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For and on behalf of
Endurance Estates

**Representations to Greater Cambridge Local Plan Regulation 18 Issues and Options
Consultation 2020**

Land South of Branch Road, Comberton

**Prepared by
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1.0 INTRODUCTION

- 1.1 These representations have been prepared by DLP Consultants on behalf of Endurance Estates and provide a response to a number of questions in the current Issues and Options Consultation on the Greater Cambridge Local Plan in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 The responses contained within this report are specific to the land being promoted by Endurance Estates at Land South of Branch Road, Comberton and should be read in conjunction with the following reports submitted as part of this response to ‘the first conversation’:-
- Vision Document including Concept Masterplan and Transport Review;
 - Greater Cambridge Housing Delivery Study by Barton Willmore; and
 - Specialist Accommodation for the Elderly study by Healthcare Property Consultants (HPC).
- 1.3 These submissions at the Regulation 18 stage build on the original call for sites submission and set out the opportunity for a high-quality development of up to 200 new homes (C3) and up to 200 units of later living accommodation within a C2 retirement village. The retirement village will bring a range of facilities within its village hub, which will also be available to existing and new Comberton residents. The site at Comberton is considered to be highly sustainable and this report sets out how the proposals are in conformity with, and will help to meet the aspirations of the Greater Cambridge Local Plan, therefore being wholly appropriate for removal from the Green Belt and allocation for the proposals set out within the Vision Document.

2.0 REGULATION 18 CONSULTATION RESPONSES

Q6 Do you agree with the potential big themes for the Local Plan?

Q7 How do you think we should prioritise these big themes?

- 2.1 We would agree with the proposed big themes for the Local Plan and as our response below sets out, these are all interlinked to a certain extent in the provision of new homes, infrastructure and jobs. Therefore, in response to question 7 we would not look to prioritise these themes in any way. We have continued to evolve our proposals for Comberton from those submitted at the call for sites stage, which includes ensuring that they are consistent with the four big themes as set out further below, consistent with the Vision Document submitted with these representations.

Climate Change

- 2.2 The consultation document defines climate change as “how the plan can contribute to achieving net zero carbon, and the mitigation and adaption measures that should be required through developments.”
- 2.3 Comberton comprises a sustainable location in good proximity to Cambridge with a regular bus service with increased frequency in peak times and real-time travel information, together with easy access to the proposed Comberton Greenway off-road footway and cycleway. It therefore represents an excellent opportunity for a modal shift away from the use of the private car and encouraging commuting by cycle and bus. In addition, Comberton is also highly sustainable in terms of its local services and facilities, including the Sixth Form college that are all within easy walking and cycling distance from the site.
- 2.4 The move away from the use of the private car will be further encouraged by the high permeability built into the masterplan connecting into the existing footpath network and allowing easy access to local facilities, bus stops and the Comberton-Cambridge Greenway. This will be further supported by enhancements to Long Road and Branch Road with footway and cycleway provision.
- 2.5 The proposed retirement village will also bring its own facilities in the form of flexible social and meeting space, health spa and gym which will be made available to existing local residents who will be able to walk and cycle to these facilities given the site’s high permeability removing the need to travel longer distances to such facilities by private car.

- 2.6 The provision of the retirement village will have a centralised heat network and it is anticipated that both the later living and residential development will be constructed in a high energy performing manner.

Biodiversity & Green Spaces

- 2.7 The consultation document defines this as *"how the plan can contribute to our 'doubling nature' vision, the improvement of existing and creation of new green spaces."* The Comberton site is currently in arable production with limited habitat and vegetation restricted to the field margins at the edge of the site.
- 2.8 The concept masterplans demonstrate how the proposals will demonstrate a net biodiversity gain with the inclusion of blue/green corridors around and through the proposals and new formal and informal public green space. This will include enhanced boundary planting with the potential for a community woodland and other community benefits can include an extension to the existing allotments and also an enhancement to the current playing field facilities. The retirement village will also be established in a high-quality soft landscape providing further green space within the development.
- 2.9 A fundamental component of the green space and biodiversity provision is that this will be multi-functional with boundary landscaping enhancing biodiversity, tree cover and with the ability to delivery green trails, informal play and community woodland. Similarly sustainable drainage can also provide biodiversity benefits together with enhancement to the ditch along the western boundary.

Wellbeing and Social Inclusion

- 2.10 The consultation document defines wellbeing and social inclusion as *"how the plan can help spread the benefits of growth creating healthy and inclusive communities."*
- 2.11 It is considered that well-being and social inclusion are at the core of the proposals for Comberton.
- 2.12 The southern part of the site includes the provision of a later-living retirement village. This location has been specifically chosen to ensure that residents can easily access existing services and facilities within the village, as well as ensuring existing residents can easily access facilities within the retirement village.

- 2.13 A number of services and facilities within the retirement village core will be available for all existing and future residents within Comberton to access and enjoy. Such provision could include the clubhouse which will provide flexible space for a variety of uses and spa facilities, as well as a gym.
- 2.14 It is considered that by providing these facilities it will allow for the existing and new communities to integrate and allow for social inclusion and the wellbeing of all residents.
- 2.15 The residential proposals will include affordable housing to meet the identified demand within Greater Cambridge with the potential to include, for example, 'First Homes' which is currently being consulted on by the Government until 3rd April but seeks to get more people onto the housing ladder. Self-build homes are also being considered as part of the housing mix.
- 2.16 The proposal shown on the Concept Plan demonstrates a high degree of permeability linking into the existing footpath and cycleway network, again encouraging integration but also promoting opportunities to walk and cycle, including enhancements to Branch Road and Long Road. In particular the site can benefit from the proposed Comberton Greenway which will provide safe off-road cycling opportunities to commute into Cambridge. Indeed, with the infrastructure investment into the Greenway, we would suggest this should assist the delivery of sustainable growth in Comberton with the site uniquely positioned to take advantage of such development and commute by alternatives to the private car.

Great Places

- 2.17 This is defined as "how the plan can protect what is already great about the area, and design new developments to create special places and spaces."
- 2.18 The responses above and the Concept Masterplan and Vision Document set out the ability to provide a high quality development that with the inclusion of later living provision, will meet demand across generations, contributing to wellbeing and social inclusion. The Vision Document in particular provides some examples of high-quality care village developments both in terms of the building design, layout and soft landscaping undertaken by providers who we are in conversation with to bring forward the provision on this site.
- 2.19 The site has development on 2 sides and will not encroach into the wider countryside but will complement the form of Comberton augmented by the multi-functional landscaping. In addition, the permeability of the site and ability for existing residents to access facilities within

the retirement village will assimilate the proposals into Comberton and also see the proposals benefit from the committed Comberton Greenway.

Q13 How do you think we should improve the green space network?

- 2.20 Allocation of the site at Comberton allows for both the creation and connection of green spaces. The site is currently within arable production with the habitat provided by trees and hedgerows entirely restricted to the site boundaries. These boundary treatments and their associated biodiversity value will be enhanced through the creation of new blue/green corridors and open spaces within the site, should it be allocated.
- 2.21 The Illustrative Concept Plan demonstrates how the proposed development will include green corridors running around and through the site which then link to the existing areas of public open space to the south east, which have the potential for enhancement as a result of the site's development.
- 2.22 An area of formalised open green space the 'Central Green Heart' will create a communal space which will allow people to socialise, relax and exercise. This is a key aspiration of the proposals and will be central to both the later living and community uses as well as the residential development of the site.
- 2.23 This will ensure that the development will encourage social integration of people and increase the opportunity for active and creative recreation and play for children and teenagers;
- 2.24 The development will also include allotments to meet the demands of the development. Green spaces within the development will also be multifunctional as set out within the consultation document. We have set out above how enhanced boundary screening will also see a biodiversity gain but these can also include trails for public access, natural green play and with the potential for inclusion of a community orchard.
- 2.25 The proposals for later living will also include a high standard of soft landscaping through the development.
- 2.26 It is important to note that the residential- led development of sites such as these is critical to the delivery of enhancements to the green-space network on land that would otherwise remain in intensive arable production with limited biodiversity value and no public access.

Q14 How do we achieve biodiversity net gain through new developments?

- 2.27 The response to question 13 above sets out how the residential-led development of the site will achieve biodiversity net gain from the current intensive arable production which sees limited ecology restricted to the field margins.
- 2.28 This will be seen with the inclusion of green corridors, enhanced boundary planting, formal open green space, allotment provision and the potential community woodland. As previously stated, such provision will be multifunctional contributing to biodiversity net gain and this will include SuDS provision.
- 2.29 Finally, it should be noted that those areas shown as development on the illustrative masterplan will also contribute to biodiversity net gain. This will include the rear gardens of new homes and the more formal soft landscaping associated with the later living provision which will all enhance the position from the current arable production.
- 2.30 Biodiversity net gain can be measured through the emerging DEFRA toolkit and we would be confident that the proposals shown on the concept masterplan would demonstrate a biodiversity net gain through that method. In the event that an off-site payment to support biodiversity net gain is required, we would support the Authority putting in place a formal mechanism through which such contributions can be pooled to provide material beneficial improvement to biodiversity within the District, through the delivery of strategic projects.

Q15 Do you agree that we should aim to increase tree cover across the area?

- 2.31 We would support the increase of tree cover across the area and this will be brought forward through residential-led development such as that proposed at Comberton with the enhancement of boundary planting including the potential community woodland.

Q16 How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?

- 2.32 It is considered that well-being and social inclusion are at the core of the proposals for Comberton.
- 2.33 The southern part of the site includes the provision of a later-living retirement village. This location has been specifically chosen to ensure that residents can easily access existing services and facilities within the village, as well as ensuring existing residents can easily access facilities within retirement village.

- 2.34 A number of services and facilities within the retirement village core will be available for all existing and future residents within Comberton to access and enjoy. Such provision could include the clubhouse which will provide flexible space for a variety of uses and spa facilities, as well as a gym.
- 2.35 It is considered that by providing these facilities it will allow for the existing and new communities to integrate allow for social inclusion and the wellbeing of all residents.
- 2.36 The residential proposals will include affordable housing to meet the identified demand within Greater Cambridge with the potential to include 'First Homes' which is currently being consulted on by the Government until 3rd April but seeks to get more people onto the housing ladder. Self-build homes are also being considered as part of the housing mix.
- 2.37 The proposals shown on the Concept Plan demonstrates a high degree of permeability linking into the existing footpath and cycleway network, again encouraging integration but also promoting opportunities to walk and cycle, including enhancements to Branch Road and Long Road. In particular the site can benefit from the proposed Cambridge-Comberton Greenway which will provide safe off-road cycling opportunities to commute into Cambridge. Indeed, with the infrastructure investment into the Greenway, we would suggest this should assist the delivery of sustainable growth in Comberton with the site uniquely positioned to take advantage of such development and commute by alternatives to the private car.

Q17 How do you think our plan could help enable communities to shape new development proposals?

- 2.38 These proposals were submitted within the previous call for sites consultation in March 2019. By submitting at the early stage, it maximises the chance for local residents to provide their thoughts and help shape the final masterplan of the site prior to it being included within the adopted version of Greater Cambridge Plan.

Q18 How do you think we can make sure that we achieve safe and inclusive communities when planning new development?

- 2.39 The matters raised in regard to safe and inclusive communities have been addressed in the responses to other questions but can be summarised as follows:-
- The proposals for this site comprise a later living village of up to 200 units and up to 200 dwellings, of which a percentage will be a form of affordable tenure. This could include a mix of build to rent, starter homes; and discounted market sales

housing as well as the opportunity to incorporate First Homes;

- Homes of all tenure will be constructed to a high standard of energy efficiency;
- The provision of the later living community will address a specific area of housing need and will also bring community facilities that can also be enjoyed by the existing and new residents of Comberton;
- The later living provision will be based on a centralised heat network giving excellent opportunities to utilise renewable energy sources and ensure energy efficiency;
- The later living provision will also create full-time permanent jobs. There is the potential for links to Comberton Sixth Form college and work experience in areas such as catering and groundskeeping etc;
- The development will be highly sustainable with good links to existing services and facilities within Comberton, and to bus services and the proposed Greenway to Cambridge giving sustainable transport options. There is also the ability for existing residents to utilise facilities provided as part of the development, all of which will reduce the need to reduce travel by the private car; and
- Provision of new areas of formal and informal green space including the provision of allotments all benefiting from natural surveillance and the potential to enhance the existing sports pitch provision on the existing playing fields.

Q19 How do you think new developments should support healthy lifestyles?

- 2.40 Responses to previous question have established how the development will support healthy lifestyles. The development will provide whole life housing provision from homes for first time buyers through to the later living provision allowing it to meet a wide range of intergenerational housing needs.
- 2.41 By providing the residential dwellings and the later living with open green space and pedestrian connections to the various facilities within Comberton, this will allow for people to walk more and socialise outside thus leading to a healthier lifestyle as there will be opportunities for residents to walk, cycle and generally exercise on a daily basis.
- 2.42 The development will be within close proximity to the proposed Greenway into Cambridge, providing a safe cycling environment not only for commuting into Cambridge but for recreational cycling tying into the wider greenway links. The location of the site more generally allows for easy access to the countryside and wider public footpath network.
- 2.43 It is also considered that with regards to the retirement village, by providing specialised

facilities for the elderly, this will encourage the residents to socialise reducing loneliness and other mental issues caused through isolation. This will be further enhanced by the ability for existing Comberton residents to access the facilities ensuring a high level of integration.

- 2.44 Finally, the site offers the potential for facilities such as an extension to the existing allotments to the immediately east of the site.

Q20 How do you think we should achieve improvements in air quality?

- 2.45 Air quality matters are more prevalent in Cambridge City centre and there are no particular issues in Comberton that would have implications for our site. However, it is clear that the location of new housing development in villages such as Comberton can take advantage of the proposed Greenway provision and local bus services, which can have positive implications for air quality by encouraging commuting by cycle and public transport. This supports the wider aims and aspirations for sustainable development and seeking to reduce climate change.
- 2.46 We have set out earlier that development should be located in locations such as Comberton where it can take advantage of the investment into sustainable infrastructure such as the Greenway.
- 2.47 Comberton also benefits from a good range of local services and facilities including a Sixth Form College and the Concept Plan demonstrates a highly permeable development with good links to these facilities. This should limit short car journeys, for example the Primary School is immediately south of the site and therefore avoid issues around air quality in Comberton itself.
- 2.48 In addition, in discussions with potential retirement village operators, it is common for residents to be served by electric vehicles for trips. We would also anticipate new development to incorporate EV vehicle charging points, as well as provision of a dedicated EV car-sharing car club space for public use.

Q23 How do you think we could ensure that new development is as well-designed as possible?

- 2.49 It is considered that the proposals set out within the Concept Masterplan and Vision Document set out the ability for a high-quality design response to the site. The later living proposals will include a centralised district heating source and attractive, architect-designed

buildings within a high-quality landscaped environment. This and the residential development will be focused around the green heart central open space which will benefit from natural surveillance. There will be green corridors through and around the site as part of multifunctional green infrastructure with the enhanced boundary screening setting the site within the surrounding landscape.

Q31 How should the Local Plan help to meet our needs for the amount and types of new homes?

- 2.50 A specific response has been provided to questions 31 & 32 in the accompanying representations by Barton Willmore on behalf of our client with regard to the amount and type of housing provision. However, in summary our view is that enough allocations need to be made in sustainable locations with clear policies on the market housing mix and facilitation of the broadest range of affordable housing tenures as set out by the NPPF. In particular it will need to ensure the economic success of the Greater Cambridge area is not hampered by inadequate housing delivery and transport infrastructure and tackle sustainability in a holistic way, rebalancing growth in the area to respond positively to the identified four big themes.
- 2.51 In that context, we would advocate allocating the widest possible range of sites in order to provide a more sustainable development strategy and rebalance Greater Cambridge growth needs. This will include allocating sufficient land for small-medium housing sites in rural settlements, which can deliver quickly and improve the rate at which houses can be absorbed by the market. As has been set out previously within this consultation response, the proposals for Comberton will see the provision of housing to meet a wider range of needs from homes for first time buyers through to later living provision, all successfully integrated into the master plan and Comberton more generally. The development will also provide affordable housing across a range of tenures, and also has the potential to meet any demand identified for self-build plots.

Q33 What kind of housing do you think we should provide?

- 2.52 The comments made in response to question 31 are also applicable here and the Comberton proposals assist in meeting the varied needs.
- 2.53 As has been set out previously within this consultation response, the proposals for Comberton will see the provision of housing to meet a wider range of needs from homes for

first time buyers through to later living provision, all successfully integrated into the proposals and Comberton more generally. The development will also provide affordable housing across a range of tenures, and also has the potential to meet any demand identified for self-build plots.

- 2.54 The consultation document specifically references a need for more specialist housing for older people and the proposals demonstrate a distinct offer with the later living housing provision at the heart of this development.
- 2.55 The later living proposals are based on direct discussions with potential providers with an interest in this location to design a carefully considered Care Village with ancillary open community space, garden and leisure areas, and landscaping.
- 2.56 The Village is intended to offer a retirement lifestyle built on knowledge, expertise and ethics where passion and understanding are designed into the fabric of every building with the health and happiness of the residents at the heart of the proposals. Proposals are designed to encourage residents to have an active and engaged lifestyle with services aligned to support wellness and well-being. Such proposals are the future of retirement accommodation where age matters less and loneliness, anxiety and boredom are replaced by fun and peace of mind. The intention is that the risk of institutionalised care is greatly reduced if not avoided completely.
- 2.57 Part of this process is for the village to be located within a beautiful and tranquil setting allowing people to flourish in their later years either independently for longer, or with varying degrees of support in the form of specifically tailored extra care units.
- 2.58 A key aspiration of such facilities is the retention of the link with the existing village, with the location towards the southern end of the site specifically chosen for that reason with physical footpath links. A central core comprising gym, spa and other leisure, fitness, health and wellbeing provision together with creative space facilities are to be shared with Comberton and allow residents to retain their connection with the village and prevent isolation.
- 2.59 A report has been prepared by Healthcare Property Consultants (HPC) and submitted as part of these representations. It summarises a forecast demand far higher than established through Greater Cambridge's assessments which are based on demand rather than need. The HPC report is to 2035, due to a limit on available data, showing a rising need and

therefore it should be noted that the demand to 2040 in the plan period is even greater than that set out within the submitted report.

- 2.60 Across Greater Cambridge, the report highlights a cumulative growth rate of over 65s at 40%, comfortably ahead of the 36% nationally. Indeed, given the high student population within Cambridge City, the position in South Cambridgeshire and villages such as Comberton is more acute and demonstrates a significant demand for the retirement living proposed here.

Q35 How should we ensure a high standard of housing is built in our area?

- 2.61 Again, many of the issues raised by question 35 have been addressed elsewhere within our response in terms of the potential for a high quality development that with the inclusion of later living provision, will meet demand across generations, contributing to wellbeing and social inclusion. The later living proposals in particular will reduce water and energy consumption. The Vision Document in particular provides some examples of high-quality care village developments undertaken by providers who we are in conversation with to bring forward the provision on this site, also considered in more detail in response to question 34.
- 2.62 Dwellings will be designed to comply with the National Space Standards, as well as providing energy efficiency throughout the development including water saving technology and adaptable dwellings which can take into account modern needs such as working from home.

Q36 How should the Local Plan ensure the right infrastructure is provided in line with development?

- 2.63 Whilst this question is phrased in terms of the infrastructure to be provided with development, it is important to recognise that with particular regard to Comberton, infrastructure requirements are limited and the development is viable and deliverable without significant infrastructure provision.
- 2.64 There is commitment to the delivery of the Greenway and Comberton is well-served by facilities and local services including the Sixth Form college. Therefore, the right infrastructure is already in place or committed and, therefore, development should come forward to make best use of such provision.
- 2.65 The development of sites such as Comberton will also see the provision of any additional infrastructure deemed necessary through a Section 106 agreement in accordance with the tests set out within Paragraph 56 of the Framework.

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?

- 2.66 We would consider that the allocation of the Comberton site would encourage a shift away from car use to sustainable modes of transport.
- 2.67 As previously set out the location of new housing development at Comberton can take advantage of the proposed Greenway provision and local bus services with positive implications for air quality by encouraging commuting by cycle and public transport.
- 2.68 We have set out earlier that development should be located in locations such as Comberton where it can take advantage of the investment into sustainable infrastructure such as the Greenway.
- 2.69 Comberton also benefits from a good range of local services and facilities including a Sixth Form College and the Concept Plan demonstrates a highly permeable development with good links to these facilities including enhancement to Branch Road and Long Road. This should limit short car journeys, for example the Primary School is immediately south of the site.
- 2.70 The Services and Facilities Study 2014 which formed part of the previous evidence base for the current South Cambridgeshire Local Plan summarises the following good range of facilities with the village which are within walking and cycling distance of our site:-
- Regular Bus Service;
 - Comberton-Cambridge Unsegregated Pavement Cycle Route;
 - Secondary School & Sixth Form;
 - Primary School;
 - Comberton Surgery;
 - Library;
 - Mobile Library;
 - Butcher;
 - Village Store & Post Office;
 - Community Pavilion;
 - Play Group;
 - Dentist;
 - Florist;
 - Hairdressers;
 - Lamps and Light Store;
 - Chartered Accountants;
 - Garage;
 - Garden Nursery;

- Public House;
- Solicitors;
- Village Hall & Community Centre;
- Comberton Leisure including all weather football pitch, Badminton Courts, Dance Studio, Fitness Suite, Gymnasiums and Tennis Courts;
- Recreation Ground with 'LEAP' play area, football pitch (including extended area); cricket pitch, bowling green, tennis courts and skate park;
- Small areas of informal open space; and
- 2 sets of allotments.

2.71 In addition, in discussions with potential retirement village operators, it is common for residents to be served by electric vehicles for trips. We would also anticipate new development to incorporate EV vehicle charging points, as well as provision of a dedicated EV car-sharing car club space for public use.

2.72 Both the Vision Document and the Transport Review submitted with these representations demonstrate the ability for access to a range of services and facilities, together with the ability to link into the Greenway by alternative to the private car. It should, however, be noted that safe vehicular access with the required visibility splays can be delivered and there is sufficient local highway capacity as set out in the Transport Review.

Q38 What do you think the priorities are for new infrastructure?

2.73 We have previously identified that the site is very well positioned to utilise the proposed Comberton Greenway both for commuting into Cambridge by cycle as an alternative to the private car and also access to the wider cycle network for leisure purposes and promoting a healthy lifestyle. We would therefore suggest that delivering the greenway commitments should be a priority.

2.74 In addition, whilst the development is within an appropriate walking distance to the bus stop, we are exploring opportunities for a small diversion through Comberton to maximise opportunities for bus travel from Comberton.

2.75 The site is otherwise not reliant on infrastructure provision for its successful delivery and it is understood that there are no restrictions at this stage in terms of utilities. Discussions will continue through the development of the proposals for the site, particularly in the context of broadband to maximise opportunities for homeworking and again reduce commuting requirements.

Q39 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?

- 2.76 We agree that the potential to remove land from the Green Belt should be fully considered as part of the development options for Greater Cambridge. Our representations have demonstrated that Comberton is a highly sustainable option in terms of its proximity to Cambridge giving realistic options for cycling as an alternative to commuting by private car as well as benefiting from a regular bus service.
- 2.77 As one of the larger villages it also benefits from a good level of services and facilities, particularly education with a Sixth Form college, which are within easy walking and cycling distance from the site. Accordingly, there are good opportunities for shorter trips to be undertaken in a sustainable fashion.
- 2.78 We would, therefore, contend that Comberton is one of the most sustainable village locations within the Green Belt and the comprehensive opportunity including later living and community uses means the site is entirely suitable for removal from the Green Belt.
- 2.79 Looking more widely at the aspirations for the Local Plan, a key ambition is the transition to a net zero carbon society highlighted within the 'Welcome' from Cllrs Hawkins and Thornburrow and forming a fundamental ambition as part of the four big themes under the climate change heading. In order to transition to a net zero carbon position, there needs to be a release of sites such as Comberton within the Green Belt in proximity to Cambridge that will allow residents to live sustainable lifestyles with realistic opportunities to commute by alternative methods to the private car, particularly where there is the provision of infrastructure such as the proposed Greenway.
- 2.80 In considering the removal of sites such as Comberton from the Green Belt, it is anticipated that a Green Belt assessment will be undertaken, against the five purposes. Although no formal assessment has been undertaken at this stage it is considered that the parcel or parcels of land forming the site would score poorly against Green Belt purposes. The site has development on both sides and a new strong and defensible Green Belt boundary could be secured through development that would endure beyond the plan period.
- 2.81 Accordingly, removal of the site from the Green Belt would do little harm in terms of 'purpose a' under paragraph 134 of the Framework to check the unrestricted sprawl of large built-up

areas. Similarly, under purpose b it is anticipated the site also scores poorly in terms of preventing towns merging, whilst there is also limited encroachment into the countryside (purpose c). Under purpose d the site does not play a significant role in preserving the special character of historic towns and again the landscape proposals provide an opportunity to enhance a strong, defensible boundary when approaching Comberton from the north. Finally, under purpose e, “*assisting in urban regeneration, by encouraging the recycling of derelict and other urban land*” it is acknowledged that the scale of growth required in this Plan exceeds that which can be met on brownfield sites alone and that some Green Belt release will be needed. We have also rehearsed above that removal of the sites from the Green Belt provides the best opportunity to meet the Council’s zero carbon aspirations in proximity to Cambridge.

Q40 How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages?

- 2.82 We would contend that the Local Plan should take a highly flexible approach to the development of jobs and home on the edge of villages in general and Comberton in particular. As set out above Comberton is a highly sustainable location and, therefore, allocating growth here would meet a number of the aspirations of the Local Plan in general, and the four big themes in particular. The later living retirement village comprises a distinct offer in that context which will also see job creation.
- 2.83 The Vision Document and in particular landscape analysis sets out how the proposed development would form a natural extension to Comberton with development on 2 sides and Branch Road forming an obvious and defensible boundary, augmented by enhanced boundary planting that is multi-functional with trails, natural play and biodiversity gains.

3.0 CONCLUSIONS

- 3.1 The responses set out within this consultation response together with the accompanying reports sets out how the proposals for Comberton will deliver a high-quality development that is in keeping with the aspirations of the First Conversation Regulation 18 Greater Cambridge Local Plan, in particular under the umbrella of the four Big Themes in delivering new homes, jobs and infrastructure.
- 3.2 The submission sets out how the release of the Comberton site from the Green Belt and its allocation would see the delivery of up to 200 new homes including affordable housing of various tenures and the distinct offer of a new later living retirement village with a range of benefits for the existing residents of Comberton particularly promoting wellbeing and social inclusion.
- 3.3 Our representations set out how Comberton is a highly sustainable location in terms of proximity to Cambridge, and uniquely positioned to benefit from the committed Comberton Greenway proposals. Together with the high level of services available within the village, within easy walking and cycling distance of the site there is a real opportunity to deliver development that is not reliant on the private car as the primary means of travel. With significant green/blue infrastructure provision as part of the scheme, it has the opportunity to both assist in meeting climate change, biodiversity and green space aspirations whilst delivering much needed new homes and jobs as part of a great place.
- 3.4 We trust this submission demonstrates there is considerable merit in the release of this site from the greenbelt and allocation through the Greater Cambridge Local Plan for the new homes and later living accommodation proposed.



Insert Job Number & Site Name
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