



## GREATER CAMBRIDGE LOCAL PLAN - THE FIRST PROPOSALS

Land to the south of Shelford Road and Cambridge Road,  
Fulbourn, CB21 5HQ.

(HELAA Site Reference: 48064)

- Representation on behalf of landowners

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**Client:**



**Landowner:**



**Date:**

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## 1. Representations on Land to the south of Shelford Road and Cambridge Road, Fulbourn, CB21 5HQ

- 1.1 Cheffins has been instructed by [REDACTED] to promote their interests in 'Land to the South of Shelford Road and Cambridge Road, Fulbourn, CB21 5HQ' (HELAA Site Reference: 48064). We propose a phased development that will create attractive open spaces for the settlement and deliver approximately 150 – 200 dwellings of mixed type and tenure in a sustainable location proximal to employment centres. The site extends to 8.45 hectares and comprises greenfield land located immediately to the south of Shelford Road and Cambridge Road in Fulbourn. The location of the site is shown on the site location plan, which accompanies this representation.
- 1.2 The aim of this document is to assist the Greater Cambridge Partnership in formulating their Local Plan, providing guidance for new, sustainable residential development within and around Fulbourn.

### Site Location and Context

- 1.3 Land to the South of Shelford Road and Cambridge Road, Fulbourn, CB21 5HQ (HELAA Site Ref: 48064) comprises greenfield land. The site adjoins the existing settlement envelope of Fulbourn (currently classified as a Minor Rural Centre) to the north and northeast. Figure 1 below outlines the location of Site 48064.
- 1.4 The site is immediately available for development and free from any technical constraints, including flood risk (it is within Flood Zone 1), ecology, highways, heritage factors, which would preclude the early delivery of the proposed development.

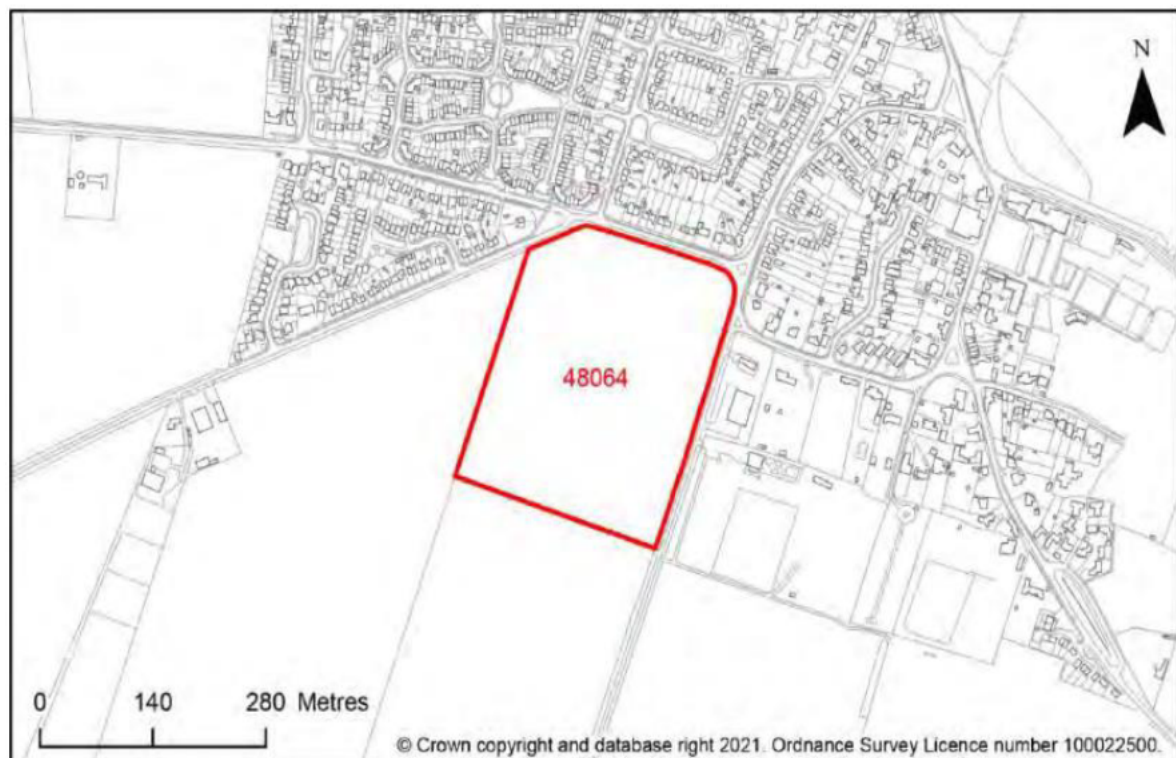


Figure 1: A map outlining the location of Site 48064.

- 1.5 Furthermore, land immediately adjacent to the western boundary of Fulbourn's development framework has been allocated for mixed-use development through the emerging Greater Cambridge Local Plan under *Policy S/RRA Site Allocations in the Rest of the Rural Area*. Allocation of Site 48064 alongside the existing site allocations in Fulbourn would ensure that much-needed residential development within and around Fulbourn can be delivered in a comprehensive manner. Development of this scale could also deliver significant public benefits, including new areas of public open space, ecological enhancements, and wider links to the countryside, in addition to ample affordable homes.
- 1.6 The site is well located in relation to the key services and facilities available in Fulbourn, being proximal to local shops, a post office, a range of public houses and restaurants, local garages, playing fields, a primary school and preschool, a village hall, churches, and various sports and recreation centres – all at a distance that is easily walkable from Site 48064.

### Masterplanning Approach

- 1.7 To date, limited master planning work has been completed. However, proposed development of Site 48064 would deliver policy-compliant levels of affordable housing and self-build plots, in addition to access routes, landscaping and public open space that would enhance the existing site for both existing and prospective residents.
- 1.8 The benefits of the proposed development are wide-ranging and will promote the social, economic, and environmental objectives of the National Planning Policy Framework. Site 48064 is located in a highly sustainable location, adjacent to existing services and facilities and will seek to provide residential capacity to support the Greater Cambridge Partnership's existing plans for growth in Fulbourn.
- 1.9 More specifically, development of the site will provide:
- Further family housing;
  - Mixed house-types;
  - Affordable homes;
  - Opportunity for sheltered housing and self-build plots;
  - Housing close to local employment, transport routes and planned sustainable transport corridors; and
  - Potential for significant public open space.
- 1.10 Aligning with the aims of emerging *Policy BG/BG Biodiversity and Geodiversity*, landscaping measures will be implemented to enhance existing ecological features on-site (e.g. trees and hedges on the site boundary) and provide wildlife corridors to contribute biodiversity net gains to the local area.
- 1.11 Connecting Site 48064 to both existing and forthcoming active transport corridors and sustainable public transport networks will be a priority during masterplanning exercises.

### Technical Assessment

- 1.12 Limited site assessments have been carried out in relation to Site 48064, but it is clear 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 48064.

## Comments on the Scoring Methodology and System

- 1.13 The performance of sites proposed for the GCLP has 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.
- 1.14 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.
- 1.15 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

- 1.16 Being outside the current settlement boundary for Fulbourn (as defined in the South Cambridgeshire Adopted Policies Map), the site is assessed as being amber. However, the boundaries are due to be reviewed as part of the plan-making process for the GCLP, "with boundaries defined to take into account the present extent of the built-up area as well as planned new development" under proposed policy *S/SB Settlement Boundaries*.
- 1.17 It is unclear if these planned boundary changes have been considered in the HELAA assessment. Residential development on Site 48064 would constitute a logical extension of the current settlement area and would complement the mixed-use development in Fulbourn forwarded under *Policy S/RRA Site Allocations in the Rest of the Rural Area*.

## Accessibility to Services and Facilities

- 1.18 Fulbourn is host to multiple key services, including local shops, a post office, a range of public houses and restaurants, local garages, playing fields, a primary school and preschool, a village hall, churches, a health centre, a library, and various sports and recreation centres. In addition to the village's high street, there is a 24hr Tesco superstore on the outskirts of the settlement, which is well served by public transport to and from Fulbourn and can be easily accessed by bicycle from Site 48064.
- 1.19 In terms of major employment centres, both public transport (via the Citi 1 bus service) and active transport networks would grant incoming residents direct access to Cambridge Biomedical Campus, the Addenbrooke's Hospital, and the major biotech industry clusters in

southern Cambridge. It is worth noting that sites around the Cambridge Biomedical Campus have been forwarded for development under emerging *Policy S/CBC: Cambridge Biomedical Campus (including Addenbrooke's Hospital)* to provide additional employment space for the growing biotechnology and life science industries that have clustered in the area. Similar expansions have been proposed for the Fulbourn and Ida Darwin hospitals, both of which can be easily accessed by public transport, bicycle, or foot from Site 48064. Therefore, given the site's proximity to this expanding employment hub, the residential capacity provided by the site would provide a sustainable way to utilize the growing job to population ratio of Fulbourn. The 'Green' rating outlined in the HELAA is reflective of this.

- 1.20 Overall, the site has adequate accessibility to key local services, transport, and employment opportunities by a range of modes of transport. Yet, despite having excellent public transport links and dedicated cycle routes into the City Centre and Cambridge Biomedical Campus, the Greater Cambridge Partnership have not proposed any new site allocations around Fulbourn. It is critical that the Partnership revises their strategy to deliver the quantum of homes needed to ensure the Greater Cambridge Partnership's plans for rapid employment growth can be delivered in a sustainable manner.
- 1.21 However, notwithstanding this assessment, it is clear that the current scoring system is in need of updating. The scoring system needs to reflect changes in modern living and technological advancements, including increased homeworking, more widespread use of remote services (e.g. GP and pharmacies), increased online shopping (including groceries), and the growth in micro-mobility (e.g. e-bikes and electric scooters).

#### *Landscape and Townscape*

- 1.22 The HELAA states that the site is within National Character Area 87 – East Anglian Chalk. At a local level, the site is considered to fall within the 6B Wilbraham Fen Edge Chalklands Landscape Character Area, which is defined by large, rolling fields with few hedges and trees – the site is not atypical of this local landscape character as it comprises a large area of greenfield land with ecological features (i.e. hedgerows and treelines) being situated along the site boundary.
- 1.23 In terms of landscape and townscape impacts, Site 48064 was given a red rating, meaning that development of this land would have a significant negative impact on landscape and/or townscape which cannot be mitigated. However, there were some comments made about the site that were either inaccurate or inconsistent with the conclusions made about sites of a similar nature.
- 1.24 Firstly, regarding Site 48064's relation to Fulbourn's townscape, the HELAA rather confusingly states that 'the site is physically more related to the suburb of Cherry Hinton than Fulbourn Village'. However, this conclusion is unfounded; Site 48064 adjoins Fulbourn's development envelope along the settlement's southern boundary and is located nowhere near Cherry Hinton. Development of Site 48064 would not have the effect of merging settlements, nor would it constitute the removal of a rural buffer between two settlements. A masterplanning exercise is also yet to be completed, so the statement has no foundation in a design context. Furthermore, adhering to *Policy GP/PP: People and Place Responsive Design*, design measures would be implemented to ensure that the residential area delivered by Site 48064's development conforms with Fulbourn's current settlement aesthetic (in terms of both density and built form).
- 1.25 In terms of landscape impacts, the HELAA concludes that 'even with a reduction in residential units, inclusion of a view gap and landscape mitigation measures, development would still have a significant impact to the landscape character'. Though we accept that development of the site would instigate inevitable changes to the area's existing landscape

characteristics, it is difficult to ascertain how the assessment came to the above conclusion without first seeing any design strategy or masterplan for the site. Such a conclusion disregards any prospective landscape improvements or enhanced views along the south of the village that could be introduced through a series of comprehensive design measures (e.g. introducing integrated woodland corridors to act as visual buffers, or using the natural contours of the land to guide the layout of footpaths, cycle lanes and roads).

- 1.26 In many ways, development of Site 48064 could complement the Greater Cambridge Partnership's expansion plans along Fulbourn's western boundary (i.e. development at Fulbourn Hospital and the Ida Darwin Hospital). Not only would allocation of the site allow provide residential capacity to support the mixed-use developments on the north-western side of Fulbourn (as stated in emerging *Policy S/RRA Site Allocations in the Rest of the Rural Area*), it would also allow the Greater Cambridge Partnership to ensure that much-needed residential development in the local area is conducted in a controlled and comprehensive manner.
- 1.27 Furthermore, land immediately west of Site 48064 is also being promoted for housing through the emerging Greater Cambridge Local Plan. In combination, these two sites can come forward as a comprehensive extension to the south of Fulbourn, which would deliver a range and number of dwellings in a highly sustainable location that would complement the Greater Cambridge Partnership's proposals in areas west of Fulbourn. A scheme of this scale would deliver significant public benefits, including new areas of public open space, ecological enhancements, and wider links to the countryside.
- 1.28 In sum, development of Site 48064 would constitute a logical extension to settlement's southern boundary and would entail only limited landscape and visual impacts at a local level. Based on the above, it is clear that an 'Amber' rating would be more appropriate in terms of landscape and townscape impacts. We request that the HELAA be updated.

#### *Flood Risk*

- 1.29 The site is situated "wholly in Flood Zone 1", the HELAA provides a green rating for flood risk.
- 1.30 As the geology is generally East Anglian Chalk, it is envisaged that surface water will be managed on site through soakaways and on-site attenuation.
- 1.31 Considering the above, the 'Green' rating is accurate and consistent with the grading of other sites.

#### *Biodiversity and Geodiversity*

- 1.32 The assessment notes that the arable habitats on-site – which constitutes the majority of the site area – is likely to be of low ecological value. However, an amber rating has been given to reflect the potential impacts of the residential development on the nearby hedges and wooded boundaries. Increased visitor pressure on the nearby SSSI is also referenced.
- 1.33 However, there is little evidence to support these conclusions. Aligning with the aims of draft *Policy BG/BG: Biodiversity and Geodiversity*, measures would be undertaken to integrate existing hedgerows and treelines along the site's boundary with the development, while a detailed landscaping strategy could easily be devised to ensure that a 20% net gain in biodiversity can be delivered through development of Site 48064. Furthermore, the provision of public open space for recreational, as well as ecological purposes would benefit the wider community, contribute to the wider green infrastructure network, and mitigate against recreational pressure on the nearby SSSI.

- 1.34 Consultations with Natural England would also be undertaken at the planning application stage to ascertain how ecological impacts may be reasonably mitigated and further environmental benefits may be facilitated by the development.
- 1.35 In sum, strategic development of Site 48064 which is consciously designed to support ecological enhancement would be achievable and, to quote the HELAA, any impact of development on local biodiversity or geodiversity could be '*reasonably mitigated or compensated*'. For these reasons, the site should be reclassified as being 'Green' in biodiversity and geodiversity terms.

#### *Archaeology*

- 1.36 Excavations have uncovered evidence of Bronze Age activity on sites north of Fulbourn, most notably on sites around Cox's Drove and Station Road. As such, an appropriate investigation strategy would be undertaken to assess the impact of development, as agreed with the Local Planning Authority. It is worth noting, however, that Site 48064 is located on the opposite side of the settlement – though this does not exclude the possibility of archaeological discoveries in the area, the topic of development should not be avoided in entirety.
- 1.37 Considering the above, a 'Green' or 'Amber' rating would be appropriate and archaeological factors should not preclude development of the site.

#### *Site Access*

- 1.38 The exact location and layout of vehicular accesses would be designated following a detailed transport and access study. However, there are clear indications that safe access to the site – and subsequent integration with the rest of Fulbourn – could be achieved using an existing vehicular access on Babraham Road or via a new access on Cambridge Road. There is also potential for new active travel access (i.e. pedestrian and cycle) which could be designated during masterplanning exercises.
- 1.39 Overall, the HELAA's conclusions on prospective site access were positive. Yet, despite concluding that access to the proposed site was "acceptable in principle" and that potential constraints could easily be "overcome through development", site access only received an amber rating.
- 1.40 Considering the above comments, a 'Green' rating would be more accurate. We request that the HELAA be updated.

#### *Transport and Roads*

- 1.41 Fulbourn is very well connected in transport terms. Cambridge Road provides a direct vehicular route towards Cambridge, while the A11 can be reached after a 5-minute drive from Site 48064.
- 1.42 In addition to the road network, Site 48064 would also benefit from frequent bus services, including the 16A (Cambridge to Great Thurlow) and the Citi 1 (Arbury to Fulbourn) services, granting both existing and incoming residents access to additional amenities. The closest bus stop to Site 48064 is located on the northern boundary of the site on Cambridge Road. Meanwhile, the site's active transport connectivity will benefit from the Fulbourn Greenway (as envisioned under the South East Cambridge Transport scheme), granting residents rapid

and safe access to services and facilities in Cambridge – including Cambridge’s primary railway station – by foot or bicycle.

- 1.43 Development of Site 48064 would deliver a significant quantity of homes proximal to rapidly expanding employment areas within Cambridge, making commuting via active travel and public transport a more viable option for incoming employees that move to the local area – an outcome sought after by proposed *Policy I/ST: Sustainable Transport and Connectivity*.
- 1.44 As part of an application, the applicant will consider the cumulative impacts that development might have on the local highway network. Echoing statements within the HELAA, ‘any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated’. Therefore, considering the prospective links to reliable active and public transport networks, and the sustainable mode share that could be delivered through development of Site 48064, a ‘Green’ rating for transport and roads would be more appropriate.

#### *Noise, Vibration, Odour, and Light Pollution*

- 1.45 Site 48064 is not located close to any significant sources of noise, vibration or odour, and there is no reason to suggest that noise, vibration or odour mitigation measures will need to be incorporated into the development. The HELAA even concludes that the site is “capable of being developed to provide healthy internal and external environments”.
- 1.46 Based on the above, a score of ‘Green’ is supported.

#### *Contamination and Ground Stability*

- 1.47 Site 48064 comprises greenfield land, 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*

- 1.48 The HELAA estimates 11 dwellings per hectare, implying a low-density development. However, given the commitment to the provision of public open space and areas of enhanced ecological diversity on-site, a density of c. 25 dwellings per hectare would be a more accurate figure to include in relation to development of Site 48064.

#### **The Proposed Policy Framework**

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

#### *Policy S/JH: New Jobs and Homes*

- 1.50 The widespread promotion of Neighbourhood Plans (page 24) is likely to act as a constraint on development in the rural area. Research on the progress and effectiveness of neighbourhood plans<sup>1</sup> found that 55% of the draft plans published for consultation have

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<sup>1</sup> Turley Associates (2014). Neighbourhood Planning: Plan and Deliver? Available at: [www.turley.co.uk/sites/default/files/uploads/news/Turley %20Neighbourhood%20Planning\\_March\\_2014.pdf](http://www.turley.co.uk/sites/default/files/uploads/news/Turley%20Neighbourhood%20Planning_March_2014.pdf)



'protectionist' agendas and many are openly anti-development. Therefore, there is a likelihood that this agenda will create inevitable conflicts between the national aim to significantly boost housebuilding and local community NIMBYism. The idea of 'top down' housing targets being set by the local authority may also dissuade some areas from engaging with the neighbourhood planning process altogether.

- 1.51 The landowner is supportive of the Councils' decision to plan for higher levels of growth than the standard method, though it is disappointing that the Council have decided to base their strategy on the medium rather than the higher growth scenario. The Greater Cambridge economy is dynamic and does not readily align with national or regional forecasts for jobs growth. It has a world-renowned life sciences cluster which has the potential to drive growth beyond typical regional or national rates.
- 1.52 We would strongly advise the Greater Cambridge Partnership to ensure that their objectively assessed housing targets are more aligned with the higher jobs growth aspirations. An indicative calculation based on Cambridgeshire and Peterborough Independent Economic Review suggests that, if the jobs growth targets are to be achieved, around 2,900 homes a year would need to be built in Greater Cambridge – an indicative total of 66,900 homes over 2020–2041.
- 1.53 As set out in the Government's most recent consultation document, the OxCam Arc has the potential to be one of *'the most prosperous, innovative and sustainable economic areas in the world'*. However, this transformational growth will only be achieved if local authorities make asserted efforts to provide the residential capacity needed to support sustainable growth across the region. On this basis, we would strongly urge the Council to plan for the higher growth scenario, which is more closely aligned with past growth rates in the Greater Cambridge area.

#### *Policy S/SB: Settlement Boundaries*

- 1.54 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.
- 1.55 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. Although sites within sensitive valued landscapes and the green belt should receive a high level of protection, the sensitive development of some sites on the edge of a village would cause no significant harm (e.g. Fulbourn). 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.
- 1.56 Furthermore, for minor rural centres such as Fulbourn, the current strategy to restrict schemes to an indicative maximum of 30 dwellings within settlement boundaries will not deliver the quantum of development required to meet the pressing local need for affordable homes. Put into context, to deliver 25 affordable homes within Fulbourn, a minimum of 63 dwellings will need to be permitted as part of major developments. Resultant affordability problems could arise across the rural area (stimulated by a paucity in affordable housing supply), particularly if the Greater Cambridge area continues along its current growth trajectory.
- 1.57 With limited scope for development within tightly drawn settlement boundaries, it will be necessary to find suitable locations on the edge of sustainable settlements. Therefore, 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 Fulbourn.

- 1.58 Overall, a carefully worded criteria-based policy which was supportive of organic growth adjacent to existing built-up areas should not perpetuate unfettered incremental growth.

*Policy CC/NZ: Net Zero Carbon New Buildings*

- 1.59 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.

- 1.60 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*

- 1.61 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*

- 1.62 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.

- 1.63 Regardless of the chosen approach, it would be useful to include further guidance/information in an SPD.

*Policy WS/HD: Creating Healthy New Developments*

- 1.64 Health Impact Assessments should be a requirement for major developments only. For minor developments, providing this information should be simplified. For example, health impact information could be attained through 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*

- 1.65 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.

- 1.66 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.

- 1.67 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.

- 1.68 Additional measures should be introduced for strategic scale development to avoid monotony. For example, the policy could introduce a minimum number of individual house types, appropriate to the scale of development.

*Policy H/AH: Affordable Housing*

- 1.69 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.
- 1.70 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.
- 1.71 In relation to the development of Land to the South of Shelford Road and Cambridge Road in Fulbourn, *Policy S/RRA Site Allocations in the Rest of the Rural Area* recognises the need for residential development within and around Fulbourn to support local employment growth and economic expansions across Cambridge more broadly. Recent analyses of local property market dynamics indicate that affordable housing demands are still a focal concern for local authorities across the Greater Cambridge area. According to recent housing needs projections, an annual net need of 435 affordable rental units and 105 affordable units for homeownership<sup>2</sup> will be needed across South Cambridgeshire to satisfy housing demands. Indeed, these projections do not account for local variegation in housing needs, which may be higher for conurbations closer to epicentres of business growth (e.g. Fulbourn).
- 1.72 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.
- 1.73 Draft Policy H/AH of the First Proposals plan requires 40% affordable housing on sites of 10 or more dwellings. With a total of 150 – 200 dwellings proposed on **Site 48064**, 60 – 80 would be sought for affordable housing under this policy (of which at least 20 will be allocated as 'First Homes' under the national First Homes initiative). As well as helping to address the current shortage of affordable housing over the Greater Cambridge area, the delivery of 60 –80 affordable dwellings would represent a significant positive for the social sustainability of the local area.

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<sup>2</sup> GL Hearn (2021). Housing Needs of Specific Groups: Cambridgeshire and West Suffolk. Available at: <https://cambridgeshireinsight.org.uk>

### *Policy H/CB: Self- and Custom-build Homes*

- 1.74 The proposed policy approach will require continual updating of the self and custom build register(s) to reflect the permissions that have been granted with a self- or custom-build element. Close monitoring on sales and completions will also be necessary in case plots earmarked for self- or custom-build revert to market dwellings at the end of the prescribed 12-month marketing period.
- 1.75 It is also unclear if the current registers for Cambridge City and South Cambridgeshire are to be combined, with delivery of plots across the wider area. This would not be logical since many prospective self-builders will have preferred locations and few will have a search area as wide as Greater Cambridge. A more focused policy, perhaps split across the two administrative areas, would encourage the development of self-build plots in the right locations to meet local demand. For example, if all the need for plots was in and around Cambridge, it would not make sense to burden developers in other parts of the area.

### **Availability and Deliverability**

- 1.76 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 delivered<sup>3</sup>. 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 48064, Land South of Cambridge Road and Shelford Road, Fulbourn is suitable, available, and it can begin to be deliverable, as phased development within 0-5 years.

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<sup>3</sup> Lichfields (2020). Start to Finish: What Factors Affect the Build-out Rates of Large-scale Housing Sites? Second Edition