

Introduction

1. These representations have been prepared by Strutt & Parker on behalf of Endurance Estates and are being submitted in response to the Greater Cambridge Local Plan Issues and Options 2020 Consultation. They should be considered in conjunction with the with the supporting Greater Cambridge Housing Delivery Study prepared by Barton Willmore.
2. My client welcomes the opportunity to comment on this Local Plan Issues & Options consultation document, which is underpinned by four big themes: climate change; biodiversity & green spaces; wellbeing & social inclusion; and great places. The document sets out a wide range of issues and options, particularly relating to the spatial strategy.
3. This response has been prepared to comment on the Greater Cambridge Local Plan Issues and Options 2020 and follows a previous submission made in March 2019 as part of the Greater Cambridge Local Plan 'Call for Sites and Broad Locations' exercise for land to the rear of Fisher's Lane, Orwell, Cambridgeshire. That submission was accompanied by a letter confirming the support of the landowners to bring forward the land for development. It was also accompanied by a supporting design statement, which considered a range of topics covering trees, noise, access, ecology, and heritage. Having taken into account these factors, the design statement concluded that the proposed development of the site *'would assimilate itself into the existing village environment in terms of scale and pattern of development. It would make better use of this under used site whilst providing high quality, well designed family housing within a sustainable location with good transport links ...'* helping meet the housing needs of the area.
4. The submitted site comprises 1.32 hectares of land immediately adjacent to the existing settlement framework for Orwell. An indicative site plan has been included within this submission and shows how the site could be developed for 26 residential units with on-plot parking and sufficient garden space. In addition, public open space would be provided to the front and centre of the site as well as a balancing pond providing new biodiversity opportunities, together with the potential for an extension. It is clear that the proposed scheme would have minimal impact on the wider landscape character and would complement the locality in terms of local character, ecology, locality and be sympathetic to the history of the area.
5. New trees and hedge planting is proposed as part of a landscaping scheme to ensure the site does not harm the views across the surrounding countryside. The potential for 20 additional car parking spaces and additional secure cycle parking has also been provided as an expansion to the existing car park for employment site, Volac International Limited. While the site does not need these facilities to come forward, this would alleviate existing parking issues on local roads as well as provide employees with the opportunity to use sustainable mode of transport.
6. Technical Due Diligence has been undertaken, which confirms that the site is located within Flood Zone 1 and is not at risk of flooding. A preliminary ecological assessment has identified that the site is likely to support a small number of breeding birds, provides a suitable habitat for reptiles and possibly bat roost suitability some species and therefore additional surveys will need to be carried out to confirm their presence and inform any proposed mitigation.
7. In terms of access, the site is currently accessed via Cambridge Road (A603) to the north west of the site, however this is overgrown and represents more of a gateway. It is proposed that

as part of the development of the site improvements would be brought forward to ensure the site can be accessed safely and appropriately via a 'T junction' with the appropriate visibility splays. This decision has been informed by an access appraisal for the site. The site is available immediately, is not located within the Cambridge Green Belt and could deliver new homes within the next 5 years.

Question 6: Do you agree with the potential big themes for the Local Plan?

8. As outlined within the Local Plan Issues and Options document, the future Local Plan must aim to ensure sustainable development. In order to achieve this, competing priorities and issues need to be balanced. Greater Cambridge Planning has grouped these into the following themes:

- Climate Change;
- Biodiversity & Green Spaces;
- Wellbeing & Social Inclusion; and
- Great Places.

9. My client supports the inclusion of these 'big themes' that have been proposed for the Local Plan, in particular 'Climate Change' and how the plan should contribute to achieving net zero carbon. Chapter 14 of the National Planning Policy Framework (NPPF) focusses on 'Meeting the challenge of climate change, flooding and coastal change'.

"The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure."

Paragraph 148 – NPPF, 2019

10. In line with the objectives and provisions of the Climate Change Act 2008, Paragraph 149 of the NPPF focusses that plans should take a proactive approach to mitigating and adapting to climate change. Policies should support appropriate measures to ensure the resilience of communities and infrastructure to climate change impacts. Impacts such as intense and frequent extreme weather events such as floods, heatwaves and droughts are likely to become more frequent. It is acknowledged that the Local Plan is asking about meeting net zero carbon by 2050.

11. My client's site, land to the rear of Fisher's Lane, Orwell would reflect the themes and aims of the new Local Plan as well as National Policy and suggestions from the Planning Inspector as part of the currently adopted policies examination in 2018.

12. **Summary: the four big themes are supported as a means by which to plan for housing, jobs, and infrastructure.**

Question 7: How do you think we should prioritise these big themes? Rank the options 1-4 (1 - Most Preferred 4 – Least Preferred)

13. Further to the above, whilst Climate Change is the most important theme that we should be focussing on tackling both at a national and local level, we believe that the big themes are equally as important as one another and agree with the statements regarding each one within the consultation document. To achieve sustainable development, we need to balance economic, social and environmental sustainability factors equally. For sustainable development to be brought forward across Greater Cambridge, the four big themes will need to be balanced depending on the surrounding environment of sites in which development is proposed to take place.
14. As the NPPF states, the purpose of the planning system is to contribute to the achievement of sustainable development and should *'meet the needs of the present without compromising the ability of future generations to meet their own needs'*.
15. **Summary: Support giving equal weight to each of the four big themes and opposition to an arbitrary ranking of them.**

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

16. According to the NPPF, the Planning Practice Guidance and the Planning Inspector's Report on the South Cambridgeshire Local Plan (2018), the Greater Cambridge Local Plan should meet housing needs through the development of small scale sites, such as those put forward by my client as well as large strategic sites. The supporting Greater Cambridge Housing Delivery Study prepared by Barton Willmore draws attention to slow delivery rates and a concentration of large sites to the north of the district. It notes that *'Greater Cambridge has seen several large-scale strategic housing sites and long lead in times for new settlements such as Cambourne and Northstowe'*. It concludes that while *'Generally, large sites deliver more housing each year on average, but the advantage of smaller sites is that they tend to build out quicker and have shorter lead-in times overall when considering the planning approval process'*. For this reason, village sites such as land to the rear of Fisher's Lane, Orwell have an important role in delivery and achieving a mix of housing.
17. NPPF Paragraph 68 sets out that *"Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly."* This can be achieved by allocating a greater number of small to medium sized sites, rather than fewer large strategic sites or working with developers to encourage the sub-division of large sites, helping to speed up the delivery of homes. Additionally, the Planning Practice Guidance identifies the need to consider a range of sites for development, including small scale sites in villages and towns.
18. The existing planning strategy places a significant reliance on the strategic allocations around the City and also the development of new settlements which the Inspector's raised concerns about. The new Local Plan should significantly increase the allocation of small to medium sized sites in the rural areas, to help speed up delivery of homes and allow more flexibility. Small-medium sized sites play an important role in providing a wide variety

Greater Cambridge Local Plan Issues and Options 2020 Consultation

of house types and mix and also deliver quickly compared to larger sites. In accordance with Paragraphs 67 and 68 of the NPPF, strategic policy-making authorities should identify an appropriate supply and mix of these sites across the District and Local Plan period.

19. **Summary: The Local Plan should adopt a blended approach including a range of locations, and site sizes to ensure deliverability and choice in the market.**

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?

20. The standard methodology indicates a need for 1,800 homes per year, or 40,900 homes for the suggested plan period of 2017-2040. However, as the draft Local Plan acknowledges, the Cambridgeshire & Peterborough Independent Economic Review (CPIER) *'showed that our recent growth has been faster than expected, and that growth is likely to continue. As a result, demand for new housing in this area has been exceptionally high and housebuilding has not kept up'*.

21. The draft Issues & Options Local Plan indicates that a rough indicative calculation based on CPIER suggests that if the jobs growth is achieved, around 2,900 homes a year would need to be built in Greater Cambridge, which equates to an indicative total of 66,700 homes over the period 2017-2040.

22. CPIER recommends that *'There should be a review of housing requirements based on the potential for higher growth in employment than currently forecast in the EEFM'*. It states that *'No economy can achieve its potential without an adequate supply of housing, which must offer a range of types and price points for all society'* and add that it *'is concerned that Cambridgeshire & Peterborough is already running a very significant risk in this regard' and that risk is most acute in the Greater Cambridge area'*.

23. CPIER continues, stating that *'There has been insufficient housing development to meet demand. Average house prices and commuting have risen, choking labour supply while reducing the well-being of those forced to commute longer and longer distances [from more affordable areas]'*. CPIER concludes that *'we believe the accumulated deficit in Cambridgeshire & Peterborough is so acute that the local authorities should re-examine their assessments of housing need, setting higher numbers, which at least reflect previous under-delivery'*. It should also be noted that the CPIER indicates that job growth in recent years in Greater Cambridge has been under-estimated with a knock-on impact for the level of housing required, which is likely to be far higher than the numbers set out using the standard methodology method.

24. The supporting Housing Delivery Study prepared by Barton Willmore demonstrates that *'current housing completions are on a par with the minimum housing need identified using the Government's standard method. However to keep up with the economic growth over the next 20 years, using the upper housing range recommended by CPIER will mean an uplift of 71% in housing supply compared to the current objectively assessed need (OAN) set out in the Cambridge and South Cambridgeshire Local Plan (2018)'*. The NIC's recommendations go even further than CPIER and recommend doubling the current OAN

to reach a total of 3,350 homes per annum. The supporting Housing Delivery Strategy concludes that *'Applying these indicative figures [set out in the CPIER and NIC] would result in a need to deliver 65,987-77,050 homes between 2017-2040. This would require a review of land available to support a further 29,587-40,650 homes during the Local Plan Period taking account the 36,400 homes that already have permission or are allocated in the adopted 2018 Local Plan'*.

25. For these reasons, my client strongly agrees that the Greater Cambridge Shared Planning Service *'should plan for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy'*. While there is clearly more empirical evidence to be undertaken, the indicative CPIER calculation of 2,900 home a year (or 66,700 homes over the plan period) should be seen as an appropriate starting point. My client therefore supports the option of delivering a minimum of 2,900 homes per year, as only by building at a higher level than has previously occurred will start to mitigate the significant negative effects on both the local and national economy should housing in Greater Cambridge continue to be constrained.
26. Housing should also reflect the upper housing range as recommended within the CPIER and the NIC to support the anticipated economic growth over the next 20 years. This equates to a minimum of 2,900 homes each year within Greater Cambridge and an uplift of a minimum of 71% of housing supply compared to the current OAN figures. This shows the potential need for 9,577 additional homes in rural areas up to 2040 based on the CPIER's estimates against existing representation of growth across the existing adopted development strategy.
27. **Summary: Strongly agree that 'we should plan for a higher number of homes than the minimum required..., to provide flexibility..for the growing economy'. In order to meet the growth aspiration that has been set out by the Local Planning Authorities and CPCA, the plan must plan for the homes to support the anticipated growth.**

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

28. As stated within at 5.2.5 of the Issues and Options document, the currently adopted 2018 South Cambridgeshire Local Plan sets a development framework for each village, outside which development is heavily restricted.
29. In addition, villages within the Local Plan 2018 have been categorised dependant on their 'sustainability'. Orwell is currently categorised as a 'Group Village'. These are villages that are considered by the Plan to be generally less sustainable where development will be limited to sites of 8 to 15 dwellings.
30. The CLA's report: Sustainable Villages – Making Rural Communities fit for the Future is critical of traditional approaches to what constitutes 'sustainability' and states that *'Sustainability assessments measure villages against a range of services and amenities more akin to how previous generations lived and used services'* and argues that *'Local authorities should factor in how advances in technology have helped shape modern life and consider how emerging technology will change rural England'*. It concludes that many

Greater Cambridge Local Plan Issues and Options 2020 Consultation

villages 'are not allocated housing and have very limited development options to improve their sustainability leaving them in a cycle of decline'.

31. In light of the above it is recommended that the Local Plan should be more flexible in particular at focussing development at the edge of the villages contained within Policy S/10 that rank higher in terms of sustainability. It would be our recommendation that a new village group is provided within the Local Plan than encompasses the less sustainable Minor Rural Centres and more sustainable Group Villages and allows for development of up to 30 dwellings.
32. Furthermore, the Local Plan should allow for more flexibility in allowing the development of sites that directly abut the development framework of a village that is not within the Green Belt (or the edge of a village abutting the Green Belt). Sites such as the one put forward by my client, Endurance Estates as part of the Greater Cambridge Local Plan 'Call for Sites' exercise in March 2019.
33. **Summary: The Local Plan should be highly flexible towards development of jobs/homes on the edge of villages and be able to respond to changing circumstances.**

Question 42: Where should we site new development? Rank the options 1-6 (1 – Most Preferred 6 – Least Preferred)

34. This is a rather blunt tool in which to assess the spatial approach and a flexible approach is likely to be more appropriate. The Cambridge & Peterborough Independent Economic Review (CPIER), which was published in September 2018. Within the document, it concludes that '*Cambridgeshire and Peterborough is an area which already makes a huge contribution to the UK, and which holds great promise for the future. It also faces risks, which could bring the success to an end, and challenges relating to creating an inclusive society where economic growth works for everyone*'.
35. One of its recommendations is that 'The Combined Authority should adopt a blended spatial strategy that includes a range of development locations. The current adopted South Cambridgeshire Local Plan places considerable emphasis on a small number of large new settlements or urban extensions, and given the need for 10% of housing allocations to be located on sites of less than 1 hectare it is clear that village locations will need to play a much greater role in meeting the housing need. While my client's site is slightly over 1 hectare in size, it is certainly within the spirit of this policy approach, which aims to provide a more flexibility supply of housing land.
36. My client's site at land to the rear of Fisher's Lane, Orwell is consistent with the conclusions of the CPIER, which advocate a blended approach. Indeed the CPIER approach acknowledges the advantages that a dispersed approach to allow some new homes and jobs to villages can have. It states that 'Bringing new homes and jobs to towns and villages where populations are aging [such as Orwell] could bring new life into them'.
37. New development should be located strategically within the District, on sites that are both sustainable and suitable, such as my client's site at land to the rear of Fisher's Lane,

Orwell. It is not appropriate to rank these options by those most and least preferred because an effective spatial strategy will be a blended approach of various options. However, as stated above, given the current South Cambridgeshire Local Plan's significant focus on delivering most of the area's growth in large new settlements or large urban extension, it is appropriate for the emerging Greater Cambridge Local Plan to acknowledge the problems and issues that a restrictive approach to development in villages has had over previous decades. This restrictive approach has coincided with a decline in many local shops, services, and facilities in many villages. While Orwell has been fortunate in retaining its public house, The Chequers, local village shop/post office, and primary school, additional housing growth that is commensurate with the size and scale of the village would help to ensure these facilities continue to survive, while at the same time enabling a wider range of housing types and tenures to meet local housing needs. There should be a reemphasis on the role of small and medium sized sites in villages in delivering growth given the adopted South Cambridgeshire Local Plan's principal focus on large new settlements and urban extensions around Cambridge.

38. Summary: A blended strategy is supported but specifically including development in villages and along public transport corridors.

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

39. The focus on growing our villages throughout the District would help sustain existing facilities and infrastructure in villages and assist in diversifying their population. In order to help sustain existing facilities and infrastructure within villages, it is key that they are grown by increasing housing numbers.
40. Paragraph 78 of the National Planning Policy Framework 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, especially where this will support local services'*. It is important to ensure that existing businesses are able to stay open and vital services to not only the Minor Rural Centres and Group Villages but also the surrounding Infill Villages, many of which rely on the services within adjacent larger settlements.
41. In Greater Cambridge, many younger people and families have effectively been priced out of areas in which they grew up. At the same time, older people wishing to remain in their communities and downsize to smaller properties, have been prevented from doing so as a result of a lack of supply of appropriate housing. This in turn has led to the under-occupation of larger properties, and the over-occupation of some smaller properties, particularly in Cambridge itself.
42. Over the same period, many villages have lost many of their services as shops have closed, public houses have been converted into houses, and bus services have been cut back or ceased altogether. Now, with better broadband connectivity, combined with the advent of home working and online shopping, there is a unique opportunity for rural areas to reinvent themselves but they need some housing to enable them to do so.

43. The Country Landowners Association's (CLA's) report Sustainable Villages – Making Communities fit for the Future which draws on the Taylor Review (2008) challenges the assumption that a lack of services means that these places are unsuitable for new housing *'due to the negative impact this process has on house price affordability, social cohesion and economic performance. This process effectively fossilises these villages instead of seeking to address the reasons behind why services are being lost, creating a cycle of decline'*.
44. Over the past 25 years, local authorities have increasingly sought to focus new development in major towns and cities. Instead of enabling modest, appropriate-scale extensions to villages, planning policies have focused on a smaller number of large allocations on the edge of urban areas, this has been the case in the Greater Cambridge area, where the current adopted South Cambridgeshire Local Plan places considerable emphasis on the growth of a small number of very large settlements including Bourn Airfield, Cambourne, Northstowe, and Waterbeach.
45. While it is acknowledged that larger settlements accompanied by high quality public transport can provide sustainable options, it is also critical that medium-sized villages such as Orwell take some development to enable it to grow in a sustainable well, helping to support local shops, services, and facilities including the local primary school. In recent years many villages across the Greater Cambridge area have lost vital services as shops have closed, public houses have been converted into residential properties and bus services have been reduced. Orwell is fortunate in this regard and has maintained a number of its key services and transport options. Now with much improved broadband connectivity and a significant increase in home working and ability to shop online, many of the historic barriers to sustainability in rural areas and villages are now reduced.
46. It is therefore important to enable modest, appropriately-sized extensions to villages so that the remaining services (including the primary school) can be supported and to enable much needed new market and affordable housing to be provided. It is considered that the proposed site is commensurate with the size and scale of the village and could provide a sustainable expansion to the settlement whilst potentially providing additional car and cycle parking for the adjacent employment site.
47. It is vital to preserve what is special about our rural communities and environment. But equally, carefully designed additional development that enables villages to become more vibrant is essential. Any new housing schemes should be targeted at local circumstances and be commensurate with the size and scale of the individual settlements. Of the top 25 local authorities in the Halifax's latest Quality of Life survey, the majority are in predominantly rural areas – so a key challenge will be to ensure that any development is not at the expense of what makes them great places to live.
48. **Summary: Support for a strategy that includes growth in villages at a level that is commensurate with their size and scale and enables sustainable growth.**

Question 49: Do you have any views on any specific policies in the two adopted 2018 Local Plans? If so, what are they?

Greater Cambridge Local Plan Issues and Options 2020 Consultation



49. Policy S/10 of the South Cambridgeshire Local Plan 2018 is far too restrictive and inflexible, and prevents appropriate-sized development in medium-sized villages such as Orwell. A much less restrictive approach to development in medium-sized villages like Orwell should be adopted, together with a much broader definition of what constitutes sustainability, focusing on the potential to enhance the sustainability of a place through allowing appropriate levels of development on the edges of villages.
50. **Summary: Support for a more flexible and less restrictive approach to appropriate residential development within and on the edges of villages.**