

**NEWTON HALL
INDUSTRIAL ESTATE
GREATER CAMBRIDGE
LOCAL PLAN ISSUES
AND OPTIONS
CONSULTATION 2020**

Quality Assurance

Site name:	Newton Hall Industrial Estate
Client name:	Newton Hall Technical Services
Type of report:	Response to Greater Cambridge Local Plan Issues and Options Consultation 2020
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Signed	
Date	February 2020
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1.0 Introduction

- 1.1 These representations are made on behalf of Newton Hall Technical Services in response to the Greater Cambridge Local Plan Issues and Options 2020 consultation.
- 1.2 Newton Hall Technical Services are promoting the redevelopment of land at Newton Hall Industrial Estate (“the Site”) for a new later living community (C2 Use Class), benefitting from the unique setting offered by the historic Grade II Listed Newton Hall and its grounds.
- 1.3 The Newton Hall Industrial Estate covers 4.97 hectares of previously developed land comprising Newton Hall and its gardens, several large industrial units and associated hard-standing and car parking areas. A location plan is included at **Appendix 1**.
- 1.4 It is proposed to demolish the existing industrial units, which significantly detract from the historic and landscape setting of Grade II Listed Newton Hall, to provide a range of specialist housing for older people, such as a new care home and smaller assisted living and retirement dwellings. The homes will benefit from access to the Newton Hall grounds, with new landscaped gardens, areas for food-growing, sport, recreation and habitat creation, along with other needed care facilities and services.

Scope of representations

- 1.5 A Call for Sites form was submitted to the Councils in early 2019. To assist the Councils with their assessment of the site for C2 use, further design and technical work has been undertaken to demonstrate that the site is suitable and deliverable. The following documents are provided and should be read in conjunction with this report:
- Vision and Delivery Document (February 2020) prepared by Bidwells;
 - Initial Heritage Assessment (February 2020) prepared by Bidwells;
 - Landscape and Visual Assessment (February 2020) prepared by Bidwells;
 - Flood Risk and Drainage Note (February 2020) prepared by EASTP;
 - Transport Appraisal (February 2020) prepared by EASTP; and
 - Ecology Report (February 2020) prepared by Applied Ecology.
- 1.6 The Vision and Delivery Document accompanying these representations illustrates the opportunities in redeveloping the site as a new later living community and shows that the proposed development is suitable and deliverable.
- 1.7 The Greater Cambridge ‘First Conversation’ Issue and Options Paper 2020 recognises the need to provide specialist housing for the older generation. The new Local Plan should therefore allocate sites for C2 specialist housing in locations, which will enhance the health and social well-being of residents.
- 1.8 Newton Hall Technical Services would welcome the opportunity to discuss the proposals with officers. It is our intention to submit a pre-application advice request to South Cambridgeshire District Council Development Management Team in due course.

1.9 This report includes responses to the following questions within the 'The First Conversation' Greater Cambridge Local Plan Issues and Options Consultation Paper:

- Question 2;
- Question 16;
- Question 21;
- Question 31;
- Question 32;
- Question 33;
- Question 40;
- Question 41;
- Question 42; and
- Question 47.

2.0 Response to Issues and Options Questions

Question 2. Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan. Provide as much information and supporting evidence as possible.

- 2.1 Newton Technical Services are promoting the redevelopment of land at Newton Hall Industrial Estate for a new later living community (C2 Use Class), benefitting from the unique setting offered by the historic Grade II Listed Newton Hall and its grounds and the surrounding countryside.
- 2.2 It is proposed to demolish the existing industrial units, which significantly detract from the historic and landscape setting of Grade II Listed Newton Hall, to provide a range of specialist housing for older people, such as a new care home and smaller assisted living and retirement dwellings. The homes will benefit from access to the Estate gardens, with new landscaped gardens, areas for food-growing, recreation and habitat creation, along with other needed care facilities and services.
- 2.3 A Call for Sites form was submitted to the Councils in early 2019. To assist the Councils with their assessment of the site for C2 use, further design and technical work has been undertaken to demonstrate that the site is suitable and deliverable and is appended to this document.

Site Characteristics

- 2.4 The Site is enclosed by historic woodland tree planting with the Hoffer Brook, a degraded chalk stream, running along its southern boundary. There are a variety of wetland, grassland and woodland habitats located within the grounds.
- 2.5 The Site lies within the Cambridge Green Belt. However, it is well-enclosed by existing vegetation with limited views from sensitive receptors (see accompanying Landscape and Visual Assessment prepared by Bidwells).
- 2.6 The developable area of the Site falls within Flood Zone 1.
- 2.7 There are currently two access points to the Site via Town Street, which provides vehicular and pedestrian access towards the village centre. Public footpath 165/3 begins at the western site access point and continues west towards Foxton.

Planning Benefits

In summary, the Site should be allocated for C2 housing in the new Local Plan for the following reasons:

1. Redevelopment of Previously Developed Land

- 2.8 The Site provides an opportunity to redevelop brownfield land for new specialist housing. This is supported by the National Planning Policy Framework 2019 which states that:

“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land” (Paragraph 117)

2. Improve setting of Grade II Listed Building

- 2.9 The redevelopment of the Site will enhance the setting of the Grade II Listed Newton Hall. The existing industrial units have a negative impact on the setting of Newton Hall. Through demolition of the units and replacement with a more sensitive form of development, a beneficial enhancement to Newton Hall can be achieved. There is also the opportunity to re-establish the key view of Newton Hall as you enter the site from Town Street and restore its prominence as the principle building on the Site. The proposed new use for the Site would also safeguard the future of Newton Hall.

3. No greater impact on the openness of Green Belt and landscape setting

- 2.10 In terms of preserving the openness of the Green Belt, the site makes a limited contribution both visually and spatially as it is well enclosed by existing vegetation. The proposed redevelopment would not have any greater impact on the rural character and openness of the Green Belt than the existing development. The landscape is not particularly susceptible to change and has a good ability to accommodate the proposed development.
- 2.11 An Illustrative Concept Plan has been prepared to show how the potential scale, massing and height of new specialist housing for older people will have no greater impact on the openness of the Green Belt than the existing buildings. For further detail please see the Landscape and Visual Assessment prepared by Bidwells.
- 2.12 The proposed development would represent appropriate development in the Green Belt under Limb g of Paragraph 145 of the National Planning Policy Framework 2019, which states that:
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:*
- not have a greater impact on the openness of the Green Belt than the existing development; or*
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.*
- 2.13 The redevelopment of the Site would not have a greater impact on the openness of the Green Belt than the existing development. Furthermore, it re-uses previously developed land to contribute towards a need to provide specialist housing for older people. It, therefore, satisfies limb g above.

The Big Themes

- 2.14 We support the Councils’ Big Themes in helping to influence how new homes, jobs and infrastructure is planned. We have considered these themes in developing the proposals for the Site. A summary of the Site’s contribution towards each theme is provided in the table below:

BIG THEMES	BENEFITS
CLIMATE CHANGE	<ul style="list-style-type: none"> ● Redevelopment of brownfield land for specialist housing. ● Removal of HGV lorry movements from the site. ● Provide new energy-efficient buildings with potential for use of on-site renewable energy technologies. ● Provide new and enhanced footpath to provide walking routes within the site, linking to the village and open countryside.
BIODIVERSITY AND GREEN SPACES	<ul style="list-style-type: none"> ● Achieve a biodiversity net gain from the demolition of existing structures and associated hardstanding and the provision of new semi-natural habitats and tree planting. ● Create a new wildlife corridor along the Hoffer Brook. ● Provide new open green spaces for both formal and informal recreation, which could be used by new residents and the existing community.
SOCIAL INCLUSION AND WELLBEING	<ul style="list-style-type: none"> ● Providing new well-designed, warm and energy-efficient homes which are affordable to run and are adaptable to the range of needs for older people. ● Provide a safe, tranquil environment with access to the natural environment, promoting interaction and visual connection with nature. ● Provision of communal spaces and activities, such as gardens, allotments, orchards and recreational facilities to promote social interaction. ● Provide future residents with a social network and support, with opportunities for inter-generational interaction to help tackle loneliness.
GREAT PLACES	<ul style="list-style-type: none"> ● Enhance the historic environment by improving the setting of the Grade II Listed Newton Hall and its Lodge. ● Improve the openness of the Green Belt through the demolition of the existing industrial structures.

Deliverability

2.15 The Site is being promoted by the landowner, who has had several approaches from healthcare and C2 promoters and operators, indicating that there is a market demand for this type of location.

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

2.16 In delivering a sufficient supply of homes, paragraph 61 of the National Planning Policy Framework 2019 states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. The new Local Plan should

allocate sites for C2 Specialist Housing in locations which can provide a healthy and safe environment, promoting the wellbeing and social inclusion for the older population.

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

- 2.17 The new Local Plan should support new development, especially development on previously developed land, which can enhance the setting of heritage assets and provide a betterment to the historic environment.

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

- 2.18 The National Planning Policy Framework 2019 Glossary highlights the diverse range of needs that exist. For example, the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.

- 2.19 The new Local Plan will need to be underpinned by robust evidence on the need for older people housing. This is reiterated in the Government's National Planning Practice Guidance, which states:

"For plan-making purposes, strategic policy-making authorities will need to determine the needs of people who will be approaching or reaching retirement over the plan period, as well as the existing population of older people" (Paragraph: 003 Reference ID: 63-003-20190626; and

"an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking." (Paragraph: 001 Reference ID: 63-001-20190626).

- 2.20 The NPPG also recognises that new innovative and diverse housing models will need to be considered where appropriate (Paragraph: 012 Reference ID: 63-012-20190626).

- 2.21 There is a significant undersupply of older people accommodation across Greater Cambridge. Bidwells Socio-Economic team undertook a review of care home need alone in Greater Cambridge and found that the demand for bed spaces is projected to exceed supply from 2027 onwards; this does not account for all other types of older people housing. The new Local Plan should, therefore, allocate land for C2 housing to meet the unmet need. This will provide greater certainty for developers and encourage the provision of sites in suitable locations.

Question 32. Do you think we should provide for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?

Agree

- 2.22 Yes, to support the Government's objective of significantly boosting the supply of homes, a sufficient amount and variety of land needs to be identified to meeting housing needs within the Greater Cambridge area. The Cambridge and Peterborough Independent Economic Review (CPIER) (September 2018) highlights the need for higher housing target numbers to ensure the higher growth in employment is met to achieve the economic growth potential for Greater Cambridge and the wider economy.

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

- 2.23 Separate housing needs assessments should be used to inform the appropriate size, type and tenure of housing needed for different sections of the community, as set out within the Greater Cambridge Housing Strategy 2019-2023.
- 2.24 It will be important for the Council to identify and allocate sites to meet the specific needs of older people. The Councils will need to establish a housing requirement specifically for the needs of older people. This will ensure that the supply of such homes can be effectively monitored and any under supply be taken into account when making decisions on applications for older peoples' accommodation.
- 2.25 Cambridgeshire County Council Older People's Accommodation Strategy (April 2016) recognised that:
- 'Without better housing in the community to which people belong, the choice for older people will often lie between getting by in unsuitable accommodation or uprooting to some form of institution home, often removed from familiar surroundings.'*
- 2.26 This illustrates the importance for the new Local Plan to allocate new sites for C2 use.

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

- 2.27 New development in rural areas is supported under paragraph 78 of the NPPF, which requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services. The new Local Plan should support older people housing (Use Class C2) within and on the edge of villages. This will enable older people to stay within their communities.
- 2.28 The new Local Plan should not restrict development using tightly drawn settlement boundaries which do not identify suitable areas for growth. It should also not restrict the quantum of development, but instead allow for design-led proposals, which take account of its individual site specifics, to come forward and be assessed against the three strands of sustainable development.
- 2.29 The Councils should make as much use as possible of suitable brownfield sites for housing available within and on the edge of villages.

Question 41. Do you think the Local Plan should be more flexible about the size of developments allowed within village boundaries (frameworks), allowing more homes on sites that become available?

- 2.30 Yes, the Local Plan should be more flexible about the size of developments within villages and on the edge of villages. The new Local Plan should not restrict development using tightly drawn settlement boundaries which do not identify suitable areas for growth. It should also not restrict the quantum of development, but instead allow for design-led proposals, which take account of its individual site specifics, to come forward and be assessed against the three strands of sustainable development.

Question 42. Where should we site new development?

- 2.31 The NPPF promotes an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land (Paragraph 117). Furthermore, planning policies should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs (Paragraph 118). The new Local Plan should identify and allocate available brownfield sites for redevelopment for housing; this includes C2 specialist housing.
- 2.32 The Cambridgeshire County Council Older People Accommodation Strategy (2016) highlights the benefit for the elderly population to remain independent within their own community wherever possible. Without better housing in the community in which people belong, the choice for older people will often lie between getting by in unsuitable accommodation or uprooting to some form of institutional home often removed from familiar surroundings. Therefore, the new Local Plan should provide flexibility in delivering new housing for older people within all communities, including within and on the edge of village, and especially, opportunities to redevelop brownfield land.

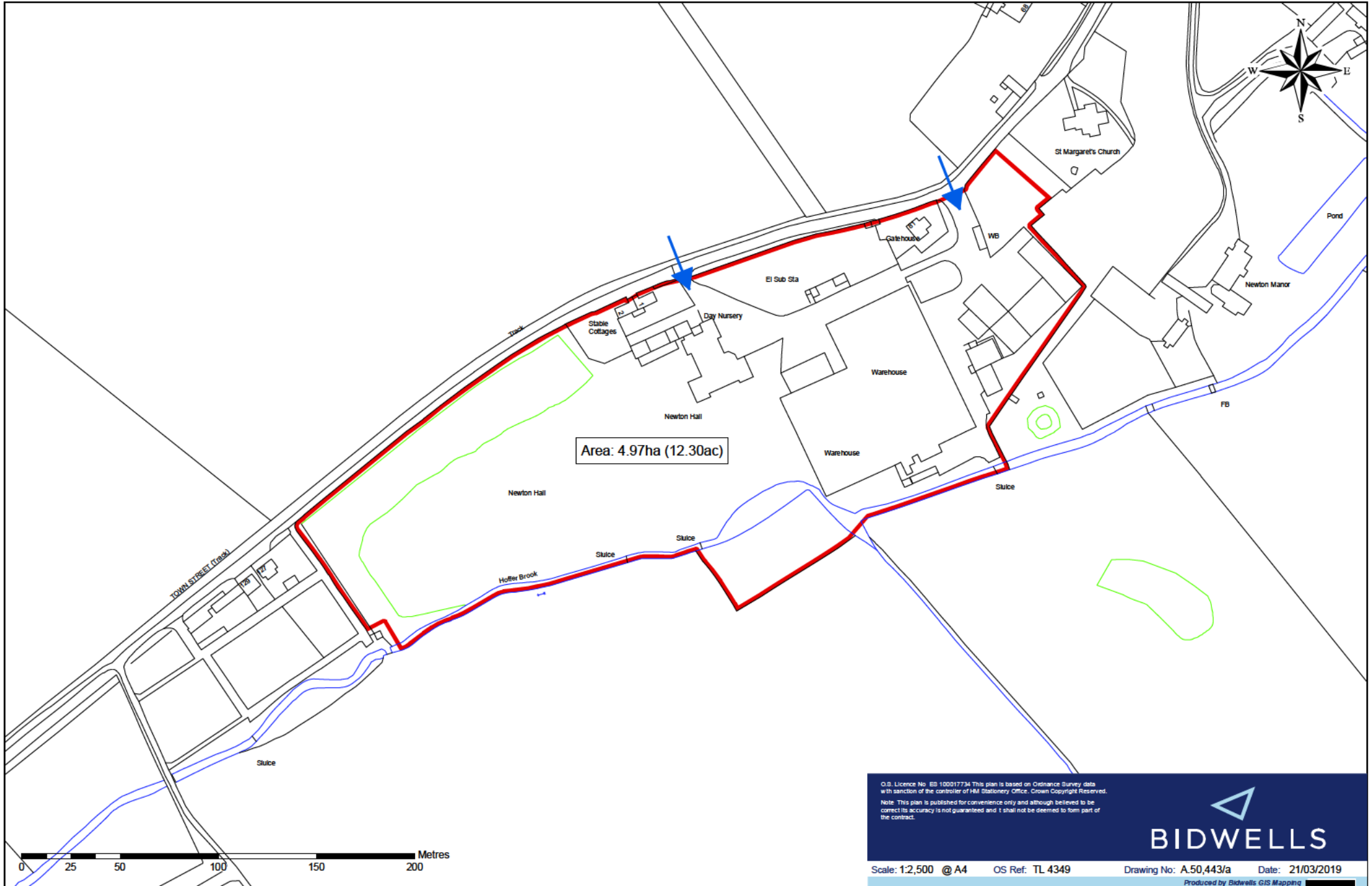
Question 47. What do you think about growing our villages?

- 2.33 The new Local Plan should provide flexibility in allowing villages to grow. This is supported by the National Planning Policy Framework (2019) which states that:
- “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive...”*
- 2.34 In particular, the new Local Plan should support new housing for older people in villages. This not only allows older people to stay within their local village community, but also frees up the existing family housing stock to allow for new residents to move into the village. This is highlighted within Cambridgeshire County Council's Older People Accommodation Strategy (2016).

APPENDIX 1

SITE LOCATION PLAN

Newton Hall Industrial Estate, Town Street, Newton, Cambridgeshire



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