
Greater Cambridge Local Plan Regulation 18 Issues and Options 2020

Representations on behalf of Hill Residential Ltd
and
Chivers Farms (Hardington) LLP

February 2020

**Greater Cambridge Local Plan
Regulation 18: Issues and Options 2020**

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CONTENTS

- 1.0 Introduction
- 2.0 Land East of Cambridge Road, Hardwick
- 3.0 Local Plan Period
- 4.0 Delivering New Homes
- 5.0 Infrastructure and Transport
- 6.0 Where to Build?
- 7.0 Summary

APPENDICES

Appendix 1: Site Location Plan

Appendix 2: Preliminary Green Belt Assessment

1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore LLP on behalf of Hill Residential Ltd and Chivers Farms (Hardington) LLP. The representations respond to relevant questions set out in the 'Issues and Options' consultation (*The First Conversation*, January 2020) on the emerging Greater Cambridge Local Plan in accordance with Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012.
- 1.2 In March 2019, representations were submitted on behalf of Hill and Chivers in response to the Greater Cambridge Local Plan 'Call for Sites' consultation. The Call for Sites submission presented 'Land east of Cambridge Road, Hardwick' as a site for potential allocation in the emerging Greater Cambridge Local Plan. The submission included a Site Assessment Proforma and some high-level technical reports relating to transport, drainage and Green Belt issues.
- 1.3 Hill and Chivers are continuing to promote the Site (Land east of Cambridge Road, Hardwick) for allocation within the emerging Greater Cambridge Local Plan for residential-led development. Since the March 2019 submission, further technical assessment work has been undertaken to better understand the Site's opportunities and constraints. Hill and Chivers have also commenced public engagement, including presenting to the Parish Council in October 2019.
- 1.4 This report responds to relevant questions from the Issues and Options consultation document, with particular reference to the Site.

2.0 LAND EAST OF CAMBRIDGE ROAD, HARDWICK

- 2.1 The Site is located in the village of Hardwick, some five miles to the west of central Cambridge and four miles east of Cambourne. Hardwick is currently classified as a 'Group Village' in the adopted South Cambridgeshire Local Plan 2018 (Policy S/10). In terms of services and facilities, the village benefits from a primary school, post office and general store, other shops, a public house, a church and a recreation area. There are regular bus services to both Cambridge and Cambourne via the Stagecoach Citi 4 route.
- 2.2. Hardwick is located within the A428 Corridor, sited between West Cambridge/Eddington on the Cambridge Fringe and the strategic growth locations of Bourn Airfield and Cambourne to the west. Accessibility will be further improved through the implementation of the Cambourne-to-Cambridge public transport project, reducing reliance on private vehicles for journeys in both directions from the village.
- 2.3 At the strategic scale, Hardwick lies within the Cambridge-Milton Keynes-Oxford (CAMKOX) arc, a key focus for future infrastructure improvement including a new Cambridge-to-Oxford Expressway road and East-West Rail.
- 2.4 The Site comprises two land parcels as shown on the Site Location Plan (**Appendix 1**). The main part of the Site extends around 27 hectares and lies to the east of Cambridge Road and south of St Neots Road, extending to Bin Brook in the south. The Site also includes a smaller landholding (circa 1 hectare) which lies to the east of Main Street, opposite Wallis Farmhouse and Sadlers Close.

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

- 2.5 The Site was presented to the Councils through the Call for Sites (March 2019). The submission was supported by the following documentation:
- Completed forms and covering letter (Barton Willmore),
 - Site Assessment Proforma (Barton Willmore),
 - High Level Transport Strategy (Stantec),
 - High Level Drainage Strategy (Stantec), and
 - Preliminary Green Belt Assessment (Terence O'Rourke).

2.6 Since the March 2019 submission, further assessment work has been undertaken to better understand the Site's opportunities and constraints. This has included desk-top archaeological assessment, ecological assessment, geo-environmental assessment, and landscape and visual impact assessment. Informed by these assessments, a Vision document has been prepared by Terence O'Rourke Ltd to support these representations to the Issues and Options consultation (**submitted alongside this Report**). The Vision document demonstrates the potential of the Site to deliver a high-quality and sustainable residential-led village extension to Hardwick, whilst also delivering significant improvements to the village and its community.

3.0 LOCAL PLAN PERIOD

- 3.1 The Issues and Options document proposes that the best approach is for the Greater Cambridge Local Plan to plan for the period 2017-2040.

Question 4: Do you agree that planning to 2040 is an appropriate date in the future to plan for? If you disagree, what would be a more appropriate date and why?

- 3.2 Disagree. 2050 would be a more appropriate date.
- 3.3 The NPPF (paragraph 22) states that strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.
- 3.4 Table 5 of the consultation document sets out a timetable which envisages Local Plan adoption in Summer 2023. However, we are aware that many other authorities are experiencing significant delays in their local plan preparations. This often occurs during the Examination in Public (EiP) phases and is therefore essentially outside of a local planning authority's control. Any significant slippage in the Greater Cambridge Local Plan timetable could compromise the ability of the Councils to deliver a Local Plan with a minimum 15-year period from adoption. On this basis, a plan period to 2050 would be more realistic.
- 3.5 In addition to this practical point on timescale, we also note that a plan period to 2050 would correspond with other strategic plans for the area and may provide a better timeframe for long-term strategic decisions.

4.0 DELIVERING NEW HOMES

- 4.1 The Issues and Options document sets out the significance of issues relating to housing supply and affordability, as follows (page 59):

“Housing is one of the most important issues in planning. The next Local Plan will define the number of new homes we should be planning for to meet the needs of our communities and the growing economy, including what types of housing we need and where they should be built.”

- 4.2 Figure 19 (page 59) shows that house prices in Cambridge are more than double the national average, with prices in South Cambridgeshire also significantly above the national figure. Greater Cambridge is an expensive place to live, and it is especially difficult for young households to get onto the property ladder given the high house price to income ratios. Many households have no choice but to rent, although monthly renting costs are also well above the national average.
- 4.3 In addition to causing stress for individual households, a lack of housing and worsening affordability has the potential to cause significant negative impacts on the local economy, communities and the environment.

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

- 4.4 The Greater Cambridge Local Plan provides a key opportunity to readdress the balance between economic growth and housing delivery. In order to ensure choice, affordability and diversity, the Local Plan must make provision for a sufficient quantity of housing. It must also include a range of housing types and sizes, across a variety of sites and locations. This should include small and medium sites, in addition to strategic sites, to ensure the ongoing delivery of housing throughout the plan period. In accordance with the NPPF (paragraphs 67 and 68), strategic policy-making authorities should identify a sufficient supply and mix of sites over the local plan period.
- 4.5 Determining the appropriate amount of housing to deliver in Greater Cambridge during the plan period is a critically important role for the Local Plan. It is essential that there is an adequate rate of housing completions across the plan period, maintaining a continuous five-year housing land supply to support economic growth and job creation, social

cohesion and sustainable lifestyles. To ensure that delivery is continuous and consistent, a number of small- and medium-sized sites must be progressed. The NLP study of large-scale site delivery (*Start to Finish*, November 2016) highlights that lead-in times for large sites is 3.9 years and the planning approval period for schemes of 2,000+ dwellings averages 6.1 years. The research showed that the planning approval period increases significantly for sites in excess of 500 units. An over-reliance on large sites such as those currently proposed at Waterbeach and Bourn Airfield which require significant infrastructure provision will therefore undermine delivery and exacerbate the housing issues that exist at present.

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?

4.6 Yes, we strongly agree.

4.7 In accordance with the National Planning Policy Framework (NPPF), the starting point for deciding how many homes need to be planned for in the emerging Greater Cambridge Local Plan is a local housing need assessment, conducted using the 'standard method' unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals (NPPF, paragraph 60).

4.8 The standard methodology is set out in Planning Practice Guidance (PPG) (*Housing and economic needs assessment*) and uses a formula to identify a minimum annual housing need figure, calculated by setting the baseline household growth projection and then adjusting it to take account of affordability and finally capping the level of any increase. The standard method does not produce a housing requirement figure and neither does it reflect economic growth requirements.

4.9 Compared with the adopted 2018 Local Plans' combined target of 1,675 homes per year, the standard method calculation for Greater Cambridge indicates a minimum need of around 1,800 homes per year. This alone reflects a minimum of +17,950 new homes than is currently planned for between 2017 and 2040.

4.10 Reflecting paragraph 60 of the NPPF, PPG (paragraph 10) explains that,

"The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to

predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”

- 4.11 PPG includes reference to circumstances under which housing need should be higher than derived using the standard method, including growth strategies, strategic infrastructure improvements and authorities agreeing to take on unmet need for neighbouring authorities.
- 4.12 Greater Cambridge is strategically located within the key economic corridors of the Cambridge-Milton Keynes-Oxford (CAMKOX) arc, the London-Stanstead-Cambridge (M11) corridor and the Cambridge-Norwich (A11) tech corridor.
- 4.13 The National Infrastructure Commission (NIC) published a report into the CAMKOX arc in 2017 (*Partnering for Prosperity: A new deal for the Cambridge-Milton Keynes-Oxford Arc*). This recommended that the current housing delivery rates will need to double up to 2050 to realise the Arc’s economic potential. This level of growth would also require significant investment in new transport infrastructure, including East-West Rail and an Expressway connecting Cambridge and Oxford.
- 4.14 At the sub-regional level, the Cambridgeshire and Peterborough Combined Authority has ambitious growth strategies for the area, with the Greater Cambridge Partnership (GCP) tasked to deliver infrastructure and a City Deal including £500m funding. The Combined Authority established the Cambridgeshire and Peterborough Independent Economic Commission to develop an evidence base and inform policy decisions. The Cambridgeshire and Peterborough Independent Economic Review (CPIER) was published in 2018 and it reported (page 9):

“Growth in employment has not been matched by corresponding house-building, or developments in infrastructure. Consequently, house prices have soared and journey times have increased as congestion has intensified. This has meant that many have been forced to endure unpleasant commutes, or been priced away from the city altogether due to the unaffordability of rents. This is

bad for both people and business, and we believe is an unsustainable approach to growth.”

- 4.15 The CPIER provided some recommendations. With direct reference to housing requirements, Key Recommendation No. 5 states:

“There should be a review of housing requirements based on the potential for higher growth in employment than currently forecast by the EEFM. This review should take into account the continuing dialogues between ONS and the Centre for Business research on employment numbers as well as the impact of the Cambridge-Milton Keynes-Oxford Arc. This should be used to set new targets which are likely to be higher than those already set – at the very least adding on accumulating backlog.”

- 4.16 The CPIER indicates that housing supply across the whole area (the Combined Authority Area) should be in the range of 6,000-8,000 homes per year over the next 20 years. For the Greater Cambridge area this translates into a CPIER figure of around 2,900 homes per year, which results in an indicative total of 66,700 homes over the period 2017-2040.
- 4.17 Following the recommendations of the NIC report (2017) and the CPIER (2018), Hill and Chivers strongly agree with the approach of planning for a higher number of homes than the standard method minimum. In order to support the growing economy, and key national, strategic and sub-regional growth strategies, a step-change in housing delivery is needed in Greater Cambridge to ensure that growth is sustainable.
- 4.18 Hill and Chivers reserve the right to provide appropriate evidence to justify the objectively assessed housing need (OAN) and housing requirement figure through the Local Plan process, as considered necessary.

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

- 4.19 The NPPF sets out that, within the context of local housing needs assessments, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This should include, but not be limited to those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes (NPPF, paragraph 61).

- 4.20 The Issues and Options consultation document identifies the need for affordable homes, including a balance of affordable tenure types (affordable rented, shared ownership and community-led housing)(page 63). It also highlights the need for “**diverse housing for diverse communities**” (page 64), covering flexible housing that is accessible and adaptable; housing for downsizing; specialist housing; student accommodation; shared accommodation; custom and self-build housing; built to rent (BTR) and local worker housing.
- 4.21 The kind of housing that should be provided in Greater Cambridge will need to be based on a clear and robust evidence of need as set out in a new Strategic Housing Market Assessment (SHMA). However, housing policies within the Local Plan should ensure a realistic element of flexibility, so that a diversity of provision can be made. This will also ensure that housing policies are future-proofed and can respond to changing market conditions as may arise during the plan period.
- 4.22 Hill and Chivers support the provision of a range of house sizes, types and tenures. It is important that new housing is delivered across a variety of site sizes, typologies and locations. Their Site at Hardwick offers the opportunity to deliver a mix of housing, meeting a range of needs and supporting the local community.

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

- 4.23 As set out in the NPPF, the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities (NPPF, paragraph 124).
- 4.24 The Issues and Options consultation document questions whether the new Local Plan should maintain the National Space Standards, as applied within the 2018 Local Plans. It also questions whether there should be specific standards for energy efficiency, accessibility and adaptability and a range of other design issues.
- 4.25 Hill has a reputation for delivering high quality homes, incorporating good and innovative design and creating sustainable homes and communities. Hill has a strong vision to minimise the impact of development on the environment, with health, safety, energy and environmental goals that seek to reduce energy use, reduce water use and divert waste from landfill.

- 4.26 Hill homes are created with an awareness of residents' wellbeing, designed to promote the use of sustainable travel through walking and cycling and also with social and recreational areas to enjoy the wider environment whilst also incorporating the highest standards of sustainable technology, supporting biodiversity and benefiting local ecology and wildlife.
- 4.27 Hill is an award-winning housebuilder, leading the way in introducing measures to improve the environmental performance of new residential developments in reducing carbon emissions, providing gains in biodiversity and improving green infrastructure and the wider environment.
- 4.28 At the national level, measures such as the Future Homes Standard and Biodiversity Gain are being implemented as new regulatory targets for residential development. The construction industry and their representative groups face a significant amount of research and development to ensure that the required standards can be adopted and implemented within the timeframes required. A national approach to achieving high-quality design and improved environmental performance is considered preferable to local authorities setting their own standards.
- 4.29 If the Councils seek to adopt any of the optional technical standards in the Local Plan then they will need to ensure that they provide the necessary evidence on the need for such homes and their impact on development viability, as required by PPG. Such standards should not require a higher standard than the optional technical standards, and they should be robustly justified.
- 4.30 We would caution against the Greater Cambridge Local Plan seeking to adopt standards that are overly ambitious, or which respond directly to current market trends. When setting policy requirements for the entire plan period, it is important that the standards are realistic and achievable for all developments across the area and the timeframe. Otherwise the policies could have the unintended consequence of constraining future development – or fuelling further escalating house prices – with a negative impact on achieving the Local Plan's strategic policy objectives.
- 4.31 Hill and Chivers are committed to supporting the new and existing community in Hardwick through the delivery of a high-quality and sustainable village extension.

5.0 INFRASTRUCTURE AND TRANSPORT

- 5.1 As set out in the Issues and Options document, new growth in the Greater Cambridge area will require new infrastructure. In addition to new transport, this includes schools, health facilities, utilities, power and telecommunications.

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

- 5.2 The Councils will need to work closely with infrastructure providers in developing their policies for infrastructure delivery within the Greater Cambridge Local Plan. It is important that projects identified in the Local Plan are ambitious, but also realistic and deliverable within the stated timescales. Whilst some transport and spatial strategies may include aspirational projects, it is essential that the Local Plan – as a statutory development plan – includes infrastructure that is committed and scheduled for delivery during the plan period.
- 5.3 The timing of infrastructure delivery is important. Some large-scale infrastructure, such as East-West Rail, will have significant lead-in times. Except where directly related to a development, delays in the delivery of strategic infrastructure should not be used as a reason for withholding planning permission. Likewise, requirements for developers to contribute to infrastructure projects should be directly related and proportional to the scale of development proposed. Geographically, housing growth should correlate with planned infrastructure. The Council should not see strategic development as an answer to delivering essential infrastructure. There needs to be a recognition that small and medium sized development opportunities can also support infrastructure delivery, often bringing benefits that are of great significance to local communities.

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?

- 5.4 Creating a modal shift in transport use away from private vehicles towards more sustainable forms of transport will require a range of measures. The Local Plan has the ability to bring some of these elements together to have the overall effect of reducing the need to travel and increasing access to sustainable transport options.

- 5.5 A key factor affecting transport choices is the location of development. Cambridge has a large employment base and significant levels of services and facilities. As such, it has a significant 'draw' effect which can result in congestion at peak times due to the number of daily trips undertaken for both commuting and pleasure. Development in locations that are in close proximity to Cambridge, or well connected via sustainable travel options, will reduce the length of journeys and the dependence on private vehicles.
- 5.6 The Cambridge Green Belt currently restricts the potential for strategic development in close proximity to the City. The Green Belt Assessment undertaken in support of the 2018 Local Plans highlighted that the value of the Green Belt diminishes over distance from the City. The Green Belt edge extends to Hardwick and in that context can be seen to potentially have less value in this location than areas of the Green Belt closer to the City – a matter supported by the Preliminary Green Belt Assessment submitted in response to the Call for Sites 2019 (**Appendix 2**).
- 5.7 Permitting village extensions to well-located settlements such as Hardwick would serve to encourage the use of sustainable transport options without impacting on the Green Belt areas of greatest value. Hardwick benefits from existing bus services (Citi 4), cycling and walking routes. Accessibility will be further improved through the implementation of the Cambourne-to-Cambridge public transport project and potential linkages into the Greenways cycle network.
- 5.8 As promoted in the NPPF (paragraph 78), sustainable development in rural areas is about locating housing where it will enhance or maintain the vitality of rural communities. The sustainable growth of villages through additional housing development can contribute to the footfall needed to support village services and facilities, i.e. reaching a critical mass that can support a vibrant village economy. This reduces the need to travel by private vehicle and also rejuvenates local areas and their communities.
- 5.9 Likewise, the co-location of different land uses is another important consideration in making strategic policy decisions to shape travel choices. For example, where new residential developments in villages provide a mix of uses (employment, shops and cafes, community facilities and recreational spaces) or are located adjacent to existing services, then this will facilitate local residents to live, work and relax within their own local area and community. This will reduce the need to travel into Cambridge or one of the larger villages or towns for work, shopping and other facilities. It will also have a positive impact on wellbeing, local community cohesion and sense of place.

6.0 WHERE TO BUILD?

- 6.1 Previous development plans for the Greater Cambridge area have prioritised development within a hierarchy, starting first with Cambridge City, then the edge of Cambridge, then new settlements close to Cambridge, and lastly at better served villages. An important issue for the emerging Greater Cambridge Local Plan is to determine an appropriate spatial strategy to guide the location of new development.
- 6.2 The Issues and Options consultation document acknowledges that decisions about the Green Belt impact on all development location choices, as the Green Belt covers around one-quarter of South Cambridgeshire District. The document states that, whilst the Cambridge Green Belt plays an important role in maintaining the special qualities of Cambridge and the surrounding area, it also restricts growth in some of the most accessible locations (page 79). This is a critical balance that will need to be considered in determining whether, and where, land should be removed from the Green Belt through the Local Plan process.
- 6.3 In terms of villages, the adopted South Cambridgeshire Local Plan (2018) sets a 'development framework' (boundary) for each village, outside of which new development is restricted. The adopted Local Plan also categorises the villages into four different types based on the services they provide (Rural Centres, Minor Rural Centres, Group Villages and Infill Villages). This is considered to reflect their relative sustainability, and forms part of the sustainable development strategy.

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?

- 6.4 Yes.
- 6.5 It is important to note that the Green Belt is a planning designation rather than an environmental designation. As set out in the NPPF (paragraph 136), Green Belt boundaries can be altered where exceptional circumstances are evidenced and justified, through the preparation or updating of plans. The current and future constraints to housing development within Cambridge and its fringe, together with the high growth needs of the area and the importance of delivering growth in a sustainable way, presents a strong case to review the Cambridge Green Belt.

- 6.6 The high level of housing delivery needed to sustain an ongoing five-year housing supply throughout the plan period is best met through a mix of housing sites and land availability. Sustainable growth within settlements surrounding Cambridge can make an important contribution to this objective, creating opportunity to rebalance housing supply and foster zero carbon developments and lifestyles through reduced travel distances and sustainable travel options. Releasing land from the Green Belt in close proximity to Cambridge, where existing infrastructure can be enhanced, arguably provides the best opportunity to influence and change people's behaviours around travel and commuting and encourage adoption of more sustainable modes of transport.
- 6.7 The villages that are fully or partly surrounded by the Cambridge Green Belt are those that are located in closest proximity to Cambridge and therefore bring significant opportunities for development that is accessible to the City. In order to provide truly sustainable development, some Green Belt sites in these locations must be considered through the Local Plan process as potentially suitable options. The appropriate release of Green Belt sites could assist in achieving sustainable development in keeping with the 'climate change' big theme of the emerging Greater Cambridge Local Plan.
- 6.8 Hill and Chivers consider that the Councils should undertake a comprehensive review of the Green Belt within Greater Cambridge as a key part of the Local Plan process. This will inform important strategic decisions regarding the most appropriate locations for development during the plan period.
- 6.9 In relation to land east of Cambridge Road, Hardwick, Terence O'Rourke has undertaken a Preliminary Green Belt Assessment (March 2019) which confirms that the Site performs poorly when assessed against Green Belt purposes. The release of the Site to create a sustainable village extension would provide a strong new Green Belt boundary, without prejudicing the remaining Cambridge Green Belt.

Question 40: How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages? Is there any particular approach you would like the Plan to take for your village?

- 6.10 Highly flexible (in the approach to reviewing village boundaries).
- 6.11 The emerging Local Plan will need to strike a careful balance when addressing the issue of development on the edge of existing villages. Some of the villages surrounding Cambridge – such as Hardwick – are located on strategic growth corridors with excellent transport links. These villages provide opportunities for sustainable development and they

should be identified as such within the Local Plan. The boundaries of these villages should be reviewed and where there are sites that will appropriately support sustainable village extensions then these should be allocated for development within the plan period.

- 6.12 In terms of Local Plan policy, the existing approach of tightly-drawn 'village frameworks' (boundaries) has in practice not been adhered to through development decisions. The Council should review this policy approach.

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

- 6.13 Highly flexible.

- 6.14 We consider that the categorisation of South Cambridgeshire villages should undergo a comprehensive review through the Local Plan process. Even since the last Local Plan (2008), strategic developments and policy decisions have resulted in significant changes in the context for existing settlements.

- 6.15 Taking Hardwick village as an example, this is categorised as a Group Village (Local Plan Policy S/10) where residential development and redevelopment is permitted up to a maximum scheme size of eight dwellings within the development framework, or exceptionally up to 15 dwellings on a single brownfield site. However, Hardwick village has seen planning permission granted for significantly larger residential schemes than these thresholds at both Grace Crescent and St Neots Road. In addition, the strategic location of the village on the route between West Cambridge/Eddington and Bourn Airfield/Cambourne means that the village benefits from good public transport links. This will be further strengthened in the forthcoming plan period by the implementation of the Cambourne-to-Cambridge public transport project, including a new Park and Ride facility at Scotland Farm (north of Hardwick); the new Cambridge-Oxford Expressway; and East-West Rail (with a station at Cambourne). In short, Hardwick's current categorisation as a Group Village does not reflect the settlement's potential as a very sustainable location for further growth, and it should be identified as such in the Greater Cambridge Local Plan.

- 6.16 The South Cambridgeshire villages should be re-categorised within a new settlement hierarchy. The new settlement hierarchy should consider not only the existing levels of services and facilities within the settlement, but also take account of the village's potential as a location for sustainable future growth during the plan period.

- 6.17 Where villages are identified for strategic growth during the plan period, this should be carefully considered through the Local Plan process, including reviewing the settlement framework boundary and considering the release of land from the Green Belt where this is appropriate. Sites for development should be allocated in the Greater Cambridge Local Plan, providing the certainty required for both the local community and landowners/developers. By following a plan-led approach to site release and development, the step-change in growth that is needed in Greater Cambridge will be best accommodated to the benefit of existing and new communities.

Question 42: Where should we site new development?

- 6.18 The spatial strategy that will inform the emerging Greater Cambridge Plan must be realistic in ensuring that the housing requirement can be met on appropriate and deliverable sites across the area. As set out in the NPPF (paragraph 67), planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

- 6.19 The Issues and Options consultation document presents a range of location options, as follows:

- Densification of existing urban areas;
- Edge of Cambridge: outside Green Belt;
- Edge of Cambridge: Green Belt;
- Dispersal: new settlements;
- Dispersal: village; and
- Public transport corridors.

- 6.20 Given the scale of new housing required over the plan period, site selection will require a mix of locations. No single option from the above list can provide the spatial strategy for the forthcoming plan period. For example, densification alone cannot accommodate the level of housing provision needed; some greenfield land will also be required.

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

- 6.21 The South Cambridgeshire villages have played an important role in delivering new housing, as Figure 23 (page 75) of the Issues and Options document demonstrates: this illustrates that 35% of growth within the adopted Local Plans (2011-2031) will be in the

Rural Areas of Greater Cambridge. The current trend indicates that the villages will continue to have a key role in achieving anticipated future growth.

- 6.22 The Issues and Options document highlights two specific advantages associated with allowing development in villages (page 87). Firstly, new development can help to sustain existing facilities and infrastructure in the village. This is relevant to a number of villages in South Cambridgeshire, where there is typically an ageing population and limited new development, restricting opportunities for the community to grow. As set out in the NPPF (paragraph 78):

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”

- 6.23 Secondly, the Issues and Options document highlights that development in villages can provide for a diversity of population in the village. New housing developments will be expected to provide affordable housing in accordance with development control policy (currently set at 40%), with an appropriate mix of rented and intermediate tenures. A mix of dwelling sizes would also be required. This creates a natural mix of population, bringing greater diversity to villages that would otherwise continue to experience an ageing population.
- 6.24 The Issues and Options document sets out four specific challenges that development within villages may face (page 87). These are considered below with particular reference to Hardwick and the proposed allocation of land east of Cambridge Road.
- 6.25 The first challenge identified is that village development can result in increased commuting by car with travel required to access services and facilities, particularly if the village is away from main transport corridors. In the case of Hardwick, the village has excellent connections to Cambridge and Cambourne, with existing bus services along with pedestrian and cycle routes. The village will also benefit from improved connectivity associated with the new Cambourne-to-Cambridge public transport project, with the latest plans showing the route along St Neots Road with the potential for a stop in Hardwick, either adjacent to or very close to the Site east of Cambridge Road. It is planned that improved cycleways will be provided alongside the new public transport route, facilitating cycling into the City Centre. In addition, a new Park and Ride facility is proposed at Scotland Farm to the northwest of Hardwick.

- 6.26 The second challenge set out is that small sites are unlikely to significantly contribute to improvements to infrastructure. However, the Site in Hardwick provides an opportunity for a strategic-scale development which will deliver a range of local benefits to the existing village. Compared to a piecemeal approach, a planned village extension would provide a unique opportunity to provide improvements to local infrastructure, including the village's green infrastructure.
- 6.27 The third challenge presented is potential impact on village character. This could be considered to include heritage, landscape and visual impact. With reference to Hardwick, these issues have been assessed with reference to the Site east of Cambridge Road. The Site lies to the north of the Conservation Area and associated historic core of the village along Main Street, with a low likelihood of adverse impacts on heritage assets. Landscape and visual assessment of the Site has identified areas where mitigation will be built into the landscaping strategy. The Site provides a unique opportunity to create a well-planned, high-quality village extension that will positively enhance the village character, promoting sustainable lifestyles and transport choices and facilitating access into the countryside.
- 6.28 The fourth challenge identified by the Issues and Options document is Green Belt. It acknowledges that some of the larger, better-served villages are surrounded by Green Belt. The Preliminary Green Belt Assessment undertaken by Terence O'Rourke demonstrated that the Site makes a low contribution to the Cambridge Green Belt when measured against the five Green Belt purposes set out in the NPPF (paragraph 134). The proposed site allocation provides an opportunity to create a new defensible boundary.
- 6.29 Hill and Chivers consider that a robust and thorough approach to Green Belt review is required through the Local Plan process. This should include a detailed consideration of Green Belt boundaries in Hardwick, as the village's evolution and development has been adversely impacted by the Green Belt designation to the east.
- 6.30 In considering the advantages and challenges that the Issues and Options document highlights in relation to development in villages, the village of Hardwick scores well in terms of sustainability.
- 6.31 Directing growth to villages that are well-located and have the potential to accommodate and benefit from growth should be a key element of the Local Plan's spatial strategy for the plan period. The planned expansion of villages such as Hardwick could provide new housing whilst also boosting the local economy, creating the critical mass for improved services and facilities which in turn will assist in rejuvenating the local community and

creating an improved sense of place. This will also reduce the need to travel, promoting sustainable lifestyles and reducing the impact of development on the environment.

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

- 6.32 The Issues and Options document sets out the approach of focusing homes and jobs along key public transport corridors and around transport hubs, extending out from Cambridge. It suggests that this strategy could include expanding or intensifying existing settlements, or creating more new settlements (page 88). We wholeheartedly support this as a sustainable option.
- 6.33 As the consultation document states, the advantages of this approach include utilising opportunities for high quality public transport whilst also supporting the expansion of economic benefits outwards from Cambridge. Promoting the use of sustainable modes of transport is key to reducing road congestion and associated negative environmental impacts, including climate change. These factors weigh strongly in favour of a strategy of focusing development along public transport corridors.
- 6.34 With reference to the proposed development of land east of Cambridge Road, Hardwick, to create a village extension, this Site is located on the Cambourne-to-Cambridge public transport route (including a new Park and Ride facility at Scotland Farm). It also lies adjacent to the A428, which will form part of the future Cambridge-to-Oxford Expressway. In addition, East-West Rail will have a station at Cambourne, providing strategic links to other locations on the CAMKOX corridor.
- 6.35 The Issues and Options document highlights challenges associated with the use of land along transport corridors, including implications for Green Belt. However, this approach does not necessitate continual linear development along chosen transport corridors. Sites within and adjacent to existing villages and new settlements should be identified for development, whilst retaining countryside gaps to ensure the appropriate setting and amenity of settlements. Another identified challenge is the weight to be given to proposed new strategic transport infrastructure, including the level of certainty relating to delivery and timing. In this regard, the Councils will need to work closely with their strategic partners and other infrastructure providers. As the statutory development plan for the area, it is important that transport projects included within the Greater Cambridge Local Plan are realistic and have a clear timescale for delivery.

- 6.36 Directing growth to public transport corridors should focus on the sustainable development of existing villages. This should be a key element of the Local Plan's spatial strategy for the plan period. Focusing development on transport corridors and within the best-connected villages will promote sustainable travel options, reducing dependence upon private vehicles and assisting in the creation of zero carbon communities in keeping with strategic policy objectives.

7.0 SUMMARY

7.1 These representations to the Greater Cambridge Local Plan Issues and Options (Regulation 18) consultation are made on behalf of Hill Residential Ltd and Chivers Farms (Hardington) LLP, pursuant to their land interest east of Cambridge Road, Hardwick.

7.2 As illustrated in the associated Vision document, the Site presents the opportunity to create a sustainable village extension to Hardwick, with excellent transport links to Cambridge and Cambourne which will be further enhanced by the Cambourne-to-Cambridge public transport project and future infrastructure improvements associated with the Cambridge-to-Oxford Expressway and East-West Rail.

Local Plan period

7.3 A plan period to 2050 would be more realistic to ensure that the requirements of the NPPF (paragraph 22) can be achieved. This date would also correspond with other strategic plans and may provide a better timeframe for long term strategic policy decisions.

Increasing the rate of housing delivery

7.4 The emerging Greater Cambridge Local Plan provides an opportunity for the Councils to address the key issue of housing delivery. As outlined in this representation, there is a clear case for adopting a housing requirement figure that is significantly higher than the minimum established by the standard method. A step-change in housing supply is required, to address the backlog in provision, to ensure that the full range of housing needs are met and to support economic growth.

The role of villages and growth corridors as locations for sustainable growth

7.5 In terms of the best spatial strategy, the levels of growth required will necessitate a mix of housing sites across a variety of locations. Sustainable growth of existing villages surrounding Cambridge can make an important contribution within the spatial strategy, particularly when these settlements are located within public transport corridors.

7.6 The Greater Cambridge Local Plan should carefully consider the existing policy approach towards the South Cambridgeshire villages, including both the settlement hierarchies and the development frameworks (boundaries). The Local Plan provides an opportunity to

consider the role of villages in the spatial strategy, including those that could both accommodate and benefit from new development.

Green Belt review

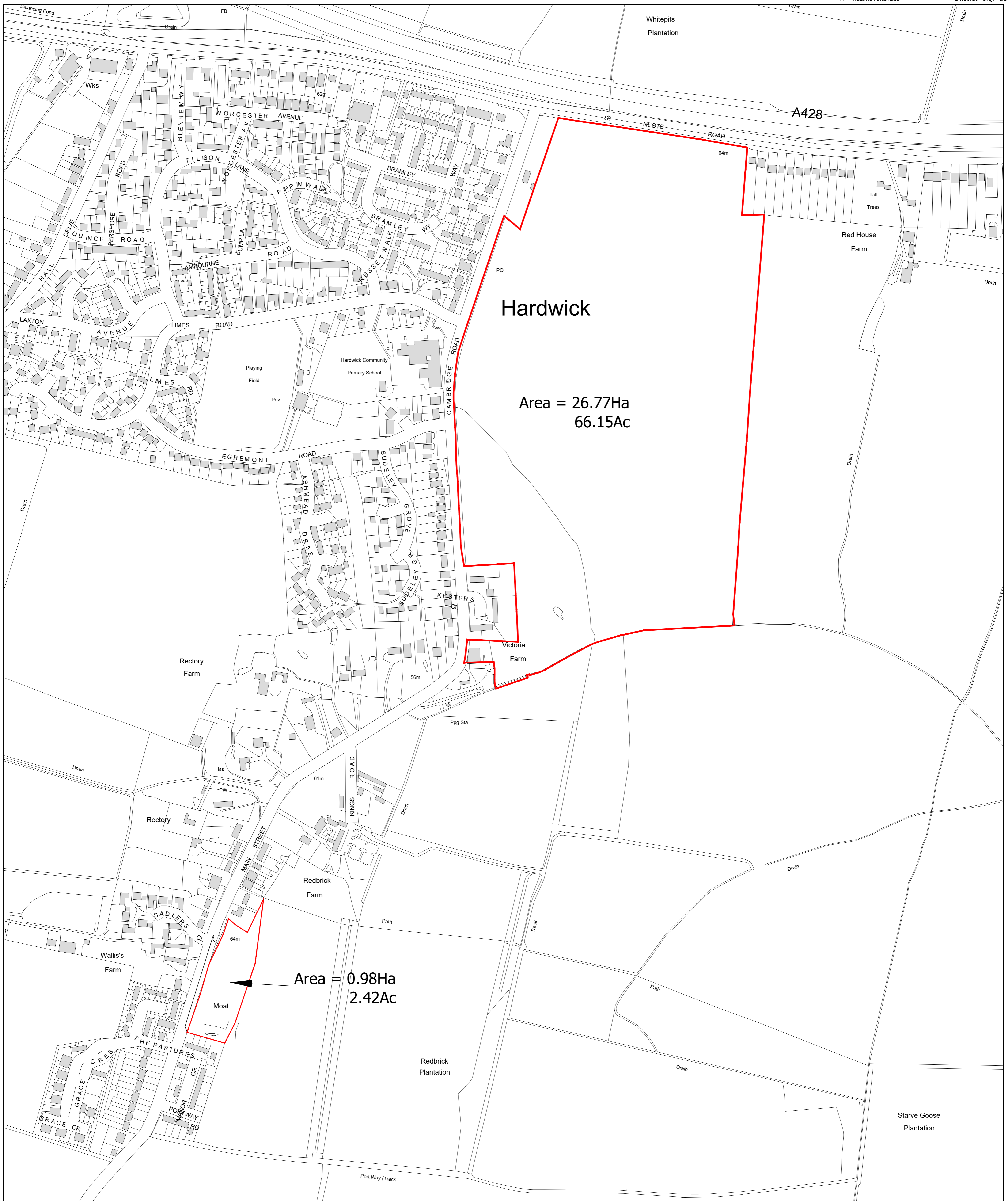
- 7.7 Considering the reasonable options available for meeting housing need as set out in the NPPF (paragraphs 137-138), there is a compelling case for the Councils to undertake a review of the Cambridge Green Belt as a key part of the Local Plan process. It would be an unreasonable and unsustainable strategy, for example, to meet housing needs through excessively high densities or poorly located new settlements in order to avoid amending Green Belt boundaries. Given the level of need in the Greater Cambridge area we consider that there are exceptional circumstances that will require the Council to amend Green Belt boundaries through strategies such as village expansion.

A sustainable village extension to Hardwick

- 7.8 The village of Hardwick is strategically located on the A428/CAMKOX corridor and benefits from excellent transport links that will be improved further through committed local and strategic infrastructure projects. The past development of the village has been constrained by the Green Belt designation to the east, forcing new housing increasingly further west of the historic core and functional village centre. The proposed site allocation at land east of Cambridge Road provides an opportunity for the village to grow and thrive in a sustainable way, supporting local services and enhancing the vitality of the community in accordance with the NPPF (paragraph 78).

APPENDIX 1

Site Location Plan



Project
Land East of Hardwick, Cambridgeshire

Drawing Title
Site Location Plan

Date: 14.10.19 Scale: 1:2500 Drawn by: S.Q. Check by: I.S.
 Project No: RG-M-01 Drawing No: A Revision: A

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APPENDIX 2

Preliminary Green Belt Assessment

LAND EAST OF CAMBRIDGE ROAD, HARDWICK
PRELIMINARY GREEN BELT ASSESSMENT

HILL RESIDENTIAL LTD and
CHIVERS FARMS (HARDINGTON) LLP

MARCH 2019



TERENCE
ROURKE

LAND EAST OF CAMBRIDGE ROAD, HARDWICK
PRELIMINARY GREEN BELT ASSESSMENT

HILL RESIDENTIAL LTD and
CHIVERS FARMS (HARDINGTON) LLP

MARCH 2019



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O'ROURKE**

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1.0 Introduction

- 1.1 Terence O'Rourke Ltd has been instructed on behalf of Hill Residential Ltd and Chivers Farm (Hardington) LLP to undertake a preliminary assessment of Green Belt issues for land east of Hardwick. This assessment will form supplementary information as part of the representations for the Call for Sites to be submitted to South Cambridgeshire District Council as part of their new joint Greater Cambridge Local Plan.

The site location and context

Location and site boundaries

- 1.2 The site is split into two parcels. Both are located along the eastern boundary of Hardwick, with their western boundaries forming parts of the western edge of the Cambridge Green Belt. The main parcel occupies two fields. One large arable field occupies the majority of this parcel with a second smaller field, kept as rough pasture, in the south western corner, surrounding properties in Kesters Close.
- 1.3 The main parcel is bounded by the tree and hedgerow lined Cambridge Road along the majority of its western boundary with the exception of properties in Kesters Close and the boundary of number 122 Cambridge Road along its north western corner. St Neots Road forms the northern boundary, and Bin Brook along with its associated riparian woodland edge forms the southern boundary. The eastern boundary is split into three. The northern extent is formed by the western edge of an isolated line of properties along St Neots Road, the middle section is formed by a post and wire boundary between two arable fields and the southern extent is marked by a strip of tree and scrub field boundary vegetation.
- 1.4 The second parcel covers a very small area to the east of Main Street in the south of Hardwick between number 87 Main Street and the rear of properties in Manor Crescent. This parcel is bounded by a treed hedgerow along Main Street and occupies a small area of rough grassland. See figure 1.

Topography

- 1.5 Like Hardwick village, the majority of the main parcel is located on the top of a raised plateau sitting roughly at 60m AOD. However, there is some localised variation, with the northern part of the site at approximately 64m AOD and the southern boundary approximately 56m AOD, providing an 8m level change from north to south the smaller second parcel is approximately 65m AOD. See figure 2.

Settlement pattern

- 1.6 The main parcel is located 5 km to the west of Cambridge. The nearest settlements are Coton 2.3km to the south east, Comberton 2km to the south, Highfields Caldecote 2km to the west and Dry Drayton 2.5km to the north.

Designations

- 1.7 Apart from being designated as Green Belt there are no other designations on either parcel. The historic core of Hardwick is on the eastern side of the village where Cambridge Road becomes Main Street. The historic core is designated as

a conservation area and contains a number of listed buildings. Due to the Green Belt, development in Hardwick has been concentrated mainly to the north and west although there has been a small amount of growth south of the village core.

- 1.8 Within a 2.5km radius from the main parcel's boundary there are two registered parks and gardens. Madingley Hall is 880 metres to the north east and the American Military Cemetery is 2.3km to the east. Childerley Hall, a further registered park and garden to the north west is located just beyond the 2.5km radius. See figure 3.

Footpaths

- 1.9 There are no public rights of way through either of the parcels. The main concentration of public rights of way, including some permissive footpaths are located to the south and south west of both parcels and includes a national trail that runs from Coton in the east to Highfield Caldecote in the west. Within the 2.5km radius around the main parcel there are a limited number of public rights of way north of the A428. The closest footpath north of the A428 links Hardwick with Dry Drayton, following Callow Brook between two ridges of high ground.

Visibility

- 1.10 At this preliminary stage, using our professional judgement and experience, it is envisaged that due to topography and intervening vegetation, visibility is likely to be fairly contained to the south east facing slopes of the higher ridges to the north west of Hardwick and the two fingers of higher land to the west of Coton and the north of Comberton.
- 1.11 The impacts on visibility will be assessed in greater detail within a landscape and visual impact assessment which will form part of the studies to be undertaken at a later stage. With regards to possible visual impacts, it is intended that any masterplan would be landscape led and that the landscape of both parcels has the ability to respond positively to landscape considerations.

2.0 Green Belt assessment

National policy

2.1 At a national level government policy is set out in the National Planning Policy Framework (NPPF), 2019 which under paragraph 134 states the purposes of Green Belt are:

- 1 *“To check the unrestricted sprawl of large built-up areas;*
- 2 *to prevent neighbouring towns merging into one another;*
- 3 *to assist in safeguarding the countryside from encroachment;*
- 4 *to preserve the setting and special character of historic towns; and*
- 5 *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

Planning policy

2.2 At a local scale, policy relating to development in the Cambridge Green Belt is contained within *The South Cambridgeshire Local Plan, adopted September 2018*. Policy S/4: Cambridge Green Belt states:

“A Green Belt will be maintained around Cambridge that will define the extent of the urban area”...

2.3 In paragraph 2.29 it states the government attaches great importance to Green Belts whose fundamental aim is to prevent urban sprawl by keeping land permanently open. A specific function of some Green Belts, such as that around Cambridge, is to preserve the setting and special character of historic towns.

2.4 Under paragraph 2.30 it states how the Cambridge Green Belt is relatively small in extent, extending around 3 to 5 miles from the edge of the city. It goes on to state that the established purposes of the Cambridge Green Belt are to:

- *“Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;*
- *Maintain and enhance the quality of its setting; and*
- *Prevent communities in the environs of Cambridge from merging into one another and with the city.”*

2.5 Within paragraph 2.31 it states how there are a number of factors that define the special character of Cambridge and its setting, those that are relevant to the sites at Hardwick are:

- *“Key views of Cambridge from the surrounding countryside;*
- *A soft green edge to the city;*
- *The distribution, physical separation, setting, scale and character of the Green Belt villages; and*
- *A landscape that retains a strong rural character”.*

Preliminary Green Belt Assessment

- 2.6 Whilst the NPPF clearly sets out the five purposes the Green Belt is intended to serve, to date there is no agreed methodology for undertaking an assessment of Green Belt and reviewing how land contributes to these purposes.
- 2.7 However, what is common in all assessments of Green Belt is that purpose 5 – assisting regeneration, is almost always discounted on the grounds that the amount of land within an urban area that could be developed will already have been factored in before identifying Green Belt land. Therefore, assessment of Green Belt against purpose 5 will not enable a distinction to be made between land parcels as all Green Belt achieves this purpose to the same extent.
- 2.8 The following section will therefore assess both parcels against NPPF purposes 1 to 4 along with commenting in relation to how they perform against the three Cambridge Green Belt purposes.

Purpose 1 – Sprawl

- 2.9 As provided in most Green Belt assessment methodologies sprawl is defined as the outward spread of a large built up-area at its periphery in a sporadic, dispersed or irregular way. Hardwick is not a large built-up area it is a village. Therefore, against NPPF purpose 1 the sites make very little contribution. Furthermore, development will be well planned and designed using strong boundaries and therefore will not represent sprawl.

Purpose 2 - Merging

- 2.10 Proposed development at both site parcels will not cause coalescence with other settlements. The main parcel is 5km to the west of Cambridge and the nearest villages are Coton, Comberton, Highfields Caldecote and Dry Drayton, all of which are 2 to 2.5km from the boundary of the larger site parcel.
- 2.11 Presently, Hardwick village has grown asymmetrically westwards of the village facilities and further from the historic core, which lies south of the main extent of the village. Development within the main parcel, east of Cambridge Road will re-address this issue. In regards to the smaller parcel south of the historic core along Main Street, this is simply a small length of infill that would close a gap between existing properties.
- 2.12 The sites do not assist in preventing the merging of major built up areas or villages.

Purpose 3 - Encroachment

- 2.13 All new development around cities, towns and villages creates encroachment into the countryside. However, the proposed masterplanning of both parcels will be landscape led and provides an opportunity for mitigation measures that will assist in screening development and the perception of encroachment.
- 2.14 There is ample opportunity to provide a strong woodland belt along the eastern boundary of the main parcel which would create a new strong Green Belt boundary and would assist in screening views from the east. New riparian

woodland can be provided to enhance the already strong southern boundary along the Bin Brook and a woodland belt along the northern boundary, created by St Neots Road, will assist in screening views from the north.

- 2.15 With regards to the smaller parcel, a strong woodland belt along the eastern boundary would form a strong new Green Belt boundary that would align with the rears of the existing properties along Main Street. There would be no perceived encroachment into the countryside with the development of this parcel. A wooded eastern boundary along with the existing woodland belts south of Redbrick Farm and Redbrick Plantation should sufficiently screen all views of development from the east and south. The existing settlement of Hardwick will screen views from the north and west.

Purpose 4 - Historic Setting

- 2.16 This purpose relates to historic towns and cities and therefore does not apply to these sites as development on both parcels will have no effect on the setting or special character of Cambridge.

Assessment against Cambridge Green Belt purposes

- 2.17 Development on both parcels will have no effect on the Cambridge Green Belt purposes. Development will not affect the unique character of Cambridge, it will not affect its setting and it will not cause settlements to merge.
- 2.18 Equally, in relation to the special character of Cambridge, development at either parcel will not affect key views toward Cambridge from the surrounding countryside. Hardwick village is 5km from Cambridge and at this distance it is unlikely that the majority of the city will be discernible.
- 2.19 Development at both parcels will not affect the soft green edge and will not affect the physical separation, setting, scale and character of the Green Belt villages. Finally, removing both parcels from the edge of the Cambridge Green Belt will have no effect on the rural character of Green Belt surrounding Cambridge.

Preliminary Green Belt assessment conclusion

- 2.20 Both parcels provide an opportunity for the creation of strong new woodland boundaries as well as scope to provide much needed new facilities such as doctors surgery, sports fields and a small amount office development.
- 2.21 Development of the main parcel will assist in balancing the village core and has the ability to integrate the isolated line of residential development along St Neots Road into the village. Development of the small parcel is just infill and would simplify the Green Belt boundary to form a sensible alignment. It is evident that this area of rough grass plays no part in upholding the Green Belt purposes.
- 2.22 From this preliminary assessment both parcels would appear to perform poorly to not at all against both the NPPF and Cambridge Green Belt purposes. We suggest that both can provide new strong Green Belt boundaries that would allow them to both be removed from the Green Belt without prejudicing the remaining Cambridge Green Belt.



- Site boundary
- 2.5km study area

**Land east of Cambridge Road,
Hardwick**
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Figure 1: Aerial

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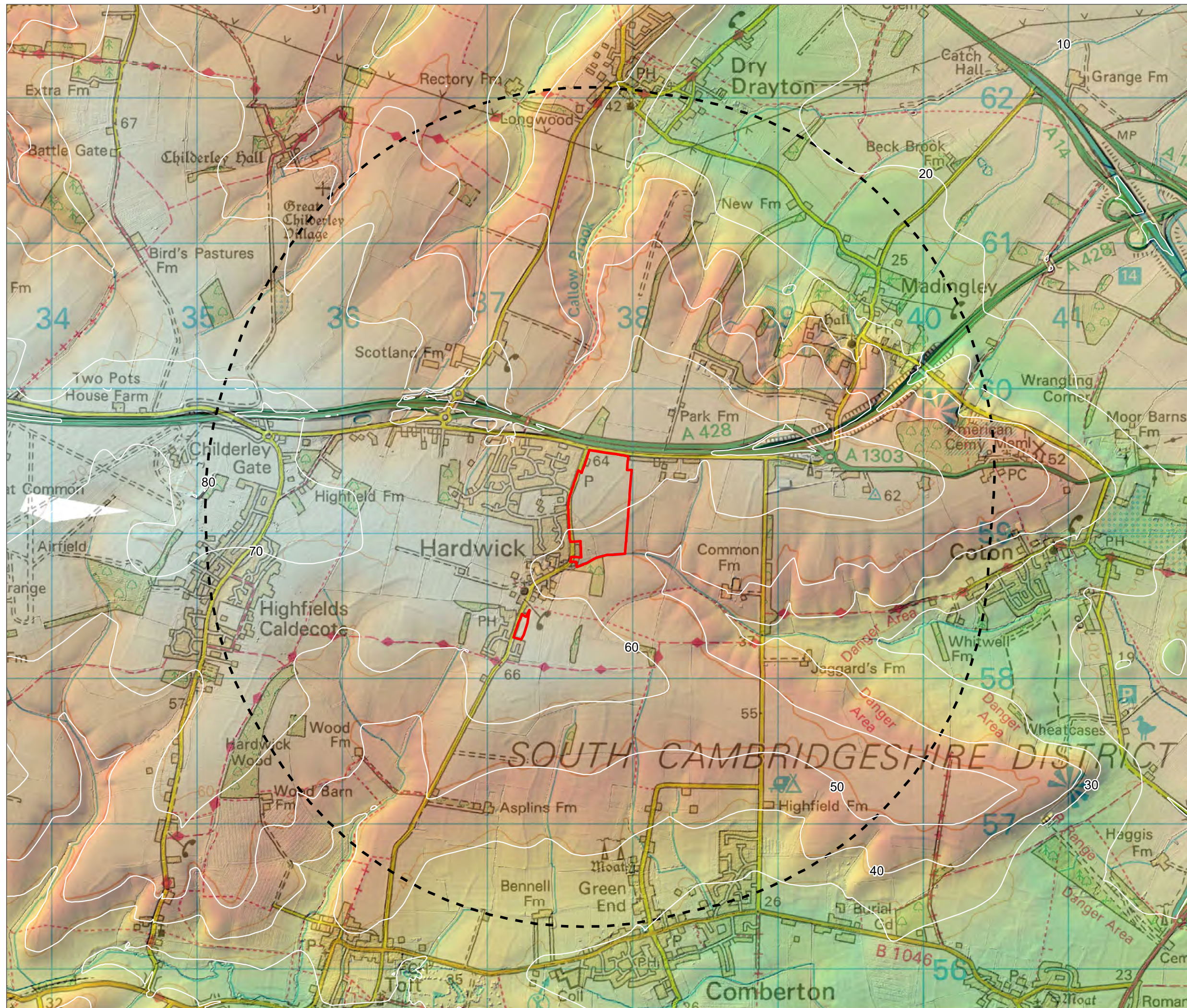
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-  Site boundary
-  2.5km study area

**Land east of Cambridge Road,
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Figure 2: Topography

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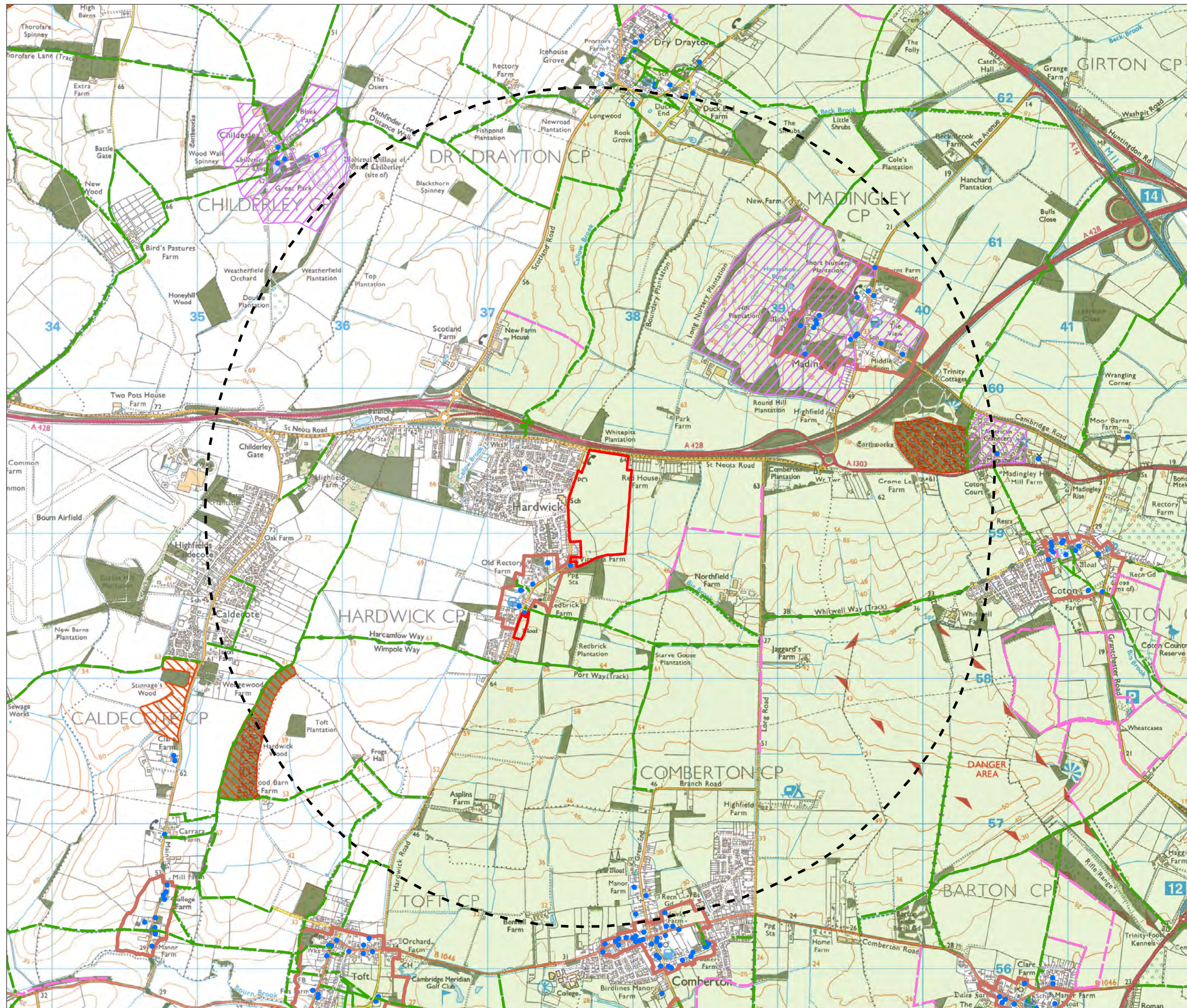
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- Site boundary
- 2.5km study area
- Rights of way
- Permissive footpaths
- Woodland
- Listed buildings
- Registered parks and gardens
- Ancient woodland
- Site of Special Scientific Interest
- Green belt
- Conservation areas

Land east of Cambridge Road, Hardwick
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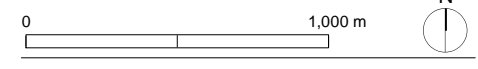


Figure 3: Designations

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