

Greater Cambridge Local Plan – The First Conversation

Regulation 18 – Issues and Options



February 2020

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1 INTRODUCTION

1.1 Introduction

1.1.1 These representations are submitted by Gladman in response to the current consultation on the Greater Cambridge Local Plan – ‘The First Conversation’. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.

1.1.2 Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure that residents have access to a decent home and employment opportunities.

1.1.3 Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in this representation.

1.1.4 The Issues and Options consultation represents the starting point of the plan preparation process and provides an early opportunity to provide comments on key issues and areas for the new Local Plan to address. This consultation is therefore welcomed, and Gladman look forward to engaging further with the Councils as the plan preparation process progresses over the next few years.

1.1.5 Through this submission, Gladman have sought to provide our thoughts on a number of the key themes and issues and also provided site submissions for land being promoted for residential development.

1.1.6 Gladman submit that the Councils’ will need to carefully consider some of its policy choices and ensure that its evidence base is up-to-date and robust in light of changing circumstances and the changes brought about by the revised National Planning Policy Framework (2019).

1.2 Context

1.2.1 The Cambridge City Local Plan and South Cambridgeshire Local Plan were adopted on 18th October 2018 and 27th September 2018 respectively. This followed a long and protracted examination process over a number of years. These Local Plans set out the planning policies and land allocations up to 2031. Although a number of the large-scale developments included within the Local Plans (such as Northstowe and Bourne Airfield) will take longer to complete.

1.2.2 Both adopted Local Plans include a policy commitment to undertake a Local Plan Review. For South Cambridgeshire this comes in the form of Policy S/13 which outlines a requirement to commence the Local Plan Review before the end of 2019, with submission to the Secretary of State for

examination by the end of Summer 2022. This policy requires the new Local Plan to be prepared jointly for the combined districts (Greater Cambridge).

1.2.3 Consequently, Cambridge City Council and South Cambridgeshire District Council are now in the process of working jointly in undertaking a new Local Plan for the Greater Cambridge area. This new Plan will cover the period 2017-2040, providing the policy framework and site allocations for this period.

1.2.4 The revised Framework (2019) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order for the Greater Cambridge Local Plan to be sound it is fundamental that the Local Plan:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework

2.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

2.1.2 The Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirms the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. Paragraph 16 of the Framework (2019) states that Plans should:

- a) *Be prepared with the objective of contributing to the achievement of sustainable development;*
- b) *Be prepared positively, in a way that is aspirational but deliverable;*
- c) *Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) *Be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

2.1.3 To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay¹.

2.1.4 To be considered sound at Examination the emerging Local Plan will need to meet all four of the soundness tests set out in paragraph 35 of the Framework (2019).

¹ NPPF – Paragraph 60

2.2 Planning Practice Guidance

- 2.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans.

3 LEGAL REQUIREMENTS

3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.²
- 3.1.2 The Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process³. The SOCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 3.1.3 Gladman are supportive of the two Councils working jointly to prepare the new Local Plan for Greater Cambridge, as this both aligns with the policy commitment in the existing Local Plans and allows for strategic matters which cross between the two LPAs to be considered comprehensively in a joined up manner. Notwithstanding this, it still remains of critical importance for Cambridge City and South Cambridgeshire to work alongside the other Cambridgeshire authorities to ensure that any wider cross boundary issues are addressed. It may be the case that these need to be addressed through SOCGs with the other LPAs.
- 3.1.4 As demonstrated through the outcome of the Coventry, Mid Sussex, Castle Point and St Albans examinations, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the

² PPG Reference ID: 61-021-20180913

³ PPG Reference ID: 61-001-20180913

requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).

- 3.2.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the emerging Local Plan proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council's decision-making and scoring should be robust, justified and transparent.

4 BIODIVERSITY AND GREEN SPACES

4.1 Biodiversity Net Gains

Question 14. How do we achieve biodiversity net gains through new development?

- 4.1.1 It is important that the long-term impacts are considered when reviewing proposals for biodiversity net gain taking into account that many of the measures provided as part of developments will need to mature beyond the build period.
- 4.1.2 Gladman also take the opportunity to note that if off-site mitigation provides the best opportunity for biodiversity gain, then the policy should be flexible enough to allow for this and it should not be ruled out from the planning application process.
- 4.1.3 These considerations should be taken into account when drafting a policy with regards to achieving biodiversity net gain.

5 GREAT PLACES

5.1 Heritage

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

- 5.1.1 With regards to conservation and the historic environment, Gladman make reference to the NPPF (2019), specifically paragraphs 195-197, which outlines the policy tests which should be applied where development effects designated and non-designated heritage assets. The Councils need to ensure that the policies within the Local Plan reflect the national policy and aligns with these varying tests.
- 5.1.2 Specifically the NPPF states that developments leading to substantial harm of a designated heritage asset should be refused unless it is necessary to achieve substantial public benefits that outweigh the harm, where proposals would lead to less than substantial harm then this harm should be weighed against the public benefits. With regards to proposals impacting on non-designated heritage assets a balanced judgment will be required.

5.2 Design

Question 23. How do you think we could ensure that new development is as well designed as possible?

- 5.2.1 Whilst Gladman recognise the importance of good design, it is critical that the Local Plan does not include overly onerous design policies which could restrict the delivery of much needed housing across the Greater Cambridge area.
- 5.2.2 In this regard, Gladman refer to paragraph 128 of the NPPF which states:

“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussions between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests....”

6 JOBS

6.1 Economic Growth

Question 24. How important do you think continuing economic growth is for the next Local Plan?

- 6.1.1 Continuing economic growth across the Greater Cambridge area is of fundamental importance and needs to be properly considered and planned for through the new Local Plan. Greater Cambridge is a key component of the Oxford to Cambridge growth arc, which is of national significance and therefore the Greater Cambridge Local Plan will have a key role to play in shaping this area and delivering transformational scales of growth.
- 6.1.2 It will be important that these growth opportunities are maximised and that the Councils work alongside the other LPA's in the arc to ensure the potential of the area is realised.
- 6.1.3 Gladman also refer to the Cambridgeshire and Peterborough Devolution Deal which was agreed by the seven Councils across Cambridgeshire and Peterborough and the LEP back in November 2016, with the Order being signed in March 2017. The Devolution deal includes a £600 million fund to support economic growth as well as a £100 million housing fund and £70 million fund to build more Council rented homes.
- 6.1.4 Gladman note the importance of the economy of Cambridge nationally and the fact that this needs to be a key consideration during the preparation of the Greater Cambridge Local Plan.

7 HOMES

7.1 Housing Need

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?

7.1.1 The consultation document outlines that the current calculations, using the Government's standard method, indicate a need for 1,800 homes per year or 40,900 homes for the plan period 2017-2040. Through the process of preparing the Greater Cambridge Local Plan, the 1,800 figure should be considered as a minimum needed and the Councils should be open minded to the fact that this figure may increase due to other considerations. Once the minimum figure has been established further interrogation of this figure will be required to ensure that this is appropriate, for example it may be necessary to increase this figure to support economic growth or to meet affordable housing need as set out in the PPG.

7.1.2 Specifically, Gladman refer to Paragraph ID 2a-010-20190220 which states:

"...Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. This will need to be assessed prior to, and separate from, considering how much of overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *Growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *An authority agreeing to take on unmet need from neighbouring authorities, as set out in the statement of common ground;..."*

7.1.3 The consultation document acknowledges this when it outlines the scale of economic growth which the Council signed up to as part of the Cambridgeshire and Peterborough Devolution Deal. Whilst the consultation document outlines that further detailed work is required, it does also outline that a rough indicative calculation suggests that if this scale of jobs growth is achieved, around 2,900 homes a year would be needed across Greater Cambridge, which would require 66,700 homes between 2017-2040.

- 7.1.4 Gladman strongly believe that the new Local Plan should be planning for a significantly higher number of homes than the minimum identified by the standard method and that they should be seeking to deliver the homes necessary to align with the scale of economic growth.
- 7.1.5 In this regard Gladman also refer to the Cambridgeshire and Peterborough Independent Economic Review (CPIER) September 2018, which sets out a compelling case for higher levels of housing growth across the Greater Cambridge area. Specifically, Gladman note Key Recommendation 5 which points to the need to review the housing requirement based on the need for high economic growth and also how the report warns of significant negative impacts, both to the local and national economy should housing needs continue to be constrained.
- 7.1.6 In addition to the Cambridgeshire and Peterborough Devolution Deal and the economic growth associated with this, it is important for the new Local Plan to recognise the areas position within the Oxford to Cambridge Growth Arc and the implications that this will have for additional growth in the area.
- 7.1.7 The Government has designated the Oxford to Cambridge Growth Arc as a key economic priority and has stated the objective to deliver up to 1 million high quality new homes across the Arc up to 2050. Given that growth across the Arc is of national importance, Gladman believe it is imperative that the Local Plan seek do deliver a higher number of homes than the minimum requirement derived from the standard method. The economy of Cambridge is too important nationally for the Councils to be planning for the minimum number of homes required by the standard method.
- 7.1.8 The consultation document claims that there are 36,400 homes already in the pipeline to be built between 2017 and 2040, and that if this figure is correct then there may be the case for making additional provision if the Local Plan does seek to deliver a higher housing figure than the standard method.
- 7.1.9 If the Council were to progress with the economic growth led scenario discussed in the consultation document this would suggest the need to identify sites for around an additional 30,000 homes in the next Local Plan. Gladman agree that the new Local Plan will need to be identifying significant amounts of land available to deliver the pro-growth strategy. The scale of this residual land to be identified will need to be clarified through further work on the housing need/requirement figure.
- 7.1.10 Given the factors identified above it is clear that the Councils will need to establish a housing requirement well in excess of the minimum number of homes required by the Standard Method. Gladman reserve the right to comment on the housing and jobs growth proposals when these are developed further and the preferred option is presented in the next stage of public consultation (Draft Plan).

7.2 Housing Mix

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

Housing Allocations

- 7.2.1 In allocating sites the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst SUEs and new settlements may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

Housing Mix

- 7.2.2 In terms of housing mix, Gladman would recommend that the Local Plan avoids a prescriptive housing mix requirement, rather that the policy should allow for schemes to determine the most appropriate housing mix for the particular location. The Plan could include an indicative mix which may be encouraged if appropriate rather than a strict requirement. The housing provided will need to reflect the needs across the area and any policy will need to be flexible and recognise that the specific housing needs may change over the course of the plan period.

Affordable Housing

- 7.2.3 The provision of affordable housing should be a key priority for the new Local Plan. Affordability of housing across the Greater Cambridge area is a significant issue, with the Median Affordability ratios being 12.95 and 10.25 for Cambridge City and South Cambridgeshire district respectively.
- 7.2.4 It will be important that the affordable housing requirement set through the new Local Plan is tested through the Local Plan Viability Assessment and that it is set at a deliverable level, whilst also ensure that the housing needs are met.
- 7.2.5 It may be necessary for the Local Plan to include varied affordable housing requirements based on site type and location. This will need to be considered further through the preparation of the Plan.

Housing for Older People

- 7.2.6 The provision of specialist housing to meet the needs of older people is of increasing importance and the Councils need to ensure that this is reflected through a positive policy approach within the new Local Plan. The Councils need a robust understanding of the scale of this type of need across the Greater Cambridge area and need to set out an approach capable of delivering accommodation

to meet this need. Gladman believe that it would be appropriate for the Local Plan to seek to identify specific sites to deliver for this specific need as this would provide a greater level of certainty regarding delivery.

- 7.2.7 Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care). Such schemes differ from traditional sheltered/retirement accommodation schemes and should provide internally accessible communal facilities including residents' lounge, library, dining room, guest suit, quiet lounge, IT suit, assisted bathroom, internal buggy store and changing facilities, reception and care managers office and staff facilities.

Self-build and Custom-build Housing

- 7.2.8 Gladman would welcome the addition of a policy in relation to self-build housing within the Greater Cambridge Local Plan. This would be in line with current government thinking and objectives. It is key that the development industry are able to understand the implications of any such policy requirement, to assist with the design of schemes and the consideration of financial viability.
- 7.2.9 Gladman recommend that any policy requirement in relation to self-build housing has an element of flexibility built in to allow for negotiation over self-build plots on the basis of identified demand and also viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include self-build plots should be tested through the Council's viability assessment of the Local Plan policies to ensure that the cumulative impacts of all proposed local standards and policy requirements do not put the implementation of the Plan as a whole at risk.
- 7.2.10 Further to this, Gladman urge the Council to ensure the policy has added flexibility as there is no guarantee that these units will be delivered and there may be situations when they are difficult to deliver which may result in the non-delivery of otherwise sustainable land for housing. Therefore, Gladman recommend that any policy specific requirement needs to include a mechanism whereby if the self-build plots are not taken up within a given time period then these revert back to market housing to be provided as part of the wider scheme. This would provide flexibility and help to ensure that the required housing is delivered.

7.3 Housing Quality

Question 35. How should we ensure a high standard of housing is built in our area?

- 7.3.1 Whilst Gladman recognise the importance of ensuring high quality design it is also important to ensure that the new Local Plan does not impose overly onerous design policies which could unnecessarily restrict sustainable development from coming forwards.

Optional Standards

- 7.3.2 With regards to optional technical standards for accessible and adaptable homes, if the Councils wish to include a policy in the Local Plan adopting these optional standards, M4(2) and M4(3), then this should only be done in accordance with the NPPF (2019) specifically paragraph 127.f, footnote 46 and the guidance contained in the PPG.
- 7.3.3 Footnote 46 states *“planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties.”* Any such policies would need to be based on relevant and up to date evidence to justify specific policy requirements.
- 7.3.4 Gladman refer to the PPG which sets out the evidence necessary to justify a policy requirement for M4(2) and M4(3). Specifically paragraph ID 56-007 which states: *“There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:*
- *The likely future need for housing for older and disabled people (including wheelchair user dwellings).*
 - *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes or care homes).*
 - *The accessibility and adaptability of existing housing stock.*
 - *How needs vary across different housing tenures.*
 - *The overall impact on viability.”* (ID: 56-007-20150327)
- 7.3.5 Gladman also note that it may be the case that any policy relating to optional standards may need to vary in different locations across the plan area, as the justification for requirements may differ. It may not be justified or appropriate, based on the up to date evidence, to set a blanket approach across the plan area.

Nationally Described Space Standards (NDSS)

- 7.3.6 The Councils will need clear and robust evidence to justify the inclusion of any policy requirement for the NDSS and will need to undertake viability testing in relation to any specific requirements which they wish to impose.
- 7.3.7 The Written Ministerial Statement (WMS) dated 25th March 2015 confirms that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”.*

- 7.3.8 Furthermore, with reference to the nationally described space standard the PPG (ID: 56-020-20150327) confirms “*where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies*”. If the Council wishes to adopt this standard it should be justified by meeting the criteria set out in the PPG including need, viability and impact on affordability.
- 7.3.9 The identification of a need for the NDSS must be more than simply stating that in some cases the standard has not been met, it should identify the harm caused or that may be caused in the future.

8 INFRASTRUCTURE

8.1 Infrastructure Provision

Question 36. How should the Local Plan ensure the right infrastructure is provided and developed in line with development?

- 8.1.1 Consideration regarding infrastructure requirements need to begin early in the process and it is of fundamental importance that the infrastructure provision aligns with the growth strategy for the area.
- 8.1.2 The Council, when establishing its housing requirement, will need to consider the likely implications of key infrastructure projects in the area such as the East West Rail link between Cambridge, Oxford and Milton Keynes and the economic benefits that may stem from this.

9 WHERE TO BUILD

9.1 Current Approach and Key Sites

9.1.1 The consultation document outlines the current approach in terms of overall strategy and the distribution of growth in the previous plans. This highlights that a balanced approach was adopted which included growth to Cambridge urban area, the edge of Cambridge, new settlements and also the rural areas. The consultation document indicates that it is likely that the most suitable strategy for the emerging Greater Cambridge Local Plan will again involve a balance of elements. Gladman agree that a balanced approach is required to ensure that the Councils do not place an over reliance of one element of the strategy which if it did not progress as planned could have severe consequences for the delivery of the plan as a whole.

9.1.2 In terms of developing the distribution strategy, the consultation document outlines that there are a couple of key sites already identified which are likely to form part of the overall strategy. The first of these identified sites is North East Cambridge, this includes the area around Cambridge north and the Anglian Water site. This site, whilst identified in the adopted Local Plan, did not have any housing numbers allocated to it to meet growth targets. Therefore, any development here would count towards the additional target identified in this new Local Plan.

9.1.3 The second significant site already identified is Cambridge Airport. Gladman note that during the preparation of the adopted 2018 Local Plans it was confirmed that an alternative site had not been secured and as a result the land would not be available until 2031. Consequently, the adopted Local Plan safeguarded the land for development in the event that it becomes available. The adopted Local Plan recognised that this is a sustainable location on the edge of Cambridge. Development of this safeguarded land could only occur following a review of the Local Plans. The Greater Cambridge Local Plan will therefore need to consider whether to allocate this site for development. The deliverability of sites such as this will be a key consideration and therefore the Councils will need a robust and realistic understanding of this.

9.2 New Transport Infrastructure

9.2.1 Gladman note reference made within the consultation document to key infrastructure including the Cambridgeshire Autonomous Metro (CAM) and the East West Rail project. As these projects progress the Local Plan will have to give them due consideration and ensure that growth proposals compliment these key infrastructure projects.

9.3 Green Belt

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 respond to climate change?

- 9.3.1 Gladman recognise that the Green Belt covers around 25% of South Cambridgeshire and adjoins much of the built edge of Cambridge. Gladman submit that the Councils should undertake the evidence base work, through the form of a Green Belt Assessment, to inform any decisions made regarding development options within the Green Belt.
- 9.3.2 In this regard, Gladman refer to paragraph 138 of the NPPF – *“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”*

9.4 Supporting Villages

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

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

- 9.4.1 Gladman recommend that the new Local Plan should take a flexible approach to growth within and on the edge of villages. The Local Plan should avoid blanket protection policies as they may act to unnecessarily stifle sustainable growth opportunities on the edge of settlements. This is at odds with national policy, seeking to boost significantly the supply of housing and applying a presumption in favour of sustainable development.
- 9.4.2 Gladman recommend that the Council could incorporate a criteria based policy, such an approach would allow the plan to protect itself against unsustainable development at the same time as being open and flexible to additional development opportunities to come forward to meet identified needs.

9.5 Distribution of Development

Question 42. Where should we site new development?

- 9.5.1 Overall Gladman submit that the Greater Cambridge Local Plan will need a balanced strategy, including a variety of different elements to ensure delivery over the course of the plan period and

to meet the varying needs across the plan area. It will be important that the Councils do not place an over reliance on just one type of approach as this could hinder delivery of much needed housing.

- 9.5.2 In this regard, Gladman refer to the CPIER Final report and reference made within this to the blended spatial strategy. This document states *“what is clear is that none of these approaches on their own are likely to work – there is a need for balance and flexibility to ensure that urban form best meets the needs of residents, businesses and the environment.”*⁴ The CPIER report provides clear support for a balanced spatial strategy which includes a number of elements in combination to ensure needs are met and delivery occurs over the course of the plan period rather than an over reliance on one approach.
- 9.5.3 In allocating sites the Councils should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.
- 9.5.4 Whilst maximising delivery in a growth location such as this is of fundamental importance this will also need to be balanced against ensuring that the locations and types of growth proposed are sustainable. The distribution of development should not be a politically driven decision, but rather one based on robust evidence and consideration of a number of factors.

9.6 Densification

Question 43. What do you think about densification?

- 9.6.1 Gladman are supportive of the efficient use of land, as required by 117 of the NPPF (2019):
- “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.”*
- 9.6.2 Notwithstanding this, it should be recognised that an approach seeking densification can only go so far and will not be a solution on its own, but rather as one element of a hybrid strategy. When looking at densification it is important to remember that proposals will still need to be brought

⁴ CPIER (September 2018) Page 42.

forward at an appropriate density for the site and particular location, therefore a blanket approach is unlikely to be appropriate.

- 9.6.3 Paragraph 122 of the NPPF outlines things that should be taken into account when considering the density of development. Paragraph 123 goes on to state *“Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site...”*

9.7 Edge of Cambridge – Outside the Green Belt

Question 44. What do you think about developing around the edge of Cambridge on land outside the Green Belt?

- 9.7.1 Gladman would in principle be supportive of the Local Plan providing for growth on the edge of Cambridge, outside of the Green Belt. Locations on the edge of Cambridge are likely to be situated on key transport routes leading into the city therefore providing sustainable transport opportunities in order to access jobs and key facilities and services.
- 9.7.2 Notwithstanding the support for this approach, it is recognised that the available land on the edge of Cambridge outside of the Green Belt is limited and should not be progressed as a strategy in isolation. The delivery of housing in other parts of the plan area will be necessary in order to meet housing needs.

9.8 Edge of Cambridge – Green Belt

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

- 9.8.1 As part of the process of preparing a new Local Plan, the Councils should undertake a detailed review of the Green Belt around Cambridge. In terms of directing growth to these areas, this would need to be dependent on the outcomes of the Green Belt review and also consideration of alternative options available within the plan area to deliver the necessary scale of growth.
- 9.8.2 Paragraph 136 of the NPPF (2019) states *“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period...”*
- 9.8.3 As part of plan preparation Gladman believe this option is something that should be given further consideration and that a robust Green Belt assessment will be needed to inform any strategy in relation to releasing land for the Green Belt for development. The Council will need to weigh up the potential release of Green Belt land against other reasonable alternatives available across the plan area in order to deliver the necessary scale of housing.

9.8.4 Paragraph 137 of the NPPF relates to the need to consider reasonable alternatives in relation to the exceptional circumstances to justify amending the Green Belt boundaries. Gladman note that this should not only take account of the overall levels of housing need but also where those needs are within Greater Cambridge. Expecting unrealistic options to meet these needs in order to avoid amending the Green Belt boundaries would not be an appropriate response.

9.8.5 Given the level of housing need across Greater Cambridge, Gladman consider it is likely that the exceptional circumstances will exist and that a degree of amendments to Green Belt boundaries will be required through the new Local Plan.

9.9 Dispersal – New Settlement

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

9.9.1 As outlined above, South Cambridgeshire and Cambridge City have got a history of including new settlements as one key component of a balanced strategy and a number of these are currently delivering housing across the area. Gladman believe that moving forwards, given the scale of growth required across the plan area that new settlements should continue to play an important role in delivering much needed housing. Gladman remind the Council that although these types of sites can play a key role, it is critical that they form part of a strategy which offers a range of sites, both in terms of size and location across the whole plan area. The Council need to avoid an over reliance on delivery from this type of large-scale site.

9.9.2 It is important that through the plan preparation, the Councils have a detailed understanding of any potential new settlements and the specific site complexities that may impact on delivery. Ensuring the Plan is realistic in terms of scale and timeframes for delivery will be crucial for ensuring the effectiveness of the plan as a whole.

9.9.3 In principle, Gladman are supportive of a spatial strategy incorporating new settlements, provided the new settlement(s) is in the right location, the assumptions regarding delivery are realistic and that the approach is combined with other elements to ensure housing delivery across the plan area and over the plan period. For example, the plan would need to balance new settlements with growth to a range of settlements allowing small/ medium sized sites to come forward earlier in the plan period.

9.9.4 With regards to the points made above, Gladman refer to paragraph 72 of the NPPF (2019) which states:

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making

authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way...”

9.10 Dispersal – Villages

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

- 9.10.1 Gladman consider it essential that the new Local Plan directs meaningful growth to the villages, and that this needs to include not just the Main Rural Villages and Minor Rural Villages but also the Group Villages. The villages across Greater Cambridge offer a range of sustainable development opportunities and growth in these types of locations is needed in order to maintain their vitality and viability.
- 9.10.2 It is important to consider existing services and facilities in a settlement when assessing their suitability for accommodating new growth. Daily needs are particularly important with a primary school, shop and access to public transport being the key considerations. It must be recognised that there may be an ability, through new development, to improve some of these services and facilities, particularly access to public transport, that should be considered through any settlement hierarchy exercise as well as the role that new development can play in ensuring these facilities are maintained and not lost because of lack of support.
- 9.10.3 Whilst it is recognised that some of the villages across the plan area are small scale and consideration of setting and character of the settlement is important, these issues must be balanced against the needs of the local community for new housing, including affordable housing and the need to ensure the long term viability of services and facilities in the village. It should also be recognised that increasing the number of sites across the plan area with allocations for residential development will increase the rate of housing completions.
- 9.10.4 The inclusion of an element of dispersed growth to the villages within the new Local Plan, will provide a suite of sites that are capable of delivering in the short to medium term which would complement other elements of an overall growth strategy.
- 9.10.5 With regards to the above comments, Gladman refer to paragraph 78 of the NPPF which states:
- “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 growth and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*

9.11 Public Transport Corridors

Question 48. What do you think about siting development along transport corridors?

- 9.11.1 Gladman are supportive of the Councils siting an element of growth along key transport corridors due to the significant sustainability benefits that this would bring with it. Notwithstanding this support, Gladman recognise that it will not be possible or appropriate to direct all of the necessary growth to these locations and like the other approaches identified in the consultation document, a combination of elements is likely to be the most appropriate strategy.
- 9.11.2 Gladman also recognise the importance of maximising growth opportunities in close proximity to sustainable transport options. An example of this being directing a degree of growth to villages with train stations which offer regular services to higher order settlements.

10 SITE SUBMISSIONS

10.1 Introduction

10.1.1 Gladman are promoting a number of sites across Greater Cambridge for residential development and associated community infrastructure. Gladman are in promotion agreements with the landowners and are keen to work with the Councils and local communities to bring forward high quality residential developments in these locations.

10.1.2 The sites are all at varying stages of the planning process but are all available and deliverable and Gladman believe should be considered for allocation through this new Local Plan. Further details on the individual sites are provided below. Appendix 1 to this submission provides a portfolio of sites across Greater Cambridge and provides further details to the site submissions included below.

10.1.3 These sites were all previously submitted as part of the ‘Call for Sites’ exercise in 2019 and Gladman request that they are assessed by the Councils through the Greater Cambridgeshire SHLAA process.

10.2 Brook Road, Bassingbourn

10.2.1 Gladman are promoting land at Brook Road, Bassingbourn for residential development and associated community infrastructure. A location plan is provided in Figure 1 below and further site details can be found in Appendix 1.

10.2.2 The site is 6.46ha and could provide approximately 140 new homes of a range of sizes and tenures. The site is located on the western edge of Bassingbourn adjacent to the Primary School.

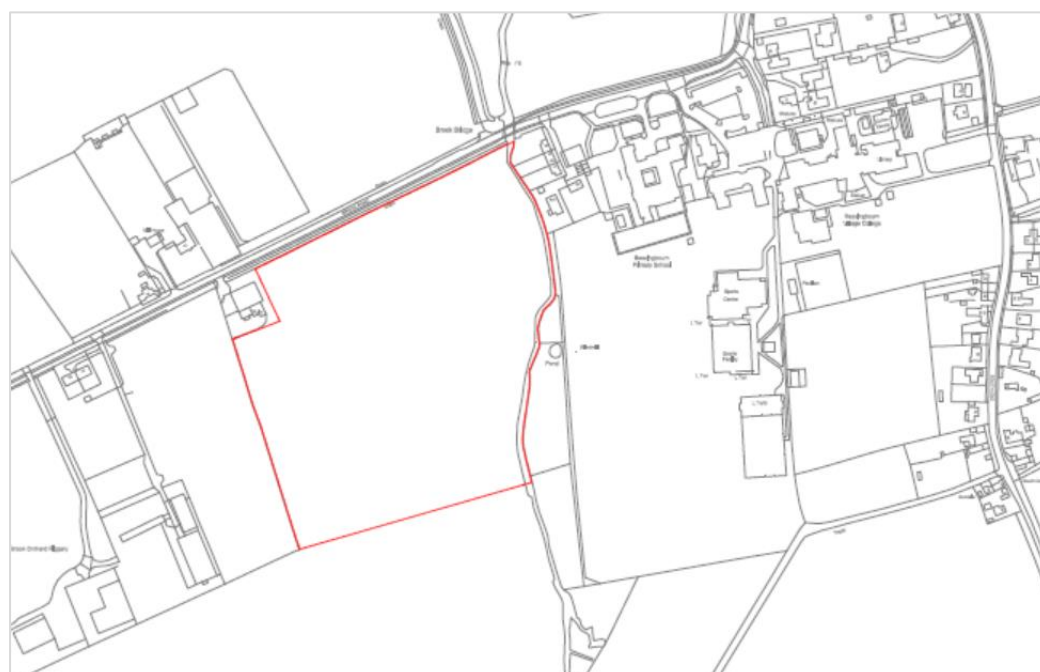


Figure 1. Location Plan – Brook Road, Bassingbourn

- 10.2.3 Gladman submit that the site is suitable and available for residential development and request the Councils consider allocating the site for residential development within the Greater Cambridge Local Plan. Gladman would welcome the opportunity to discuss our proposals with the Councils in more detail.

10.3 Back Road, Linton

- 10.3.1 Gladman are promoting land at Back Road, Linton for residential development and associated community infrastructure. A location plan is provided in Figure 2 below and further site details can be found in Appendix 1.

- 10.3.2 The site measures 3.98 hectares and is located on the northern edge of Linton. It is anticipated that subject to the outcome of technical work and surveys, the site could deliver up to 95 dwellings. Linton is identified as a Minor Rural Centre in the adopted South Cambridgeshire Local Plan as it is recognised that it has a greater level of services and facilities than other villages in South Cambridgeshire and performs a role in terms of providing services and facilities for the surrounding area. This site provides the opportunity to deliver housing in a sustainable location.



Figure 2. Location Plan – Back Road, Linton

- 10.3.3 Gladman submit that the site is suitable and available for residential development and request the Councils consider allocating the site for residential development within the Greater Cambridge Local Plan. Gladman would welcome the opportunity to discuss our proposals with the Councils in more detail.

10.4 Balsham Road, Linton

- 10.4.1 Gladman are promoting land at Balsham Road, Linton for residential development and associated community infrastructure. A location plan is provided in Figure 3 below and further site details can be found in Appendix 1.
- 10.4.2 The site measures 3.07 hectares, is located on the north eastern edge of Linton and has the potential to deliver a residential development of approximately 65 new homes with public open space and play facilities.

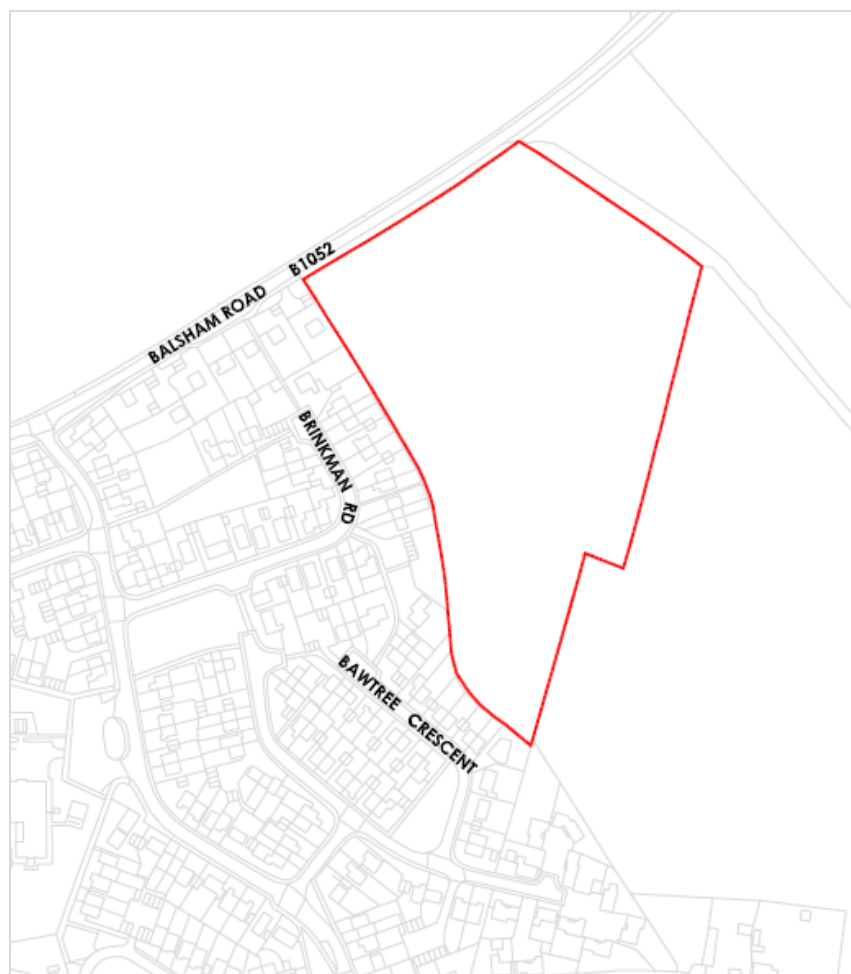


Figure 3. Location Plan – Balsham Road, Linton

- 10.4.3 The site has previously been subject to an application for 65 dwellings (ref: S/2650/17/OL). The application was refused for two reasons concerning insufficient information with regard to highways and archaeology, both of which have now been addressed.
- 10.4.4 Gladman submit that the site is suitable and available for residential development and request the Councils consider allocating the site for residential development within the Greater Cambridge Local Plan. Gladman would welcome the opportunity to discuss our proposals with the Councils in more detail.

10.5 New Road, Melbourn

10.5.1 Gladman are promoting land at New Road, Melbourn for residential development and associated community infrastructure. A location plan is provided in Figure 4 below and further site details can be found in Appendix 1.

10.5.2 The site measures 5.88 hectares, lies to the south of Melbourn and has the potential to deliver a residential development of approximately 140 dwellings with associated public open space.



Figure 4. Location Plan – New Road, Melbourn

10.5.3 Gladman submit that the site is suitable and available for residential development and request the Councils consider allocating the site for residential development within the Greater Cambridge Local Plan. Gladman would welcome the opportunity to discuss our proposals with the Councils in more detail.

10.6 Whitecroft Road, Meldreth

10.6.1 Gladman are promoting land at Whitecroft Road, Meldreth for residential development and associated community infrastructure. A location plan is provided in Figure 5 below and further site details can be found in Appendix 1.

10.6.2 The site measures approximately 3.64 hectares and is located to the west of Meldreth. Meldreth is a sustainable settlement and the site itself lies within walking and cycling distance of a range of local services, including a primary school, convenience store with post office and a train station. Trains to higher order settlements are frequent, with twice-hourly services to Royston and London Kings Cross. The site is also well located for access to the strategic highway network; with the A10 and M11 in close proximity.

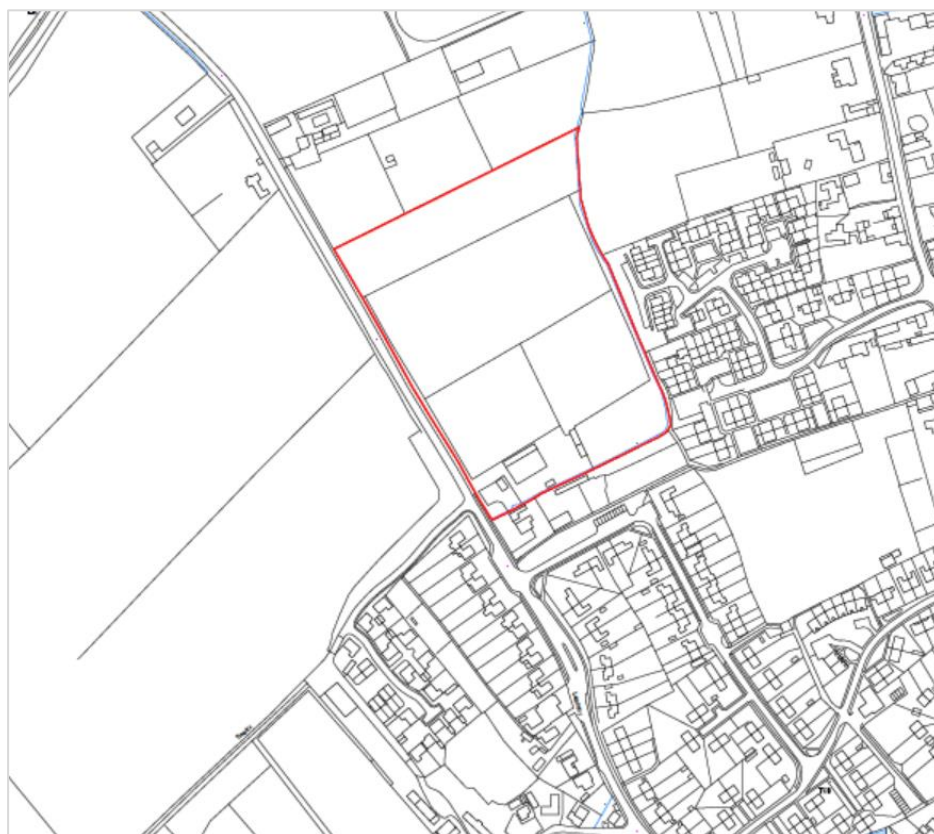


Figure 5. Location Plan – Whitecroft Road, Meldreth

- 10.6.3 Gladman submit that the site is suitable and available for residential development and request the Councils consider allocating the site for residential development within the Greater Cambridge Local Plan. Gladman would welcome the opportunity to discuss our proposals with the Councils in more detail.

10.7 Station Road, Over

- 10.7.1 Gladman are promoting land at Station Road, Over for residential development and associated community infrastructure. A location plan is provided in Figure 6 below and further site details can be found in Appendix 1.
- 10.7.2 The site measures 3.46 hectares and has the potential to deliver a residential development of approximately 65 new homes with public open space and play facilities. The development of this site offers the opportunity to provide further benefits to the community and Gladman are keen to work with the local community to identify any such benefits which could be secured as part of an allocation.

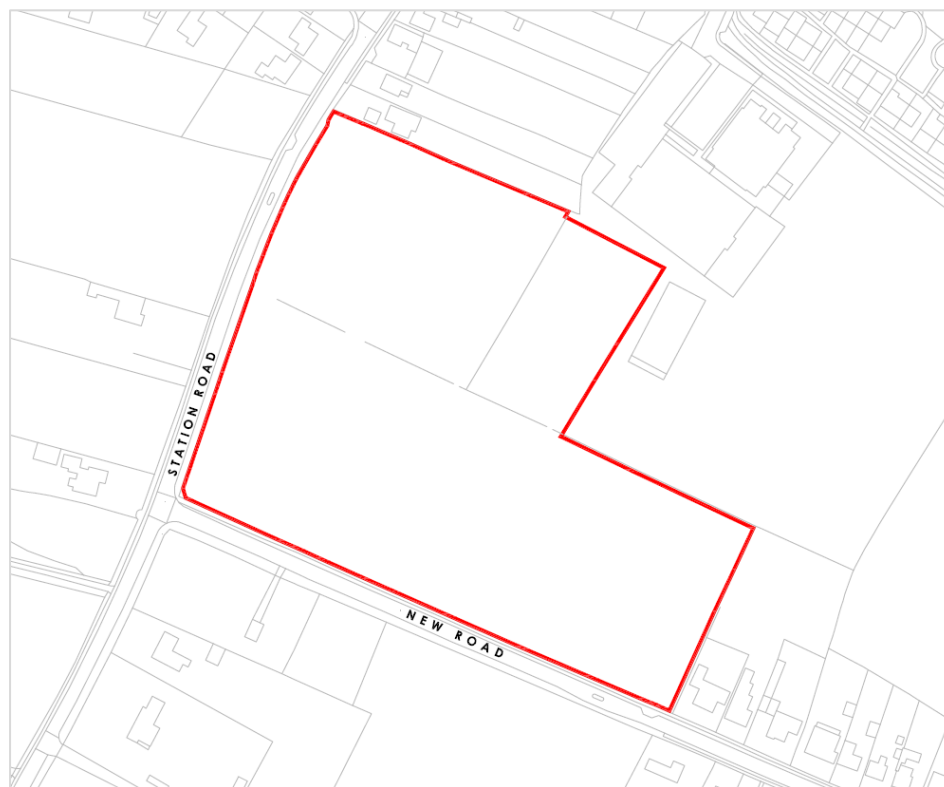


Figure 6. Location Plan – Station Road, Over

- 10.7.3 Gladman submit that the site is suitable and available for residential development and request the Councils consider allocating the site for residential development within the Greater Cambridge Local Plan. Gladman would welcome the opportunity to discuss our proposals with the Councils in more detail.

10.8 Willingham Road, Willingham

- 10.8.1 Gladman are promoting land at Willingham Road, Willingham for residential development and associated community infrastructure. A location plan is provided in Figure 7 below and further site details can be found in Appendix 1.
- 10.8.2 The site measures 4.82 hectares and has the potential to deliver a residential development of approximately 100 new homes with public open space and play facilities. The development of this site offers the opportunity to provide further benefits to the community and Gladman are keen to work with the local community to identify any such benefits which could be secured as part of an allocation.



Figure 7. Location Plan – Willingham Road, Willingham

- 10.8.3 Gladman submit that the site is suitable and available for residential development and request the Councils consider allocating the site for residential development within the Greater Cambridge Local Plan. Gladman would welcome the opportunity to discuss our proposals with the Councils in more detail.

11 CONCLUSION

11.1 Soundness Tests

11.1.1 Gladman welcome the opportunity to comment on the Greater Cambridge Local Plan Issues and Options document and hope that these representations are found to be constructive. Gladman request to be added to the consultation database and updated on any future public consultations for the Greater Cambridge Local Plan.

11.1.2 For the Greater Cambridge Local Plan to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. These tests are outlined as follows:

- **Positively prepared** – provide a strategy which, as a minimum seeks to meet the areas objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking account the reasonable alternatives based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

11.1.3 Gladman have provided comments on a number of the themes covered in the Local Plan Issues and Options document and believe that these need considering and addressing in order to aid successful and efficient plan preparation. Both Cambridge City and South Cambridgeshire Local Plans were the subject of lengthy and protracted examinations. It is important that the Councils learn from issues faced during these examinations to try and ensure an efficient preparation and examination process for this new Local Plan.

11.2 Key Conclusions

11.2.1 Greater Cambridge is a key growth area, sitting within the nationally important Oxford to Cambridge Growth Arc. As such, it is critical that the new Local Plan for Greater Cambridge is aspirational and pro-growth. The proposals identified for the growth arc will require transformational growth across the area and it is fundamental that the Greater Cambridge area plays its part within this. Consequently, Gladman submit that when identifying the housing requirement for the new Local Plan it is fundamental that the Council's do not plan for the minimum

but instead opt for an economic growth led housing requirement figure which is significantly greater than the minimum.

- 11.2.2 In terms of distributing the growth across the plan area, Gladman believe it is important that the Council's progress a balanced approach, which whilst incorporating new settlements also directs growth to all tiers of settlements including the Group Villages. There are many sustainable settlements across the plan area, and these should be accommodating growth. It will also be important for the Council's to consider the location of growth in combination with existing and planned growth. A balanced strategy should help to ensure delivery over the course of the plan period and also that the various needs across the whole plan area can be met.

11.3 Site Submissions

- 11.3.1 As outlined above, Gladman have a number of land interests within Greater Cambridge and are promoting these for residential development. The sites are as follows:

- Brook Road, Bassingbourn
- Back Road, Linton
- Balsham Road, Linton
- New Road, Melbourne
- Whitecroft Road, Meldreth
- Station Road, Over
- Willingham Road, Willingham

- 11.3.2 These sites are all sustainable development locations, are available and deliverable. Gladman are keen to work with the Council and the landowners to bring forwards high quality residential schemes in these locations and would welcome the opportunity to discuss these sites further with Council officers. Gladman believe these sites should be considered for residential allocations through the new Local Plan.

Appendix 1 – Opportunities for Sustainable Growth in Greater Cambridge