Introduction

Walsingham Planning is submitting this representation on behalf of R. Cambridge Propco Limited, the owners of the Cambridge Bar Hill Hotel and Golf Course, Bar Hill, CB23, 8EU.

From the outset, we note that our client fully supports the Local Plan’s vision of planning for enough homes to meet Greater Cambridge’s needs, with a strong mix of housing types and tenures. We also note that the Local Plan First Proposals aims to deliver 1,771 new homes per year, which is 550 more homes per year than under the current policy context, and this is an ambitious strategy, which is to be supported. However, in order to secure this uplift in housing delivery, it is clear that the new Local Plan must be underpinned by a range of housing allocations which are deliverable in both the short and longer-term.

Development Strategy

Draft Policy S/DS sets out the proposed Development Strategy to deliver the vision, which includes provision for 44,400 new homes. The Strategy explains that the proposal is to utilise existing planning permissions alongside “*a limited number of new sites in the most sustainable locations*”. Indeed, it is clear from the schedule in the draft policy that the vast majority of the Council’s housing growth it to be accommodated on just 13 sites. Whilst concentrating housing development in a limited number of locations may have the benefit of creating sustainable new hubs of development, it also bears risks in terms of the deliverability of the strategy. For example, if there are any unforeseen delays on any of the major projects, it will have a significant detrimental impact on the ability to meet Greater Cambridge’s housing needs.

This is a real risk and one that is recognised in the National Planning Policy Framework (NPPF). We note that paragraph 60 of the NPPF states that:

“*To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed*”.

Furthermore, paragraph 68 explains that:

“*Planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability, and likely economic viability*”.

More specifically, paragraph 68 notes that planning policies should identify specific deliverable sites for years 1 – 5 of the plan period; and specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan. At present the emerging Local Plan is only at the ‘First Proposals’ stage, but no information is currently provided to explain which of the proposed site allocations will be deliverable within the first five years of the plan period, and which will represent medium and longer-term opportunities.

Finally, we note the contents of paragraph 69 of the NPPF, which is clear that:

“*Small and medium-sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly*”.

This is a key point, and it is our view that the proposals put forward in the emerging Local Plan document are currently over-reliant on the delivery of a limited number of strategic sites. For example, of the 11,596 additional homes required, 11,200 (i.e. 97% of the total additional requirement) are planned to be provided on just 6 sites.

We note that one proposed new allocation at North East Cambridge (ref. S/NEC), which is to deliver a substantial 3,900 new dwellings, is on the site of an existing waste water treatment works. The draft policy for this allocation explains that delivery of a new mixed-use development on this site is reliant on the relocation of the existing works, a process which is being led by Anglian Water. The proposed development is also reliant on the successful implementation of the North East Cambridge Trip Budget, which has been calculated to ensure that there are no additional vehicle trips on Milton Road at peak times and subsequently no result in queuing on the A14 at Milton Interchange. It is clear, therefore, that there are significant hurdles that will need to be overcome before any scheme can progress on this site, and the timescales for development are currently very much unknown.

Similarly, 2,750 new homes are proposed on the Cambridge Airport site (Policy S/CE). However, it is clear from the policy wording that this is another long-term opportunity, as it is reliant on the closure and relocation of the airport, which is currently not anticipated to take place before 2030.

The Development Strategy also relies upon the faster delivery of housing at planned new settlements in Northstowe and Waterbeach, which will bring forward 1,500 additional new homes before 2041. However, whilst some acceleration of development may be possible at these new settlements, the additional new homes – that were previously expected after 2041 – are not likely to be available until towards the end of the plan period.

It is clear, therefore, that the emerging Local Plan relies upon its existing allocations – which have not yet been built-out - combined with a limited selection of new strategic sites, but each with its own constraints.

It is our firm view that the Local Plan should make provision for a wider range of sites, and include more small and medium-scale opportunities, to ensure a more fluid supply of housing land and ensure that there are also sites dedicated to deliver housing growth in the shorter term.

Alternative site at Bar Hill

With this in mind, it is relevant that we recently submitted our client’s site (the Bar Hill golf course) to the ‘call for sites’ exercise (ref. 56476). The site has not yet been assessed and so was not taken into account in the formulation of the First Proposals document, but we consider that it offers strong potential as a future allocation to provide an additional option to support housing growth in the Greater Cambridge area in a sustainable location.

Full details about the site can be found in our call for sites submission, and so we do not seek to reiterate all of the site specific information here. However, in summary we believe that this site has strong potential to provide a sustainable urban extension at Bar Hill (delivering around 300 homes, with complementary facilities). It should be noted that this site is available for the use proposed, and the site owner is already progressing a pre-application enquiry with the Council in relation to the prospects for the site.

The site comprises the existing golf course, with its associated fairways, roughs and bunker, alongside two ornamental lakes. There are also three storage barns located in the north of the site, which would be removed as part of any development. The site lies directly adjacent to the established settlement of Bar Hill (a minor rural centre) and has good potential to form a natural sustainable urban extension to the settlement. Indeed, the urban area of Bar Hill already extends in the direction of the golf course. The site is also bounded by the A14, which has recently been upgraded through junction improvements, and this also forms an urbanised edge to the site, on its northern boundary.

It is relevant that Bar Hill is well-served by a range of shops, services and community facilities, including a Tesco Extra store, public house, Post Office, primary school and village hall. The local centre, anchored by Tesco, is located off Saxon Way, within easy walking distance of the hotel and golf course. A new residential development on the land would thus be sustainably and accessibly located with regards to the main facilities of the settlement. It is also notable that there are two bus stops on Crafts Way (known as ‘Hollytrees’ and ‘Acorn Avenue’), which are both adjacent to - and within easy walking distance of - the golf course land, and which provide access to bus services to Cambridge, Swavesey and the centre of Bar Hill. The site would therefore be well-served by public transport.

The site is subject to few physical, heritage or environmental constraints. The site is not located within a Conservation Area and there are no listed buildings within the vicinity of the site. A stream does bisect the site along its northern extent (close to the lakes), and the land along its banks does fall within Flood Zone 2 / 3. The land within the higher flood risk areas would remain clear of residential development. The majority of the golf course, however, lies within Flood Zone 1 and is thus within the lowest area of risk of flooding from coastal and fluvial sources.

It is recognised that the entire extent of the golf course lies within the designated Green Belt. However, we note from the recent Greater Cambridge Green Belt Assessment (2021) that the land does not contribute strongly to the purposes of the Green Belt designation in this location. The Assessment identifies three purposes of the Cambridge Green Belt, and the site scores as follows:

* **Purpose 1** – Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre: Limited / No contribution;
* **Purpose 2** – Maintain and enhance the quality of its setting: Moderate contribution; and
* **Purpose 3** – Prevent communities in the environs of Cambridge from merging into one another and with the city: Moderate contribution.

The Assessment concludes that the release of this land from the Green Belt would have a ‘moderate / high’ level of harm on the Cambridge Green Belt. The Assessment explains that this would mean that:

“*Release of land results in a loss of strong contribution to one of the Green Belt purposes, but would constitute a negligible impact on adjacent Green Belt land; or*

*Release of land results in a loss of relatively limited contribution to one of the Green Belt purposes, and would constitute a moderate impact on adjacent Green Belt land*”.

The assessment does not therefore rule out the release of this land from the Green Belt. In particular, it is highly relevant that the site performs much better in the assessment that most plots, with the harm rating for the vast majority of the Green belt land assessed as being ‘high’ or ‘very high’. The site is one of a very small number of plots that attained a ‘low’ to ‘moderate high’ harm rating in the recent assessment.

Moreover, it is relevant that as part of a development on this land, the vision is to retain the majority of the golf course site as ‘open land’. It is envisaged that the north-west section of the golf course (to the north of Crafts Way and The Fairway) could be developed to provide a new neighbourhood within Bar Hill, which would function as a sustainable urban extension to the settlement. Meanwhile, the retained area of land would have the potential to act as a strategic reserve for future housing allocations or might be converted to form a new country park / area of public open space / allotments / recreation or sporting use, with possible focus on planting and habitat creation which would deliver substantial biodiversity net gain over the existing use of the land as a manicured golf course. Certainly, any development on this land, has the potential benefit of opening up the southern / eastern areas of the land for public access, delivering significant new areas of public open space for the Bar Hill / north Cambridge communities on either a temporary or permanent basis.

The proposed residential element of the scheme would include a mix of housing styles, sizes and types, and could include apartments as well as detached and semi-detached dwellings, to cater for the full range of local housing needs. There would also be scope to provide some self / custom-build plots, and the scheme would of course include affordable housing provision. There is scope to provide some form of community building / local shop, to service the local community’s needs, and – subject to further market testing – additional complementary uses could be added. There is scope to provide these uses along the main spine through the development, or around a new village square.

Conclusion

In summary, whilst our client supports the vision of the Local Plan First Proposals document, it is our view that the Development Strategy requires further amendments in order to deliver the housing growth planned.

The Local Plan, as currently drafted, places an over-reliance on a limited number of strategic sites, and it is our view that it would be preferential to include a broader range of small and medium-sized sites, which are less constrained; that are available now; and that can ensure a supply of deliverable housing land in the short-term. Moreover, this strategy would also ensure that there is more choice and flexibility in the plan, so that if a problem arises with one of the larger strategic sites, housing delivery can continue on alternative sites.

To this end, we would encourage the Greater Cambridge Shared Planning Unit to seriously consider our client’s site at Bar Hill golf course, which can provide a sustainable urban extension to an existing settlement in a sustainable location, and which can deliver around 300 homes, in addition to community facilities and new publicly-accessible green infrastructure. We consider that this site would complement the draft Development Strategy, and provide a medium-scale site which is deliverable within the Local Plan period.