

6 March 2025
449385/AM



Greater Cambridge Shared Planning Policy Team



Dear Sirs,

SUBMISSION TO GREATER CAMBRIDGE LOCAL PLAN CALL FOR SITES ON BEHALF OF HOPKINS HOMES – LAND EAST OF BUSH CLOSE, COMBERTON

HELAA SITE REFERENCE: 40501

Savills (UK) Ltd Planning Team are instructed by Hopkins Homes to make further representations as part of the Greater Cambridge Local Plan Call for Sites in respect of development at Land East of Bush Close, Comberton.

The Call for Sites makes clear that we should not resubmit documents that have been submitted previously. These comments should therefore be read in conjunction with the information previously submitted in relation to this site in February 2020 and December 2021.

This representation provides updates to the previous information submitted in relation to:

- Updates to the National Planning Policy Framework 2024 (amended 2025);
- LAND AT COMBERTON CAMBRIDGESHIRE Green Belt Strategic Site Landscape Appraisal March 2025 (a copy of which also forms part of this submission); and
- Comberton Greenway.

It also provides a brief summary of the evidence provided as part of the February 2020 and December 2021 submissions, and provides an overall summary of the site.

The National Planning Policy Framework 2024 (amended February 2025)

The National Planning Policy Framework (NPPF) now defines Grey belt for the purposes of plan-making and decision-making as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143, namely (a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; or d) to preserve the setting and special character of historic towns.

Paragraph 148 of the NPPF states that "Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development



towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

Paragraph 148 of the NPPF states that when defining Green Belt boundaries, plans should (amongst others) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

LAND AT COMBERTON CAMBRIDGESHIRE Green Belt Strategic Site Landscape Appraisal March 2025

This Appraisal, undertaken having regard to the updated policy position set out in the NPPF demonstrates that the site makes a limited contribution to, and certainly does not 'strongly contribute' to, any of purposes (a), (b) or (d) in paragraph 143 of the NPPF. As such, the site is 'Grey belt' land. It is therefore considered that the site could be released from the Green Belt and that a sensitively designed residential development can be successfully integrated into the site without resulting in unrestricted sprawl or significant encroachment into the wider Green Belt with the enclosure provided by the existing robust mature vegetation and nature of the landform. Development within the site would have no effect on the openness of the wider Green Belt.

The combination of mature vegetation, byway, watercourse and woodland to the site's boundaries and immediate setting provide robust boundaries between the site and the wider landscape to the east and south. The allocation and development of this site would provide more recognisable and more permanent boundaries to the Green Belt than at present (as advocated by Paragraph 149 of the NPPF). Paragraph 149 of the National Planning Policy Framework states that "When defining Green Belt boundaries, plans should:f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent." In this instance, the byway along the eastern boundary of the site and Tit Brook along the southern boundary are more recognisable and permanent physical features than the existing village boundaries (southern boundary of Swaynes Lane development and eastern boundary of Bush Close development). The existing boundary vegetation structure would be reinforced with additional native tree, shrub and hedgerow planting in order to provide an enhanced degree of containment and robust green edges to the site. The creation of landscape buffers and public open space within the proposals would also present a number of opportunities for the creation of new formal and informal recreation facilities which would benefit both new and existing residents and establishment of new habitats. Within these areas there is the potential to establish native wildflower grassland, shrub planting and trees, that would not only ensure that the vegetated boundaries are retained but enhanced and would also represent a positive contribution to local biodiversity.

The following elements would be incorporated into the proposed development to ensure it had positive landscape and visual effects in line with planning policy and the 'principles for landscape improvement and management' in the Western Claylands set out within the Cambridgeshire Landscape Guidelines:

- Retain and reinforce the existing mature vegetation structure to the Site boundaries, where possible, enhance through additional planting to create soft landscape buffers to the Site boundaries and create a verdant landscape setting for any new development;
- Incorporate a comprehensive scheme of landscaping utilising locally native species. Offsets to be established along the eastern and southern Site boundaries to provide a robust landscaped boundary and creating a degree of separation between the Site and the wider landscape.
- Create new, varied habitats that are characteristic of this landscape setting. In particular, hedgerow and hedgerow tree planting should be incorporated into the landscaping scheme to reinforce the presence of this characteristic local landscape feature;
- Incorporate a network of publicly accessible open spaces within the Site. This would not only assist in provision of formal and informal recreation facilities but break up the built environment and assist in placemaking;
- Create opportunities to enhance public access to the countryside, which at present is limited;
- Adopt a positive outward looking layout to ensure that the proposals do not appear to be turning their back on the wider setting and create an appropriate transition settlement edge; and
- Incorporate a simple palette of materials and architectural detailing that reflect the local vernacular.

Comberton Greenway

Work on the [Comberton Greenway](#) has begun with sections of the path between Comberton and Barton widened, and with Comberton Village traffic calming improvements completed including new Zebra crossings and 20mph zone. In 2025/26, the Adams Road improvements are to be constructed, the Coton Village improvements are to be constructed and a planning application is to be submitted for the rest of the route. As the scheme webpage states “The greenway will make it safer and easier to reach Cambridge University West Campus, the Sidgwick site and Newnham. As well as better access to Comberton Village College and Long Road Sixth Form.”

The [Cambourne to Cambridge](#) scheme website states that “It would also provide a path for pedestrians, cyclists and horse riders. The path would connect with new and existing routes, such as the planned Comberton Greenway, to complement the growing rural walking and cycling network” (our underlining).

Comberton is increasingly connected to employment opportunities and facilities. Alongside its range of facilities and services (including Comberton Village College, sports facilities, Primary School, Surgery, Village Hall, Public House, two Churches, and a range of shops and employment opportunities), it is evident that growth at Comberton should form part of a balanced strategy for sustainable growth across Greater Cambridge.

Previous Site Submissions

It continues to be the case that the positive conclusions demonstrated by the previously submitted information remain valid:

- **Transport and Highways** – The Councils’ September 2021 HELAA comments that the proposed site does not have a direct link to the adopted public highway, and there is no possibility of creating a safe access. The Technical Note 01 in relation to this site previously submitted however clearly demonstrates that safe highway access to the site can be provided and that the existing Byway Open to All Traffic (BOAT) can be upgraded to provide a link to the surfaced road providing access to Thornbury and thereby directly link the site with the B1046;
- **Utilities** – The site is within close proximity to existing statutory provider assets in order that the site may be serviced by electricity, water and telecommunications;
- **Foul Water Drainage** – There are existing foul water sewers present within the access road to Thornbury and on the B1046 which could provide a point of connection for the site;
- **Surface Water Drainage** – At present the site is a Green field and therefore the natural drainage mechanism has been reviewed. Currently the site falls generally towards the Tit Brook and the brook forms the southern boundary of the site. The Greenfield runoff rate will be assessed and proposed surface water flows will be directed to the brook at a maximum discharge rate to reflect that of the present greenfield runoff. As such, attenuation of flows will be provided in the form of an open basin SuDs feature along with additional SuDs solutions where space permits to store flows over and above the greenfield discharge up to a critical design storm event of 100yr + 40% climate change, with adequate freeboard to accommodate a further 10yr storm within 24 hours. Water quality will be controlled using SuDs features such as swales, permeable paving and filter drains, and will be determined further as the drainage strategy is developed.
- **Biodiversity** – A Phase 1 Ecology Report has been carried out by Aspect in January 2020, which concludes that the site itself, comprising a single grassland field is unlikely to comprise an important ecological feature and should therefore not form a constraint to development. Any habitats of elevated value are restricted to the site boundaries. The Phase 1 Ecology Report identifies potential for a small number of faunal species, and therefore further Phase 2 surveys would be undertaken in the event that a planning application is progressed. In the event that species are found, the report identifies appropriate mitigation that could be implemented. It also highlights the potential for ecological enhancements on the site; and
- **Deliverability** – The site would be delivered in the 5 year period following adoption of the Plan (or potentially earlier if planning permission was granted in advance of adoption of the Plan).

Other Matters

The green rating in the HELAA 2021 for the site for Open Space / Green Infrastructure; Historic Environment; Noise; Vibration; Odour and Light Pollution; and Air Quality is welcome. Accessibility to Services and Facilities is being improved, and Flood Risk, Biodiversity and Geodiversity, Archaeology, Transport and Roads, Contamination and Ground Stability impacts can all be adequately mitigated.

Conclusion

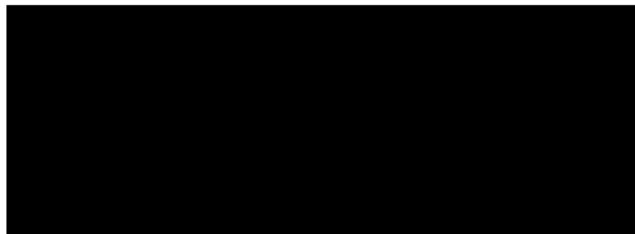
In summary:

- As the site does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143 – namely (a) to check the unrestricted sprawl of large built-up areas; b) to prevent neighbouring towns merging into one another; or d) to preserve the setting and special character of historic towns – it is ‘Grey Belt’;
- Development in Comberton should form part of a balanced growth strategy for sustainable growth across Greater Cambridge, and land east of Bush Close provides the opportunity to deliver a development that has positive landscape and visual effects and has more recognisable and permanent village / Green Belt boundaries than at present;
- The proposed site has a direct link to the adopted public highway and safe access could be created (contrary to the statement in the HELAA);
- The information submitted in relation to the site demonstrates that it is Suitable in all respects (as well as Available and Achievable); and
- The east of Bush Close site, which can be delivered within the first five years following adoption of the plan (or potentially earlier if planning permission was granted in advance of adoption of the Plan), is well-placed to make an important contribution towards a balanced and resilient housing land supply for Comberton and the Greater Cambridge area.

We welcome the opportunity to provide further information in relation to the site and trust that this now enables the Councils to include the site as an allocation in the upcoming new Draft Local Plan.

If there is any further information and/or clarification that we can usefully provide to assist your consideration of these proposals, please do not hesitate to contact the undersigned in the first instance.

Yours faithfully



Accompanying documents:

LAND AT COMBERTON CAMBRIDGESHIRE Green Belt Strategic Site Landscape Appraisal March 2025