

# Greater Cambridge Local Plan: First Proposals

Representations on Behalf of BDW and Landowners

Land to the West of Beach Road, Cottenham

December 2021

Ref: P854



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## Validation

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This report has been prepared by Optimis Consulting Limited in collaboration with the client and where necessary other professionals. This report is only considered acceptable for use once signed by the Project Director from Optimis Consulting Limited as follows; and at all other times shall be considered to be in draft only.

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## 1.0 Introduction

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- 1.1 Optimis Consulting Limited (OCL) presents these representations on behalf of our client Barratt David Wilson Homes (BDW) and the Landowners (Mr Currington, Mr Todd, Ms Douglas, Ms Jarvis, Mr Badock & Ms Hartwell).
- 1.2 These representations are provided in two parts. Part 1 considers the potential for future residential development of approximately 80 new homes and open space on land off Beach Road, Cottenham. Part 2 sets out detailed representations responding specifically to the content of the Greater Cambridge Local Plan First Proposals.
- 1.3 Our client, BDW, is the nation's leading housebuilder, building high quality homes and creating great new places to live. The quality of their projects is recognized by the HBF 5-star customer rating, which has been achieved for 12 consecutive years, the only major housebuilder to have achieved such a feat. In 2021, BDW, were awarded Sustainable Housebuilder of the year at the Housebuilder awards.
- 1.4 These representations are submitted alongside a Vision Document which sets out a masterplan for the development of the site and explains the ideas that have guided it.
- 1.5 The submission is made in collaboration with the landowners and there is no barrier to delivery in terms of land ownership therefore.

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## 2.0 The Site

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### Site Details

2.1 These representations relate to land West of Beach Road, Cottenham, as outlined below.



2.2 The site comprises an area of approximately 3.7 hectares and is located to southwest of Beach Road, on the southern periphery of Cottenham. Existing residential development wraps around the site to the east and the north, with a mixture of arable farmland, paddocks and orchards beyond the site to the south west.

2.3 The site itself is a small arable field, located in the Green Belt. Notwithstanding this, with housing facing the site on the opposite side of Beach Road to the north east and a small cluster of housing to the south west, the site is not perceived as sitting outside of the settlement envelope.

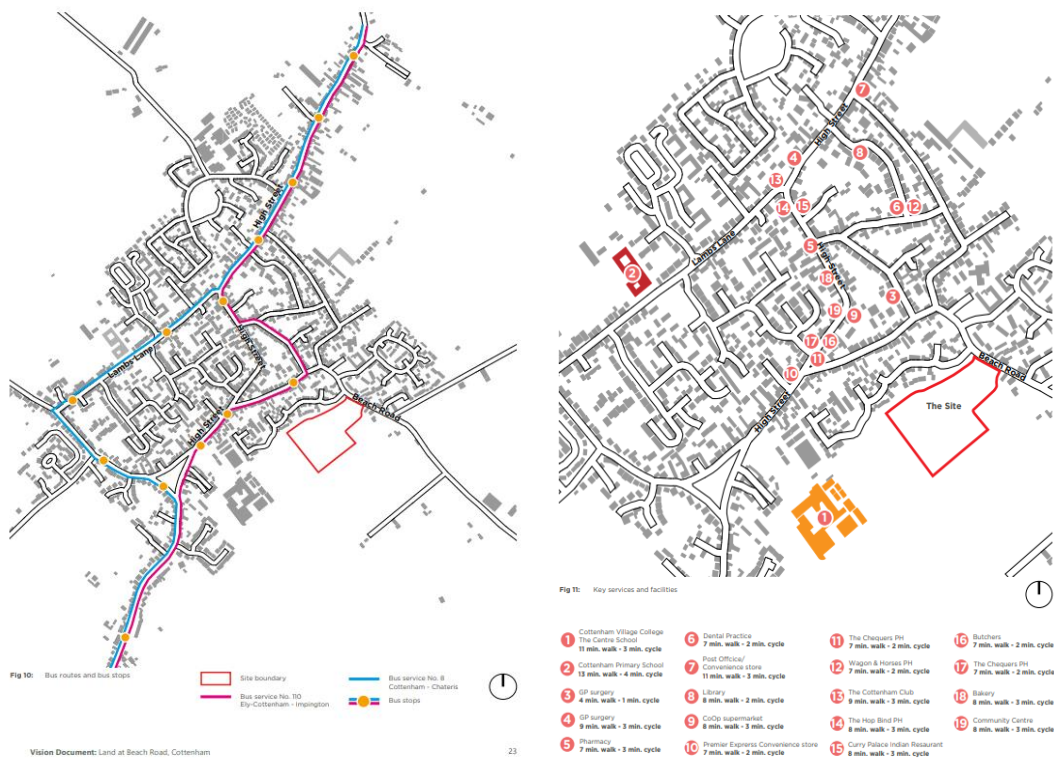
2.4 In general, the site is flat and largely enclosed as a result of the existing settlement and surrounding vegetation.

2.5 The site bounds the built settlement of Cottenham and borders Cottenham Conservation Area to the north east. The site is approximately only 10 minute walk to the High Street. In this respect it is arguably closer to a range of facilities locally than other 'built up' areas of the village. Set within close proximity to the village centre and set amongst existing housing any development on the site very much offers the potential to be fully integrated into the surrounding settlement.

2.6 There are no barriers to delivery of the site in terms of land ownership.

## Cottenham

- 2.7 Identified as a Rural Centre in the South Cambridgeshire Local Plan 2018 (the largest and most sustainable villages within the District) Cottenham benefits from a range of local facilities including primary and secondary schools, post office, convenience stores, GP surgeries and a number of pubs and restaurants.
- 2.8 The two plans below are taken from the Vision Document. Fig 10 (p23) shows the proximity of the site to existing bus services. Fig 11 (P25) shows the sites proximity to services and facilities.



- 2.9 It is clear that Cottenham has not grown in an even manner around its core. As a result, as is evident when shown on the plans above, the site is located in very close proximity to both bus services and key facilities. Indeed the site is situated in closer proximity to these services than some of the existing built up areas of the village.
- 2.10 The village had an approximate population of 6,400 in 2017, this will have risen subsequently however as a result of recent housing developments.

- 2.11 Cambridge is located just 6 miles to the south with the most direct access provided by the B1049. The village is served by regular bus services, within easy walking distance of the site, which run to Cambridge and surrounding villages.
- 2.12 The two bus services serving Cottenham are the Nos. 110 and 8. The No. 8 bus is the prominent service. It takes around 31 minutes to get into Cambridge and runs approximately twice every hour between 06:45 and 22:45 Monday to Saturday. The service is reduced slightly on Sundays and public holidays but regular services still operate.
- 2.13 The site is also within close proximity to the Cambridgeshire Guided Busway and Waterbeach railway station providing further means of access to locations further afield.

### **Site Strengths**

- Good access to local and district facilities;
- Good access to strategic transport infrastructure;
- Strong relationship to existing settlement;
- Clearly defined and strong boundaries;
- Located within Flood Zone 1;
- Not located within a Conservation Area.

### **Potential Opportunities**

- Delivery of housing to meet district needs;
- Contribution to sustainable growth of Cottenham;
- Siting of development in the most sustainable location in Cottenham in close proximity to the High Street, shops and services and bus stops;
- Closer to village amenities than other sites being promoted;
- Improvements to the landscape and open space character;
- Biodiversity Net Gain



## 3.0 Planning History

3.1 The site itself has not been the subject of any previous planning applications.

### Allocations

3.3 No sites within Cottenham were identified for development in the 2018 South Cambridgeshire Local Plan.

3.4 Within the Greater Cambridge Local Plan first proposals, there is one new allocation made to the north of Cottenham. This is a small allocation, for 0.61ha of land for employment uses at the Old Highways Depot.

### Development within Cottenham

3.5 Notwithstanding the lack of allocations for residential development within Cottenham there has been a series of planning applications approved for residential development in the village in recent years, as set out below:

Site	Development	LPA Ref	Outcome	Appeal	Appeal Outcome
<b>Land Northeast of Rampton Road</b>	154 Dwellings	S/2876/16/OL	Refused	Y	Allowed
<b>Land off Rampton Road</b>	200 Dwellings	S/2413/17/OL	Granted	N	N/A
<b>36 Oakington Road</b>	50 Dwellings	S/1952/15/OL	Granted	N	N/A
<b>Land at Oakington Road</b>	126 Dwellings	S/1606/16/OL	Granted	N	N/A

3.6 It is evident from the above that Cottenham has in recent years been considered a suitable and sustainable location for increased housing development.

3.7 Permission (Outline) was granted for 200 dwellings at Land off Rampton Road in August 2017. The application was approved at a meeting of the Council's Planning Committee. The proposal sought permission for a residential development outside the Cottenham Village Framework, in the countryside. In recommending the application for approval to the Planning Committee Planning Officers made the following relevant observations:

- Cottenham is considered a sustainable location for increased housing development;
  - The village was ranked 4th in the Village Classification Report 2012 in the District in terms of access to transport, secondary education, village services and facilities and employment. Future residents of the housing development would not therefore be wholly dependent upon the private car to meet their day-to-day and the majority of their wider needs;
  - Cottenham was considered a sustainable location for a development of this scale;
  - Whilst it was noted at the time that several applications were before the Council that may, cumulatively, result in a total of 600 new dwellings coming forward in Cottenham (an increase in the number of dwellings in the village of some 24%) this was not considered to be out-of-scale and character with the size of the village and its services and facilities;
  - Despite the scheme having been reduced previously because of the significance of the encroachment into the countryside it was determined, following revisions to the scheme, that the impact of the application from public viewpoints was not considered significantly adverse and any harm was outweighed by the wider benefits arising from the development.
- 3.8 Similar conclusions were also drawn in the assessment of the two further applications, one for 50 dwellings and the other for 126 dwellings, also at Oakington Road.
- 3.9 The development of 154 dwellings at Land northeast of Rampton Road was permitted in May 2018, a refusal of planning permission having been successfully appealed. This is interesting in the context of housing developments permitted in Cottenham as a third party was required to conclude on a housing development again proposed outside the village framework. The following comments made by the Inspector are considered relevant to these representations:
- The appeal site was located outside the village framework of Cottenham in open Countryside. An area of the site also formed part of a wider area of playing fields and was designated as Local Green Space in the emerging Local Plan. Notwithstanding this, the Inspector concluded that the loss of countryside would only have a minor adverse significance of effect on landscape character and the development would actually complement the form of the village;
  - Whilst the site was outside the village framework, as defined at that time, it was concluded that a significant number of local services and facilities including bus stops, were within a reasonable walking distance of the centre of the appeal site and all services and facilities were considered in comfortable cycling distance;
  - Having regard to the Government's three strands of sustainable development the Inspector concluded the following:



- Socially, the proposed development would contribute to help address the shortage of housing in the District as a whole;
- Environmentally, whilst the development would cause minor harm to landscape character the proposed development would complement the form of the village and the character and appearance of built development within it;
- Economically, whilst the loss of agricultural land would result in minimal economic impact the development would generate construction employment and the additional households would increase the spending power in the local community to the benefit of businesses and services in the area.

3.7 The following conclusions can be drawn from housing development permitted in Cottenham in recent years:

- Cottenham provides a wide range of services and facilities and is an accessible location;
- Cottenham is of an appropriate scale to accommodate and provide for new housing development;
- Cottenham is a sustainable location for the development of housing;
- Existing services and facilities can be accessible from sites outside of the existing village framework;
- Any harm perceived from the development of sites in the Countryside must be weighed against the wider benefits;
- Development beyond the village framework can complement and integrate with the built form of the wider settlement; and
- Cottenham is accessible by public transport.

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## 4.0 Land of Beach Road, Cottenham – The Vision

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- 4.1 These representations are supported by a Vision Document promoting land off Beach Road, Cottenham for up to 80 new homes and open space.
- 4.2 In the context of these representations the document aims to:
- Illustrate the process that has led to development proposals for the site;
  - Introduce the masterplan and explain the ideas that have guided it;
  - Set out a high-level vision and broad design principles for the site and explore the scale and form of potential development; and
  - Act as a basis for consideration of the land for development.

### **Loss of Green Belt**

- 4.3 A green Belt review has been undertaken as part of the formulation of a vision for the site. It looked specifically at this land parcel to establish to what extent it fulfils its purpose, as specified by the NPPF.
- 4.4 It is considered that the parcel of land only partially fulfils only one function of the Green Belt, to assist in safeguarding the countryside from encroachment, only and does not fulfil the other functions i.e. to check the unrestricted sprawl of large built up areas; to prevent neighbouring towns merging into one another; to preserve the setting and special character of historic towns and to assist in urban regeneration.
- 4.5 Having specific regard to the purposes of the Cambridge Green Belt, as set out in the South Cambridgeshire Local Plan 2018 and mirrored in the Greater Cambridge Plan Proposals, it is considered that the parcel of land only partial contributes to maintaining and enhancing the quality of its setting and that it fails to contribute to either preserving the unique character of Cambridge or from preventing communities in the environs of Cambridge from merging into one another and with the City
- 4.6 There would only be limited effect therefore from releasing the land from Green Belt for development. The assessment highlights that the land is rather separate from the wider landscape, and that the land is well contained by existing features including existing settlement edges, together with strong patterns of vegetation, resulting in the land being somewhat separate to the more rural and open characteristics of the wider landscape. The analysis concludes that the effect of releasing land from the Green Belt would have a very limited overall effect on the remaining functions of the Green Belt, which would be preserved as a result.

- 4.7 The release of land from the Green Belt will enable strong boundaries to be maintained and would also enable the boundaries to be strengthened and reinforced through new planting. In addition, parts of the land would be suitable for Green Belt enhancement, in line with paragraph 138 of the NPPF, comprising new planting, ecological features, enhanced buffers where appropriate, as well as improved access routes to connect with existing public routes, resulting in a beneficial change to the condition and quality of the remaining land.

#### **Landscape Character Areas.**

- 4.8 Preliminary Landscape and Visual Impact Analysis has also been undertaken to inform proposals coming forward for the site.
- 4.9 The site is within a transitional area at the edge of the fen edge village and bordered by a series of orchards, hedges and trees to the southeast, by (mostly modern 2-storey brick) housing on Brenda Gautrey Way to the north and further residential areas to the west. To its northeast and eastern edge, the site fronts Beach Road and includes a number of dwellings on the road frontage, further estate development beyond. Historic maps show that the southern edge of the village was formed of orchards before the village expanded south to its current position.
- 4.10 Beyond the edge to the southeast of the site lies a series of orchards that form strong features and that blend with the hedges and mature trees in the area to form a layering effect, such that views from the south are limited. As such, the site is very well contained (on more than three sides) and the vegetative features that surround the site merge with other tree lines at the edges of the rectangular fields to provide a layering effect in preventing views open views out into the wider landscape.
- 4.11 The natural landscape is also one of transition, since the site is a parcel of low-lying agricultural land at the outer of the fen edge village, closely related to the changing patterns of claylands between Cottenham and Cambridge, which are divided by drains, lodes and tree line features within the landscape. The site is a regular parcel agricultural land, where the field pattern is generally formed bordered by existing features at the southern edge of the village of Cottenham, where the landscape is well vegetated. However, in the context of a local landscape that is influenced locally by housing, there are also limited number of elements that contrast with and dilute or erode the rural character.
- 4.12 It is considered that development can be brought forward sensitively on the site.

#### **Ecology**

- 4.13 A Preliminary Ecological Assessment has also been undertaken to inform proposals coming forward for the site.

- 4.14 This work has identified that the land west of Beach Road, Cottenham, comprises a variety of ecological habitats but does not identify anything that may prejudice development proposal being brought forward for the site at this time.
- 4.15 Numerous opportunities have been identified to improve the biodiversity of the site post-development potentially to include:
- Retention and enhancement of orchard habitats;
  - The provision of native hedgerow and tree planting to emphasise the extent of the habitat within the development.
  - The provision of significant green space for residents to enjoy, which will also have the added benefit of helping to alleviate any potential impacts from recreational pressures on existing green infrastructure in the area.
  - The provision of integrated bird and bat boxes and small scale enhancement features such as invertebrate “bug hotels” and hedgehog highways.
- 4.16 It is proposed that the site will deliver a 10% net gain in bio-diversity on the site.

### **Summary**

- 4.17 In summary the vision document demonstrates that the site can accommodate new rural housing in an environmentally sensitive, sustainable and responsible manner. It is proposed that development of the site can deliver approximately 80 new homes offering opportunities across a range of house types, sizes and tenures including an appropriate proportion of affordable housing and green open space. The proposals as outlined through the Vision Document would deliver new high quality homes and open space in a sustainable and deliverable location, with access to essential local services and facilities, employment, public transport, education and leisure.

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## 5.0 Planning Policy

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### National Planning Policy

- 5.1 The revised National Planning Policy Framework was adopted on 24th July 2018 and updated in July 2021. The most relevant policies relevant to the site are as follows:
- 5.2 **Paragraph 8** of the NPPF covers the three dimensions to sustainable development: economic, social, and environmental.
- *“Help build a strong, responsive and competitive economy”*
  - *“To support strong, healthy and vibrant communities”*
  - *“To contribute to protecting and enhancing our natural, built and historic environment”.*
- 5.3 **Paragraph 11** demonstrates that *“plans and decisions should apply a presumption in favour of sustainable development...”* Therefore, *“plans should positively seek opportunities to meet the development needs of their area”.*
- 5.4 **Paragraph 68** outlines how *“small and medium sized sites can make an important contribution to meeting the housing requirement of an area.”* Therefore, local planning authorities should *“support the development of windfall”.*
- 5.5 **Paragraph 122** makes clear that developments should *“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users”.*
- 5.6 **Paragraph 124** explains that *“good design is a key aspect of sustainable development”.*
- 5.7 **Paragraph 137** outlines that Green Belts should serve the following five purposes:
- To check the unrestricted sprawl of large built-up areas
  - To prevent neighbouring town merging into one another
  - To assist in safeguarding the countryside from encroachment
  - To preserve the setting and special character of historic towns, and
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

### Local Planning Policy

- 5.8 The South Cambridgeshire Local Plan was adopted on 27th September 2018. It runs to 2031. Within this Plan, Cottenham is identified as one of five Rural Centres in South Cambridgeshire, ‘the largest and most sustainable villages’ within the District. The other

Rural Centres, as identified through the Plan comprise; Cambourne, Great Shelford & Stapleford, Histon and Impington and Sawston.

- 5.9 Rural Centres are considered the largest, most sustainable villages in the district with good access to a secondary school, employment opportunities, a variety of services and facilities and good public transport services to Cambridge. Since the Rural Centres represent the most sustainable villages in South Cambridgeshire the Local Plan places no ceiling on the number of houses to come forward in future developments in these Settlements.
- 5.10 The Cottenham Neighbourhood Plan was made in May 2021. The Plan identifies that to remain sustainable “a village should provide local homes and employment opportunities for current and future generations, with adequate education, health, leisure and recreation facilities within easy walking distance for most residents and good public transport link”.
- 5.11 Interestingly Policy COH/2-2 of the Neighbourhood Plan sets out requirements for the design of larger housing developments, defined as those over 50 units. It is clear therefore that the Neighbourhood Plan considers Cottenham a sustainable location able to accommodate larger developments. Under this policy any large housing proposal should, amongst other things, address, off-road transport routes, incorporation of open space, high-quality design, and layout that is reflective of the surrounding area.
- 5.12 The Greater Cambridge Plan will supersede the South Cambridgeshire Local Plan. It seeks to shape development within the area through to 2041.
- 5.13 Within the Plan Cottenham is reclassified as a ‘Minor Rural Centre’ relegating it from its status as a ‘Rural Centre’. The Plan states that the reclassification of Cottenham is to reflect a revision to the criteria for Rural Centres that requires that they must have high quality public transport in the form of a segregated public transport route. In essence this is deemed to be access to either one of the Greater Cambridge Partnership schemes or the Cambridgeshire Guided Busway. Within Minor Rural Centres Policy S/SH places an indicative limit on housing development of just 30 units.
- 5.14 Cottenham continues to benefit from good public access and a range of shops and services. It remains a sustainable location for future development. By all other measures Cottenham remains comparable to the other Rural Centres, if anything the recent developments in the village have consolidated this. It is considered that this site remains suitable for in excess of 30 houses. To summarise:
- Cottenham continues to offer good access to a secondary school, employment opportunities, a variety of services and facilities;
  - Cottenham is well served by public transport with bus services to Cambridge every 30 minutes;



- In terms of population, amenities and services Cottenham remains largely comparable to the other Rural Centres. Equally it is evident that Cottenham has a greater range of facilities relative to the minor rural centres and is better able to accommodate growth;
- The Neighbourhood Plan (May 2021) identifies a desire locally to consolidate and enhance existing services and amenities. Key issues highlighted in the plan include limitations on education, medical, leisure and recreational facilities however aspirations in the plan point to the retention of Cottenham as a Rural Centre.
- The demotion of Cottenham's status at the expense of the nearby centres of Waterbeach and Northstowe presents real challenge to the future viability of Cottenham, in terms of services and amenities. The Neighbourhood Plan raises concern about the potential of rival centres to draw residents from Cottenham. The promotion of local centres at the expense of Cottenham flies in the face of the neighbourhood plan aspirations.

5.19 Whilst there may be a rationale to promote strategic growth elsewhere therefore there appears no rationale to pre-judge and place a pre-ordained limit on development in Cottenham.

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## 6.0 Detailed Representations

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6.1 This section sets out the specific representation in the context of the Greater Cambridge Local Plan First Proposals.

### **Section 2 Aims (P21):**

6.2 We support the aims of the Greater Cambridge Local Plan, as set out at Section 2 of the Plan, to respond to:

- Climate Change;
- Bio-Diversity & Green Spaces;
- Wellbeing and Social Inclusion;
- Great Places;
- Jobs;
- Homes; and
- Infrastructure.

6.3 **Recommendation:** Support

### **Neighbourhood Plan Housing Targets (P27)**

6.4 Neighbourhood planning is specifically aimed at ensuring communities retain direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. It seems wholly inappropriate therefore for the Greater Cambridge Plan seeks to centralise these decisions stating that “...As such we are not relying on neighbourhood areas providing additional homes to met our requirements.” Similarly it is appropriate that emerging policies in the Greater Cambridge Local Plan reflect those made in Neighbourhood Plans.

6.5 **Recommendation:** Where an appropriate case can be made, in the context of national planning policy, Neighbourhood Plans should be afforded the ability to consider and bring forward housing developments appropriate to their needs and objectives.

### **What Alternatives did we Consider (P28)**

6.6 It is not clear that alternative patterns of growth were considered in preparing the plan. In particular the rationale for relegating Cottenham in the settlement hierarchy (see below) is unclear and to this end it is similarly not clear to what extent retention of Cottenham as a Major Rural Centre has been considered.

- 6.7 **Recommendation:** A refined strategy should be considered that allows an appropriate proportion of growth to take place in sustainable locations to compliment that being focused to strategic allocations.

#### **Policy S/DS – Development Strategy (P29)**

- 6.8 We support the proposed development strategy for Greater Cambridge in seeking to “direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.”
- 6.9 We do not agree however that this should dictate that the plan promote few strategic sites at the expense of all other existing centres in the District. The development strategy as proposed is overly reliant on strategic allocations. It does not consider what may happen to 5 year housing supply if these limited locations encounter delivery issues. Equally it does not consider the impact of both limiting growth in existing settlements such as Cottenham and promoting it elsewhere.
- 6.10 **Recommendation:** Existing Centres represent sustainable locations for residential development. It is important that future housing growth be distributed throughout the district in order to safeguard the future vitality and viability of existing settlements. This needs to be acknowledged within policy. The need for growth to sustain and help existing settlements thrive should be promoted.

#### **Policy S/DS: Development Strategy (Sources of Housing Supply) (P32)**

- 6.11 Very few sites for housing are identified outside of the strategic allocations. No sites are identified to contribute to Cottenham’s future vitality and viability.
- 6.12 It is evident that existing planning permissions in Cottenham will be built out over the next few years. The Plan then envisages no further development in Cottenham through to 2041. This is not a proactive strategy for maintaining and enhancing the vitality of a sustainable location. The Plan must set out options for the longer term future of sustainable locations such as Cottenham
- 6.13 Delivering extensions to existing communities and continuing to build on the strong cultural and social aspects of the larger settlements is vital in the progress towards achieving healthier communities. Proposing modern homes that create improved sustainable credentials and add vitality to existing neighbourhoods is not only a requirement of local and regional policy, but one that is adopted within the National Planning Policy Framework.
- 6.14 Limiting growth to just a few strategic allocations presents risks with disproportionate settlement growth presenting a real threat to settlements such as Cottenham resulting in

stagnated growth and poor support for local facilities. Furthermore the over reliance on strategy allocations is high risk in terms of continual supply and draw down for 5 year land supply. It is suggested that at the very least Green Belt is reviewed and where sites may be suitable for removal from this designation this should be identified and acknowledged and such sites should safeguarded for future residential development should it be required.

- 6.15 As per the proposals presented in the Vision Document submitted alongside these representations it is proposed that Land off Beach Road, Cottenham is identified in the Greater Cambridge Local Plan for the development of up to 80 houses.
- 6.16 It is considered that the development of the site could contribute substantially to the social and economic growth of Cottenham Its significance as an important settlement within the district. Extensive assessments of the site have concluded that its development would result in minor impacts to the character and openness of the Green Belt and the wider landscape, whilst also outlining the opportunity to provide policy compliant levels of biodiversity enhancement and affordable housing.
- 6.17 It is clear that development of this site will not impinge on the environs of Cambridge. A Green Belt review has been undertaken having regard the potential development of the site concluding that the release of the parcel for residential development would have no impact on 4 of the 5 functions of Green Belt and only minor impacts on the purposes of the Cambridge Green Belt as identified in the Greater Cambridge Local Plan.
- 6.18 Similarly, given the nature of the site and the surrounding landscape, a Landscape Visual Impact Assessment has also been prepared for the site. It notes that the site is within a transitional area at the edge of the Fen Edge Village and bordered by a series of orchards, hedges and trees to the southeast, by (mostly modern 2-storey brick) housing on Brenda Gautry Way to the north and further residential areas to the west. To its northeast and eastern edge, the site fronts Beach Road and includes a number of dwellings on the road frontage, with further estate development beyond. It is considered that development of the site can be managed sensitively so as to be read as part of the existing settlement and minimise any impacts on the local landscape.
- 6.19 The vision document demonstrates that the site can accommodate new rural housing in an environmentally sensitive, sustainable and responsible manor. It is proposed that development of the site can deliver approximately 80 new homes offering opportunities across a range of house types, sizes and tenures including an appropriate proportion of affordable housing and green open space. The proposals as outlined through the Vision Document would deliver new high quality homes and open space in a sustainable and deliverable location, with access to essential local services and facilities, employment, public transport, education and leisure.
- 6.20 To conclude, Cottenham's sustainable location within the district, in combination with the highly accessible transport connections, make the village an appropriate location for future growth. The site itself represents a wholly viable option for residential development and it is recommended therefore, that this site be allocated for residential development in the emerging Greater Cambridge Local Plan.

- 6.21 **Recommendation:** Land off Beach Road, Cottenham be identified as a site suitable for the development of up to 80 new homes.

A Green Belt Review should be undertaken and where to identify locations where the removal of sites from this designation will be appropriate in time. These sites should then be safeguarded for future development either in case there is an issue with delivery of strategic allocations or to inform future iterations of the plan.

#### **Policy S/SH Settlement Hierarchy (P48)**

- 6.22 The Plan states that ‘Cottenham should be classified as a Minor Rural Centre reflecting a revision to the criteria for a segregated public transport route such as the Greater Cambridge Partnership schemes of the Cambridgeshire Guided Busway, which is not the case of Cottenham.’
- 6.23 We strongly disagree that Cottenham should be relegated in the settlement hierarchy.
- 6.24 Policy S/SH fails to define each categorisation of settlement simply stating the limits that will be placed on development within each tier.
- 6.25 In the South Cambridgeshire Local Plan Rural Centres are defined as those that are the largest, most sustainable villages of the district. They have good access to a secondary school (either within the village or accessible by good public transport), employment opportunities, a variety of services and facilities and have good public transport services to Cambridge or a market town.
- 6.26 Meanwhile minor Rural Centres are defined as those that have a lower level of services, facilities and employment than Rural Centres, but a greater level than most other villages in South Cambridgeshire, and often perform a role in terms of providing services and facilities for a small rural hinterland.
- 6.27 We maintain on this basis that Cottenham should remain a Rural Centre. The shortcomings in the approach proposed in the Greater Cambridge Plan is summarised below:
- Cottenham continues to benefit from good public access and a range of shops and services. It remains a sustainable location for future development. By all other measures Cottenham remains comparable to the other Rural Centres, if anything the recent developments in the village have consolidated this. It is considered that this site remains suitable for in excess of 30 houses. To summarise:
  - Cottenham continues to offer good access to a secondary school, employment opportunities, a variety of services and facilities and have good public transport services to Cambridge.

- In terms of population, amenities and services Cottenham remains largely comparable to the other Rural Centres. Equally it is evident that Cottenham has a greater range of facilities relative to the minor rural centres and is better able to accommodate growth;
- The Greater Cambridge Plan (First proposals) does not define what is deemed to constitute a Town, Rural Centre or Minor Rural Centre. Notwithstanding, if you look at population, amenities and services however Cottenham remains largely comparable to Histon & Impington, Great Shelford & Stapleford and Sawston. Equally it is evident that Cottenham has a greater range of facilities relative to the minor rural centres;
- It is stated within the Greater Cambridge First proposals that the reason for changes to the settlement hierarchy, is due to a revision to the criteria for a Rural Centre, in that they must have high quality public transport in the form of a segregated public transport route, such as the Greater Cambridge Partnership schemes, or the Cambridgeshire Guided Busway. There is no justification for this fixation on certain forms or mediums of public transport. There is no doubting that Cottenham is accessible to the Greater Cambridge Area. There appears no sound logic for demoting the centre on this basis.
- Cottenham benefits from a bus service to Cambridge every half hour. This service takes approximately 31 minutes where as services from Great Shelford and Stapleford take approximately 20-32 minutes, current services from Cambourne take approximately 30-50 minutes and services from Sawston take approximately 45 minutes. There is no clear basis on which Cottenham is therefore now deemed less accessible than the other Rural Centres therefore;
- The Neighbourhood Plan (May 2021) identifies a desire locally / need to consolidate and enhance existing services and amenities, with policy that acknowledges the potential for sites in excess of 50 houses to come forward. Key issues highlighted in the plan include limitations on education, medical, leisure and recreational facilities. Aspirations in the plan point to the retention of Cottenham as a Rural Centre. Demotion of Cottenham's status runs contrary to the policy aspirations of the Neighbourhood Plan.
- The viability of Cottenham remains dependent on a critical mass of residents. It is in this context that the new residential development has been permitted in recent years. The neighbourhood plan identifies 500 units are to be added to Cottenham following permission granted in 2017-2018. This will increase the population further in Cottenham. It is counter intuitive to down grade Cottenham in the settlement hierarchy having just allowed this growth which in effect consolidates its status as a rural centre.
- Further to the above, demotion of Cottenham's status at the expense of the nearby centres of Waterbeach and Northstowe presents real challenge to the future viability of Cottenham, in terms of services and amenities, given there potential appeal. The Neighbourhood Plan raises concern about the potential of rival centres to draw residents



from Cottenham. Again, the promotion of local centres at the expense of Cottenham, which is instead being actively downgraded, fly's in the face of the neighbourhood plan aspirations.

- In determining applications for previous housing development in Cottenham, South Cambridgeshire District Council and the Planning Inspectorate have concluded that Cottenham is a sustainable, suitable location for large scale housing development.

6.28 Cottenham was promoted from a Minor Rural Centre to a Rural Centre in the South Cambridgeshire Local Plan 2018 on the basis of its accessibility generally and its range of facilities and services. Since this time further residential development has taken place in the village. In this context it is unclear why Cottenham is considered to have become less sustainable.

6.29 A blanket limit of 30 units on any development site in a centre such as Cottenham, that is able to offer a sustainable range of services and facilities, runs contrary to the NPPF. Cottenham has in recent years been viewed as a sustainable location for additional housing. It is clear on this basis that any policy should allow for the review of the respective merits of any future residential proposals rather than simply prohibiting development on the basis of a generic, uninformed benchmark. Similarly it is clear that this policy runs contrary to Policy COH/2-2 of the Cottenham Neighbourhood Plan.

6.30 **Recommendation:** Cottenham's role in the Spatial Strategy be reconsidered. Cottenham be identified as a Rural Centre allowing for the consideration of any future residential proposals on their respective merits having regard to the accepted sustainability of the village.

#### **Policy S/SB Settlement Boundary (P51)**

6.31 We acknowledge a requirement to identify existing settlements and their boundaries. It should be acknowledged however that this reflects a snap shot in time. A blanket ban on development outside of a settlement boundary should not be adopted as is in effect currently proposed. Rather policy should allow for the consideration of all future proposals on their respective merits in line with the NPPF.

6.32 Land off Beach Road, Cottenham is closer to many existing facilities and services than existing built up areas of the settlement. As has been determined on previous applications approved in Cottenham the location of a site outside the settlement boundary does not necessarily prejudice its accessibility nor the ability for development to integrate with and complement existing development.

6.33 **Recommendation:** Policy should not put a blanket ban on development outside of the settlement boundary, in effect pre-judging any such proposal, rather it should set out a series of criteria allowing development proposals to be assessed on its respective merits.

### **Policy BG/BG: Biodiversity and Geodiversity (P168)**

- 6.34 We acknowledge the importance of delivering bio-diversity net gain as an integral part of future development. Notwithstanding this, no sound basis has been provided for the requirement for a 20% net gain in biodiversity proposed under this policy.
- 6.35 The Government considers a 10% net gain sufficient to mitigate the impact of new development and it should be recognised that the Environment Act does not set this as a minimum. No basis is presented therefore as to why Greater Cambridge should adopt a different approach to the other areas of the Country.
- 6.36 The result of requiring a 20% net gain will likely be to make some schemes unviable. Equally it will potentially reduce the number of units coming forward on sites requiring identification and delivery of further sites for development which is counter intuitive to the original objective.
- 6.37 **Recommendation:** It is strongly recommended that the policy is amended to require a 10% net gain in bio-diversity, as per the approach established through the Environment Act.

### **Policy GP/LC: Protection and Enhancement of landscape character (P209)**

- 6.38 We acknowledge the need to fully consider the effects of development and change in the landscape character. Policy should not seek to pre-judge development proposals however and instead ensure it allows for the consideration of a proposal on its respective merits. Equally it is important that policy should not focus solely on impacts and equally recognise benefits development can bring. To this end we support acknowledgement that new development can provide opportunities to enhance the landscape, such as by improving the edge of settlements.
- 6.39 **Recommendation:** Policy should continue to allow for the consideration of development on its own merits, alongside any potential impacts recognising that development can bring benefits in the context of landscape character.

### **Policy CP/GB: Protection and enhancement of the Cambridge Green Belt (P212)**

- 6.40 Policy makes it clear that the purpose of Green Belt identified around Cambridge is to:
- Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
  - Maintain and enhance the quality of its setting;
  - Prevent communities in the environs of Cambridge from merging into one another and with the city.

6.41 A Green Belt Review of Land off Beach Road has been undertaken. Having specific regard to the above purposes of the Cambridge Green Belt it is considered that this parcel of land only partial contributes to maintaining and enhancing the quality of its setting. On this basis it is concluded therefore that there would only be limited effect therefore from releasing the land from Green Belt for development.

6.42 **Recommendation:** Policy should allow for the removal of sites from the Green Belt for residential development where it can be show that this would not prejudice the purposes of Cambridge's Green Belt.

**Policy GP/QD: Achieving high quality development (P214)**

6.43 Policy GP/OP seeks to achieve high quality development. It requires that development be designed with communities in mind, namely to:

- Ensure that buildings are orientated to provide natural surveillance and maximise opportunities to create active ground floor uses;
- Create active edges on to public space by locating appropriate uses, as well as entrances and windows of habitable rooms next to the street;
- Use design to minimise adverse impact on neighbouring buildings and spaces in terms of privacy and overlooking, sunlight and daylight, overshadowing and other micro climate considerations, artificial lighting, vibration, noise, fumes and odour, and other forms of pollution;
- Introduce mixed uses proposals in a way that can benefit all occupants where appropriate, avoiding the mixing of incompatible uses.

6.44 The promotion of good design is supported. The Masterplan proposals accompanying these representations demonstrate the potential to deliver these objectives through the development of Land of Beach Road.

6.45 **Recommendation:** Where this objectives can be demonstrated policy should make clear that this will carry significant weight in the consideration of the proposal.