

## **Representation to Greater Cambridge Local Plan Issues and Options 2020 Consultation**

### **Introduction**

1. This representation is submitted by Taylor Wimpey (Strategic Land) in response to the Greater Cambridge Local Plan Issues and Options 2020 consultation. Taylor Wimpey are promoting Land North of Cambridge Road (A1307), Linton ('the Site') in collaboration with the land owner.
2. This representation is made in the context of promoting this Site for a residential development of circa 85 dwellings, open space, landscaping and new vehicular access point from Cambridge Road.
3. A suite of supporting information accompanies this submission which, alongside this representation, demonstrate that the Site is available, achievable and suitable to deliver housing immediately. The supporting information comprises the following:
  - Site Location Plan (**Appendix 1**);
  - Indicative Concept Masterplan (**Appendix 2**);
  - Access Appraisal, prepared by Transport Planning Associates (TPA) (**Appendix 3**);
  - Flood Risk Assessment & Drainage Strategy Report, prepared by TPA (**Appendix 4**);
  - Archaeology and Heritage Technical Note, prepared by EDP (**Appendix 5**); and
  - Ecology Technical Note, prepared by EDP (**Appendix 6**).
4. The Site being promoted is a refined version of that which was previously submitted by Taylor Wimpey to the Greater Cambridge 2019 SHELAA Call for Sites consultation. The site extent has been reduced from the previous larger 'Land at Mill Lane and Long Lane, Linton, CB21 4NL' and now simply comprises Land North of Cambridge Road (A1307), Linton. This smaller area is confined to land directly abutting the existing settlement boundary for Linton and now benefits from masterplanning and technical work to assess its suitability for residential development.
5. The proposal will bring a number of benefits to support the delivery of a sound and sustainable spatial strategy as part of the Local Plan, including:
  - Providing new homes in an accessible location on the edge of a sustainable settlement;
  - Facilitating development in a non-Green Belt location;
  - Suitability for delivering a range of home sizes to respond to local demand and need;
  - Providing growth on the north side of the A1307 with direct links to Linton village; and
  - Provision of informal open space and landscaping, including native species to deliver ecological enhancements
6. Responses to the relevant consultation questions from the Issues & Options Consultation documentation are set out below.

## Site Background

7. The Site immediately adjoins the existing Linton village boundary to the north and lies approximately 15km south-east of Cambridge City Centre. The Site benefits from an existing footpath connection into the village via the village green (Camping Close) and is circa 250 metres from the bus stops on Cambridge Road, which provide services into Cambridge City Centre.
8. Linton Village has an extensive range of services including shops, supermarkets, a post office, pharmacy, opticians, restaurants/cafes and pubs, churches, four schools (infant, junior, secondary and a school for special educational needs), a library, health centre and a leisure centre (attached to Linton Village College).
9. The Site is approximately 6.3ha and comprises green open land. The A1307 bounds the Site to the south, whilst the River Granta borders the Site to north. Mill Lane makes up the eastern site boundary whilst residential development abuts the site to the west.
10. Linton is one of the closest Rural Centres outside of the Green Belt on the southern side of Cambridge. This means that development is more appropriate in this location than any Green Belt village or areas closer to Cambridge. Therefore, as a sustainable, edge of village site outside of the Green Belt, the Site should be considered as an appropriate location for growth.

**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.**

11. As outlined above, Land at North of Cambridge Road (A1307), Linton, is being promoted for allocation for circa 85 dwellings, open space, landscaping and new vehicular access point from Cambridge Road. A Site Location Plan and Indicative Masterplan accompany this representation.
12. The Site is well related to the Linton Village boundary and is already connected to the village by two public footpaths running through the village green and Mill Lane. The Site is located north of the A1307 (Cambridge Road) which denotes a clear southern boundary and as such constitutes a logical and sustainable location for an extension to the Village.
13. The designation within Policy H/6 of the adopted South Cambridgeshire Local Plan (SCLP) to not allow windfall residential development south of the A1307 even within the Linton Village Framework is a clear acknowledgement that land north of Cambridge Road is more sustainable than development within the village framework to the south. The SCLP identifies that the southern part of Linton is severed from the rest of the village by the A1307 which makes it difficult to safely and easily access the services and facilities in the centre of the village.
14. The Site is not limited by any of these constraints and therefore provides the opportune location to accommodate growth to the south of the Linton which is unable to take place within the village framework south of the A1307.
15. Additionally, consultation on the emerging plans for the Cambridgeshire Autonomous Metro (CAM) indicate that Linton will be served by its own stop which would make the settlement an optimum location for additional growth moving forward.
16. The supporting technical reports demonstrate that there are no designations or technical considerations which would justify the Site being considered unsuitable for development. The finding from these can be summarised as follows:

## Transport

17. Transport Planning Associates (TPA) have undertaken an Access Appraisal which considers the key transport related matters for the Site including the identification of achievable and appropriate access to the Site for both vehicular and non-vehicular modes.
18. The proposed access arrangement is shown in drawing number 190205/SK02 appended to the Access Appraisal. This demonstrates that the Site could accommodate a priority T-junction which will allow for safe entrance and egress without prejudice to the delivery of the proposed Greater Cambridgeshire Partnership scheme for the A1307.
19. The appraisal highlights that the site can be accessed by all necessary transport modes and is appropriately located to local amenities, facilities and services to encourage travel by sustainable modes.
20. Overall, the site is found to be highly suitable for a future residential allocation, given its accessibility to nearby facilities via sustainable modes of travel, and suitability in regard to its contextual location as an existing part of Linton and the site being an obvious extension of existing residential areas within the village.
21. A full copy of the Access Appraisal and supporting appendices is provided at Appendix 3 of this representation.

## Flood Risk & Drainage

22. The Site is covered by areas of Flood Zones 1, 2 and 3, however the Indicative Concept Masterplan shows that the proposed layout of the development seeks to, as far as possible, locate dwellings outside the higher Flood Risk areas. An extensive land buffer is provided to the River Granta to allow for flood mitigation and drainage infrastructure.
23. A Flood Risk Assessment & Drainage Strategy Report has been prepared by TPA and enclosed at **Appendix 4**.
24. The assessment provides a comprehensive and robust analysis of the flood impact of the development upon other adjacent properties and of existing flood mechanisms on the development itself.
25. The report notes that the underlying soil type is considered to be compatible for using infiltration techniques as a way to manage the surface water drainage runoff. However, specific on-site infiltration testing will be required to confirm whether the existing Site ground conditions are compatible for the storage of groundwater.
26. Should the on-site infiltration testing demonstrate that the storage of groundwater is not a viable method for the management of the surface water drainage runoff, attenuation and discharge within the nearest watercourse will be proposed as part of the overall surface water drainage strategy.
27. The report confirms that the ongoing risk of surface water flooding can be mitigated by using conveyance features which will collect and convey this runoff to the final point of the discharge within the proposed SuDS features, where this extra volume will be accommodated.
28. Overall, the report concludes the proposed development is sustainable in terms of flood risk and the management of foul and surface water drainage.

### Archaeology and Heritage

29. An Archaeology and Heritage Technical Note, prepared by EDP accompanies this submission at **Appendix 5**.
30. The note confirms that the Site does not contain any designated heritage assets. However, the immediate context is characterised by a number of heritage designations including listed buildings within the village and the Linton Conservation Area which is located along the northern and western edge of the Site.
31. A scheduled monument also lies 300m to the east of the Site but the note confirms that development within the Site would have no potential for any negative effects on this asset.
32. The Technical Note recommends that the northern extents of the Site are retained as open space to preserve both the rural edge to the conservation area and the character of the inwards and outward views.
33. Additionally, consideration of all listed building and important views with potential to be affected by the development on the Site is undertaken and the Technical Note finds that it is likely that any potential effects can be avoided by the sensitive masterplanning of the Site.
34. In terms of archaeology, it is possible that archaeological work within the Site may be required to determine the presence, character and significance of any remains on Site but there is no reason to expect that the Site's delivery or capacity would be compromised by this work.
35. Overall, it is considered unlikely that archaeological or heritage issues would affect the deliverability and/or capacity of the Site for residential development.

### Ecology

36. An Ecology Technical Note prepared by EDP considers the ecological sensitivities for the Site and identifies opportunities and constraints which influence its potential to support residential development.
37. This desk study identifies a number of valuable ecological features within or adjacent to the Site but considers that there are no obvious in principle ecological constraints that would preclude development, and which cannot be avoided by good design.
38. The Technical Note recommends that future development proposals maintain their connectivity to the wider area through the Linton Pocket Park and River Granta corridor.
39. Overall, EDP consider that the Site and wider land parcel presents an opportunity to deliver a net gain to local biodiversity and contribute to the conservation objectives for the local priority species on Site as well as ensuring local and national policy compliance.

### Indicative Concept Masterplan

40. At this stage, the Indicative Concept Masterplan does not set out a proposed mix of dwellings as this would form part of a detailed planning application. However, the size of the site offers the potential to deliver a mix of dwelling types and sizes which would be refined through discussion with the Council to ensure the proposed mix was appropriate to meet local housing need whilst respecting the character of the area.

## Summary

41. Overall, the Site constitutes a sustainable location for a sensitive southern extension to Linton and there are no technical reasons which preclude development on this Site. Allocating this Site which lies on the edge of an established village (identified as a Minor Rural Centre) with existing services and infrastructure, would deliver much needed housing and is considered to provide significant social, economic and environmental benefits which constitutes sustainable development.
42. Whilst building on the edge of villages as a priority would be a change in direction from greater Cambridgeshire's current growth approach, change is necessary and inevitable for any authority which is serious about delivering housing.

### **Question 3. Please submit any sites for green space and wildlife habitats you wish to suggest for consideration through the Local Plan. Provide as much information and supporting evidence as possible.**

43. Whilst the Site is not proposed for designation as a green space or wildlife habitat, the accompanying Indicative Masterplan shows that it is intended to provide extensive publicly accessible green space and habitat for wildlife on the Site.

### **Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?**

44. We do not dispute that planning for the period up to 2040 is appropriate. However, in accordance with Paragraph 67 of the NPPF, it is more important for plans to identify a supply of specific, deliverable sites for years one to five of the plan period. After this, developable sites or broad locations for growth should be identified for years 6-10 of the Plan and, where possible, for years 11-15 of the Plan.
45. As such, it is clear that there should be a focus on allocating sites for delivery in years 1-5 of the Plan rather than planning for up to 2040. Medium and smaller sites, such as our Site, are best placed to come forward quickly (in years 0-5) as typically, they are not constrained by multiple land owners, viability issues or delays in progressing detailed design. As such, these smaller, well located sites must be allocated now to provide an immediate and robust supply of sites in the short-term.

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

46. Any strategy which progresses must adequately respond to the needs of both Cambridge City Council (CCC) and South Cambridgeshire District Council (SCDC) and provide a sufficient supply and mix of sites to deliver growth needs across both areas.
47. Therefore, reliance on a single growth strategy such as Edge of Cambridge or new settlements must be avoided, and a mixed and flexible approach should be adopted to ensure housing demand is met in all locations across the Plan area including established settlements and villages.
48. Allocating a range of types and locations for development will ensure there is a robust supply which will enable a sufficient amount and variety of land can come forward where it is needed as encouraged by the NPPF (paragraph 59).

49. This means there needs to be a step away from the existing preference for locating development, as set out in adopted Plans for SCC and CCC. At present, the priority is to deliver new housing on the edge of Cambridge, followed by within new settlements and lastly in the rural area at Rural Centres.

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

50. Progressing a spatial strategy which links new homes with jobs, facilities/services, high-quality open spaces and public transport helps to achieve good growth. Allocating sensitive development on the edge of villages fulfils these criteria by being accessible to an existing provision of facilities which can encourage walking and cycle and provide access to established jobs and social activities.
51. By locating such development within established village communities, best use can be made of existing resources with less reliance and concerns on new housing being delivered before the necessary infrastructure to support it which is often a criticism of new settlements and large urban extensions. Additionally, the presence of an existing community structure means new development in these village locations have better opportunities for good levels of social inclusion and wellbeing.

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

52. See response to Question 16.

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

53. Healthy lifestyles can be supported by allocating new developments in locations where daily activities such as travelling to school, shopping and work can be undertaken actively by foot or bicycle. Within or on the edge of established villages communities, such as Linton, provide ideal locations for new development which can deliver such active lifestyles as services and facilities are already contained within short distance. New development in these locations can, where appropriate, enhance or increase existing provisions / opportunities which provide benefits for existing residents as well.
54. New development should also be close to, or provide, open space and recreational activities. The proposed Site is located adjacent to the River Granta and a number of public footpaths and walks which provide the ideal setting and opportunities for a healthy lifestyle. The Indicative Concept Masterplan accompanying this submission show that it is intended to protect and enhance the riverside setting and be retaining an extensive expanse of open spaces which, alongside the existing village green to the north, will create a link of connected green space to provide a new green infrastructure and recreation hub for the village. An opportunity to create such a high quality new residential development, which also enhances the quality of life of existing residents, must not be missed.

**Question 26. Do you think we should be protecting existing business and industrial space?**

55. Existing employment and business locations within Rural Centres and Minor Rural Centres should be protected to ensure they maintain the level of services and employment in these sustainable village locations.

56. A number of employment sites in rural centres have already been lost to housing allocations which in turn can reduce the sustainability of such villages. Further loss should be prevented by considering alternative options for new housing such as redrawing the village boundaries and allocating edge of village sites.

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

57. In order to adequately respond to changing housing needs over the Local Plan period, flexibility and variety in the amount and type of new homes is required.
58. As stated in response to Question 5, this can be achieved by avoiding reliance on a single growth strategy, and instead adopting a mixed and flexible approach to identifying and allocating new housing sites of different sizes and in different locations across the entire plan area. This will ensure a range of different housing types and products will come forward which are appropriate to the site context and development size and will help meet demand for housing in all locations including established settlements and villages.
59. Additionally, Cambridgeshire has significant housing affordability issue which will only increase as job growth continues, and the Greater Cambridge Plan must seek to significantly exceed minimum housing requirements to begin to rebalance this issue, and ensure a range of different affordable housing types can be delivered.

**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?**

60. Local Housing Need figures are a minima and the intention should be to exceed the number of homes required by the Government both to provide flexibility and meet affordability challenges. In order to be robust and sound, the number of sites and dwellings to be allocated by the Plan should exceed the objectively assessed need to reflect the reality that some allocated sites will not come forward in the plan period or deliver the number of homes they are allocated for.
61. Additionally, this is particularly the case when considering the aspirations for growth in jobs and economies across the district. Greater Cambridge's current and future housing need is largely driven by the employment growth targeted as part of doubling the regional GVA by 2041. Research by Cambridgeshire & Peterborough Independent Economic Commission (CPIEC) clearly shows that the quantity of land/sites allocated for housing will need to be significantly more than that currently planned for in the Local Plans.
62. Evidence on job density and economic activity shows there is little capacity among existing Greater Cambridge residents to expand the workforce and economic growth will need to rely on workers migrating or commuting into the area to avoid to not be limited. This places continuing pressure and demand on the housing market and to date, demand has vastly surpassed supply, creating a severe affordability issue. Therefore, the volume of house building needs to significantly increase across the district and exceed minimum requirements in order to prevent economic growth in Greater Cambridge stalling and housing unaffordability increasing.
63. Allocating land for additional housing, above minimum targets, would also ensure there is sufficient flexibility within the Local Plan to respond to changing housing needs/trends over the Local Plan period.

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

64. Whilst there are different advantages and challenges for each growth option as recognised by the consultation material, significant weight must be given to the NPPF in considering which growth options are appropriate to progress. The NPPF (paragraphs 133 and 136) is clear that great importance is attached to Green Belt and boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.
65. Paragraph 137 explicitly requires the strategic policy-making authority to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries. Compliance with this process will be assessed through the examination of its strategic policies.
66. Therefore, the onus is on the GC authority to demonstrate that all other reasonable options for growth have been exhausted before releasing Green Belt, regardless of the potential sustainability benefits of Green Belt locations.
67. Therefore, it is clear that edge of village locations outside of the Green Belt, such as Linton, which present a suitable, available and sustainable location for development must be given significant weight and consideration for allocation before any land can be released from Green Belt.
68. If further sites are required to meet growth needs once all edge of village and edge of Cambridge sites outside the Green Belt have been assessed and, where appropriate, allocated, then the Green Belt boundaries can then be changed and justified as necessary.

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

69. Significant flexibility should be given towards the development of housing and jobs on the edge of villages, particularly for Rural Centres and Minor Rural Centres as identified in the adopted South Cambridgeshire Local Plan.
70. Edge of village locations provide new development with access to established communities as well as services and other infrastructure which make them an ideal location for additional jobs and homes.
71. For example, Linton is identified as a Minor Rural Centre which are villages with a greater level of services, facilities and employment than most other villages in South Cambridgeshire, and often perform a role in terms of providing services and facilities for a small rural hinterland. Providing additional homes in this location would deliver social and economic benefits which weigh heavily on presumption in favour of sustainable development,
72. Given this, the settlement boundaries for existing Rural Centres and Minor Rural Centres should be reconsidered and reassessed particularly where edge of village sites are promoted for sustainable development.
73. Additionally, the NPPF encourages planning policies to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. As noted previously, edge of village sites tend to be smaller and within single ownership with less constraints than larger strategic allocations. This means they are a reliable and robust source for

housing delivery and where such sites are immediately available, significant flexibility should be given to allow sustainable development to be delivered quickly.

**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?**

74. Yes, particularly within Rural Centres and Minor Rural Centres where the indicative maximum number of dwellings for sites should be removed to allow the assessment of appropriate densities to take place on a site-by-site basis. This will ensure the most efficient use of land can be made, as is appropriate to the sites context, in line with the requirements of the NPPF.
75. The boundaries of village frameworks should also be re-assessed to allow sustainable sites abutting the existing village boundaries to come forward where appropriate. This will open up a large new supply of small and medium sized housing sites which can be delivered immediately as the necessary infrastructure and services to serve the new resident already exist.

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

76. No single solution will deliver a sound Local Plan or spatial strategy. A flexible and mixed approach is required to provide a robust supply of housing and to deliver new housing and employment development in the appropriate locations across the district.
77. However, as directed by the NPPF, the first approach should be to consider sites outside of the Green Belt. Therefore, sites within or well related to existing sustainable settlements outside the Green Belt provide the most logical place to consider for new development and to provide a varied spatial delivery of growth.

**Question 45. What do you think about developing around the edge of Cambridge in the Green Belt?**

78. Please see response to Question 39.

**Question 46. What do you think about creating planned new settlements?**

79. If the correct mechanisms are not in place to ensure that new settlements are delivered as intended during the Plan period, then reliance on such allocations for meeting housing need would not be effective or sound in meeting housing and job needs.
80. In recent years, a number of Local Authorities have been criticised, and Local Plans have failed at Examination, due to relying on such limited approaches. The most recent being the St Albans Local Plan Examination in January 2020 where the Planning Inspector cancelled the remaining hearings after the first week. This decision was made following discussions focusing on the proposed allocation of a Garden Village to provide 2,300 new homes and the significant concerns about delivering the allocation as the site also benefitted from planning permission for a rail interchange.
81. New settlements can contribute significantly to meeting housing need but cannot be relied upon as the sole solution. The above demonstrates that there are real risks associated with simply relying on large urban extensions or any single solution to delivering housing need and that a range of sites must be allocated in order to provide a robust supply of housing.

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

82. Please refer to response to Question 40.

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

83. South Cambridgeshire Local Plan Policy S/5 set a target for 19,500 new homes between 2011-2031. Some of this target had already been completed/committed at the time of adoption but the remainder of housing delivery supply relied on three major strategic site allocations which were anticipated to provide a further 13,700 (70%) of these homes.
84. As stated within the response to Question 46, a move away from simply relying a small number of large allocations is needed. Smaller and medium sized sites must also be considered to ensure that a robust supply of sites are allocated which delivers growth in the right locations across the district throughout the entire Plan period.
85. Furthermore, the reference within Policy S/6 to limiting residential development and redevelopment to up to 30 dwellings in Minor Rural Centres should be removed. It would be more appropriate to consider housing numbers and densities on a case-by-case basis taking into account the local context and need for housing. This is particularly the case as the range and number of services, facilities and employment vary amongst different rural centres. A more flexible policy approach should be taken to new development in or adjacent to these better serviced rural centres as they can deliver growth in sustainable locations and make best use of existing services, facilities and employment opportunities.

**Question 50: What do you think should be in the next Local Plan? Are there issues, ideas or themes that you don't feel we have yet explored?**

86. The next iteration of the Sustainability Appraisal (SA) for the Local Plan must ensure that it considers a wide range of development scenarios and that these are all taken through the subsequent stages of the Local Plan-making process. This will help ensure that the Local Plan process and its SA support the Submission Local Plan, which is highly likely to contain a hybrid of development scenarios.
87. Six different spatial growth options are considered within the SA and Issues and Option consultation but with only high-level options assessed at this stage, there is substantial uncertainty over the outcomes of these options. Additional assessment should take place at another local plan stage, with full assessments within the SA Framework, before any options are fully dismissed. Without a full consideration of all these options which considers substantive detail of deliverable sites as well as broader locations for growth, there is a risk of the plans' selected approach not being properly justified, and the plan being found unsound at examination.