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Representation number:



Greater Cambridge Local Plan Issues and Options 2020 Consultation

Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or Localplan@greetercambridgeplanning.org

All comments must be received by 5pm on Monday 24 February 2020.

Data Protection

We will treat your data in accordance with our [Privacy Notices](#). Information will be used by South Cambridgeshire District Council and Cambridge City Council solely in relation to the Greater Cambridge Local Plan Issues and Options 2020. Please note that all responses will be available for public inspection and cannot be treated as confidential. Comments, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

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Do you wish to be kept informed about future stages of the Greater Cambridge Local Plan?

Please tick: Yes No

Part A – Your Details

Please note that we cannot formally register your comments without your details.

Note: If you wish to make quick comments without providing your details, at this early stage in the plan making process you can do so directly on the website, providing just an email contact if you would like to be kept informed of further stages in the process, at www.greatercambridgeplanning.org/local-plan

Name:		Agent's name:	Robert Barber
Name of organisation: (if applicable)	Martin Grant Homes Ltd	Name of Agent's organisation: (if applicable)	Pegaus Group
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Signature:	Robert Barber	Date:	24.1.20
If you are submitting the form electronically, no signature is required.			

Part B – Your Response

Document details:	
<p>Which document are you commenting on? (please tick)</p>	<p><input checked="" type="checkbox"/> Greater Cambridge Local Plan Issues and Options 2020</p> <p><input type="checkbox"/> Sustainability Appraisal of Issues and Options</p> <p><input type="checkbox"/> Sustainability Appraisal Scoping Report</p> <p><input type="checkbox"/> Habitat Regulation Assessment Scoping Report</p>
<p>Question / Paragraph / Figure (Please state)</p>	<p>See Below</p>

Comments:
<p>Please provide your response to the Issues and Options question, or views on the section of the other document you are commenting on. Where the question suggests options for the answers please start with indicating your choice (continue on separate A4 sheets(s) if necessary). Please use a separate response form for each question you are responding to.</p>
<p>Appended to this form are our client's representations to following question in the GCLP Issues and Options Document. We have responded to the following questions: 2, 4, 6, 16, 24, 32, 37, 39, 40, 41, 47 & 48.</p> <p>These representations should be read alongside the submitted Land off Ambrose Way, Impington Site Promotion Document which includes the following appendices:</p> <ul style="list-style-type: none"> • Site Location Plan – prepared by Pegasus Group • Framework Plan – prepared by Pegasus Group • Updated Call for Sites Forms – prepared by Pegasus Group • Site Promotion Document – prepared by Pegasus Group • Flood Modelling Position Statement - prepared by PFA • Transport Strategy Overview – prepared by iTransport • Landscape and Visual Appraisal – prepared by EDP • Ecology Briefing Paper – prepared by EDP • Archaeological and Heritage Assessment – prepared by EDP • Green Belt Appraisal – prepared by EDP

Summary of Comments:
<p>If your comments are longer than 100 words, please summarise the main issues raised.</p>
<p>n/a</p>

Completed response forms must be received by 5pm on Monday 24 February 2020.

Email: Localplan@greatercambridgeplanning.org or post it to:

Greater Cambridge Shared Planning Policy Team
c/o South Cambridgeshire District Council
Cambourne Business Park
Cambourne
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CB23 6EA

GREATER CAMBRIDGE LOCAL PLAN ISSUES AND OPTION CONSULTATION

(JANUARY-FEBRUARY 2020)

REPRESENTATIONS

ON BEHALF OF MARTIN GRANT HOMES LTD



Pegasus Group

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough

DESIGN **ENVIRONMENT** **PLANNING** **ECONOMICS** **HERITAGE**

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1.0 Introduction

1.1 These representations are submitted on behalf of our client Martin Grant Homes Ltd in response to the Greater Cambridge Local Plan (GCLP) Issues and Options consultation. The representations have also been submitted online via the Council's online portal.

1.2 Our client is promoting Land at Ambrose Way, Impington for residential development through the GCLP. This site was previously promoted by our client through the 2019 Call for Site consultation. In the last 12 months our client has undertaken further important technical work to demonstrate the suitability and sustainability of the Ambrose Way site, as such, these representations should be read in conjunction with the following submitted documents:

- Site Location Plan – prepared by Pegasus Group
- Framework Plan – prepared by Pegasus Group
- Updated Call for Sites Forms – prepared by Pegasus Group
- Site Promotion Document – prepared by Pegasus Group
- Flood Modelling Position Statement - prepared by PFA
- Transport Strategy Overview – prepared by iTransport
- Landscape and Visual Appraisal – prepared by EDP
- Ecology Briefing Paper – prepared by EDP
- Archaeological and Heritage Assessment – prepared by EDP
- Green Belt Appraisal – prepared by EDP

1.3 Please note the above referenced Site Promotion Document has all of the other documents appended to it.

2.0 Question 2. Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan

2.1 Our client, Martin Grant Homes Ltd, are promoting 'Land at Ambrose Way, Impington' for residential development and allocation in the emerging Greater Cambridge Local Plan. As demonstrated by the submitted Framework Plan it is currently estimated that the Ambrose Way site has a capacity of up to 190 dwellings.

2.2 The site was promoted by Martin Grant Homes Ltd through the 2019 'Call for Sites' exercise. Since this initial promotion our client has undertaken significant technical work to address site constraints and further development the indicative proposals. The additional technical work is summarised in an updated Site Promotion Document which is submitted alongside these representations. The following technical reports are also provided at this time to demonstrate the sustainability and suitability of the site for release from the Green Belt and subsequent allocation for residential development.

- Overview Transport Strategy - prepared by iTransport
- Drainage Position Statement - prepared by PFA
- Green Belt Appraisal - prepared by EDP
- Landscape and Visual Appraisal - prepared by EDP
- Archaeology and Heritage Assessment - prepared by EDP
- Ecology Briefing Paper – prepared by EDP

2.3 The above listed reports and the Framework Plan provide robust site-specific evidence to inform the Councils' review of the Ambrose Way site when the Strategic Housing Land Availability Assessment is completed.

2.4 The suitability and sustainability of the Ambrose Way site is also set out in these representations; along with details of how the site can be released from the Green Belt and then allocated for development to complement the sustainable spatial distribution of growth in the GCLP area.

3.0 Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? Please choose from the following options:

Form Tick Box: Agree

- 3.1 Paragraph 22 of the National Planning Policy Framework (NPPF) requires Local Plans and strategic policies to plan for a minimum period of 15 years from the date of adoption of the Local Plan.
- 3.2 Figure 5 of the Issues and Options document outlines the Councils ambition to adopt the new Greater Cambridge Local Plan (GCLP) in Summer 2023. Working off this estimate the Plan would need to cover up to 2038 as a minimum. Given the that the Plan is proposed to run to 2040 there is some flexibility to allow for any delays in the plan preparation process.
- 3.3 Notwithstanding the above, it is recommended that the Council retains a flexible stance on the potential Plan period until later stages of the plan preparation process sufficient to allow for any future delays. This recommendation is based on the previous experience of South Cambridgeshire District Council, whereby it took six years for the Local Plan to move through the process from the Issues and Options stage through to formal Adoption. In addition to this, the Cambridgeshire and Peterborough Strategic Spatial Framework (CPSSF) sets out a longer-term growth strategy to 2050, and so the Councils may also want to consider extending the Greater Cambridge Local Plan (GCLP) period to correspond with this.
- 3.4 In our assessment the need to maintain a flexible approach in these early stages of the plan preparation is also influenced by other external factors, such as, the announcement and delivery of major infrastructure projects in the region. These projects and estimated delivery timetables are set out below:
- The A14 road improvements between Huntingdon and Cambridge. Expected completion date December 2020.
 - A new railway station close to Addenbrookes Hospital to the south of the city centre. Expected completion date 2025.
 - The duelling of the A428 between Black Cat Roundabout and Caxton Gibbet. Expected completion date 2026.

- Cambridge Autonomous Metro route. Expected delivery of the core infrastructure by 2029. It is estimated that the delivery of the Metro route could create 100,000 new jobs and the opportunity to deliver 60,000 new homes in Cambridge and the wider region.
- The delivery of East-West rail, which includes a Phase 3 link running between Bedford and Cambridge. Expected completion date 2030. As with the Black Cat to Caxton Gibbet A428 road improvements, the delivery of East-West forms key elements of Oxford-Cambridge Arc which will unlock the 1 million new homes by 2050.

3.5 These major infrastructure improvements will influence the level and spatial distribution of growth in Cambridge City and South Cambridgeshire. Projects of this scale and cost are often subject to delay or changing delivery timescales, on this basis, it is essential that the Councils adopt a flexible approach to determining the time period for the new GCLP. Moving forward the Councils will need to ensure that the Plan is capable of responding to the changing infrastructure needs of the area and how this could potentially impact upon the level growth required and the need to deliver sustainable development which reduces the need to travel by private car.

4.0 **Question 6. Do you agree with the potential big themes for the Local Plan?**

Form Tick Box: Agree

- 4.1 The Issues and Options document identifies four 'big themes' (Climate Change, Wellbeing & Social Inclusion, Biodiversity & Green Spaces and Great Places) which will shape the delivery of new infrastructure, jobs and homes. Our client supports and agrees with these themes and is confident that they will assist in delivering sustainable development to meet the needs of the local community and agenda for growth.
- 4.2 Our client is promoting Land at Ambrose Way, Impington for allocation for residential development through the emerging Greater Cambridge Local Plan (GCLP). It is estimated that the site is capable of delivering up to 190 dwellings towards meeting the housing need target for the GCLP. In addition, to delivering much needed market and affordable housing the site will deliver upon the draft themes of the GCLP as follows:
- **Climate Change:** Any scheme would provide modern high-quality living with housing that meets Building Regulation requirements in respect of energy and water consumption. In addition, the site is located in a highly sustainable settlement, within walking distance of a range of shops, services, community infrastructure and major sustainable travel opportunities such as the Cambridge Guided Busway. The site's location and proximity to the local service provision and wider array of services in Cambridge would assist in reducing travel by the car and thus assist in reducing climate change.
 - **Wellbeing & Social Inclusion:** Any scheme would provide a range of housing types and tenures to meet local needs and the needs of the wider district. This would include a provision of affordable housing which would be tenure blind in terms of design and be well integrated into the scheme to enhance social cohesion and generate community spirit. The site's location in an established sustainable settlement and in close proximity to Cambridge will also ensure residents of the scheme have good access to employment

and leisure opportunities; and access to key social infrastructure such as school, GPs and hospitals.

- **Biodiversity & Green Spaces:** Any scheme would come forward with the aim of achieving a net gain in biodiversity through the retention, protection and enhancement of any on-site habitats, provision of extensive new public open space and high-quality landscaped areas. Existing vegetation at the Ambrose Way site would be retained and enhanced through new planting to enhance the potential for habitat creation. In addition, drainage attenuation basins, required as part of the surface water drainage solution, offer further potential to boost on-site biodiversity.

- **Great Places:** Our client prides itself on delivering well-designed and high-quality residential developments for all to enjoy. Place-making and creating a sense of identity is at the heart of the scheme design shown on the submitted Framework Plan. New dwellings would be modern, but sensitively designed to complement the character of the local area and public open space would be delivered to a high standard to stimulate on-site recreation and interaction between residents. The development would be a positive and environmentally friendly place to live, work and play.

4.3 In light of the above it is clear that the four 'big themes' can assist in identifying and shaping proposals for housing growth. The Land at Ambrose Way, Impington will deliver sustainable development and positively engage with the 'Big Themes' of the GCLP.

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

- 5.1 Section 8 of the National Planning Policy Framework (NPPF) is entitled 'Promoting healthy and safe communities.' Paragraph 91 requires that planning policies should achieve healthy, inclusive and safe places. This includes promoting places that create social interaction; are safe and accessible; and enable and support healthy lifestyles.
- 5.2 Section 4.3 of the Issues and Options document, states that Cambridge is one of the most unequal cities in the UK. Indeed, the Cities Outlook 2019 Report, produced by Centre for Cities, states that Cambridge has the 3rd highest housing affordability ratio (average house prices to average wage) in Great Britain.
- 5.3 Our client supports and endorses the Issues and Options document in that it states that the Greater Cambridge Local Plan (GCLP) can be a 'powerful tool' to improve wellbeing and social inclusion. The GCLP has the opportunity to assist in the reduction of inequality and boosting the wellbeing of residents in inner city areas and across South Cambridgeshire by boosting the supply of market and affordable housing, supporting local services, improving infrastructure, enhancing job creation and protecting the environment.
- 5.4 Central to achieving 'good growth' is ensuring the most sustainable and suitable sites are allocated for residential development through the emerging GCLP. It is vital that the GCLP allocates sites for residential development in sustainable locations where residents have convenient access to local shops, services and recreation opportunities; and sustainable travel links to larger centres which offer a comprehensive range of facilities and major public transport links. In addition, proposed allocations also need to demonstrate that they will promote wellbeing and social inclusion through the provision of a varied housing mix which includes market and affordable housing; and through the creation of sensitively designed layouts which promote cycling, walking, recreation opportunities and high quality modern housing that residents can be proud of. Such schemes will attract house buyers ranging from young families through to the elderly who are seeking to downsize and thus create a balanced community.

- 5.5 Our client's site at Ambrose Way, Impington is fully capable of delivering on the requirements and goals outlined above. This is evident from the site's sustainable location in Impington, and by the submitted Framework Plan which provides an indicative layout of a potential scheme capable of delivering up to 190 new homes, open space, play space and landscaping.
- 5.6 The site's allocation in the GCLP and subsequent delivery would result in 'good growth' and fully address and indeed boost wellbeing and social inclusion in South Cambridgeshire.

6.0 Question 24. How important do you think continuing economic growth is for the next Local Plan? Please choose from the following options: Very important / Somewhat important / Neither important nor unimportant / Somewhat unimportant / Not at all important

Form Tick Box: Very important

- 6.1 Cambridge is a prosperous city and acts as thriving hub for education, innovation, business and investment. The significant committed public and private investment and plans for further future investment in strategic infrastructure and employment growth in the Cambridge and South Cambridgeshire continues to reinforce the importance of the area to the East of England and indeed the United Kingdom.
- 6.2 The Greater Cambridge Local Plan (GCLP) comes forward in this context, accordingly, it is vital that the Plan works to proactively deliver and shape the opportunities on the horizon to the benefit of existing and future residents; and the environment.
- 6.3 By proactively assisting in the delivery of economic growth through the preparation of the GCLP, Councils and residents have the opportunity to ensure that the economic growth, and the associated housing growth, comes forward in sustainable locations and in a form which addresses the areas wider needs which include promoting health and wellbeing, biodiversity, great places and reducing climate change.
- 6.4 It is vital that the GCLP supports the economic growth of the area to fully realise the benefits of the investment in infrastructure and to ensure residents are able to live fulfilling lives where they have access to employment, high quality housing, recreation opportunities and green spaces.

7.0 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?

Form Tick Box: Yes, strongly agree

- 7.1 Paragraph 60 of the National Planning Policy Framework (NPPF) outlines that strategic policies should be informed by local housing needs, using the Government's standard method unless exceptional circumstances for an alternative approach can be justified which reflect current and future demographic trends and market signals.
- 7.2 The evidence and explanation provided at page 61 and 62 of the Issues and Options document, regarding the scale of the future economic growth in area, justifies and in our client's view necessitates the need for the Greater Cambridge Local Plan (GCLP) to plan for housing growth in excess of the Government's standard method figures. This would be entirely in accordance with paragraph 60 of the NPPF.
- 7.3 The Issues and Options document indicates that based on indicative calculations from the Cambridgeshire and Peterborough Independent Economic Review (CPIER), that around 2,900 homes a year would need to be built in Greater Cambridge, creating an indicative total of 66,700 homes over 2017-2040. This compares with the adopted 2018 Local Plans target of 1,675 homes per year, and 1,800 homes per year to meet local needs using the Government's standard method. Based on the CPIER 66,700 housing need figure the Issues and Options document states that the Local Plan will need to allocate housing sites capable of delivering an additional 30,000 dwellings over and above the sites already in the pipeline to be built out between 2017-2040.
- 7.4 Given the early stage of the plan preparation and the need for further technical work and analysis regarding economic growth and housing need it is recommended that the additional 30,000 dwelling figure, based on the CPIER findings, is viewed as a minimum by the Councils. Indeed, the NPPF also requires housing targets to be viewed as minimum figures in order to stimulate positive growth. The Councils will need to adopt a flexible approach to setting the increased housing target to

ensure that available land is used efficiently to meet the economic and housing needs of the area.

- 7.5 By planning proactively for increased rates of housing the GCLP will support and stimulate the anticipated economic growth and job creation in the area and in turn support the growth of the Cambridge area as it becomes a global leader in innovation. Preparing the GCLP on the basis of an enhanced figure to address economic growth is entirely justified given the context provided by the Cambridgeshire and Peterborough devolution deal, which aims to double economic output in the 25 years, and the continued high rate of job creation in Cambridge. In addition, as set out early in our client's representations, the continued investment in strategic infrastructure in and around Cambridge will only seek to enhance the area's credentials as a focus for employment and housing growth.
- 7.6 Having established the principle and need to deliver a rate of housing growth above that set out by the Government's figures, the Council's will now need to prepare and publish the evidence base to support the increased housing target for Greater Cambridge. This should be published as part of the next GCLP consultation; alongside a review of the housing sites put forward by developers, land promoters and landowners.
- 7.7 In our assessment, based on the information available and content of the Issues and Option document, it is strongly recommended that the GCLP plans for an increased housing need figure. This will support economic growth, reduce inequality, increase affordability levels and promote wellbeing through the delivery of additional market and affordable housing in sustainable locations. Even at this early stage of the plan preparation process it is evident that exceptional circumstances exist in this instance to justify increased housing delivery in accordance with paragraph 60 of the NPPF.

8.0 Question 37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?

- 8.1 Paragraph 102 of the National Planning Policy Framework (NPPF) identifies that transport issues should be considered from the earliest stages of plan-making, which includes opportunities to promote walking, cycling and public transport. Our client recognises the importance of encouraging a shift towards more sustainable modes of transport as this will assist in reducing climate change and congestion levels on roads.
- 8.2 The Greater Cambridge Local Plan (GCLP) should promote sustainable forms of transport by allocating housing sites in sustainable locations in established settlements which possesses high quality public transport links including; bus services, Cambridge Guided Busway, footways and cycleways.
- 8.3 The Land at Ambrose Way, Impington, promoted by our client Martin Grant Homes Ltd, is exceptionally well placed to encourage a shift away from the private car. As shown by the submitted Framework Plan, any development at the Ambrose Way site will integrate into the existing highway network by providing vehicular, pedestrian and cycle access points.
- 8.4 By utilising the proposed access points, residents of the scheme will have convenient and sustainable access (via walking or cycling) to an excellent range of shops, services, employment opportunities and community infrastructure (the full range of services is set out in the submitted Site Promotion Document) capable of serving their day to day needs.
- 8.5 The village is served by a direct bus link to Cambridge city centre and its public transport hubs (Cambridge Rail Station and Cambridge North Rail Station). These excellent connections offer sustainable travel options to major employment hubs and recreation/leisure destinations in Cambridge and further afield. The public transport links available to residents of a scheme at Ambrose Way are summarised in the schedule below.

Transport	Location	Travel Time from the Ambrose Way site
Bus	<p>Cambridge Guided Busway, Impington, Cambridge, CB24 9YS Services to and from: Royston, Cambridge, Science Park, St Ives, Huntington, Peterborough.</p> <p>Frequency every 5-10 minutes Monday-Friday with a reduced service every 7-15 minutes on a weekend.</p>	<p>1.6km- to bus stop 19-minute walk</p>
	<p>Bus Service – Citi 8 Histon High Street Services to and from: Cottenham, Histon and Cambridge.</p> <p>Frequency every 20 minutes Monday-Friday during the daytime dropping to hourly service in the evening. The service runs every 20 and 30 minutes on Saturday and Sunday respectively, with reduced services in the evening.</p>	<p>1km- to bus stop 10- minute walk</p>
Rail Links	<p>Cambridge North Station, Cowley Road, CB4 0WZ Services to and from: Norwich, Ely, London Kings Cross and Cambridge.</p>	<p>6.75 km 10-minutes via the Guided Busway</p>

- 8.6 In devising the spatial strategy for the GCLP it is essential that the Councils take the opportunity to promote modal shift away from the private car by allocating housing and employment sites in sustainable locations where residents and employees have regular and convenient access to high quality public transport links and a local service provision capable of meeting day to day needs.
- 8.7 Outside of the urban area of Cambridge Histon and Impington is one of the most, if not the most, sustainable locations for housing growth in terms of access to a variety of quality public transport links and a range of services and infrastructure. On this basis, the allocation of the Ambrose Way, Impington site would be in accordance with paragraph 102 of the NPPF and encourage modal shift away from the private car. This in turn would assist the Councils in delivering on the big themes of the GCLP such as: reducing climate change, promoting wellbeing and social inclusion and developing great places.

9.0 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?

Form Tick Box: Yes

9.1 Paragraph 136 of the National Planning Policy Framework (NPPF) confirms that Green Belt boundaries should only be altered where exceptional circumstances can be demonstrated as part of the preparation of a Local Plan. The preparation of the Greater Cambridge Local Plan (GCLP) provides the opportunity for the Councils to consider undertaking a review of the Cambridge Green Belt in the context of the challenges and opportunities facing the area in respect of delivering housing and employment growth, whilst also reducing climate change.

9.2 Over the next plan period and beyond significant investment and growth will come forward in Cambridge and the surrounding area within the district boundary of South Cambridgeshire. As set out in the Issues and Options document it is estimated that an additional 30,000 new homes, above the Government's standard method, will be required to support the economic growth of the area. This growth is driven by the following initiatives:

- The Cambridge and Peterborough Combined Authority (CPCA) have confirmed that due the high levels of growth and 'exceptional' housing market conditions in Greater Cambridge, the Government will provide £100m housing and infrastructure fund to help deliver infrastructure for housing and growth and at least 2,000 affordable homes.
- The CPCA have confirmed that Central Government are to provide an additional £70m ring fenced for Cambridge to help meet the 'exceptional' housing needs of the city.
- The CPCA anticipate that economic output will increase by 100% over the next 25 years. The GVA of the area is estimated to increase from £22bn to over £40bn.
- Cambridge City and South Cambridgeshire anchors the eastern end of the Oxford-Cambridge Arc as defined by Central Government in March 2019. The Government have stated that the Arc area is an economic asset of international standing and can be influential to the performance of the

national economy. The National Infrastructure Committee (NIC) found the Arc area to be home to UK's most productive and fast-growing cities and has significant potential for transformative Growth. However, the growth and opportunity in this area is currently constrained by poor east-west infrastructure and a lack suitable housing. The Arc initiative aims to realise the full economic potential of the area by delivering significant new infrastructure and building up to 1 million new homes by 2050.

9.3 The above described initiatives highlight the importance of Cambridge and South Cambridge and have already started to yield direct and indirect results in terms of investment and progress. The following major infrastructure improvements are either being planned or have started:

- The A14 road improvements between Huntingdon and Cambridge. Expected completion date December 2020.
- A new railway station close to Addenbrookes Hospital to the south of the city centre. Expected completion date 2025.
- The duelling of the A428 between Black Cat Roundabout and Caxton Gibbet. Expected completion date 2026.
- Cambridge Autonomous Metro route. Expected delivery of the core infrastructure by 2029. It is estimated that the delivery of the Metro route could create 100,000 new jobs and the opportunity to deliver 60,000 new homes in Cambridge and the wider region.
- The delivery of East-West rail, which includes a Phase 3 link running between Bedford and Cambridge. Expected completion date 2030. As with the Black Cat to Caxton Gibbet A428 road improvements, the delivery of East-West forms key elements of Oxford-Cambridge Arc.

9.4 The Green Belt was defined many years ago and the opportunity can now be taken through the preparation of the GCLP to refresh those existing Green Belt boundaries. It is evident that the investment and growth in Cambridge and South Cambridge represent exceptional circumstances. The scale of economic and housing growth required in the region is highly unlikely to be delivered in a sustainable manner without the suitable and evidenced release of Green Belt land. As highlighted in the Devolution Deal for the CPCA the needs of the Cambridge and surrounding area are exceptional. Accordingly, in accordance with paragraph 136 of the NPPF, it is clear that exceptional circumstances exist to warrant a review of the Green Belt as part of the GCLP.

9.5 Paragraph 138 of the NPPF makes it clear that when reviewing Green Belt boundaries, it is important to promote sustainable patterns of development. Indeed paragraph 136 states,

"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."

9.6 Given the extent of the Cambridge Green Belt, drawn tightly to sustainable settlements such as Impington, it is vital that specific parcels of Green Belt land adjacent to settlement boundaries are subject to a detailed Green Belt review process. Notwithstanding its Green Belt designation, this land will often provide a sustainable location for growth by virtue of its proximity to the local service provision and public transport links. Indeed, this is the case of Impington where our client is promoting Land at Ambrose Way, Impington.

9.7 Central to the release of land from the Green Belt is how that land performs against the five purposes of the NPPF set out at paragraph 134 of the NPPF. In respect of the Land at Ambrose Way, our clients have commissioned a Green Belt Appraisal of the site. The Appraisal, produced by EDP, is appended to these representations and evidences the following conclusions in respect of the Ambrose Way site's contribution to the Green Belt purposes:

- Purpose 1: To check the unrestricted sprawl of large built-up areas. Site Contribution is assessed as Low/Moderate.
- Purpose 2: To prevent neighbouring towns merging into one another. Site Contribution is assessed as Low/No contribution
- Purpose 3: To assist in safeguarding the countryside from encroachment. Site Contribution is assessed as Moderate.
- Purpose 4: To preserve the setting and special character of historic towns. Site Contribution is assessed as No Contribution.
- Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land. Site Contribution is assessed as n/a.

9.8 The detail underpinning the above listed conclusions is evidenced in the EDP report. In light of the specific assessment against each Green Belt purpose the Green Belt Appraisal provides an overarching conclusion which confirms that the Ambrose Way site provides a low contribution to the NPPF Green Belt purposes. In respect of bringing forward development at the site the Appraisal concludes that,

"development can occur in this location without compromising the fundamental aims of the NPPF to keep land permanently open and while continuing to serve the five of Green Belt at this northern edge of Histon and Impington; primarily to check the unrestricted sprawl, prevent merging of settlements and safeguard the countryside from encroachment."

- 9.9 It is strongly recommended that the Council review the Green Belt Appraisal alongside the other submitted evidence when preparing their Strategic Housing Land Availability Assessment (SHLAA) and Green Belt Review study.
- 9.10 Paragraph 136 of the NPPF readily acknowledges that the plan making process can incorporate the review of existing Green Belt boundaries in exceptional circumstances. Martin Grant Homes believe that exceptional circumstances exist to warrant such a review and consider that a modification is required in order to deliver economic and housing growth which is recognised by the Government to be of national and potentially international importance.
- 9.11 Central to this review should be an assessment of specific parcels of land with development potential against the five purposes of Green Belt as set out in the NPPF. Sustainable sites for housing growth which are found to not contribute to the five purposes of the Green Belt should be released and subsequently allocated for development. It is strongly contested that this is the case for the Land at Ambrose Way, Impington. The evidenced and justified release of this land from the Green Belt will allow development to come forward which will meet the objectives of achieving sustainable development as set out at paragraph 8 of the NPPF and assist in delivering growth of regional and national importance.

10.0 Question 40. How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages? Please choose from the following options: Highly flexible / Somewhat flexible / Keep the current approach / Restrict further

Form Tick Box: Highly Flexible

- 10.1 The spatial distribution of housing and employment is a key challenge for the Greater Cambridge Local Plan (GCLP). As shown by the figures for the adopted Local Plans, the spatial distribution of housing growth is something of a balancing act with each type of sustainable development option required to play a role.
- 10.2 The delivery of the minimum 30,000 additional dwellings, identified in the Issues and Options document, will inevitably and rightly lead to the densification of urban areas. However, to relieve the pressure on urban areas and utilise other sustainable locations the GLCP will need to identify sites for housing in sustainable villages. As evidenced by the delivery of allocated sites in adopted plans and numerous planning applications approved during the period South Cambridgeshire District Council could not demonstrate a five-year land supply, land and development sites on the edge of established villages are capable of accommodating housing growth. These sites are able to come forward at a fast rate and are fully capable of delivering sustainable development in accordance with paragraph 8 of the National Planning Policy Framework (NPPF). On this basis the Councils should adopt a highly flexible and positive approach to directing employment and housing growth to the edge of sustainable villages.
- 10.3 The settlement of Impington and Histon is located to the north of Cambridge and lies within South Cambridgeshire. Policy S/8 of the adopted Local Plan (2018) identifies Histon and Impington as a Rural Centre. Rural Centres are classed as the largest, most sustainable villages in the district. Indeed, as set out in the submitted Site Promotion Document, the settlement possesses a wide range of shops, services, infrastructure, employment opportunities and public transport links. Our client supports and endorses Histon and Impington's status as a Rural Centre and this designation should be continued in emerging GCLP.

- 10.4 Whilst adopted policy currently resists development outside of the settlement boundary at Rural Centres, there is no development limit (in terms of no. of dwellings) for sites within the settlement boundary. This policy wording reflects the positive sustainability credentials of Rural Centres such as Impington. Indeed, our client contends that this also indicates that should there be adequate infrastructure capacity and the potential for a high quality environmentally friendly scheme; the capacity of a site or development located outside, but immediately adjacent to the settlement boundary, should not be unnecessarily constrained by an arbitrary limit.
- 10.5 All sustainable settlements have a role to play in accommodating growth; so that the wider programme for growth is delivered, but also to ensure established settlements continue to grow incrementally and thus support the long-term vitality of local services upon which residents rely. The level of growth afforded to each sustainable settlement should be based on:
- Size of the current settlement;
 - Service provision and any planned improvements to local community infrastructure such as schools;
 - Access to Cambridge Bus Way and rail links;
 - Access to high quality local bus services;
 - Access to employment opportunities
 - Proximity to Cambridge
 - Proximity to key public transport corridors
- 10.6 As set out in our submitted Site Promotion Document Histon and Impington performs exceptionally well in respect of these key criteria. It is of vital importance that the Councils adopt a highly flexible approach to directing growth to the edge of sustainable villages in the emerging GCLP; especially the Rural Centres, such as Histon and Impington, which have sound and robust sustainability credentials.
- 10.7 The Land at Ambrose Way, Impington falls outside of the current settlement boundary for the village but adjoins it to the north west and south west. Whilst the site is currently located in the Green Belt, the evidence provided in our representations and accompanying Green Belt Appraisal demonstrate that the site performs poorly against the five purposes of Green Belt as set out in the NPPF and is capable of coming forward for development without unduly damaging the integrity of the Cambridge Belt.

- 10.8 In light of the above the Ambrose Way site should be removed from the Green Belt and allocated for residential development through the GCLP. The site is capable of delivering up to 190 dwellings; and will deliver a scheme capable of addressing the 'big themes' of the GCLP.

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

- 11.1 The Greater Cambridge Local Plan should be flexible about the size of developments allowed within village boundaries. The Local Plan preparation process should have due regard for the size of a village and its sustainability credentials, however, it is vital that potential development sites are considered on their individual merits to allow for the efficient use of land. Setting arbitrary limits on the scale of development restricts development and is contrary to the National Planning Policy Framework's goal of making most efficient use of land and boosting the supply of housing.
- 11.2 Through the plan preparation process it is likely that the Councils will identify sustainable sites for development; and sites capable of release from the Green Belt; but then choose not to allocate this land for development. Should this eventuality arise it is strongly recommended that such sites are identified in planning policy as 'Reserve Sites'. Such sites would then come forward for development should there be a demonstrable shortfall in housing supply and delivery rates in the plan area.
- 11.3 Adopting this positive and proactive approach to housing growth, through the GCLP, would help ensure the continued supply of new housing and allow the Council to have policy mechanism in place to release the next most sustainable sites for development should the need arise. To ensure the timely submission of planning applications and avoid the potential need to partially review the Plan and or the Proposals Map it is strongly recommended that Reserve Sites are included with the village boundary and are released from the Green Belt as required.

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

- 12.1 To deliver on the 'Big Themes' of the Greater Cambridge Local Plan (GCLP) and the agenda for growth in the region it is vital that villages grow commensurate to their scale and sustainability credentials. Affording sustainable levels of growth to villages will assist in safeguarding existing services, public transport links and infrastructure which local people currently rely upon. In addition, delivering growth in villages will diversify the local community and allow others to benefit from village life should they wish to do so. Martin Grant Homes Ltd also recognise the importance of ensuring development is commensurate to the size of the host settlement, as this will ensure the character and identity of the village is preserved and enhanced.
- 12.2 The adopted South Cambridgeshire Local Plan 2018 currently categorises villages into four different types (rural centres, minor rural centres, group villages and infill villages) according to how 'sustainable' they are in terms of facilities and services. Our client broadly agrees with the current Settlement Hierarchy in the adopted Local Plan and the need to focus larger scale development at Rural Centres.
- 12.3 Designated Rural Centres, such as Impington and Histon, should be a focus for sustainable levels of housing growth. The opportunity for growth in these villages should be supported by a thorough Green Belt review to ensure that otherwise sustainable sites are not excluded from development. Histon and Impington has extensive and high quality public transport links which promote sustainable travel and is located immediately adjacent to the Cambridge city boundary. It is our client's belief that living in Histon and Impington is as sustainable as living in the outer suburbs of Cambridge.
- 12.4 As evidenced in our client's representations to Questions 39 and 40 the Land at Ambrose Way, Impington represents a sustainable development site for housing on land which fails to contribute effectively to the purposes of the Green Belt. Accordingly, this land should be released from the Green Belt and allocated for residential development. A residential development at this site would be capable of delivering on all four of the 'Big Themes' identified in the Issues and Options document.

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

- 13.1 Paragraphs 102 and 103 of the National Planning Policy Framework (NPPF) require transport issues to be considered at the earliest stage of the plan preparation process. These paragraphs also highlight that the planning system should actively manage patterns of growth to promote sustainable travel.
- 13.2 Martin Grant Homes Ltd support and endorse the siting of growth along public transport corridors. A focus should be on identifying those sustainable settlements located on or within close proximity to such corridors. The presence of public transport corridors significantly enhances the sustainability credentials of a settlement and gives residents convenient and quick access to Cambridge city centre and other major settlements which act as hubs for employment and leisure, including London.
- 13.3 Histon and Impington is served by the frequent Citi 8 bus service which connects the settlement to Cottenham, Cambridge city centre and Cambridge railway station. Of greater importance, Impington is served by the Cambridge Guided Busway. This is a unique piece of infrastructure for the region and provides excellent connections to Royston, Cambridge, Science Park, St Ives, Huntingdon and Peterborough. In addition, the Busway enables residents of Histon and Impington to access Cambridge North Railway Station in approximately 10 minutes. The Greater Cambridge Local Plan (GCLP) should fully realise the benefits of this excellent piece of infrastructure and its ability to increase the sustainability of potential development sites.
- 13.4 The preparation of the Strategic Housing Land Availability Assessment and ultimately the site allocation process should focus on the need to realise the sustainability benefits arising from the presence of the Guided Busway. Indeed, this would be entirely in accordance with paragraphs 102 and 103 of the NPPF. If Green Belt land, around settlements served by the Busway, is failing to contribute to the Green Belt purposes set out in the NPPF it should be released to enable the delivery of sustainable development.
- 13.5 As evidenced in our client's representations to Questions 39 and 40 the Land at Ambrose Way, Impington represents a sustainable development site for housing

on land which fails to contribute effectively to the purposes of the Green Belt. Accordingly, this land should be released from the Green Belt and allocated for residential development. A residential development at this site would be capable of delivering on all four of the 'Big Themes' identified in the Issues and Options document.