

Greater Cambridge Local Plan Issues and Options 2020 Consultation

1. These representations have been prepared by Strutt & Parker on behalf of M F Mead & Son, and are being submitted in response to the Greater Cambridge Local Plan Issues and Options 2020 Consultation. This response should be read in conjunction with our previous submissions made in March 2019, as part of the Greater Cambridge Local Plan 'Call for Sites and Broad Locations' exercise. As part of the Call for Sites consultation we promoted the following sites:
 - Land to the North and East of Barrington Road, Foxton
 - Land to the East of Cambridge Road (A10), Foxton
2. My client welcomes the opportunity to comment on the Greater Cambridge Local Plan Issues & Options consultation document, which is underpinned by four important 'big themes': climate change; biodiversity & green spaces; wellbeing & social inclusion; and great places. The document sets out a range of key issues & options, particularly relating to the overall spatial strategy.
3. This submission has been prepared to comment on the Greater Cambridge Local Plan Issues & Options 2020 document and follows the earlier 'Call for Sites and Broad Locations' submission. The earlier submission was accompanied by a letter, which confirmed the support of the landowners to bring forward the land for development.
4. Our Call for Sites submissions have been appended to this response, which includes an overview of the location of the different sites.

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

5. As outlined within the Local Plan Issues and Options document, the future Local Plan must aim to ensure sustainable development. In order to achieve this, competing priorities and issues need to be balanced. Greater Cambridge Planning has grouped these into the following themes:
 - Climate Change
 - Biodiversity and Green Spaces
 - Wellbeing and Social Inclusion
 - Great Places
6. We agree with these 'big themes' that have been proposed for the Local Plan, in particular 'Climate Change' and how the plan should contribute to achieving net zero carbon. Chapter 14 of the National Planning Policy Framework (NPPF) focusses on 'Meeting the challenge of climate change, flooding and coastal change'.

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

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7. On the 21st February 2019, Cambridge City Council declared a 'climate emergency' and call on the Government, industry and regulators to implement the necessary changes to enable Cambridge and the rest of the UK to reach net zero carbon by 2030.
8. Furthermore, we believe that my client's sites can help address these themes and it is considered that the two sites previously promoted through the Call for Sites exercise reflect the themes and aims of the emerging Local Plan.
9. **Summary: the four big themes are supported as a means by which to plan for housing, jobs, and infrastructure.**

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

10. Further to the above, whilst Climate Change is the most important theme, we believe that the big themes are equally as important as one another and agree with the statements regarding each one within the consultation document. Therefore, we would propose that these are all ranked equally as all are important towards sustainability. As the NPPF states, the purpose of the planning system is to contribute to the achievement of sustainable development and should '*meet the needs of the present without compromising the ability of future generations to meet their own needs*'.
11. **Summary: Support giving equal weight to each of the four big themes and opposition to an arbitrary ranking of them.**

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

12. According to the 'big themes' of the Greater Cambridge Local Plan, it is important that local village centres, at a range of scales provide varied employment. The National Planning Policy Framework 2019 (NPPF), reflect this with its focus on sustainable development, stating in paragraph 84 states that;

"Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements".

13. The application site is exactly the type of site the NPPF is referring to; a medium sized site, located adjacent to the development limit, and provides a proposed rural hub in conjunction with the housing, to accommodate small and medium sized local businesses. In order for the emerging Greater Cambridge Local Plan to be found 'sound' it must be consistent with the policies detailed in the NPPF; including paragraph 84 identified above.
14. **Summary: Support for providing land in sustainable locations to enable economic growth to continue.**

Question 28: Are there particular locations for employment the Local Plan should focus on?

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15. It is important that employment is dispersed within the Greater Cambridge area, with not all employment just focused on Cambridge. The potential of land in rural areas beyond existent settlements have in providing land for employment development is recognised in the NPPF at Paragraph 84; “*Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.*” Provision for sized employment sites within the larger villages is appropriate and will help support the rural community. In addition, it is also appropriate to focus a proportionate quantum of employment growth along key transport corridors, such as in Foxton, and my client’s site immediately adjacent to Foxton railway station is excellently located to encourage more sustainable modes of transport.
16. As part of the Greater Cambridge Partnership (GCP), a new Travel Hub is proposed within Foxton to encourage the use of public transport to the village. The village’s sustainability is anticipated to increase significantly, resulting in Foxton being a prime location residential and employment development with a much easier link into both Cambridge and London.
17. There is capacity for Foxton to provide an increased amount office space for local business, or start-up businesses from the village, or surrounding villages to work. This relatively small scale employment site would function as a natural addition to the village, within close proximity to the railway station and provide the opportunity for new companies to begin locally, as well as host a work space for existing businesses, without having to travel to Cambridge City.
18. **Summary: Support for providing land in sustainable locations such as next to railway stations, to enable economic growth to continue.**

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

19. The Local Plan should help meet our needs for the amount and types of new homes through a blended spatial strategy that focuses on sustainable locations that are well-connected or have the potential to be connected to high quality public transport. Whilst also recognising that a range of sites is required to aid deliverability and to ensure that all villages can grow in a sustainable manner appropriate to their size and scale.
20. The housing market area for Greater Cambridge is a very challenging one. Affordable housing delivery is a significant problem with high levels of demand for affordable and key worker housing. The ageing population will also add significantly to the demand for specialist housing. Consequently, the new plan needs to be very ambitious in terms housing delivery to ensure that there is a significant supply and mix of deliverable housing sites across the plan area, in excess of the levels of identified need, to boost delivery and help maintain competition in market and drive affordability.
21. The joint Inspector’s Report on the Examination of the South Cambridgeshire Local Plan (August 2018) noted that “*The Plan proposes that development needs will be met at two new settlements at Waterbeach and Bourn Airfield. We have some concerns regarding the challenges of delivering new development at Waterbeach and Bourn...*” However, because these development sites were not required to deliver housing in the early part of the plan period, the Inspectors concluded that due to the plans commitment to an early review there

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would be an opportunity to review progress as part of the preparation of the new joint local plan.

22. We consider the Inspector's concerns to be justified and that the new plan should include a range of allocations including small and medium size sites throughout the area to ensure that rural settlements have the opportunity to grow and thrive in line with National Planning Policy advice.
23. It is important to note that the Inspector for the Uttlesford Local Plan Examination recently wrote to the Council on the 10th January 2020 raising significant concerns in relation to the soundness of the plan. In particular, in respect of the overall spatial strategy which relies on the development of three Garden Communities.
24. This reinforces the essential need for the new Greater Cambridge Local Plan to be based on a blended strategy which builds on the existing urban extensions already allocated around Cambridge and the strategic growth proposed at Cambourne, Northstowe, Waterbeach and Bourn Airfield through the allocation small and medium sized sites across the plan area. This is imperative to not only maintain supply and flexibility but to ensure that the rural areas can prosper and thrive and are not left behind.
25. **Summary: The Local Plan should adopt a blended approach including a range of locations, and site sizes to ensure deliverability and choice in the market.**

Question 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?

26. As reflected in the NPPF (2019) and Planning Inspectors report on the South Cambridgeshire Local Plan (2018), a shift away from our reliance on cars and towards more sustainable transport can be achieved by locating development in existing villages, with established transport connections. The development of new, large settlements is less likely to be able to be served by existing transport networks, whereas existing villages have established services and transport links which can serve an increased population.

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

27. The Green Belt provides an important role in preventing urban sprawl by keeping land permanently open and serving the five purposes set out in paragraph 134 of the National Planning Policy Framework namely:
 - a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns from merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
28. A comprehensive review of the original 2012 Green Belt Review should be undertaken as part of the evidence base underpinning the new Greater Cambridge Local Plan. In many

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instances there may be opportunities to release land currently within the Green Belt, which plays a limited role in serving the five purposes set out in the NPPF.

29. It is clear that given the geography of Greater Cambridge in which many of the most sustainable parts of the spatial planning area (such as my client's land within very close proximity of Foxton railway station, are located within the Green Belt, that some Green Belt release should form part of the overall spatial strategy. In this way, the area can help to reduce travel distances and help facilitate sustainability through the provision of sustainable transport infrastructure. Historically, much development has taken place in locations beyond the Green Belt, and this has led to many of the unsustainable commuting patterns that we see today.
30. While the important role that the Green Belt plays is acknowledged, a flexible approach needs to be taken where sites such as my client's land at Foxton benefit from its proximity to existing frequent public transport (with the railway station immediately adjacent to the site). The proposed Melbourn Greenway being promoted by the Greater Cambridge Partnership (GCP) would also to provide high quality sustainable transport infrastructure to further improve connectivity.
31. The land, which comprises two sites is very well-contained and provides a very limited contribution to the Green Belt purposes. Its release would play no role in facilitating unrestricted sprawl of large built up areas and would not result in towns merging into one another.
32. **Summary: Sites like my client's land at Foxton should be released from the Green Belt.**

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

33. Flexibility should be given to the development of jobs and homes on the edges of villages, within sustainable locations.
34. As stated within at 5.2.5 of the Issues and Options document, the currently adopted 2018 South Cambridgeshire Local Plan sets a development framework for each village, outside which development is heavily restricted. The development framework for Foxton is shown at Appendix 1 of this document.
35. In addition, villages within the Local Plan 2018 have been categorised dependant on their 'sustainability'. Foxton is categorised as a 'Group Village', along with 32 other villages. However, of the 32 group villages, Foxton is clearly one of the four most sustainable and has the ability to take a suitable quantum of housing growth as part of the emerging Local Plan. It is not considered that Foxton's current position in the existing settlement hierarchy reflects its status as a sustainable location for growth.
36. We encourage the next Local Plan to re-examine the approach currently taken to village growth and explore the re-grouping of village categories and flexibility on the scale of development with in newer more specific village groups. Table 1 below shows a list of the

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villages included within Policy S/10: Group Villages of the South Cambridgeshire Local Plan 2018 and analyses the facilities provided within these villages.

37. It is clear that the villages included within Policy S/10 vary significantly in terms of the services provided. Only three of the villages included have a railway station (Meldreth, Foxton and Shepreth). Therefore, it can be argued that these three villages are significantly more sustainable than those that do not have a station. Furthermore, a number of the villages are situated within the Green Belt. Sequentially, in accordance with national policy, Green Belt boundaries should only be altered in exceptionally circumstances (NPPF paragraph 136). This should be considered as a key factor when selecting villages for growth as part of the new Local Plan.
38. The Country Landowners Association's (CLA's) report Sustainable Villages – Making Communities fit for the Future, which draws upon the findings of the Taylor Review (2008) challenges the assumptions that a lack of services means that these villages are unsuitable for new development 'due to the negative impact this process has on house price affordability, social cohesion and economic performance. This process effectively fossilises these villages instead of seeking to address the reasons behind why services are being lost, creating a cycle of decline'.
39. Foxton is particularly well placed to accommodate some additional growth as it, not only benefits from a railway station and line, with regular services to Cambridge and London King's Cross, but also has a number of services, including a public house, church, primary school, post office and village store, sports pavilion and village hall.

Table 1: Services and Facilities within Group Villages at Policy S/10 of the South Cambridgeshire Local Plan 2018.

Village	Green Belt	School(s)	Village Shop/Post Office	Railway Station	Doctors
Balsham	No	Primary	Yes	No	No
Barrington	Partial (east side abuts)	Primary	Yes	No	No
Barton	Yes	Primary	Yes	No	No
Bourn	No	Primary	Yes	No	Yes
Castle Camps	No	Primary	No	No	No
Coton	Yes	Primary	Yes – Farm Shop	No	No
Dry Drayton	Partial (to the north, east and south)	Primary	No	No	No
Duxford	No	Primary	Yes	No (but close to)	No

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				Whittlesford Parkway)	
Elsworth	No	Primary	Yes	No	No
Eltisley	No	Primary	No	No	No
Fen Ditton	Yes	Primary	No (But within close proximity)	No (but close to Cambridge North)	No
Fen Drayton	No	Primary	Yes	No	No
Fowlmere	Partial (east abuts)	Primary	No	No	No
Foxton	Partial (east abuts)	Primary	Yes	Yes	No
Great Abington	No	Primary	Yes	No	No
Great Wilbraham	Yes	Primary	Yes	No	No
Guilden Morden	No	Primary	No	No	No
Hardwick	Partial (east abuts)	Primary	Yes	No	No
Harston	Yes	Primary	Yes	No	Yes
Haslingfield	Yes	Primary	Yes	No	No
Hauxton	Yes	Primary	No	No	No
Highfields Caldecote	No	Primary	No	No	No
Little Abington	No	Primary – Great Abington	Yes	No	No
Longstanton	No	Primary x2	Yes	Yes	Yes
Meldreth	No	Primary	Yes	Yes	No
Oakington	Partial (south abuts)	Primary	Yes	Yes	No
Orwell	No	Primary	Yes	No	No

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Over	No	Primary	No	No	Yes
Steeple Morden	No	Primary	Yes	No – (Ashwell & Morden Station)	No
Teversham	Yes	Primary	No	No	No
Thriplow	Yes	Primary	Yes	No	No
Whittlesford	Yes	Primary	Yes	Yes	No

40. The Local Plan should be more flexible in particular at focussing development at the edge of the villages contained within Policy S/10 that rank higher in terms of sustainability. It would be our recommendation that a new village group is provided within the Local Plan than encompasses the less sustainable Minor Rural Centres and more sustainable Group Villages and allows for development of a larger scale. Villages such as Foxton and Meldreth, highlighted green within the above table would be recommended for inclusion within such a village group due their location outside the Green Belt and provision of a railway station, along with some services, ranking them higher in terms of sustainability.
41. Furthermore, the Local Plan should allow for more flexibility in allowing the development of sites that directly abut the development boundary of a village that are within areas of the countryside beyond the Green Belt.
42. **Summary: The Local Plan should be highly flexible towards development of jobs/homes on the edge of villages and be able to respond to changing circumstances.**

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

43. We consider that new development should be located strategically within the District, on site's that are considered to be both sustainable and suitable. Therefore, we feel as though these options should not be ranked by those most and least preferred and should be considered on the basis of their location and sustainability merits.
44. Fundamentally, new development should aim to address problems within the South Cambridgeshire and Cambridge City areas, such as reducing congestion and traffic within and around Cambridge City Centre. It is not considered that further major allocations within and on the edge of Cambridge City will address congestion.
45. It is considered that growth should be focused along key transport corridors and within villages that have a train station and are situated outside of the Green Belt. It is also very important that a number of smaller and medium sites are allocated that can be delivered in the short term without the need for substantial infrastructure requirements.
46. **Summary: A blended strategy is supported but specifically including development in villages and along public transport corridors.**

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

47. We strongly support suitable growth within villages, particularly the villages located in the most sustainable locations.
48. The focus on growing our villages throughout the District would help sustain existing facilities and infrastructure within them and assist in diversifying their population. In order to help sustain existing facilities and infrastructure within villages, it is key that they are grown by increasing housing numbers. It is important to ensure that existing businesses within the villages are able to stay open and provide services not only for the village that they are located, but also for smaller infill Villages, many of which rely on the services within and adjacent to larger settlements.
49. Sustainably located villages such as Foxton are ideally located and of a size to accommodate a suitable proportion of housing growth. Putting a focus on growing these would not necessarily see an increase in commuting by car and needing to travel to access services and facilities due to availability of services and easy access to public transport links. Conversely, it would assist with minimising the impact on the already at capacity highway infrastructure in and around Cambridge City Centre, which has recently had substantial housing growth. It would assist with promoting train travel from Foxton to Cambridge City, as a result of an expanded population.
50. In addition, to ensure supply is maintained, local planning authorities are also required to monitor the progress in building out sites, to comply with the housing delivery test. Currently, the supply of housing in South Cambridgeshire is only marginally above the 5-year requirement (5.05 years – Appeal Reference APP/W0530/W/19/3220761) and the Government’s recently published housing delivery figures for 2019 indicate delivery to be at 95% which while not significantly below the target is still falling short.
51. In addition to this, the current Local Plan 2018 for both South Cambridgeshire and Cambridge City includes allocations for two new settlements at Waterbeach and Bourn Airfield as well as the continued development of Northstowe.
52. However, these larger growth sites will only be delivered later on in the plan period and as acknowledged within the Inspectors Report, there is
- ‘no requirement for these sites to deliver housing in the early years of the plan period and consequently there will be an opportunity to review progress through the preparation of a joint local plan.’*
53. The Council will also be aware of the recent outcome of the Uttlesford Local Plan Examination, where the inspector was concerned that an overreliance had been placed on the development of three new garden communities and that insufficient smaller sites had been identified throughout the rural area to ensure that a 5-year supply could be maintained.
54. In recent years, South Cambridgeshire have focused development in larger villages and towns, of Cambridge City. This approach is supported up to a point, but it is critical that medium-sized villages such as Foxton take some development. In recent years many villages across the Greater Cambridge area have lost vital services as shops have closed, public houses have been converted into residential properties and bus services have been

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reduced. Foxton is fortunate in this regard and has maintained a number of its key services and transport options. Now with much improved broadband connectivity and a significant increase in home working and ability to shop online, many of the historic barriers to sustainability in rural areas and villages are now reduced.

55. It is therefore important to enable modest, appropriately-sized extensions to villages so that the remaining services can be supported and to enable much needed new market and affordable housing to be provided.
56. **Summary: support for a strategy that includes growth in villages, particularly those with existing high-quality public transport links such as Foxton.**

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

57. Focusing growth along transport corridors is strongly supported.
58. Focussing homes and jobs along key public transport corridors and around transport hubs extending out from Cambridge could be achieved by focussing growth around the towns and villages located along these routes, particularly those further from Cambridge City Centre and not within the Green Belt. Siting development along these corridors would capitalise on improved connectivity and transport networks that are currently the focus of the GCP. The GCP are developing a number of transport infrastructure projects around the City of Cambridge to ease congestion, make it easier for people to travel and keep the Greater Cambridge area well connected. Such schemes include a proposed South West Travel Hub at Junction 11 of the M11, to further improve park and ride facilities and improve cycle links to the City Centre.
59. As outlined above, the GCP are currently assessing the potential for a Travel Hub in Foxton to encourage more people to use public transport and the existing rail service which will be key in further improving the village's sustainability and suitability for catering to more growth. The proposed Cambridge South Station, will further enhance the sustainability of Foxton, in that it will provide direct and quick access from Foxton to Addenbrookes Medical Campus.
60. Paragraph 5.3.6 of the Issues and Options document addresses that one of the challenges that may impact the approach to developing along transport corridors, would be that many locations along transport corridors are within the Green Belt, and as such could have implications that fundamentally change the nature of Cambridge. While my client's land is located within the Cambridge Green Belt, it is so well-related to the railway station and plays a limited role in the purposes of the green belt that it should be considered as a location for development.
61. **Summary: Strong support for housing and economic growth in locations with good access to existing public transport such as Foxton railway station.**

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

62. We feel as though Policy S/10 of the South Cambridgeshire Local Plan 2018 is restrictive to enabling development to villages that are considered sustainable with suitable transport links and not within the Green Belt.

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

63. As stated within the response provided at Question 40 and further to our above response to Question 49, the new Local Plan needs to be more flexible in its approach to the settlement hierarchy. A new village group should be provided and include the less sustainable Minor Rural Centres and more sustainable Group Villages and allow for development of up to 20 dwellings.