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# **Greater Cambridge Local Plan First Proposals Consultation 2021**

Representations on behalf of Endurance Estates

December 2021

# Greater Cambridge Local Plan The First Proposals (Reg 18)

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## **1.0 EXECUTIVE SUMMARY**

- 1.1 Endurance Estates are supportive of the Councils' aim of preparing a comprehensive long term local plan which sets out a clear aspiration for sustainability objectives to be met. We do have some concerns regarding the detailed approach and evidence that has currently been presented. As a critical friend to the council, in view of the early stage of plan making, we are keen to flag our concerns.
- 1.2 Overall, we do not believe that the Councils are planning for enough growth. We also have concerns at the lack of new planned commercial space, as highlighted in the appended evidence report by Savills.
- 1.3 The Council's over-reliance on a few major sites (and critically the complex nature of some), we believe, is flawed and likely to result in delivery challenges.
- 1.4 The draft plan policies will need to go further for larger scale developments and set out a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery and ensure the development strategy is sustainable and resilient.
- 1.5 As such, we think it would be prudent for the Councils to allocate more sites in a variety of locations for a wider range of housing. Additional allocations in the villages will help in this regard, as would less complex/constrained sites closer to Cambridge.

## **2.0 INTRODUCTION**

- 2.1 These representations are made on behalf of Endurance Estates Ltd and set out comments in response to the Greater Cambridge Local Plan – The First Proposals – Reg 18 consultation.
  
- 2.2 These representations include commentary on Greater Cambridge’s strategic policies, including its vision and aims, the proposed objectively assessed need, development strategy and specific site allocations.

### **3.0 REPRESENTATIONS TO THE GREATER CAMBRIDGE LOCAL PLAN – THE FIRST PROPOSALS**

#### **Vision and Aims**

- 3.1 We support the seven main aims for the Local Plan that focus on: climate change, biodiversity and green space, wellbeing and social inclusion, great places, jobs, homes and infrastructure.

#### **How much development, and where – general comments**

- 3.2 We agree that development should be sustainable and mitigate climate impacts. However, we have strong concerns that the level of employment growth forecasted and the supply of homes proposed is not high enough and not best located. If not planned for, this will cause high levels of in-commuting to the area contributing to congestion, poor air quality, adverse climate impacts, poor housing choice and affordability and rising business costs.
- 3.3 Cambridge has a strong and nationally important economy with fast job growth experienced over recent years that is not reflected in the Government's Standard Method. The Councils' proposed development strategy relies heavily on development in and around Cambridge's urban area, as well as existing new settlements for the majority of its housing supply. The dependency that is placed on a handful of, often complex, strategic sites to deliver this housing is problematic in that it creates an inflexible development strategy that is unable to respond to faster/higher growth rates. It provides little contingency if any of the sites are stalled or slow to build out and does little to distribute growth to meet the needs of the wider area.
- 3.4 With regards to supporting employment and economic growth in the district, the Local Plan does not allocate enough land and equally does not appear to address the increasing affordability issues around commercial premises close to Cambridge. The Local Plan needs to ensure that it provides sufficient opportunities across the full spectrum of employment and commercial uses, in locations that not only support sustainable development but are also aligned with land values. Providing a wider range of employment opportunities on key transport corridors across the district will provide greater choice to the population closer to homes and supporting a reduction in commuting distance as well as a potential shift to more sustainable modes.

## **Policy S/JH: New jobs and homes**

- 3.5 The proposed Local Plan sets an objectively assessed need of 58,500 jobs and 44,400 (48,800 inc. 10% buffer) homes during 2020-2041. This is based on the Councils' medium+ growth scenario of homes and jobs. The maximum growth scenario of 78,700 jobs and 56,500 homes was discounted on the basis that this did not reflect the most likely level of new jobs when factoring in long term patterns of employment. However, at paragraph 5.22, the Councils' Employment Land and Economic Development Evidence Study recommends a preferred range 'between a central and higher growth scenario' rather than just the 'central growth scenario'.
- 3.6 The Cambridgeshire and Peterborough Independent Economic Review (CPIER) 2018 highlighted concern that Cambridgeshire and Peterborough are running a very significant risk of not achieving their economic potential due to insufficient levels of planned housing. It calls for the recalibration of housing need assessments based on more accurate employment growth forecasts, which in turn should set new, higher housing targets – at the very least adding on accumulated backlog. This would require delivery of around 2900 dwellings per annum (dpa) in Greater Cambridge until 2040 in contrast to the currently proposed 2,111 (dpa) in the First Proposals. These housing projections are substantially higher than the proposed OAN in the First Proposals and indicate that a higher OAN should be considered.
- 3.7 The Plan briefly discusses the link between homes and jobs (pages 25-26) and identifies paragraph 81 of the NPPF which requires plans to support economic growth and productivity. Expanding on this, it is important to emphasise the detail of paragraph 81 which reads as follows
- 3.8 *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. **Significant weight** should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is **particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.**"* (Our emphasis).
- 3.9 The 'Planning for sustainable growth in the Oxford-Cambridge Arc' document (February 2021) states *"Oxford and Cambridge are world-leading centres of research and innovation"* and identifies how *"Cambridge's rate of patent applications – a key indicator*



*of innovation – is the highest in the UK, at over 12 times the national average.*” The document also notes how the Arc was fundamental in the development of the COVID-19 vaccine. Acknowledging this, the fact that Cambridge has one of the fast growing economies in the Country, Paragraph 81 of the NPPF arguably applies to Greater Cambridge more than any other Local Authority.

- 3.10 Paragraph 82 of the NPPF expands on Paragraph 81, stating how planning policies should “seek to address potential barriers to investment, such as inadequate infrastructure, services or **housing**, or a poor environment.” Research by Cambridge Ahead reveals a positive picture of employment growth over the last six years, which has been particularly strong among knowledge-intensive companies. This growth rate has slowed in more recent years and there are warnings that start-ups and companies outside knowledge-intensive sectors may be finding conditions in the city less attractive with the rising costs of doing business in Cambridge and lack of affordable housing and adequate transport infrastructure. Companies are being ‘priced out’ of Cambridge, not only reducing the range of businesses present but the range of job opportunities for the local population as a direct result.
- 3.11 This does not appear to have been picked up in the Councils’ evidence base and is an important reminder that the success of the Cambridge phenomenon cannot be taken for granted. The Local Plan needs to address the knock-on impact of the phenomenon on other areas of the economy and ensure that these are also supported through the new Local Plan.
- 3.12 Cambridge has a particular role in pulling the country out of the Covid-19 recession and creating the science-based economy that ministers talk about, which is why it is important to plan for the right level of growth. Currently, the draft Local Plan does not go far enough to factor in the more optimistic/aspirational growth scenarios for the area, especially when considering the ability for transformational infrastructure improvements to unlock growth in the area and create more favourable conditions for its economy, environment and communities to flourish.
- 3.13 The Greater Cambridge First Proposals document plans to take forward the ‘Central’ growth scenario, based on employment growth of 58,500 jobs 2020-2041, at an average annual growth rate of 1.1%. However, the CPIER report identified that Cambridge and South Cambridgeshire Districts experienced average annual employment growth of **2.4%** and **2.3%** respectively according to Office for National Statistics data, between 2010 and 2016. The CPIER report states *that: “by studying the global employment of all companies based in our area, we come to the conclusion that this is higher still”*<sup>1</sup>. The CPIER report goes on to explain how they have created a ‘*blended rate*’ of employment growth, which

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<sup>1</sup> Page 44, The Cambridgeshire and Peterborough Independent Economic Review (CPIER) Final Report, September 2018

*combines employment growth rate data for the corporate sectors where we have the most knowledge, and the ONS growth rates where we are less confident (for instance, in relation to retailing and the public sector employment)."*

- 3.14 This approach by CPIER results in an annual employment growth rate for Cambridge which is the same as the ONS rate (2.4%), but a significantly higher rate (4.2%) is calculated for South Cambridgeshire.
- 3.15 This strongly suggests that the Councils' forecasted growth scenarios (medium and high) do not go far enough to reflect the potential growth scenarios for the area. We argue that a substantial increase in the Councils' employment growth and housing delivery assumptions is required to ensure planned growth aligns with past performance and that aspired to in order to double GVA over the next 25 years.
- 3.16 The Councils' approach to forecasting employment growth must also take into account suppressed demand and more accurately account for historic or current property market dynamics. The accompanying report by Savills 'Review of the Need for Employment Land' (appendix 1) raises fundamental concerns in this regard, particularly in relation to industrial land which is highly constrained in the area and exhibits old stock. It advises that additional factors need to be taken into account in estimating future need, including:
- The typical levels of demand at other similar local authorities of up to 27,300 sqm (300,000 sqft) per annum;
  - The national benchmarks of floorspace per dwelling of about 6.4 sqm per dwelling compared to Greater Cambridge's 3.5 sqm per dwelling;
  - Future demand generated by the 44,400 new dwellings to be delivered over the draft plan period; and
  - Footloose demand from national and international occupiers.
- 3.17 Currently, Greater Cambridge relies on other parts of the wider region to provide industrial premises, which is contrary to national guidance and planning policy. Whilst the Councils' study identifies an existing deficit in the supply of B2/B8 premises (reflecting anticipated losses) of 55,000 sqm, the study's three forecast methods generate weak to negative levels of need that do not account for the need to address the ongoing losses of industrial premises and the current highly limited options for industrial occupiers in Greater Cambridge.

## **Policy S/DS: Development strategy**

- 3.18 The additional housing need set out in the Development Strategy is 11,640 homes, which we argue is not sufficient to meet the growth aspirations of the area and the levels of employment growth expected over the next 20 years, not to mention the worsening affordability crises. The Local Plan should allocate the widest possible range of sites in order to provide choice, affordability and diversity in the market; not to mention resilience in supply across the plan period. Small-medium sized sites play an important role in providing a wide variety of house types, tenures, sizes and mix and also deliver quickly compared to larger sites. In accordance with paragraphs 67 and 68 of the NPPF, strategic policy-making authorities should identify a sufficient supply and mix of sites over the local plan, including at least 10% of their requirement on sites no larger than one hectare.
- 3.19 The majority of the additional housing and employment land is concentrated within high density urban districts in the city with North East Cambridge (NEC), Cambridge Airport and Eddington delivering 67% of the additional supply. Our first concern with this approach is that development strategy will not provide a wide range of homes and jobs and is heavily reliant on commuting to Cambridge and high-density living environments on sites with high infrastructure burdens.
- 3.20 The pandemic has shown that high density living and a lack of access to green spaces can produce negative health and wellbeing effects. There is a role that higher density, urban development's play in meeting certain housing needs but thought also needs to be given to development of new communities on sites that: facilitate greater space for people; provide a greater variety of housing; increase affordability for those unable to afford urban prices; and provide opportunities to connect with the surrounding countryside to improve mental and physical health.
- 3.21 Our second concern is that the development strategy is not diverse or flexible enough to respond to changing circumstances. It is too reliant on complex, high density sites within Cambridge and existing new settlements and employment clusters to deliver the area's growth needs, rather than redistributing growth to the wider area and offering up opportunities to widen the economic base and provide a greater mix of housing locations, densities and prices. With so much focus on sites like North East Cambridge, we question how affordable such developments are likely to be given house prices are currently 12 times people's annual earnings in Cambridge. With the cost of remediation and redevelopment of brownfield sites like NEC, and the infrastructure burden, we expect affordable housing levels will struggle to reach 40%, which will compound the problem.

- 3.22 Evidence for South Cambridgeshire published in the 2019-2020 AMR highlights that the current plan period average for affordable housing delivery is 27%, significantly below the 40% target. Whilst the most recent data shows an increase up to 37% for 2019-2020 there remains a significant existing deficit and large strategic sites are still being built out that will not deliver a fully policy compliant level of affordable housing. Of the dwellings consented in 2019-2020, only 32% are affordable, which means the situation will continue to worsen, not improve.
- 3.23 Thirdly, delivery at NEC, Cambridge Airport and 'Additional Cambourne' brings with it uncertainty over the timing and relocation of existing uses or major infrastructure delivery such as East West Rail. In the case of NEC and Additional Cambourne, there is reliance on other consenting processes which in itself adds greater risk and uncertainty to the deliverability of the plan. Should commencement at these large sites be delayed this will have a knock on impact on housing supply – especially from the mid-term of the planned housing trajectory onwards. There is little opportunity in the development strategy to plug this gap in supply should it arise or should employment growth be higher than expected. As a result, there is a need for a more resilient housing delivery strategy with further allocations and a greater mix of sites – small, medium and (lower risk) large, added to the development strategy. This should include village locations that perform well from a sustainability perspective and are served well by public transport and existing services and facilities, as well as less complex/ more immediately available sites on the edge of Cambridge. Accompanying employment land within villages can also go a long way to improving the vitality of these locations and attracting small-medium sized businesses that struggle to find suitable and affordable premises within the city.
- 3.24 We also wish to highlight the importance of the development strategy in meeting the area's affordable housing need. A significant amount of affordable housing is provided alongside market housing in new residential developments. However, in order to ensure that mixed and sustainable communities are created and maintained, this approach should include a range of medium to large sites. The development strategy does very little to address existing local housing needs within the rural areas and villages, leaving large swathes of the district devoid of any allocations. The development strategy does not even allocate homes and employment sites in a range of large / more sustainable villages that can then better serve their rural hinterland (NPPF para. 79). People with local connections are often unable to afford market prices (either sale or rent) and have to move away from their local area and support network. The need to provide for a range of housing needs should be carefully considered in respect of both the OAN and the related spatial strategy.

- 3.25 The lack of site allocations within the rural areas of the district represents a lack of forward planning for existing village settlements, some of which are highly sustainable and represent excellent locations for growth. Existing village settlements make up a significant proportion of the Greater Cambridge area and form the majority of South Cambridgeshire District. By adopting a reactive-only approach (windfalls-led), there are restricted opportunities for a genuinely plan-led approach to the development of these villages. This is particularly pertinent given the tightly drawn settlement boundaries and lack of opportunity within those to bring forward development, not to mention developments that will trigger the requirement to provide affordable housing (10+ dwellings).
- 3.26 The ongoing sustainable development, support for and rejuvenation of existing village settlements should form part of the vision and development strategy for the Greater Cambridge Local Plan along with appropriate edge of Cambridge locations to provide resilience in the development strategy. The strategy set out in D/DS includes an over-reliance on a handful of strategic sites that present significant challenges and uncertainty in terms of lead-in times, infrastructure delivery costs, affordable housing delivery levels and sustainability. The strategy is imbalanced and demonstrates a lack of consideration for the significant proportion of the area which is made up of village settlements. These communities require new housing to meet local needs, and opportunities for sustainable growth and development. We believe that the strategy should be revisited with this in mind.
- 3.27 In terms of the key constraints to the development strategy, it is clear that strategic water supply infrastructure will be required to meet longer term needs, and to protect the integrity of the chalk aquifer south of Cambridge. We understand from Water Resources East that water supply should not curtail development and that the regional plan will offer up a number of solutions to address short-long term needs. Therefore, water supply should not be seen as a constraint on development and meeting the growth ambitions of the area.

### **Cambridge Urban Area**

#### Policy S/NEC: North East Cambridge

- 3.28 The NECAAP Area is expected to deliver a total of up to 15,000 jobs and 8,350 homes - 4,000 of these homes are anticipated to be delivered during the Local Plan period to 2041. The vast majority of the homes are to be provided on the eastern part of the Action Area

and we have strong concerns that such a large-scale housing allocation should be focused on a relatively small and highly constrained site.

- 3.29 The quantum of residential development proposed is comparable to strategic sites such as Cambourne, Northstowe and Waterbeach but relies on much higher densities and heights that are unprecedented in the Cambridge area. This gives rise to significant challenges in terms of townscape impacts but also the site's ability to deliver sustainable development given the limited land available to accommodate key infrastructure such as sustainable drainage systems, open space, sports and mitigating transport measures. It is also highly likely that the provision of 20% on site biodiversity net gain, as required under the new plan policies, will be unachievable and consequently will be dependent on off-site land acquisition or biodiversity credits.
- 3.30 We are of the view that the quantum of development is far too high for the size of the area allocated for housing and the various site constraints. Furthermore, the remediation of the site and complex consenting (DCO) process is likely to negatively impact on delivery timescales and affordable housing provision.
- 3.31 Policy S/NEC depends on the relocation of the Cambridge Waste Water Treatment Plant ("CWWTP") to deliver on its objectives but does not currently "plan for" the CWWTP relocation or indeed any other particular water treatment mitigation needed in connection with the plan proposals.
- 3.32 The First Proposals acknowledge that the timetable for the emerging plan may now depend on the DCO proposals for the CWWTP as evidence is required as to whether that project, and in turn the development envisaged by Policy S/NEC, is deliverable. We note that the Sustainability Appraisal for the Proposed Submission version of the North East Cambridge Area Action Plan ("NECAAP") published in November 2021 confirms that the publication of that version of the NECAAP for consultation will only occur once the DCO for the CWWTP relocation has been granted. We assume that the Councils will be updating their Local Development Scheme to acknowledge the same in respect of the emerging Greater Cambridge Local Plan given the objectives of this as drafted are also wholly dependent on the CWWTP relocation.
- 3.33 Page 58 of the First Proposals says that an alternative to Policy S/NEC of retaining a consolidated waste water treatment works on its existing site (either as an indoors or outdoors facility) is not considered a "reasonable alternative" as it is not "deliverable or viable". It is not clear what information has been taken into account when the Councils formed this conclusion and as a result we have not been able to comment on this in any detail. We request further detail is provided to explain the Councils' decision making in

this regard. We also note that Anglian Water's Initial Options Appraisal reported that it "would be technically feasible to consolidate the existing treatment assets and occupy a smaller area of the existing site" which appear to show that this policy option is possible.

3.34 NEC relies on a trip budget to manage its transport impacts on the Milton Road Corridor. This will mean either:

(a) Any new development has to achieve a 0% car driver mode share, because the trip budget does not allow any further car trips to be generated over and above that already being generated by existing development in the area. Despite the very good non-car accessibility of the area, this is a very challenging target; or

(b) Any new development has to commit to reducing the car mode share for existing developments in the area in order to give these new developments some headroom in which they can generate some car trips, albeit the overall car mode share will be significantly less than current mode shares. The issue here is how new developments are meant to have control over the travel patterns (including car mode share) of existing developments in order to reduce those existing developments' car mode share. And what would be the mechanism for a new development's planning permission that secures this?

3.35 There is also the question of practical monitoring and enforcement of the vehicular trip budget. The monitoring itself would be technically complex, but assuming that it detects that the trip budget for the overall area has been exceeded, how would the system identify the perpetrator?

3.36 Additionally, this trip budget applies to the pre-Covid conventional weekday AM and PM peak hours. Whether this is still the right approach given the very different working patterns that have emerged since Covid is still up for debate. Since May this year, the Department for Transport has advised on the use of their 'Uncertainty Toolkit' to assess uncertainty over future travel demand, and the use of different future scenarios so decision-makers can see the implications of applying differing assumptions on how travel patterns and characteristics may now change over time. Neither the Local Plan transport evidence base nor the NECAAP consultation mention using this Uncertainty Toolkit.

3.37 We also have concerns regarding the viability assumptions behind this site. The First Proposals Viability Appraisal by Aspinall Verdi makes a number of assumptions that we think are not reflective of the real world context in which it will come forward. For example:

- 3.38 It is assumed that NEC will be built out by a consortium of housebuilders, whereas it is far more likely a master developer model will be pursued. This has a substantial bearing on scheme viability given no allowance is made for the master-developer profit return. At the very minimum this needs to be tested as a scenario to stress test the assumptions made and ensure a robust approach.
- 3.39 The estimated market revenues require reconsideration. At an average of £452 per square foot these do not appear realistic for a development of this density and scale, where market saturation could become an issue. Again, sensitivity testing is required to ensure a robust approach.
- 3.40 The market revenues then have a knock-on impact on the affordable revenues, given they are based on the former. As a result, the modelled results show that the plot values of the social rent units are higher than First Homes (which are capped at £250,000 per plot). This does not seem correct and we would ask that more detail is provided around the calculation of affordable values and the evidence to support them.
- 3.42 The appraisal also includes zero S106 contributions, which should be included as a cost within any assessment of this nature. Please could information be provided as to why they are not included, or if they have been, where.
- 3.43 More information and viability evidence is also required in relation the following:
- a. How the calculation of the residential coverage at 32,000sqft per net acre has been provided;
  - b. how the included finance costs have been calculated;
  - c. how the infrastructure costs at £30k per plot has been calculated; and
  - d. how the abnormal costs of £1.15m been calculated and how these relate to any funding that the project has been granted. For a project of this complexity, more detail is needed to understand whether the assumptions are robust.
- 3.44 It is not contested that development on the edge of Cambridge, including in the Green Belt, presents opportunity to bring forward sustainable development and the ability to drive behavioural shifts in commuting and a step-change in the use of sustainable modes. The concern is around the risk of delays and complexity of the site, coupled with the inflexible nature of the development strategy as a whole.



### **Policy S/NS: Existing new settlements**

- 3.45 The draft policy assumes that annual delivery rates at Northstowe and Waterbeach will be higher than so far relied on, meaning that more of the planned homes will be completed in the plan period, with fewer to follow after 2041.
- 3.46 As a result, the build out rates in the housing trajectory increase from 250 units per annum to 300. For Waterbeach in particular, we question whether the required infrastructure is able to keep pace with these increased delivery rates especially as there is a trip budget cap on the first 1600 homes of Waterbeach West and the first 800 homes of Waterbeach East. Once these thresholds are met, it is highly likely that the dualling of the A10 will be required to unlock further development. The dualling outline business case is due at the Combined Authority committee in Jan/Feb 2023 and at present has no certainty over build programme. Similar concerns exist in terms of wastewater infrastructure delivery and the relocation of Milton Sewage Works.
- 3.47 No evidence has been put forward to detail how delivery will be sped up on these large strategic sites. What specific, reliable and deliverable mechanisms will be used to ensure that this strategy will come to fruition.

### **Rest of the Rural Area - General Comments**

- 3.48 We have strong concerns that the overall level of growth forecasted and the supply of homes proposed in The First Proposal is not high enough. The development strategy therefore needs to be revised to ensure that employment growth is supported by sufficient levels of planned housing and other infrastructure. In doing so, it will need to provide a sufficient supply and mix of sites including small and medium sized sites (paragraphs 68 and 69 of the NPPF). Such sites cannot all be delivered in the city or its fringes and therefore village growth locations will play an important role in ensuring a resilient and balanced growth strategy for the area.
- 3.49 Currently, the development strategy does not provide enough land within village locations to make a meaningful contribution to the housing trajectory or affordable housing provision. Out of the total of 11,596 homes delivered within the proposed additional site allocations only 3% would be within village settlements. In some instances, the size of site allocated is diminutive resulting in very little benefit locally in terms of affordable housing provision or other infrastructure required to enhance the sustainability of existing settlements.

3.53 There are also missed opportunities in the development strategy to allocate land for employment in villages or support existing employment areas. This is needed to reduce commuting pressures in and around Cambridge and bring further vitality and sustainability to villages. Employment in villages is important not only to broaden the economic base of the area but also to adapt to changing work patterns and practices. For instance, the increasing digitalisation of science is likely to lead to less demand for traditional lab environments and greater opportunity for desk-based work either at home or in collaborative spaces such as rural work hubs. This trend is disrupting the dominance of institutional labs as the only legitimate venue where science can occur, shifting the geography of innovation to more decentralised locations.

3.54 We consider that the suggested policy approach represents a lack of forward planning for existing village settlements, some of which are highly sustainable and represent excellent locations for growth. Existing village settlements make up a significant proportion of the Greater Cambridge area and form the majority of South Cambridgeshire District. Tightly drawn settlement boundaries mean that opportunities for windfall development of any meaningful size are severely restricted and likely unachievable in many villages. By adopting a reactive-only approach (windfalls-led), the Councils are restricting the opportunities for a genuinely plan-led approach to the development of these villages and again restricting the ability to deliver much needed affordable housing. We believe that this is in direct conflict with policy set out in NPPF (paragraph 79), which sets out the following approach in relation to rural housing:

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."*

3.55 In the context of the NPPF, we urge the Councils to review their development strategy in relation to the rural area. Directing growth to villages that are well located and have the potential to accommodate and benefit from growth should be a key element of the Local Plan's spatial strategy for the period to 2041. Planned expansion of villages can provide new housing whilst also boosting the local economy, creating the critical mass for improved services and facilities which in turn will assist in rejuvenation and creating an improved sense of place. This will also reduce the need to travel, promoting sustainable lifestyles and reducing the impact of development on the environment.

- 3.56 Identifying and allocating village extensions to well-located settlements will serve to encourage the use of sustainable transport options without impacting on the Green Belt areas of greatest value. As set out in the NPPF (as above), sustainable development in rural areas is about locating housing where it will enhance or maintain the vitality of rural communities. The sustainable growth of villages through additional housing development can contribute to the footfall needed to support village services and facilities, reaching a critical mass that can support a vibrant village economy. This reduces the need to travel by private vehicle and also rejuvenates local areas and their communities. In addition, the allocation of medium- and large-scale residential sites ensures the delivery of much-needed affordable housing within villages, promoting mixed communities and providing for emerging housing needs. A lack of market and affordable housing in villages, or permitting only small-scale development, will perpetuate problems of restricted housing supply, increasing house prices and lack of provision for genuine local needs.

### **Biodiversity and Green Spaces**

Policy BG/BG: Biodiversity and Geodiversity

- 3.57 The need for biodiversity net gain (BNG) is supported but we have concerns that the proposed 20% net gain requirement has not been fully tested in the Council's development viability appraisal. The First Proposals Viability Report assumes separate costs for greenfield and brownfield developments that will deliver 20% BNG on site. However, there will be several sites that cannot achieve this level of net gain on site and will require higher cost assumptions for off-site delivery. It is also not clear how the report has costed off-site delivery S106 contributions. In order to demonstrate wider deliverability, more detail is also needed as to how the Councils will support and facilitate projects that can receive any off-site contributions to ensure there are no knock-on delays to housing delivery.
- 3.58 Further evidence is required as to how the Councils' have assessed the costs and impacts of their proposed approach particularly as the requirement for 20% BNG will reduce gross development value and in some cases impact on site viability and deliverability.

### **Supporting Documents**

Sustainability Appraisal

- 3.59 Paragraph 5.4 of the Sustainability Appraisal for the First Proposals highlights that the "SA of the draft Local Plan will consider potential in-combination effects of the Local Plan

with other relevant plans and programmes, including those being brought forward by other organisations and under separate planning processes, for example the relocation of the Cambridge waste water treatment plant". It is not at all clear at this stage whether any "in-combination" effects of the First Proposals and the CWWTP have been adequately assessed. We expect the Sustainability Appraisal to be updated to reflect a proper assessment of impacts of the CWWTP relocation together with the impacts of the First Proposals.

### **Supporting Documents**

Habitats Regulations Assessment (HRA)

- 3.60 It appears from the HRA Report that the relocation of the CWWTP is part of the mitigation measures which will be necessary to provide certainty that water quality impacts arising from the First Proposals will not adversely affect the integrity of the Ouse Washes SAC, SPA and Ramsar Site, Wicken Fen Ramsar Site, Chippenham Fen Ramsar Site and Fenland SAC in combination with other plans and projects. We expect the policies of the First Proposals to be revised (including to provide for the relocation of the CWWTP) in order to ensure that the emerging plan secures appropriate mitigation in connection with the development strategy - in particular North East Cambridge. This will require the emerging plan to include proposals for the CWWTP's relocation and if that update is made to the plan we expect the Sustainability Appraisal to be updated to reflect the effects of the CWWTP as part of the assessment of the impacts arising from Policy S/NEC and for this to be re-assessed alongside the alternatives to this policy option.

# **Appendix 1**

## **Review of the Need for Employment Land, Savills Report, December 2021**

[bartonwillmore.co.uk](http://bartonwillmore.co.uk)

TOWN PLANNING  
MASTERPLANNING & URBAN DESIGN  
ARCHITECTURE  
LANDSCAPE PLANNING & DESIGN  
ENVIRONMENTAL PLANNING  
HERITAGE  
GRAPHIC COMMUNICATION  
PUBLIC ENGAGEMENT  
DEVELOPMENT ECONOMICS

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