



GREATER CAMBRIDGE LOCAL PLAN - THE FIRST PROPOSALS

Land to the West of Elizabeth Way, Gamlingay

(HELAA Site Reference: 40030)

Representation on behalf of Wheatley Group Developments Ltd

Client: [REDACTED]

Landowner: Wheatley Group Development Ltd

Our Reference:

Date: 13th December 2021

Prepared by: Suzanne Nugent MRTPI

Checked by: Jon Jennings MRTPI

1. Representations on Land to the West of Elizabeth Way, Gamlingay

- 1.1 Cheffins Planning has been instructed by Wheatley Group Developments Ltd to promote their interests in 'Land to the West of Elizabeth Way, Gamlingay (HELAA site reference: 40030). The site is submitted on the basis that it could provide a development of 45 dwellings with associated, open space and local area of play.
- 1.2 Accompanying these representations is an Indicative Site Plan (Drawing No 1376).

Site Location and Context

- 1.3 The site (HELAA ref: 40030) is located to the west of the village of Gamlingay and currently comprises agricultural land. The site borders existing residential development along its eastern boundary (Elizabeth Way) and its northern boundary (Cinques Road). Access to the site can be achieved from two access points through the existing Elizabeth Way residential development; the site therefore represents a logical extension to the existing built form.
- 1.4 The site is well located in relation to the key services and facilities of Gamlingay, being a walkable distance from the post office, primary school, pre-school, convenience store, playing fields and play area.
- 1.5 The site is located wholly in Flood Zone 1 and there are no physical constraints that would prevent residential development coming forward on this site.

Masterplanning Approach

- 1.6 Included as part of this submission is an Indicative Site Plan (Drawing No 1376). As illustrated, the site can deliver approximately 45 dwellings on the edge of village in an unquestionably sustainable location. The site will include policy compliant levels of affordable housing and open space including a local area of play as well as significant landscaping to incorporate a number of existing trees on the site, integrating the proposal into its surroundings.
- 1.7 The benefits of the proposed development are wide-ranging and will promote the social, economic and environmental objectives of the National Planning Policy Framework. The site is a sustainable location, in walking distance from the services and facilities within Gamlingay, in accordance with Paragraph 79 of the NPPF which seeks to promote sustainable development in rural areas by locating housing growth where it will enhance or maintain the vitality of rural communities and enable villages to grow and thrive.

Technical Assessment

- 1.8 Some initial site and contextual assessments have been carried out in relation to this site. This work indicates that some of the scoring in the HELAA needs to be updated, and the site should be reconsidered for development as part of the emerging Greater Cambridge Local Plan (GCLP). The following section provides commentary on the HELAA, including the assessment methodology and the individual scores given for site 40030.

Comments on the Scoring Methodology and System

- 1.9 The performance of sites proposed for the GCLP have been coded using a traffic light system (red/amber/green). Although traffic light scoring systems are commonly used in this context, the performance criteria applied by the Greater Cambridge authorities appears overly stringent and inconsistent.
- 1.10 According to the published assessment criteria and supporting text within the HELAA, a site will generally be scored as amber where there is a detrimental impact which could be satisfactorily mitigated. This is an unusually strict approach which results in sites seeming to score more poorly than they should. It is more common for such assessments to apply an amber score to indicate that there is a potential issue that would need to be addressed through further detailed technical work or masterplanning. The current scoring matrix indicates deliverability issues where there are none. Where there are clear opportunities for effective mitigation of an impact or evidence to suggest that the matter is unlikely to constrain development, then a green rating would be more appropriate.
- 1.11 Ultimately, the key question that needs to be answered by a site assessment would be, "is development of this site acceptable in planning terms?" A revised scoring system based on the following key principles would be easier for stakeholders to understand a site's suitability for development:
- **Red:** NO. This is a major concern which would likely result in planning permission being refused.
 - **Amber:** POSSIBLY. This is a potential concern for which there may be a design solution (i.e. further site-specific work is needed).
 - **Green:** YES. This is unlikely to be a significant concern or constraint on development.

Suitability for Development

Adopted Development Plan Policies

- 1.12 Being outside the current settlement boundary for Gamlingay (as defined in the South Cambridgeshire Adopted Policies Map), the site is assessed as being 'amber'. When considering locations for growth, it is a widely accepted approach that sites adjacent settlement boundaries are considered as sustainable locations for growth. The assessment should therefore be reworded to 'site is outside but adjacent to the development framework' and receive a 'green' assessment to reflect that the location is not considered to be a constraint, but provides a suitable opportunity for planned growth.

Landscape and Townscape

- 1.13 The HELAA states that the site is within National Character Area (NCA) 90 Bedfordshire Greensand Ridge. In terms of Local Character, the Council states that the site is located on a slope which is typical of the character of the area. The site 40300 has received as 'red' score, meaning that development of this land would have a significant negative impact on landscape and/or townscape which cannot be mitigated.
- 1.14 There does not appear to be any evidence supporting the assessment of 'red'. The comments regarding the Gamlingay Village Design Guide are noted, however this does not result in a constraint which would prevent any development on the site; rather that a

sensitive design approach is required to assimilate the site into its surroundings. The built form to the West of Gamlingay already extends further into the countryside through the residential development along Cinques Road. This site would therefore 'round off' this part of the settlement and would not encroach further than the line of the development along its northern boundary.

- 1.15 Any significant trees on site can be retained and additional landscaping provided on site to provide a development which reflects the transition from its edge of village location and the existing residential built form with the transition to the open countryside.
- 1.16 Based on the above, it is clear that a 'green' or 'amber' rating would be more appropriate. It is requested that the HELAA be updated.

Flood Risk

- 1.17 Despite outlining that the site is situated, wholly in Flood Zone 1', the HELAA provides an 'amber' rating for flood risk. This flood risk rating seems inconsistent when compared to other sites that were rated green for being located wholly in Flood Zone 1 or presenting negligible flood risk (e.g. HELAA site ref: 40536).
- 1.18 In relation to surface water drainage, the site is very low risk and it is envisaged that on site attenuation could be provided.
- 1.19 In light of the above, a 'green' rating would be more accurate and consistent with the grading of other sites. As such, it is requested that the HELAA be updated.

Site Access

- 1.20 The Council has assessed the site as 'red' stating that the proposed site does not have a direct link to the adopted highway. This assessment is incorrect; the attached Indicative Site Plan illustrates two suitable accesses to the site, a central access from Elizabeth Way as well as an additional further access from Elizabeth Way to the south of the development.
- 1.21 The landowner has full access rights to the site and can provide a connection up to the adopted highway. A pre-application enquiry was undertaken with the County Council (received 22.10.2021) in relation to this site where it was requested to ensure that the existing red line of the site meets the adopted highway. Any planning application would ensure that the red line adjoins the adopted highway. No further highway issues were raised.
- 1.22 Considering the above comments, a 'green' rating would be more accurate. It is requested that the HELAA be updated.

Contamination and Ground Stability

- 1.23 Site 40030 comprises arable greenfield, so it is unlikely that significant contamination is present. Sites of this nature would normally receive a green rating in a sustainability assessment, rather than the amber rating received in the HELAA. In the event that contamination is found, this should not preclude development as any necessary conditions can be applied at the planning application stage. Therefore, we request the HELAA is updated to show a more appropriate 'green' rating for contamination and ground stability.

Site Density

- 1.24 The HELAA estimates 27 dwellings per hectare, implying a medium-density development, concluding that the site could deliver 42 dwellings. As shown on the indicative Site Plan it is estimated that 45 dwellings could comfortably be accommodated whilst maintaining a spacious feel to the development to reflect its edge of village setting and to provide an appropriate transition between the development and the wider open landscape to the west and south of the site.

The Proposed Policy Framework

- 1.25 The following section includes comments on the emerging policy direction as published in the Greater Cambridge Local Plan First Proposals.

Policy S/DS: Development Strategy

- 1.26 There are no proposed allocations in Gamlingay as part of the emerging GCLP, and very little residential development proposed for the rural areas as a whole which questions whether the Council will meet the NPPF target of delivering at least 10% of their housing requirement on small and medium sized sites (as set out within paragraph 69 of the NPPF). Land to the West of Elizabeth Way, Gamlingay would provide a sustainable medium sized site providing much needed affordable housing. The GCLP needs to provide for a range of different housing needs which allows smaller settlements and rural areas to continue to thrive. This is in accordance with Paragraph 79 of the NPPF which seeks to promote sustainable development in rural areas by locating housing growth where it will enhance or maintain the vitality of rural communities and enable villages to grow and thrive.
- 1.27 There is also a need for sites to be allocated which can deliver the required level of affordable housing which is a need both in the urban and rural areas. According to recent housing needs projections, an annual net need of 435 affordable rental units and 105 affordable units for homeownership will be needed across South Cambridgeshire to satisfy housing demands. Dependence on the allocation of strategic sites with already high infrastructure burdens is unlikely to offer sustainable, long-term solutions to the chronic and worsening affordability issues manifesting across the Greater Cambridge area. Strategic sites alone do not deliver policy-compliant levels of affordable housing, so, if this is the target, more smaller sites that are far more likely to deliver a policy-compliant level of affordable homes at a faster rate need to be allocated.

Policy S/SB: Settlement Boundaries

- 1.28 Although much of the Greater Cambridge area has a dispersed settlement pattern, the draft plan does not support the 'organic' growth of smaller settlements. To ensure that local housing needs can be fulfilled and prevent any further loss of key local services, a more flexible and tolerant approach is needed towards development in the rural area.
- 1.29 Through the application of tightly drawn settlement boundaries, development is strictly controlled on sites in the 'open countryside'. But it is not logical to treat all sites equally in policy terms. The sensitive development of some sites on the edge of a village would cause no significant harm (e.g. Land West of Elizabeth Way, Gamlingay). Such a pragmatic approach is often taken at appeal; rounding off development where there is a defensible physical boundary or allowing a high-quality development with extensive landscaping that would soften an existing harsh area of built form can be acceptable in certain locations.
- 1.30 Furthermore, for Minor Rural Centres such as Gamlingay the current strategy to restrict developments to an indicative maximum of 30 dwellings within settlement boundaries will not deliver the quantum of development required to meet the existing need for affordable

homes as there are few opportunities for the development of sites within the existing settlement. With limited scope for development within the tightly drawn settlement boundary, it will be necessary to find suitable locations on the edge of the village. To discourage the development of less suitable sites and assist in the delivery of much-needed affordable housing, the most logical approach is to allocate further sites on the edge of sustainable villages such as Gamlingay.

- 1.31 Overall, a carefully worded criteria-based policy which is supportive of organic growth adjacent to existing built-up areas would allow rural areas to thrive and is in accordance with the aims of NPPF paragraph 79 which seeks to promote sustainable development in rural areas by locating housing growth where it will enhance or maintain the vitality of rural communities and enable villages to grow and thrive.

Policy CC/NZ: Net Zero Carbon New Buildings

- 1.32 Draft Policy CC/NZ sets a high threshold of 150 homes for calculating whole life carbon emissions. Support should also be expressed for developments of <150 dwellings where this information is provided voluntarily.
- 1.33 What support will be available for developers in seeking to meet the high standards proposed? Will the potential impact on viability be taken into consideration? Regardless of the chosen approach, it would be useful to include further guidance/information in a supplementary planning document (SPD).

Policy CC/WE: Water Efficiency in New Developments

- 1.34 What support will be available for developers in seeking to meet the high standards proposed? Will the potential impact on viability be taken into consideration? Regardless of the chosen approach, it would be useful to include further guidance/information in an SPD.

Policy BG/GI: Green Infrastructure

- 1.35 The adoption of a green infrastructure standard should be a recommendation, not a requirement. Developments should not be opposed where all reasonable steps have been taken to protect and incorporate green infrastructure.
- 1.36 Regardless of the chosen approach, it would be useful to include further guidance/information in an SPD.

Policy WS/HD: Creating Healthy New Developments

- 1.37 Health Impact Assessments should be a requirement for major developments only. For minor developments, this information should be optional or simplified, for example through the use of a short questionnaire (similar to the Cambridgeshire Biodiversity Checklist).

Policy GP/PP: People and Place Responsive Design and Policy GP/QD: Achieving High-quality Development

- 1.38 It is accepted that good design is highly subjective. However, the planning system has allowed the steady homogenisation of built environments, with a dominance of bland, monotonous "identikit" housing estates from major housebuilders.
- 1.39 The bold ambitions of draft policy GP/PP are supported, particularly the proposed use of design Guides/Codes to set out the design expectations for a particular area. Local community input will also be as stated, and a robust consultation process will be needed since the 'devil will be in the detail'; these documents must go well beyond broad

requirements for new homes to be 'in keeping' with the character and appearance of the area.

- 1.40 However, it will take time for these design guides to be drafted and adopted. In the interim, developers could be signposted towards an alternative framework, such as the National Design Guide, which includes 10 characteristics of a well-designed place: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan. Developments which can demonstrate a high standard of design should be fast-tracked through the application process.

Policy H/AH: Affordable Housing

- 1.41 The First Proposals plan sets a challenging target for affordable housing to reflect the acute and substantial need for affordable housing across Greater Cambridge. This places a great responsibility on all major developments to provide an element of affordable housing.
- 1.42 Policy H/AH will have a significant bearing on the viability of individual residential developments, so it is vital that the affordable housing requirement is achievable in practice. Although the First Proposals plan indicates that viability evidence will be reviewed as appropriate as part of the plan-making process, this is not sufficient. Planning Practice Guidance indicates that plans should set out circumstances where review mechanisms may be appropriate, as well as a clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of a development to ensure policy compliance and optimal public benefits through economic cycles. Draft Policy H/AH does not do this – changes in affordable housing tenure models or continued increases in build costs may render the viability evidence which underpins the affordable housing requirement out-of-date relatively quickly.
- 1.43 Draft Policy H/AH of the First Proposals plan requires 40% affordable housing on sites of 10 or more dwellings. With a total of 45 dwellings, 18 dwellings would be sought for affordable housing under this policy (as shown on the Indicative Site Plan). As well as helping to address the current shortage of affordable housing over the Greater Cambridge area, the delivery of up to 18 affordable dwellings would represent a considerable contribution to the social sustainability of the local area.

Availability and Deliverability

- 1.44 The First Proposals plan is heavily reliant on the delivery of a handful of strategic developments, particularly large and complex sites which, on average, would take 5–8 years for the first home to be delivered¹. To ensure that housing delivery does not stall, and the affordability crisis worsened as a result, a pipeline of smaller developments which can deliver homes quickly will be needed in the short-to-medium term. Site 40300, Land West of Elizabeth Way, Gamlingay is suitable, available, and deliverable within 0–5 years.

¹ Lichfields (2020). Start to Finish: What Factors Affect the Build-out Rates of Large-scale Housing Sites? Second Edition