



GREATER CAMBRIDGE LOCAL PLAN - THE FIRST PROPOSALS

Land to the South West of St Michael's, Longstanton
(HELAA Site Reference: 40521)

- Representation on behalf of landowners

Client:



Landowners:



Our Reference:

019-30

Date:

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1. Representations Land to the South West of St Michael's, Longstanton, CB24 3BZ

- 1.1 Cheffins has been instructed by [REDACTED] to promote their interests in Land to the southwest of St Michael's, Longstanton (HELAA Site Reference: 40521). We propose a development that will deliver approximately 98 dwellings of mixed type and tenure in a sustainable location proximal to major employment centres, and create attractive open spaces for the village.

Site Location and Context

- 1.2 Land to the southwest of St Michael's in Longstanton (HELAA Site Reference: 40521) extends to 5.32 hectares and comprises greenfield land located within the built-up area of Longstanton (currently classified as a Group Village). The site is located to west of St Michael's, to the south of Wilson Road, and to the west of Longstanton Road, and the site can be accessed from all three. The majority of the land lies to the rear of No.s 36 to 50 St Michael's. The location of the site is shown on the site location plan, which accompanies this representation.
- 1.3 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.

Comments on the Scoring Methodology and System

- 1.4 The performance of sites proposed for the Greater Cambridge Local Plan (GCLP) has been coded using a traffic light system (red/amber/green). Although traffic light scoring systems are commonly used in this context, the particular performance criteria applied by the Greater Cambridge authorities appears overly stringent and inconsistent.
- 1.5 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.
- 1.6 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

- 1.7 Being just outside the current settlement boundary for Longstanton (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*. It is unclear if these planned boundary changes have been considered in the HELAA assessment. The site is very well related to the existing settlement with the current development framework boundary bounding site on three sides. The inclusion of the sustainably located Site 40521 would constitute a logical extension to Longstanton and comprise a 'rounding off' of the settlement.

Landscape and Townscape

- 1.8 The HELAA states that the site is within National Character Area 88 Bedfordshire and Cambridgeshire Claylands. The HELAA concludes that the site is not typical, being influenced by the wide landscape and drove to the south, the small-scale village edge landscape to the north, and the proposed housing at Northstowe to the east.
- 1.9 In terms of townscape factors, the HELAA concludes that 'development of the site would remove both the green buffer between the site and Northstowe, and also the landscape setting of the village to the south'. However, the proposed development would constitute a logical continuation of Longstanton as Site 40521 is bounded by existing residential buildings to the north.
- 1.10 Furthermore, the argument that development of Site 40521 would 'remove the buffer between Longstanton and Northstowe' conflicts with the Greater Cambridge Partnerships own proposed "major development site" allocation for Northstowe under *Policy S/NS Existing New Settlements*. As an accompanying excerpt of the Greater Cambridge Partnership's proposed policy map demonstrates (see **Appendix 1**), the proposed development area for Northstowe will connect the town with the existing settlement boundaries for Longstanton, while also adjoining the separate development frameworks for Longstanton. Where landscape buffers could be implemented along Northstowe's major development area to maintain a separation between Longstanton and Northstowe, the same would be applicable to the development of Site 40521; significant tree planting and landscape wilding could be undertaken along the southern and eastern boundaries of the site, providing a natural barrier for Longstanton, which, at present, does not exist.
- 1.11 Based on the above comments, it is clear that either a 'Green' or 'Amber' rating would be more accurate assessment of the landscape and townscape impacts of development at Site 4021. Therefore, we request that the HELAA be updated.

Biodiversity and Geodiversity

- 1.12 Similar to other sites, the assessment notes that the site is likely to be of relatively low ecological value, although it may support farmland bird populations. While the site contains no priority habitats, the HELAA does note that the hedges and trees along the site's boundary may qualify as Habitats of Principle importance.
- 1.13 However, consultations with Natural England and ecological surveys can be undertaken at the planning application stage to determine what design measures might be implemented to mitigate the environmental impacts of development, and the planning conditions needed to ensure that a 20% net gain in biodiversity can be achieved by development. It is also

worth noting that allocation of Site 40521 for development would put less pressure on the allocation of more sensitive ecological sites (e.g. sites within the green belt).

- 1.14 For these reasons, we agree with the 'Green' classification for biodiversity and geodiversity.

Archaeology

- 1.15 As the HELAA has noted, the site is proximal to the medieval parish church and west of the site of the Bishop's Palace but does not state the relevance to the site. An appropriate investigation strategy will be undertaken to assess the impact of development, which will be agreed with the Local Planning Authority. As such, a 'Green' or 'Amber' rating would be appropriate in this context.

Historic Environment

- 1.16 Contrary to statements made within the HELAA, Site 40521 is outside of, but adjacent to, the Longstanton Conservation Area. The development proposal outlines a mid-to-low density residential area, allowing the site to maintain the character of the village. Moreover, aligning with the HELAA's conclusions, detailed design measures and appropriate planning conditions can be implemented at the planning application stage to mitigate any possible impact on nearby heritage assets.
- 1.17 Considering the mitigation measures that can be implemented through detailed design and planning, a 'Green' rating would be more appropriate.

Accessibility to Services and Facilities

- 1.18 Longstanton is host to multiple key services, including local shops, a post office, GP surgery, a dental practice, a veterinary clinic, the Black Bull pub, a playground, sports fields, a local church, and a village hall. Northstowe, which lies adjacent to Longstanton, offers further services such as a Nursery, primary and secondary schools, playing fields, and local shops which incoming residents would also be able to access. The HELAA assessment of Site 40521 refers to the many local facilities and services within an accessible distance to the site, and concludes that adequate accessibility to key local amenities, transport services, and employment opportunities, and the proposed development would not require the delivery of accompanying key services.
- 1.19 In terms of major employment centres, Site 40521 would benefit from a regular, direct connection to Cambridge from Longstanton via the CITI 5 and CITI 6 bus services, providing a sustainable route to employment opportunities within the city. Meanwhile, The Cambridge Science Park is only a 16-minute drive from the site, while the centre of Cambridge is a 20-minute drive from the site. The Guided Busway services from Longstanton Park and Ride – which can be reached after a 10-minute cycle or a 35-minute walk from Site 40521 – would grant incoming residents a direct public transport route to numerous employment hubs, including the Cambridge Vision Park in Histon (after a 10-minute bus journey) and the Cambridge Science Park (after a 12-minute bus journey).
- 1.20 Furthermore, given the Greater Cambridge Partnership's proposal to redevelop the land around the former station in Histon and Impington (as stated within *Policy S/RRP: Policy Areas in the Rest of the Rural Area* under policy area *S/RRP/E/8*), residential development of Site 40521 would provide housing with sustainable connections to any employment opportunities brought forward by redevelopment in Histon and Impington. The residential capacity provided by Site 40521's development would also provide a bulwark against widening gaps between the supply and demand for housing, and any subsequent exacerbation of the affordability crisis – this could be stimulated by the increased demand

for housing that follows expansions to major employment hubs if there is a paucity in housing supply.

- 1.21 Overall, the site has adequate accessibility to key local services, transport, and employment opportunities by a range of modes of transport. Development of Site 40521 would also provide a number of dwellings in a sustainable location, making commuting via active travel 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*.
- 1.22 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).
- 1.23 Considering the above comments, a 'Green' rating would seem more accurate and we request that the HELAA be updated.

Site Access

- 1.24 Despite giving the site an "amber" rating in respect of site access, the assessment clearly states that the proposed site is acceptable in principle subject to detailed design. Although there are potential access constraints, these could be overcome through development.
- 1.25 Considering the above comments, a 'Green' rating would seem more accurate and we request that the HELAA be updated.

Transport and Roads

- 1.26 The HELAA has rated the site as "amber", yet the comments are positive in that it states: *'The site is located between Longstanton and Willingham; efforts will need to be made to ensure local trips can be made by sustainable modes. There are existing walking and cycling improvement plans in the CCC transport investment plan which need to be considered. Due to the site's location to the busway, it is expected that high quality walking and cycling links will be provided.'*
- 1.27 In light of the above, a 'Green' rating would be accurate and we request that the HELAA be updated.

Noise, Vibration, Odour, and Light Pollution

- 1.28 The HELAA confirms that the site is capable of being developed to provide healthy internal and external environments in regard to noise, vibration, odour and light pollution after careful site layout, design and mitigation.
- 1.29 Based on the above, the 'Green' rating provided is accurate.

Air Quality

- 1.30 The HELAA confirms that the site does not lie within an AQMA and there will be a minimal traffic impact on AQMA.
- 1.31 As such, the 'Green' rating provided is accurate.

Contamination and Ground Stability

- 1.32 Site 40521 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. If contamination was 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

- 1.33 The HELAA estimates 18 dwellings per hectare, implying a mid-to-low-density development. Considering the nature of the site, this density would allow the development to be compliant with the aesthetic of the surrounding area.

The Proposed Policy Framework

- 1.34 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

- 1.35 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 plans¹ found that 55% of the draft plans published for consultation have '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.

Policy S/SB: Settlement Boundaries

- 1.36 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 prevent stagnation and the further loss of key local services, a more flexible and tolerant approach is needed towards development in the rural area.
- 1.37 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. Longstanton). Such a pragmatic approach is often taken at appeal; rounding off development where there is a defensible physical boundary or allowing a high-quality scheme with extensive landscaping that would soften an existing harsh area of built form can be acceptable in certain locations.
- 1.38 Furthermore, for Group Villages such as Longstanton, the current strategy to restrict schemes to an indicative maximum of 8 dwellings (or 15 dwellings where this would make the best use of a single brownfield site) within settlement boundaries will not deliver the quantum of development required to meet the existing need for affordable homes or the projected need that could follow nearby business park expansions. As a result, the affordability crisis will deepen in the rural area. For example, to deliver 25 affordable homes within Longstanton

¹ Turley (2014). Neighbourhood Planning: Plan and Deliver?

a minimum of 63 dwellings will need to be permitted as part of major developments. 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 Longstanton.

- 1.39 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

- 1.40 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.

- 1.41 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

- 1.42 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

- 1.43 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.

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

Policy WS/HD: Creating Healthy New Developments

- 1.45 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

- 1.46 Firstly, it is unusual to have two separate policies on design. Is this really necessary?

- 1.47 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.

- 1.48 Design Guides/Codes are acceptable on large scale, strategic developments, but should not be imposed on smaller scale developments where other mechanisms, including parameter plans, can adequately achieve similar and proportionate outcomes. 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 beyond broad requirements for new homes to be 'in keeping' with the character and appearance of the area.

- 1.49 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. Schemes which can demonstrate a high standard of design should be fast-tracked through the application process.
- 1.50 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

- 1.51 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.
- 1.52 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.
- 1.53 The draft policy states that "current evidence" indicates that securing 40% affordable homes is deliverable across Greater Cambridge. Does this refer to The Greater Cambridge Local Plan Strategic Spatial Options Viability Assessment (November 2020) and/or The Greater Cambridge Local Plan Viability Study and Assessment Interim Report 2021? If so, this should be more clearly stated.
- 1.54 The latest build cost figures may not factor in fluctuating material costs caused by the pandemic, the haulage driver shortages, and Brexit. Building material costs increased around 23% year-on-year in August 2021, with timber and steel in particularly short supply. It is unclear whether shortages in building materials will continue long-term. It is also noted that the First Proposals plan sets ambitious requirements in relation to sustainability and design. These more stringent requirements are likely to further increase the costs of development.
- 1.55 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.
- 1.56 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 homeownership² 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. Longstanton). Dependence on the allocation of strategic

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

sites with already high infrastructure burdens is unlikely to offer sustainable, long-term solutions to the chronic and worsening affordability issues being experienced 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 affordable homes at a faster rate need to be allocated.

- 1.57 Draft Policy H/AH of the First Proposals plan requires 40% affordable housing on sites of 10 or more dwellings. With a total of 98 dwellings proposed on Site 40521, 39 would be sought for affordable housing under this policy (of which at least 9 will be allocated as 'First Homes' under the national First Homes scheme). As well as helping to address the current shortage of affordable housing over the Greater Cambridge area, the delivery of up to 39 affordable dwellings would represent a positive contribution for the social sustainability of the local area.

Availability and Deliverability

- 1.58 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 delivered³. 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. Land to the southwest of St Michael's Longstanton (HELAA Site Reference: 40521) extends to 5.32 hectares and comprises greenfield land located within the built-up area of Longstanton (currently classified as a Group Village). 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; it is suitable, available, and deliverable within 0-5 years.

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