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Sent via email: [planningpolicy@scambs.gov.uk](mailto:planningpolicy@scambs.gov.uk)

Dear Sir/Madam,

**Re: Submission of Land on North Side of Newton Road at Whittlesford for Call for Sites consultation regarding Greater Cambridge Local Plan**

We are instructed by Axis Land Partnerships (Axis) to submit land at Whittlesford to the Call for Sites that is being carried out as part of the preparation of the Greater Cambridge Local Plan (GCLP). The land lies within South Cambridgeshire (who is preparing the GCLP in partnership with Cambridge City Council). The land is being promoted for residential development.

The Plan (for which, it is understood, a Regulation 18 consultation will take place in Autumn 2019; with an adoption in Summer 2023) follows the joint adoptions of Local Plans for South Cambridgeshire and Cambridge City Council in September and October 2018 respectively.

The Plans for both South Cambridgeshire and Cambridge City were subject to an immediate review to ensure that changes to national guidance on the housing requirement could be addressed as expediently as possible. In their report to the South Cambridgeshire Plan, the Inspectors observed:

*To avoid further, potentially substantial, delay in the adoption of the Plan, we have taken the view that the most pragmatic approach is for the latest Government household projections to be considered through the early review of the Plan.*

This letter sets out the housing requirements that we understand the GCLP will have to meet, alongside how the emerging Plan may interact with the recently adopted Plans for both planning authority areas. Its conclusions, in summary, are as follows:

- **The local housing requirement will increase substantially under the standard methodology;**
- **The exceptional circumstances occasioned by the increased housing requirement under the preparation of a new Local Plan justifies the release of land from the Green Belt to accommodate necessary growth;**
- **The currently adopted Plan relies heavily on large sites, and it is not considered sustainable to supplement this strategy with further large site (the failure of any one of which could substantially derail the success of the Plan);**

- **The land that is being promoted by Axis is sustainable and deliverable. It should form part of the local authorities' joint Local Plan for meeting its developmental needs over the Plan period.**

### **Local Housing Requirements**

The current Local Plans for South Cambridgeshire and Cambridge City were prepared hand in glove, and were examined in tandem. The incorporation of the two authorities under a single development strategy does not, therefore, represent a significant departure from previous policy. Jointly, the Plans provide for a total supply of 19,500 homes in South Cambridgeshire and 14,000 in Cambridge City over the period 2011-2031. This equates to 975 dwellings per annum (dpa) in South Cambridgeshire, and 700dpa in Cambridge: a total of 1,675 dpa.

The Standard Methodology for calculating housing need (to which the GCLP will be subject), sets the following *minimum* requirements for housing:

- Cambridge City - 585 dpa; and
- South Cambridgeshire - 1,136 dpa; and
- Total – 1,721 dpa.

In addition to providing 1,721 dpa after the expiration of the currently adopted Plans in 2031, the GCLP will also need to address the undersupply during the period where both Plans overlap. Such pressure may be augmented by the Oxbridge arc, which is set to become a major area for national growth over the coming years.

Discounting the delivery under the recently adopted Plans from 2023 to 2031, and assuming that the GCLP will have a time horizon of twenty years from adoption (paragraph 22 of the NPPF states that strategic plans should look ahead over a minimum of 15 years from adoption), the GCLP will have to provide the following housing figures:

- 2023 to 2031: 46 dpa;
- 2032 to 2043: 1,721 dpa; and
- Total: 19,299 dwellings.

This total does not take into account changes that will occur to the standard methodology. These will change through updated evidence (new median house price to wages ratios, expected in March 2019; and household projections, expected April 2020); and through any updates to the workings of the methodology itself (the Government, in its technical consultation of October 2018, pledged amendments to this process by the time the next household projections are published). These factors are likely to see the housing requirements increase, and the figure proposed above should therefore be seen (as per national guidance) as the *minimum* target.

### **Exceptional Circumstances for Green Belt Release**

Paragraph 136 of the NPPF states that 'once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans'.

In their report to the South Cambridgeshire Local Plan, the Inspectors considered exceptional circumstances justified: 'the Plan is consistent with national policy in its approach to the Green Belt, that the allocations in Green Belt are justified by exceptional circumstances.'

If exceptional circumstances arose when the authorities were planning for 19,500 dwellings, it is safe to operate on the understanding that they will apply for the preparation of the GCLP, which seeks to plan for roughly the same amount. In light of the increased housing requirement, exceptional circumstances clearly justify the release of Green Belt land for development under the GCLP.

### Current Strategy in South Cambridgeshire's Adopted Development Plan

Of the 19,500 units provided across South Cambridgeshire over the period up to 2031, the vast majority are to be delivered across three strategic sites:

- Waterbeach New Town – 8,000 to 9,000 units
- Bourne Airfield – 3,500 units; and
- Cambourn West – 1,200 units;

These total 13,700 units: over 70% of the Plan's collectively stated housing requirement. Much of the remaining target will be provided through strategic sites allocated in previous Local Plans. The new settlement of Northstowe, for example, was identified for 10,000 units in the South Cambridge Local Development Framework adopted in 2010. Phase 2 was granted outline permission for 3,500 homes in 2017.

As is clear, there has been a continued trend for the authorities to accommodate future growth on large strategic sites. Whilst such allocations can play an important role in providing future growth, over-reliance on them can threaten the soundness of a development strategy.

An example of this is already present within the Greater Cambridge area: after South Cambridgeshire adopted their Local Development Framework in 2010, it emerged that identified land at Cambridge East would not be developed in full during the Plan period. It was initially expected to provide between 10,000 and 12,000 new homes alongside employment, retail and services. It is now identified for only 2,500 units. Additional land at Cambridge East is safeguarded until beyond 2031. If this safeguarded land is included within the GCLP, then the emerging Plan is already reliant on one strategic site in order to meet its housing requirement.

Considering Greater Cambridge's current dependency on a small number of large strategic sites, it is not considered sustainable to increase this dependency further through the identification of further major sites to accommodate growth up to 2043. Any future strategy should therefore seek to identify small and medium sized sites to supplement the existing strategic land that already forms part of the development strategy after the adopted plan period of 2031. Such sites can be identified throughout the district, including at smaller settlements.

### The Settlement

Whittlesford is defined in the South Cambridgeshire Local Plan as a 'group village'. Group villages are defined as follows:

*Group villages are generally less sustainable locations for new development than Rural Centres and Minor Rural Centres, having fewer services and facilities allowing only some of the basic day-to-day requirements of their residents to be met without the need to travel outside the village.*

However, the proliferation and worsening condition of small, unsustainable villages is a growing concern across the country. The matter was addressed as early as June 2008 in the *Taylor Review on the Rural Economy and Affordable Housing*, commissioned by the Prime Minister. It stated:

*Villages, "protected" from development, face becoming increasingly exclusive communities of the retired and of wealthy commuters travelling ever longer distances to work, losing their services like schools and shops, and with local jobs either lost, or serviced by people commuting in from larger town [...] This is not a sustainable future for rural England. We need to better balance social and economic sustainability with environmental sustainability.*

In November 2018, CLA published *Sustainable Villages – making rural communities fit for the future*. The report assessed 70 Local Plans in England and found that 2,154 villages within their review were unsustainable in precisely the way outlined a decade earlier by the Taylor Review. Lack of growth within

settlements leads to local services closing, and renders the area less viable as a location for housing growth. This lack of viability then negatively impacts a development’s ability to provide viable affordable housing. This creates a ‘sustainability trap’ whereby an area becomes more and more unaffordable, and less and less sustainable/viable.

Villages like Whittlesford, as evidenced by its classification within the recently adopted South Cambridgeshire Plan, are clearly at risk of falling further into this ‘sustainability trap’. The identification of housing sites around villages like Whittlesford therefore serves to benefit Greater Cambridge in two ways:

- Allocation of a range of small and medium sized sites that preclude an over-reliance on major strategic land; and
- Helping to prevent the increased unsustainability of small rural settlements.

Whittlesford is outside the Green Belt, but the settlement boundary is tight to existing development. In order to provide for future development within the area land will therefore have to be released from the Green Belt as a matter of course as part of the plan making process.

**The Site**

**Land on North Side of Newton Road**

The site is undeveloped land within the Green Belt, located approximately 850m to the northwest of Whittlesford and within Flood Zone 1. It is immediately north of a small ribbon of residential development along Newton Road. It is irregular in shape and measures approximately (16.5 ha). It can be considered suitable for around 570 dwellings at a density of 30-35 dwellings per hectare.

The site is considered to be developable, deliverable, and sustainable, and should be included within the Greater Cambridge’s strategy for residential development under the emerging Local Plan.

The following provides an assessment of the site in the context of the purposes of the Green Belt and other development management considerations.

Green Belt Purposes		
Consideration	Assessment	Comment
<b>Green Belt Purpose 1 Unrestricted Sprawl</b>	The site is contained to the west by the M11, and to the south by Newton Road (which includes existing development and woodland). To the north and east are pockets of woodland that also serve as clearly defensible boundaries. It is surrounded on all sides by hedgerows.	The site has strong defensible boundaries that reduce risk of unrestricted sprawl.
<b>Green Belt Purpose 2 Merging Settlements</b>	The western side of Whittlesford is not near to any settlements.	Development on the site does not present a threat to settlement merging

**Green Belt Purpose 3  
Countryside Encroachment**

The site is not considered to be in the open countryside, and is adjacent to existing residential development.

Development on the site is not considered to represent countryside encroachment

**Green Belt Purpose 4  
Setting of Historic Towns**

The site is not within or adjacent to any registered heritage assets.

Development on the site is not thought to represent an impact on the historic environment.

**Development Management Considerations**

Consideration	Assessment	Comment
<b>Landscape</b>	The site is not within any designated landscape areas such as AONB or National Parks	Nothing at this stage to suggest an unacceptable impact on the landscape. Concerns about specific landscape issues may be addressed at a later stage.
<b>Ecology</b>	The site is not within any designated ecological areas such as SSSI, SPA, SAC.	Nothing at this stage to suggest an unacceptable impact in ecological terms. This may be confirmed through additional research.
<b>Heritage</b>	The site is not within or adjacent to any registered heritage assets.	Development on the site is not thought to represent an impact on the historic environment.
<b>Flooding</b>	The site is within Flood Zone 1	Nothing at this stage to suggest the site has flooding concerns. This may be confirmed through additional research.
<b>Noise</b>	The site is adjacent to the M11.	Whilst the proximity to the M11 may generate some noise, this can be addressed through appropriate design and mitigation.
<b>Archeology</b>	The site is not within an area of archaeological significance.	Nothing at this stage to suggest this is a cause for concern.
<b>Defensible Boundaries</b>	The site is contained to the west and south by the public highway, with woodland and hedgerows to the north and east.	The site is considered to have strong, defensible boundaries.
<b>Access</b>	Access to the site is from Newton Road	There are no concerns regarding access to the site.

**Conclusion**

The Greater Cambridge Local Plan needs to provide for a significant increase in housing over the next twenty or so years. There are, as is clear from the analysis above, clear reasons to justify Green Belt land release.

Owing to the existing dependency on strategic sites, it is not considered sound to allocate even more large sites to accommodate the housing requirement.

In addition, small rural villages such as Whittlesford risk being ‘left behind’ and rendered unviable locations for development unless their long term viability is secured through sustainable growth.

The development strategy should, therefore, address both considerations at once by identifying small sites that minimize Greater Cambridge’s exposure to large sites failing to come forward as anticipated, whilst simultaneously improving the future viability of villages around the authority areas.

Land being promoted at Whittlesford by Axis should therefore be considered and identified as part of the GCLP’s strategy for development, and we welcome further engagement with the Greater Cambridge authorities going forward in order to discuss further the benefits of the site.

Yours faithfully,



**Henry Asson**  
BA (Hons)  
Planner

