



Representation to the Greater  
Cambridge Local Plan: First Proposals  
The Church Commissioners for  
England

December 2021

# 1. Introduction

- 1.1 Deloitte LLP (“Deloitte”) is instructed by the Church Commissioners for England (“the Commissioners”) to submit representations to the Greater Cambridge Local Plan: First Proposals (“the First Proposals”) which is subject to public consultation until 13<sup>th</sup> December 2021.
- 1.2 The consultation is run by the Greater Cambridge Shared Planning team as Cambridge City Council and South Cambridge District Council work together to create a joint Local Plan for the two areas. Collectively, for the purpose of this representation, the two councils are referred to as “the Councils”.
- 1.3 In addition to the First Proposals document, comment is also provided in relation to the various evidence base documents that seek to underpin the emerging Local Plan.
- 1.4 With regards to the structure of these representations, the following section (section 2) relates to ‘Background and Context’; setting out the plan-making policy context against which these representations have been prepared, further detail regarding the Commissioners and the Commissioners’ interests within the Greater Cambridge area and the work that has been undertaken by the Commissioners to date, to demonstrate the development potential of their interests within the Plan period. Section 3 provides comment in response to the First Proposals document, the emerging policies and supporting text. Comments within section 3 will follow the same order as the Greater Cambridge Response Form for detailed policies. Section 4 provides an overview and summary of the key discussion points.
- 1.5 In addition to this representation, please note that revised site information has also been submitted via the Greater Cambridge on-line form in respect of the Commissioners interests. Information was previously submitted in response to the Call for Site exercise that ran in 2019-2020.

## 2. Background and Context

2.1 The following provides the context and background for the preparation for this representation notably; the overarching national policy context, details regarding the Commissioners, their interests within the area and the work completed to date in respect of their interests.

### Planning Policy Context

2.2 In preparing this representation, consideration has been had for Chapter 3 of the National Planning Policy Framework issued in July 2021 (“the NPPF”) which relates to ‘plan-making’.

2.3 In summary, paragraph 16 identifies that plans should be prepared:

- a) With the objective of achieving sustainable development;
- b) Positively, in a way that is aspirational but deliverable;
- c) Shaped early with effective engagement between the plan-makers, local communities and stakeholders;
- d) Contain clear and unambiguous policies;
- e) Should be easily accessible through digital tools; and
- f) Serve a clear purpose.

2.4 As identified at paragraph 35, local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are ‘sound’. The test for soundness as set out within the NPPF is as follows:

Plans must be:

- a) Positively prepared;
- b) Justified;
- c) Effective; and
- d) Consistent with national policy.

2.5 Whilst the emerging local plan is currently at Regulation 18 stage, it is important to have consideration for the test for soundness in reviewing the First Proposals, identifying where the Councils may need to provide further information to ensure that at the examination stage, the Plan is compliant with paragraph 35 of the NPPF.

### The Church Commissioners for England

2.6 The Commissioners are a registered charity, established to manage the Church of England’s historic assets, and are responsible for providing financial support for the work and mission of the Church of England across the country. This support includes contributing to the cost of clergy stipends and pensions, bishop and cathedral costs, and providing support for parishes, especially where there is a particular need. The Commissioners are responsible for managing a property portfolio that includes commercial, rural and residential property, as well as strategic land, forestry and indirect property investments.

2.7 The Commissioners are active across the region that spans the Oxford and Cambridge Arc, responding to strategic plan consultations such as the Oxford-Cambridge Arc Spatial Framework, infrastructure consultations including the East West Rail 'Making Meaningful Connections' consultation earlier in 2021 and participating in the examination of the proposed A428 Black Cat to Caxton Gibbet Development Consent Order.

### **The Kingsfields, Land to the West of Cambourne**

- 2.8 The Commissioners hold significant levels of land interest across the Oxford-Cambridge Arc, including land at a site referred to as 'The Kingsfields' ("the Site"), which is located within the Greater Cambridge area. This representation has been prepared in the context of this Site and its suitability for future development.
- 2.9 The Site is located to the west of the consented Cambourne West development and to the east of the existing village of Eltisley. The Site is bisected by the A428 and comprises three parcels under the Commissioners ownership, with a fourth parcel the subject of an Option Agreement between the Commissioners and landowner. The Commissioners land covers an area of approximately 350 hectares, with the Option Agreement land cover a further 51.6 hectares.
- 2.10 The Commissioners' acquired the Site in January 2021 and consequently the Commissioners have not previously submitted representation to the emerging local plan. It should however be noted that the Site (excluding the area covered by the Option Agreement) has previously been submitted by others as part of the Greater Cambridge Call for Sites exercise and is included within the Greater Cambridge Housing and Economic Land Availability Assessment (September 2021) ("HELAA") as site reference "51668 – Land north and south of Cambridge Rd, Eltisley".
- 2.11 Further detail regarding the Site and its potential to accommodate residential-led mixed use development, is discussed in detail in response to emerging Policy S/CB: Cambourne' ("Policy S/CB").

### **Supporting Work to Date**

- 2.12 This representation, particularly the response to Policy S/CB, should be read alongside the Vision Document for the Site prepared by JTP, titled 'A Vision for The Kingsfields'. The Vision Document details the Commissioners' vision for the Site and the concepts underpinning this. It demonstrates how future development could help to contribute towards both Greater Cambridge's growth aspirations and those of the wider Oxford-Cambridge Arc.
- 2.13 The Vision Document has been informed by a suite of technical work including: highways and access information (as detailed within the Transport Written Representation) (Pell Frischmann); flood risk and drainage information (Pell Frischmann); existing utilities information (Pell Frischmann); a heritage desk based assessment (Cotswold Archaeology); an ecological preliminary assessment and wintering bird survey (Ecology Solutions); landscape information (The Richards Partnership); and sustainability information (Hoare Lea). The technical information can be found woven throughout the document and where relevant, full reports are appended.

# 3. The First Proposals

3.1 This section of the representation responds directly to the relevant headings as identified in the Councils' response form for detailed policies.

## Vision and Development Strategy

### Vision and Aims

#### *The Vision*

- 3.2 The Commissioners strongly endorse the Councils' vision of Greater Cambridge that is focused on decreasing climate impacts and increasing the quality of everyday life for all communities. The vision as set out at page 21 of the First Proposals, identifies that the Councils are working to prepare a Plan that takes *"inspiration from what is unique about our area and embraces the bold new approaches that will help us achieve this vision"*.
- 3.3 The factors that equate to the area's uniqueness are woven throughout the First Proposals. The First Proposals acknowledge that agriculture is a key economic and environmental resource for the Greater Cambridge area (page 235) and that the area sits at the heart of several economic corridors including; the Oxford-Cambridge Arc ("the OxCam Arc"), the UK Innovation Corridor and the Cambridge-Norwich Tech Corridor (Page 14). The document also highlights the area's global reputation for innovation (page 21). As identified at page 25 of the First Proposals, the 'Centres for Cities' report published in 2021 describes Cambridge as one of the most important research and innovation-led employment hubs in the UK and in recent years, it states, the city started from a strong, well-educated employment base and moved from strength to strength. Recent fast jobs growth has resulted in implications for housing demand (as identified at page 25 of the First Proposals).
- 3.4 In establishing a vision for the Site, the Commissioners have taken inspiration from the unique characteristics of the area, as summarised above. The bold approach which the Commissioners have taken in creating a vision for the Site, which would align with the Councils' vision for the Greater Cambridge area, is set out within the accompanying Vision Document and discussed further in response to Policy S/CB.

#### *The Aims of the Plan*

- 3.5 In turning to look at the Councils' aims for the Plan which relate to: climate change; biodiversity and green space; wellbeing and social inclusion; great places; jobs; homes; and infrastructure, all align closely with the five priority areas as included within the accompanying Sustainability Charter prepared by Hoare Lea on behalf of the Commissioners, in relation to the Site. The Sustainability Charter has helped underpin the formulation of the Vision Document and the Commissioners' sustainability related aspirations for the Site. Further information regarding the Sustainability Charter is provided in response to Policy S/CB found later within this document.
- 3.6 The Commissioners support the ethos of the aims but, as is the requirement of the NPPF (paragraph 16 (b)), for Plans to be aspiration but deliverable, the Commissioners consider that, particularly in relation to 'homes' the Councils could go further to align with this national policy. The housing aim simply states that the Local Plan plans *"for enough housing to meet our needs"*. Given that paragraph 60 of the NPPF identifies that it is the Government's objective to significantly boost the supply of homes and that the local housing needs

assessment only identifies a minimum number of homes needed, this aim should be updated to be more aspirational. It is suggested that the aim is amended to:

**“Homes: Plan for enough housing to meet our needs, as a minimum, including significant quantities of housing that is affordable to rent and buy, and different kinds of homes to suit our diverse communities.”**

#### How much development and where – general comment

- 3.7 It is welcomed that the Councils are preparing the Local Plan having consideration for the wider regional context. The *“Government for the Oxford-Cambridge Arc”* (“the OxCam Arc”) is listed at page 11 of the Councils’ ‘Duty to Cooperate Statement of Common Ground’ (“the Duty to Cooperate”) as a relevant body with whom liaison is required when considering the spatial strategy and potential implication on cross-boundary matters. The importance of this is highlighted at page 11 of the Duty to Cooperate which states *“in principle, the levels and location of housing and employment growth could have cross-boundary implications particularly due to the resulting commuting patterns”*. Page 13 of the Duty to Cooperate identifies that engagement has taken place with *“neighbouring and nearby authorities within the Arc, but not more widely with the Arc as a whole”*. The Councils identify that this reflects *“the wide geography and related nature of responsibilities”* and that *“it would also be somewhat challenging to identify and engage with relevant stakeholders who would be able to provide input to the Greater Cambridge duty to cooperate from an Arc-wide perspective, or else to identify an appropriate forum to discuss such issues”*.
- 3.8 As the Councils are aware (as referenced at section 1.2 of the First Proposals), in July 2021 the Ministry of Housing, Communities and Local Government, now known as the Department for Levelling Up, Housing and Communities, commenced scoping consultation on the ‘Oxford-Cambridge Arc Spatial Framework’. The consultation sought views on what the vision for the future growth of the OxCam Arc should be to 2050, to be delivered through the OxCam Arc Spatial Framework. The consultation did not identify specific growth targets or give any indication as to where within the OxCam Arc this growth should be focused. It is anticipated that this will be addressed at later stages in the formulation of the OxCam Arc Spatial Framework. However, it is imperative that the Councils are actively engaged in a forum for such discussions whilst preparing the Local Plan, as the Arc Spatial Framework evolves to set the growth ambitions for the wider regional area up until 2050. The Commissioners suggest that whilst *“challenging”*, in order to ensure compliance with paragraph 16 of the NPPF which requires Plans to be shaped by *“early, proportionate and effective engagement”* between plan-makers and stakeholders, the Councils should seek to identify or establish a suitable forum for engaging with the Government for the OxCam Arc.

#### Policy S/JH: New jobs and homes (“Policy S/JH”)

##### *The Plan Period*

- 3.9 Emerging Policy S/JH sets out the levels of need that development will meet with regards to jobs, homes and accommodation for gypsies, travellers and travelling showpeople, within Greater Cambridge over the Plan period. The Plan period as set out within the First Proposals runs between 2020 and 2041.
- 3.10 With regards to the identified Plan period it is considered that this should be:

## Extended to at least 2050 in order to align with the Plan period for the OxCam Arc's Strategic Framework.

- 3.11 This would help facilitate for properly planned strategic growth across the wider region over the next 30 years.
- 3.12 Furthermore, page 31 of the First Proposals states that *"consistent with the new National Planning Policy Framework, our vision for Greater Cambridge looks not only to the plan period of 2041, but well beyond to 2050, reflecting that significant development identified in our strategy will continue beyond the plan period from the range of strategic sites identified, including the new settlements"*. As the Councils allude to, Paragraph 22 of the NPPF now requires policies to be set within a vision that looks further ahead, this being *"at least 30 years"*, where larger scale developments such as new settlements or significant extensions form part of the strategy for the area. However, chapter 2 of the First Proposals which sets out the Council's vision and aims and includes Policy S/JH, is titled 'Greater Cambridge in 2041'; there needs to be clarity around the period that the Councils' are establishing a vision and planning for and, having regard for the above comments related to the Plan period for the OxCam Arc and the Councils' proposed use of large scale developments, it is again recommended that this is extended to at least 2050.

### *Objectively Assessed Needs*

- 3.13 Policy S/JH identifies that within the Plan period, the Local Plan will facilitate development to meet the objectively assessed needs ("OAN") for 58,500 jobs and 44,400 homes, reflecting an annual OAN of 2,111 homes per year. It is welcomed that the Councils have sought to plan for growth that extends beyond the figure calculated using the standard method in national planning guidance. As identified within the Government's 'Indicative Local Housing Needs (December 2020 Revised Methodology)' table, using the standard method would result in 1,085 homes per year for South Cambridge and 685 homes for Cambridge City, equating to 1,743 homes per year across both authorities, or 36,603 homes over a 21 year Plan period (such as that included within the First Proposals). If the Plan period were to be extended until 2050, using the OAN figure, this would equate to a total need for 63,330 new homes or, 52,290 homes using the Government's standard method.
- 3.14 Paragraph 61 of the NPPF identifies that *"exceptional circumstances"* should justify an alternative approach to using the standard method. The evidence for the use of the alternative approach is included at page 22 of the Councils' 'Development Strategy Topic Paper' which states that the 'Employment Land and Economic Development Evidence Study' and 'Greater Cambridge Housing and Employment Relationships Report', commissioned in parallel by the Councils, found that the standard method housing figure set by Government *"would not support the number of jobs expected to arise between 2020 and 2041"* and *"it would also be a substantially lower annual levels of jobs provision that has been created over recent years"*. Planning for this figure would *"risk increasing the amount of longer distance commuting into Greater Cambridge, with the resulting impacts on climate change and congestion"* and as such, as is also concluded by the Councils at page 23 of the Development Strategy Topic Paper, it cannot be considered that the standard method housing represents the OAN for homes and jobs within Greater Cambridge.

### *Growth Options*

- 3.15 In turning to look at the identified OAN set out within Policy S/JH, the OAN for 58,500 jobs over the Plan period is based on the 'medium' growth level as set

out within the Local Plan 'First Discussions' consultation. A full range of previously identified growth options for homes, alongside the associated possible jobs outcomes, is included at page 21 of the Development Strategy Topic Paper. The growth options were informed by the work undertaken as part of the Employment Land and Economic Development Evidence Study and Greater Cambridge Housing and Employment Relationships Report and as such is underpinned by suitable evidence however, it is questionable as to whether the most appropriate growth scenario has been applied. Whilst the Councils are planning for 'medium' growth as the most likely level of new jobs, the Employment Land and Economic Development Evidence Study also identified a higher growth forecast, placing greater weight on the fast growth experienced in the recent years. The 'maximum' growth level would result in 78,700 jobs over the Plan period and 53,500 homes, equivalent to 2,549 homes per year. The Councils identify at page 25 of the First Proposals that they are "*mindful*" of the fast growth experienced in recent years, albeit it has not been reflected within Policy S/JH.

- 3.16 When referencing the higher employment scenario, the Development Strategy Topic Paper states at page 24 that "*by implication from the wording included in the Employment Land Review regarding the central [medium] scenario, this outcome is considered possible but not the most likely*". Firstly, it is assumed that references to the "*central*" (otherwise known as the 'medium' scenario) is a typo and that this should read "*higher*" (or "*maximum*"). Secondly, if this growth option is "*possible*", then the Councils should be planning for it. As identified within the NPPF, the planning system should be "*genuinely plan-led*" (paragraph 15) with plans "*prepared positively, in a way that is aspirational*" (paragraph 16) and strategic policies making sufficient provision for housing and employment development (paragraph 20). Subsequently, failure to plan for this possible growth could result in the Plan being contrary to national policy.
- 3.17 Furthermore, as is identified at page 11 of the Development Strategy Topic Paper, in 2017 the National Infrastructure Commission identified the OxCam Arc as a national economic priority. In light of this, whilst details regarding the quantum of development to be sought through the OxCam Arc Spatial Framework are yet to be determined, it is anticipated that proposed growth levels will be high in order to support the realisation of this national economic priority. Given that a forum for discussion between Greater Cambridge and the Government for the OxCam Arc is yet to be established (as discussed in response to 'How much development where – general comment'), it is unclear as to what extent the identification of this economic national priority has fed into considerations regarding the Councils' own future growth plans as set out within the First Proposals. Similarly, within the evidence base, it is not explicitly clear what assumptions have been made with regards to the implications key infrastructure projects such as the A248 improvement works and East West Rail proposals (as discussed in the Commissioners' response to Policy S/DS) will have on attracting investment and subsequently growth, to the area.
- 3.18 In respect of the above, the Commissioners would urge the Councils to review the growth assumption applied in calculating the OAN and the justification for not using the 'higher' or 'maximum' levels.

S/DS: Development Strategy ("Policy S/DS")

*The Policy Direction*

- 3.19 As identified at page 29 of the First Proposals, Policy S/DS sets out the proposed strategy for the pattern, scale and design quality of places created in Greater Cambridge, "*not only for the plan period but beyond to 2050*". With regards to this, we reiterate the comments made in response to Policy S/JH and the recommended requirement to extend the Plan period to 2050.



- 3.20 The preferred option for the proposed policy direction is a *“blended strategy”* (page 38 of the First Proposals) that is strongly focused on growth that directs 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”*. The proposed development strategy seeks to take up *“opportunities to use brownfield land”* and *“responds to opportunities created by proposed new infrastructure”*. Firstly, the Commissioners wish to highlight that within the document, there is no clarity as to what is meant by development having *“the least climate impact”*, the term is not defined, leading to ambiguity for developers as to what proposals should be seeking to achieve. This is contrary to the requirements of paragraph 16(d) of the NPPF. Secondly, it is highlighted that the redevelopment of brownfield land can bring its own challenges with regards to sustainability; such sites are usually associated with higher abnormal costs which can sometimes put pressure on viability and the ability to deliver higher standard, sustainable developments.
- 3.21 With regards to the policy direction, the First Proposals document goes onto identify that the Councils propose to meet their housing and jobs needs by taking account of existing planning permissions, *“alongside a limited number of new sites in the most sustainable locations”*. Page 31 of the First Proposals identifies that in terms of the Councils’ new settlements, it is proposed that Cambourne will be evolved and expanded into *“a vibrant town alongside the development of the new East West Rail station, which will make it one of the best connected and most accessible places in the area”*.
- 3.22 Strategically Cambourne is ideally located, being approximately 15 kilometres to the west of Cambridge city centre and to the south of the A428, the highway that connects Cambridge with the A1 to the east.
- 3.23 In terms of proposed infrastructure works, there are two significant strategic transport schemes within proximity to Cambourne that are being developed by National Highways and East West Rail, to support future growth within the area. These relate to improvements to the A428 Black Cat to Caxton Gibbet and East West Rail between Oxford and Cambridge.
- 3.24 In terms of the A428 improvement works, National Highways has identified the upgrade of the A428 as a strategically important scheme to enable delivery of the Oxford-Cambridge growth corridor, the delivery of which is identified in National Highway’s ‘RISE2 5-year Delivery Plan’. The delivery of the scheme will have a significant beneficial impact on the potential for development within the locality and importantly for the Site. This is discussed further within the Transport Written Representation prepared by Pell Frischmann on behalf of the Commissioners, which accompanies this representation.
- 3.25 With regards to the East West Rail proposals, of relevance is the central section of the proposed East West railway line which is planned to link Bedford to Cambridge. This will form the final stage of the larger project to link Oxford and Cambridge. This scheme would include the construction of a new station at Cambourne. The route alignment and location of the station, which would either sit to the north-east or south-east of the Site, is yet to be announced. However, as detailed at page 23 within the East West Rail Company’s ‘Making Meaningful Connects Consultation Document’ (2021), it is anticipated that the scheme at Cambourne will support the potential for *“new housing and communities within the area”* and *“bring economic growth to the community, creating more jobs and prosperity”* through the new station.
- 3.26 Subsequently, the Commissioners strongly support the identification of growth at Cambourne.

### *The Source of Housing Supply*

- 3.27 Emerging Policy S/DS goes on to identify the total additional homes that need to be identified within the Plan; 11,640. This figure takes account of the identified housing need for the period 2020-2041 (44,400 homes), application of a 10% buffer (4,400 homes) to provide “flexibility to deal with unforeseen circumstances” and the current committed housing supply (37,200 homes).
- 3.28 As discussed in response to Policy S/JH, the Commissioners consider that the identified housing need of 44,400 should be reviewed and increased to reflect the higher growth scenario. We do not propose to repeat the reasoning for this in response to Policy S/DS (please refer to the Commissioners response to Policy S/JH for completeness) however, based on this scenario, the Commissioners consider that the total additional homes to be identified in the emerging Local Plan between 2020 and 2041 should be at least **21,650**, as calculated below:

Plan Period (2020-2041): Housing need based on ‘higher’ growth (53,500 homes) + 10% buffer for flexibility (5,350 homes) – Current housing supply (37,200 homes) = **21,650 homes**

- 3.29 If the Plan period were to be extended until 2050, as recommended in the Commissioners’ response to Policy S/JH, based on the high growth scenario, the total additional homes to be identified in the emerging Local Plan should be at least 46,917, as calculated below:

Recommended Plan Period (2020-2050): Housing need based on ‘higher’ growth (76,470 homes) + 10% buffer for flexibility (7,647 homes) – Current housing supply (37,200 homes) = **46,917 homes**

- 3.30 Even if the Plan period were to remain as currently proposed (2020-2041), this results in the Council needing to identify a further 10,010 homes. This is a significant increase (approximately 46%) from the current requirement, which the Commissioners consider the Councils need to identify in order for the Plan to accord with national policy, specifically paragraph 20, which requires strategic policies to “make sufficient provision” for (*inter alia*) housing. Clearly, if the Plan period were to be increased to 2050, the requirement would further drastically increase, with the Council needing to identify 35,277 new homes in addition to the 11,640 identified within the First Proposals.
- 3.31 The sources to meet the housing requirement as set out within the First Proposals are included within the table that follows the ‘Homes to provide for’ table within the document. Upon review of the sources of supply table, the identified supply results in only 11,596 homes being identified between 2020 and 2041, 44 homes less than the requirement as it currently stands. Therefore, and notwithstanding the Commissioners comments regarding the need to significantly increase the housing requirement, the Councils should be at least identifying sufficient supply to meet the identified requirement.
- 3.32 The Commissioners support the identification of new development at Cambourne within the sources of supply table. Page 38 of the First Proposals relates to the Councils’ justification for Policy S/JH and it states, “the most sustainable location for strategic scale development away from Cambridge is to expand on existing development in the Cambourne area, taking advantage of the significant benefits that will be provided by the proposed East West Rail station

*as well as the improvements already anticipated from the Greater Cambridge Partnership's Cambourne to Cambridge scheme. This significant improvement in public transport provides an opportunity to grow an existing town, enhancing the critical mass of population, employment and services available locally to those communities".* The evidence that has underpinned this justification is detailed at page 73 of the Councils' Development Strategy Topic Paper. As discussed in response to Policy S/SD and explored further in the upcoming response to Policy S/CB, the Commissioners concur with this assessment.

- 3.33 The policy goes on to identify that 1,950 homes of the 11,640 additional homes to be identified within the Local Plan, as required by the Councils, should be directed to Cambourne. This equates to approximately 17% of the overall additional homes to be identified supply. However, what is not clear within the First Proposals document is which sites have been included within the current housing supply figure. Therefore, when reviewing the First Proposals document alone, it lacks transparency as to how the overall figure for future development at Cambourne during the Plan period accords with the Councils' development strategy.
- 3.34 Based on the current 17% distribution figure as discussed above, if the housing need were to be based on the high growth figure resulting in the Councils needing to identify 21,650 additional homes in the currently proposed Plan period, then this would equate to approximately 3,600 new homes to be planned for at Cambourne. This would further increase if the Plan period were to be extended to 2050. Subsequently, the Commissioners consider that the Councils should be planning for a significant extension or new settlement within the area. The Commissioners' Site, The Kingsfields, has the ability to accommodate such growth. As set out within the Vision Document that accompanies these representations, it is considered that the Site could accommodate circa. 4,500 new homes.
- 3.35 Whilst the First Proposals document includes an infographic showing the proposed housing trajectory for the different types of supply (page 35), it does not include a trajectory setting out the anticipated rate of development for specific sites, nor does it consider the reasons as to why this exclusion is considered appropriate. This is a requirement of national policy (as detailed at paragraph 74 of the NPPF) and as such, the Commissioners recommend that the Councils address this within the emerging Local Plan's next iteration.

#### Policy S/SH: Settlement Hierarchy ("Policy S/SH")

- 3.36 The proposed settlement hierarchy identifies Cambridge at the top of the hierarchy and as the main urban centre in Greater Cambridge. Outside of Cambridge, it is proposed the hierarchy remains as set out within the South Cambridge Local Plan, subject to a number of changes. One of these changes is including Cambourne as a new town, along with Northstowe and Waterbeach new towns. The changes have been informed an updated settlement assessment which identifies that Cambourne is a growing centre, with a growing level of services, facilities, and transport opportunities. As identified at page 48 of the First Proposals, these areas of growth for Cambourne have been *"recognised by it now having a town council, and it is considered that this should be recognised in the local plan"*. The Commissioners agree with this assessment and support the identification of Cambourne as a new town within the emerging settlement hierarchy.

## **New Settlements**

### New settlements – general comments

- 3.37 The Commissioners strongly support the Councils' aspirations of ensuring Greater Cambridge's new towns mature into great places to live and work, that

make the most of existing and planned transport infrastructure and are real communities with their own distinctive identity, with the critical mass to support local businesses, services and facilities. It is recognised that in the case of Cambourne *“it will be one of the best-connected places in the region”* as a result of East West Rail. Page 97 of the First Proposals identifies that *“development near to this future transport hub will support delivering homes and jobs in sustainable locations”* and that *“it can also help make the existing Cambourne area more sustainable by increasing the range and facilities available, and providing opportunities to create sustainable new green spaces”*. Again, the Commissioners agree with the Councils’ regarding the opportunities Cambourne presents in achieving sustainable growth that meets these aspirations.

Policy S/CB: Cambourne (“Policy S/CB”)

*General Comment*

- 3.38 In order to help achieve the aspirations as detailed at page 97 of the First Proposals in relation to the Greater Cambridge’s new towns, Policy S/CB is proposed. Page 99 of the First Proposals states that the policy will *“identify Cambourne as a broad location for longer term strategic scale growth as an expansion to Cambourne and will provide continued guidance for the development of the existing allocation at Cambourne West”*. It goes on to explain that the policy will set out the intention to identify Cambourne as a broad location for growth in the 2030’s to respond to the opportunity that will be provided by the proposed East West Rail which includes a station at Cambourne.
- 3.39 It is identified at page 100 and 101 of the First Proposals that *“given the East West Rail route and station location at Cambourne have yet to be confirmed, it is too early to identify a specific development area and amount of development”* at Cambourne. The Commissioners consider that further clarity is required regarding this point given that Policy S/DS specifically identifies the allocation of 1,950 new homes between 2020 and 2041 at Cambourne. It is not considered that the First Proposals sufficiently explains the link between the two emerging policies, and as such is currently inconsistent with paragraph 16(d) of the NPPF which states that plans should *“contain policies that are clearly written and unambiguous”*.
- 3.40 Furthermore, the only reference to when additional growth at Cambourne can be expected to come forward, is made at page 99, where *“growth in the 2030’s”* is briefly mentioned. It is assumed that the Councils would seek to plan for this and allocate land for such development as part of subsequent Local Plan reviews or updates however, this is not explained within the First Proposals. Again, the Commissioners consider greater clarity regarding the intention of the policy and the mechanisms for planning for future growth at Cambourne, are explained and justified.

*Large Scale Development*

- 3.41 Whilst it is acknowledged that the identification of broad locations for growth for years 6 and onwards of the Plan is acceptable in policy terms (as set out at paragraph 68(b) of the NPPF), the Commissioners consider that the Site presents a specific, developable opportunity that could help the Councils meet their aspirations for new towns. The strengths of the Site are detailed below however, before turning to look at the Site specifics, the Commissions wish to highlight the benefits of large scale development sites, such as The Kingsfields.
- 3.42 The Commissioners’ advocate that the identification of a large scale development site at Cambourne would facilitate for the holistic planning of the area, ensuring that the infrastructure, services and facilities that would be required to serve the community are properly masterplanned. Paragraph 73 of the NPPF supports this and identifies that the *“supply of large numbers of new homes can often be best achieved through planning for large scale development,*

*such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities*". Therefore, it is recommended that as the Councils consider future sites to accommodate growth at Cambourne, they do so having consideration for the benefits that can be achieved through large scale development.

#### *The Kingsfields*

3.43 The below sets out the Commissioners' reasoning as to why the Site represents a suitable option for the future growth of Cambourne. The reasoning is structured to respond directly to the proposed criteria contained within S/CB; 'Future development at Cambourne will need to consider' (as set out page 99 and 100 of the First Proposals). Where appropriate, commentary is also provided in response to the assessment of the Site within the HEELA.

#### *Proposed Future Development Criteria*

- *"To integrate and maximise the opportunity provided by East West Rail"*

3.44 The East West Rail alignment has not yet been confirmed, with the route still being defined within a broad corridor. There are also options for the new Cambourne Station to be located north or south of the A428. Whilst locating the station to the south of the A428 would be closer to the Site, quality pedestrian and cycle connections would ensure that a northern station would also be accessible from the development, and therefore locating the station north or south of the A428 presents no concern in terms of accessibility.

- *"The role of the new development in Cambourne as a place, and how it can contribute towards the achievement of net zero carbon"*

3.45 Whilst the Councils do not think that further new settlements should be allocated within Greater Cambridge (page 39 of the First Proposals), as has been identified within the Commissioners' representation in response to emerging Policy S/JH, it is considered that the Councils' housing requirement should be significantly increased to accommodate the potential higher levels of growth identified within the evidence base. Subsequently, a new settlement within the locality of Cambourne (which as identified within the First Proposals at page 39 as *"the most sustainable location for development away from Cambridge"*) should be explored as a potential opportunity to accommodate some of this uplift. The Site represents a potential suitable option in that it can be developed to provide an extension to Cambourne whilst still providing sufficient land for it to evolve and organically grow into a new settlement.

3.46 On behalf of the Commissioners', JTP has prepared a vision document for the Site, titled, 'A Vision for the Kingsfields' ("the Vision Document"). The vision is based on the notion *"little steps become great strides"*, meaning that whilst the development of a new settlement within this locality is very much possible, this is a longer term aspiration. The Commissioners acknowledge that the journey towards this begins with a series of steps that can lead to the realisation of a new place in a way which is both sustainable and where people want to be. The creation of a community that helps forge the future identity of the place is crucial. Evolving from this and taken in the right direction, will allow the Site to then make great strides towards a genuinely zero carbon, super-connected place, and one where the community actively provides for itself (please refer to the Vision Document for further commentary as to how this could be achieved). This is why the Commissioners consider that the Site is suitable for accommodating both the current level of growth directed towards Cambourne within the First Proposals and future requirements.

3.47 As this criterion relates specifically to achieving net zero carbon, the Commissioners wish to highlight the strong focus on sustainability that has

helped shaped the vision for the Site. The Vision Document is supported by work undertaken by Sustainability Consultant, Hoare Lea. Hoare Lea has formulated a 'Sustainability Charter' for the Site which helps to define a pathway and enable the realisation of the sustainability aspirations for the Site. The Sustainability Charter is based on five defined factors or 'capitals' – natural, human, social, economic and physical so, whilst responding to the challenge of climate change, it also encompasses health and wellbeing and biodiversity. The Sustainability Charter therefore goes much further than solely identifying how the Site could achieve net zero carbon.

- 3.48 Details of the sustainability measures that could be supported at the Site are detailed within the Vision Document and Sustainability Charter but in summary they potentially include (*inter alia*): an aspiration to be net zero carbon through (*inter alia*) a reduction in embodied carbon through carbon budgets and completion of a whole life carbon assessment for the Site and on-site energy generation within the identified energy park; the co-location of services in community hubs and focus on shared spaces and neighbourhood co-creation; the inclusion of mobility hubs; and facilitating continued co-creation of the environment by the community through the integration of 'agrihoods', where the production of food is embedded into the local character of the areas and people can actively participate in ongoing nature recovery, grow their own food, share knowledge and socialise.
- *"The economic role of the place, and which employment sectors would benefit from the location to support the needs of the Greater Cambridge economy"*
- 3.49 As identified within the Commissioners' response to the Councils' vision for the Plan, agriculture is a key economic and environmental resource for Greater Cambridge. It has also strongly shaped the landscape and character of the Cambourne area, where agricultural practices are still very prevalent. Subsequently, the Commissioners have sought to support the practice and existing economic role of the place, whilst also providing the additional homes the community requires, through the inclusion of agrihoods within the masterplan contained in the Vision Document. It is anticipated that such agrihoods could potentially support the regenerative farming practices that already take place on the land to the immediate east of the Commissioners' land, to the south of the A428.
- 3.50 Furthermore, the masterplan shows how employment use development could be integrated into the Site. The identified employment land is predominantly located within and around existing areas of employment within the Site. It is also noted that a parcel of land located to the immediate north east of the Site's southern parcel, is included within the Councils' HEELA (site reference: '40076 – Land south west of Caxton Gibbet'), having been submitted in response to the Call for Sites exercise for a variety of uses including employment. This parcel offers an opportunity for a flexible range of uses at a key gateway into the Site and provides a strong interface between the proposals and Cambourne West. Because of its locality, this area also has the potential to support micromobility opportunities, such a mobility hub, to encourage active travel through the Site and to existing neighbouring communities.
- *"How the place will develop over time, and the infrastructure needed to support different stages during its development"*
- 3.51 As discussed above, the Commissioners' vision for the Site is centred around the evolution of a place, under the notion; *"little steps become great strides"*. The Commissioners consider that the Site is both suitable to accommodate the proposed 1,950 homes the Councils are looking to direct towards Cambourne, as well as any future increase up to a capacity of approximately 4,900 homes. The Vision Document includes an indicative parcel within the Site to accommodate an initial 2,000 new homes along with the infrastructure and services necessary to

support this. This will be developed as the Commissioners' plans for the Site evolve.

3.52 Whilst focusing on the infrastructure required to support the Site, it is of note that whilst the HEELA scored the Site 'amber' in terms of 'Site Access' and 'Transport and Roads', the Transport Written Representation prepared by Pell Frischmann does not identify concern in terms of being able to access the Site.

- *"Making effective connections within the new development and with Cambourne for public transport and active travel, as well as connections to surrounding villages so they can also benefit"*

3.53 Sustainable travel modes are at the heart of the proposed transport strategy for the Site, with accessibility both to and from the Site being achievable by walking and cycling. The Site is within 2km of the edge of Lower Cambourne and Cambourne Village College and Great Cambourne and Upper Cambourne are within 5km, which is approximately 25 minutes by cycle. Therefore, there is significant opportunity for residents of the Site to travel to these areas by more sustainable modes of transport. The masterplan within the Vision Document identifies such potential routes which include upgrading existing public rights of way and providing new pedestrian and cycle links (including a new segregated pedestrian/cycleway running alongside any new vehicle connection which runs east to west providing a new connection to Ermine Street. This would provide a quality connection to the planned 'Cambourne to Cambridge (C2C) Better Public Transport Project' travel hub in Cambourne. This would provide another public transport option for the residents of the Site and would improve accessibility to Cambridge and destinations in-between.

- *"The relationship with Cambourne and Bourn Airfield, and how to make the area more sustainable, through the mix of services, employment and transport opportunities offered by the area as a whole"*

3.54 The connectivity of the Site to the wider area including Cambourne and the villages beyond (which includes Bourn Airfield), has been covered in response to the criteria above.

- *"Be structured around and have local and district centres that can meet people's day to day needs within walking distance, including responding to changing retail and working patterns"*

3.55 The masterplan contained within the Vision Document illustrates how the Site could be developed to accommodate a range of services and facilities to ensure that all residents are within walking distances of local centres that can meet their day to day needs. The Site is capable of being developed to provide the services and facilities to support the community as it grows, without being reliant on Cambourne, whilst still providing suitable access to Cambourne and the larger range of goods and services that can be found there.

3.56 The Vision Document also explores 'Flexible Ways of Working', highlighting that it is widely acknowledged that we will not fully revert to previous patterns of working and therefore it is essential that places are designed, from the outset to support flexible and productive ways of working. The vision for the Site is where this support is not only intrinsic but where its benefits (through reduced car use, greater community integration, and increased viability of local facilities and services), translate into better, mixed-use, people focused placemaking.

3.57 Subsequently, whilst the Site scored 'amber' within the HEELA in terms of its accessibility to services and facilities, it is evident from the above that the Site is capable of being developed to provide a betterment to the existing situation as assessed within the HEELA.

- *"How it can help deliver the Western Gateway Green Infrastructure project, and in doing so positively engage with its landscape setting, as well as*

*recreation and biodiversity enhancement opportunities such as woodland planting”*

- 3.58 With regards to landscape, the HEELA scores the Site as ‘red’, identifying that development across the parcels assessed would have *“a significant adverse impact upon the landscape character, views and visual amenity. It would be an encroachment into the countryside, urbanisation of the rural landscape and amalgamate both the villages of Caxton and Papworth Everard.”* However, as identified at page 73 of the Councils’ Development Strategy Topic Paper, it states *“our evidence shows that the most sustainable location for further new settlement scale development is through an expansion of Cambourne...It is important to recognise that our evidence says that large scale development at Cambourne would have landscape impacts and that these would be hard to address. However, when considered in the context of the significant economic and carbon benefits of locating development at the proposed new rail station at Cambourne, it is considered that the benefits are likely to outweigh the level of landscape harm”*.
- 3.59 Notwithstanding the above, in order to support the masterplan for the Site, a landscape strategy has been prepared by The Richards Partnership. This strategy is contained within the Vision Document. The strategy has had significant regard for the Councils’ landscape evidence base, including the Greater Cambridge Green Infrastructure Opportunity Mapping Study (September 2021) which identifies ‘Strategic Initiative #8 – Western Gateway (multifunctional GI Corridors) and includes a broad swathe of land in the western side of the district.
- 3.60 A key element of the strategy is the inclusion of a major new tree planting initiative that creates a wildlife corridor and buffer along the new A428. Extensive green corridors running through the Site and substantial buffers between the Site and Caxton, Eltisley and Papworth Everard help address the Councils’ previous concerns regarding the amalgamation of nearby villages.
- 3.61 Within the locality of Cambourne, it is considered that other potential locations to accommodate the growth of Cambourne will have greater impact on the area’s landscape character. For example, the broad plateau landscape to the north of Cambourne and east of the A1198 has a much more open and expansive character, with little or no visual interrelationship with Cambourne. The absence of any urban form and influences in this area suggests it would be more difficult to assimilate significant urban form into this landscape. Similarly, the proximity of Caxton and Caxton End to the more modern Cambourne villages suggests it would be difficult to introduce further development here without bringing about physical, visual and perceived coalescence between the recent Twentieth Century developments and the older villages to the south and south east.
- *“Take opportunities to reduce flood risk to surrounding areas, that take innovative solutions to the management and reuse of water”*
- 3.62 It is noted that within Appendix 4 of the HEELA, that the Site is assessed as ‘amber’ in respect of flood risk. This is because parts of the Site are at risk of surface water flooding. A Flood Risk Assessment prepared by Pell Frischmann on behalf of the Commissioners has been submitted and used to help inform the concept masterplan within the Vision Document. As identified within the Flood Risk Assessment, the majority of this risk is contained to topographical depressions, watercourses and drains on Site. Mitigation measure can be incorporated through appropriate site design and consideration of the flow routes, which can be built into landscaping and external areas. The Commissioners therefore consider that surface water drainage should not be viewed as a constraint to development, but an opportunity to explore innovative solutions to water management.



3.63 In summary, the above demonstrates the extensive work that has gone into the formulation of a well evidence and robust Vision Document for the Site. The concept masterplan contained within the Vision Document shows that the Commissioners are having consideration for the key themes that are emerging within the proposed development considerations criteria contained within policy S/CB. The Commissioners strongly recommend that the Councils' review and re-assess the Site in light of the information that has been prepared to support this representation.

## Climate Change

### Climate Change – general comment

3.64 Section 3 of the First Proposals relates to 'The Plan Themes', the first of which is 'Climate Change'. The Commissioners strongly support the Councils' aim to transition to net zero carbon by 2050, and recommend that this provides further justification as to why the Plan period should be extended to 2050 as detailed in the response to Policy S/JH. It is acknowledged that the Councils seeks to achieve this target by ensuring that development is sited in places that help to limit carbon emissions. The Commissioners wish to reiterate the comments made in response to Policy S/DS and Policy S/CB where reference is made to the Councils' identification of development at Cambourne being the most sustainable outside of Cambridge. This is in part due to the proposed infrastructure works in the area which would help reduce carbon emissions.

### Policy CC/NZ: Net zero carbon new buildings ("Policy CC/NZ")

3.65 Policy CC/NZ sets the levels of energy use that will be allowed for new development, how renewable energy should be used to meet that energy need and how whole-life carbon emissions should be taken into account. Whilst the Commissioners fully support the Councils' overarching climate change aspirations, in accordance with paragraph 16 of the NPPF, Plans need to be aspirational but also deliverable. The emissions targets as set out within the policy are considered to be extremely ambitious, aiming for London Energy Transformation Initiative ("LETI") targets. The Council should ensure that the use of such targets outside of London is evidenced and achievable.

## Biodiversity and Green Space

### Biodiversity and Green Space – general comment

3.66 The second 'Plan Theme' within section 3 of the First Proposals is 'Biodiversity and green spaces'. Overall, the Commissioners are supportive of the Councils' aims to increase and improve habitats for wildlife and green spaces for people, ensuring that development leaves the natural environment better than it was before. The Commissioners do however wish to make specific comment in relation to emerging Policy BG/BG.

### Policy BG/BG: Biodiversity and geodiversity ("Policy BG/BG")

3.67 The Commissioners note the ambitious target of development achieving a minimum 20% biodiversity net gain. Whilst supportive of ambitious targets for biodiversity, the Commissioners note that this is double the target that was identified in the recently consulted on Cambridge Biodiversity SPD and also the national target which is set by Government.

3.68 The Council should be confident that the justification and impact of such policy is fully evidenced, which includes ensuring it is fed into the Plan's viability assessment.

## Wellbeing and Inclusion

### Wellbeing and Social Inclusion – general comment

- 3.69 The aim of the wellbeing and social inclusion policies contained within the First Proposals are to help everyone in Greater Cambridge to “*lead healthier and happier lives, ensuring that everyone benefits from the development of new homes and jobs*”. The Commissioners wholly support this aim. ‘Healthy Placemaking’ is a concept explored within the Commissioners’ accompanying Vision Document. The Vision Document and concept masterplan contained within it, places emphasis on enabling the coexistence of humans and nature which can bring a variety of benefits, not least to people’s health and wellbeing. The concept masterplan has also been designed so that neighbourhoods have ready access to spaces and routes for exercise, recreation and simply travelling about on foot and bicycle, all of which can result in significant health benefits to those who live there.

## Great Places Policies

### Great Places – general comment

- 3.70 The Commissioners strongly advocate the Councils’ aim of sustaining the unique character of Greater Cambridge and complementing it with beautiful and distinctive development, creating a place where people want to live, work and play.
- 3.71 As discussed in response to Policy S/CB, the Commissioners’ vision for the Site is the realisation of a new place that exemplifies how people and nature can co-inhabit the landscape sustainably, in a place where they want to be. The Commissioners’ accompanying Vision Document details how it envisages this will be achieved.

## Homes Policies

### Homes – general comment

- 3.72 Section 3.6 of the First Proposals relates to ‘Homes’ policies. It is noted that the Councils’ aim, as stated at page 258 of the First Proposals document, it to “*plan for enough housing to meet our needs, including significant quantities of housing that is affordable*”. As was highlighted in the response to the Plan’s emerging vision and aims, the Commissioners consider that the Councils could be more aspirational in relation to the number of homes to be delivered within the Plan period. Whilst paragraph 16(b) of the NPPF calls for strategic policies within Plans to be “*aspirational*”, the aim contained at page 258 is to simply, “*plan for enough housing to meet our needs*”. As previously stated within this representation, the Commissioners suggest that the aim is updated to read “*...for enough housing to meet our needs, as a minimum*”.

### Policy H/AH: Affordable Housing (“Policy H/AH”)

- 3.73 Policy H/AH identifies that on all sites of 10 or more dwellings, 40% of new homes will be required to be affordable. The Commissioners support the need for an affordable housing policy within the Local Plan which will deliver the level of provision required within Greater Cambridge. At this early stage in the plan-making process, the Council acknowledges further work regarding the Plan’s viability is required in order to justify this proposal. The Commissioners wish to reiterate the importance of ensuring that a whole Plan viability assessment, which takes into account infrastructure and emerging policy requirements, is undertaken at the appropriate time to ensure the policy is robust.

## 4. Summary

- 4.1 Deloitte has been instructed by the Church Commissioners for England to submit representation to the Greater Cambridge Local Plan: First Proposals consultation on their behalf.
- 4.2 This document has been prepared in the context of the Commissioners interests within Greater Cambridge and the site known as The Kingsfields. The document should be read alongside the suite of documents that has been prepared on behalf of the Commissioners to support this representation including: the Vision Document prepared for the Site by JTP; highways and access information (as detailed within the Transport Written Representation) (Pell Frischmann); flood risk and drainage information (Pell Frischmann); existing utilities information (Pell Frischmann); a heritage desk based assessment (Cotswold Archaeology); an ecological preliminary assessment and wintering bird survey (Ecology Solutions); landscape information (The Richards Partnership); and sustainability information (Hoare Lea).
- 4.3 In summary, this representation concludes that whilst the Commissioners are largely supportive of the proposals emerging within the First Proposals document, there are a number of areas where it is recommended that further evidence, justification or clarity is required. This is particularly relevant to the policies associated with the number of new jobs and homes required (Policy S/JH), the emerging development strategy (Policy S/CB) and Cambourne (S/CB).
- 4.4 As demonstrated within the above comments, accompanying Vision Document and technical reports, the Commissioners consider that The Kingsfields presents the Councils with an opportunity to sustainably extend Cambourne to accommodate the level of growth directed towards the new settlement within the First Proposals document. Furthermore, it also provides a site that can organically grow as an extension, into a sustainable settlement where people want to live and work, in order to accommodate further growth.
- 4.5 The Commissioners welcome the opportunity to engage with the Councils regarding both the First Proposals and the Site and look forward to continuing to do so as the Local Plan progresses.



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