendices



Appendix 1 Site Location Plan



Appendix 2

Landscape and Visual Appraisal and Green Belt Review

Appendix 3 Air Quality Assessment



Appendix 4 Acoustic Impact Assessment

