

9 December 2021

Delivered by email

Greater Cambridge Shared Planning
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

Ref: SILC3017

Dear Sir / Madam

GREATER CAMBRIDGE LOCAL PLAN - FIRST PROPOSALS CONSULTATION 2021 SUBMISSION ON BEHALF OF SILVERLEY PROPERTIES LTD

This representation has been prepared by Turley on behalf of Silverley Properties Ltd in respect of the Greater Cambridge Local Plan (GCLP) – First Proposals Consultation 2021. Silverley Properties Ltd have interests within the Local Plan area at Land South of Newington, Willingham. This site has not been submitted to the Council as a development option to date. As such this representation also forms a site submission, which the Council are understood to be accepting as part of this consultation. A site location plan can be found at **Appendix 1**.

The structure of this representation therefore provides details of the site, along with a response to the First Proposals document.

LAND SOUTH OF NEWINGTON, WILLINGHAM

Site Description and Context

Willingham is located to the north west of Cambridge, approximately 7 miles from the northern extent of the city. The site is located towards the south of the village, just off Newington. Willingham is a sustainable village benefitting from a large number of services and facilities.

The site is a rectangular parcel covering an area of 0.26ha. It currently consists of open grassland without an active use. Gated access to the site is provided from the northern boundary with Newington, and a number of trees line this boundary.

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There is also a potential option to include an additional area of land indicated on plan DR-A-1000_rev P2 in **Appendix 1**, to the west of the site under promotion. This land is again an unused area of open space, with some tree coverage within the site and to its boundaries.

Newington is a characteristically residential street with mostly detached 2 storey and single storey properties lining the road. Further northwards is the main body of the village where many of the services and facilities are located.

The eastern site boundary is met with a number of trees and shrubs within the adjacent 26 Newington, which is a 2 storey detached house. The rear garden of this property extends southwards along the length of the site.

The southern site boundary is met with a longstanding commercial horticultural nursery, accessed from Mill Road. The area of land adjacent to the site appears to be used for greenhouses and growing plants. The western site boundary is adjacent to 6 Newington which is a 2 storey house. Beyond this are houses lining Mill Road and Long Lane to the west. As such, the site is well contained and surrounded by existing development.

The site itself has limited constraints. According to the South Cambridgeshire Local Plan 2018 Policies Map for Willingham, the northern portion of the site is located within the Development Framework for the village. The southern extent and possible western parcel are within the countryside. This land outside of the framework is within a sand and gravel mineral safeguarding area. The site is within Flood Zone 1 and there are no heritage assets or environmental designations on or in close proximity of the site.

In 1969 planning permission was granted for the erection of a single dwelling on the site, but this has never been implemented (ref. C/0064/69/O). The Council have therefore accepted in the past that the site is suitable for residential development.

Proposed Development

The proposal shows 5 dwellings on the site, allowing for a mix of 2, 3 and 4 bedroom units. There is the potential for an additional 5-8 homes should the land to the west also be included.

The precise nature and form of development would be determined through a planning application, but the submitted DR-A-1001_rev P1 (**Appendix 2**) provides an indication of how the site could be developed.

It is considered that a scheme could be delivered to draw upon the architectural characteristics of the area, providing a high quality residential development on a long vacant and underutilised site.

As demonstrated by DR-A-1001_rev P1 (**Appendix 2**) suitable vehicular access from Newington can be provided for the number of dwellings proposed.

Assessment

In order to demonstrate that the site should be allocated for residential development, an assessment has been undertaken of the key issues for consideration. This assessment has been informed by that used by the Council in their Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) (September 2021). This document forms part of the evidence base, and therefore provides an appropriate template for assessing the site.

Issue	Comments
Adopted Development Plan Policies	Part of the site is located within the Development Framework for Willingham, where the principle of development is deemed acceptable. The location of the remainder of the site outside of the framework does not prohibit the allocation of the site through the emerging Local Plan.
Flood Risk	The site is entirely within Flood Zone 1 and only a very limited area is at low to high risk of surface water flooding (almost exclusively the potential western portion). As with any development proposal an appropriate surface water drainage strategy would be incorporated into the design of the scheme.
Landscape and Townscape	<p>As set out, the frontage of the site is located within the Development Framework for Willingham. Whilst the remainder of the site is regarded as countryside on the basis of the emerging Policies Map, the site can be considered to make a limited contribution to the wider countryside. This is owing to the site being bordered to the north, east and west by residential development. The southern boundary is detached from the wider landscape by the buildings associated with the nursery to the south, and development extends southwards along Mill Road and Rampton Road.</p> <p>The site is seen within the context of existing residential development, with this forming the main characteristic of the area. The plot is a suitable infill location for development, in an otherwise built up streetscene along Newington. The appearance of residential development on the site would be wholly appropriate for this location, with the ability for new homes on the site to be designed with regard to the character of existing homes in the area.</p> <p>As such there would be limited if any harm to the wider landscape, instead complimenting the existing townscape.</p>
Biodiversity and Geodiversity	Further assessment of ecological impact could be dealt with through the submission of supporting work as part of a planning application, including agreement to any necessary mitigation. It is not expected that the site is of any significant value for ecology, and the proposed development would offer the opportunity for biodiversity net gain.
Open Space/Green Infrastructure	<p>The site is not designated as Open Space and is not publicly accessible.</p> <p>Green infrastructure on the site is limited to the boundaries, and this would be retained wherever possible. The development offers the opportunity for additional planting and landscaping to provide an overall enhancement.</p>

Historic Environment	The site is not in close proximity to any heritage assets, and is not therefore considered to have any impact on the historic environment.
Archaeology	Any archaeological interest in the area would not prevent the development of the site, and could be dealt with through the submission of supporting archaeological work as part of a planning application if necessary.
Accessibility to Services and Facilities	As set out in more detail later in this letter, Willingham is a sustainable village with a very good range of services and facilities. These are located within walking and cycling distance of the site. This is reflected in Willingham's position in the settlement hierarchy as a Minor Rural Centre.
Site Access	The proposed scheme would be accessed via new accesses onto Newington. These can be delivered with the necessary visibility splays to meet Council requirements.
Transport and Roads	It is considered that safe access can be provided from the site onto Newington, as shown on DR-A-1001_rev P1 (Appendix 2). This access would include the necessary visibility splays, and not cause any harm to the safety of road users. Given the small number of dwellings proposed, movements to and from the site are expected to be limited and within the capacity of the existing highway network. However, as part of the preparation of a planning application transport survey work would be carried out, with any necessary mitigation identified.
Noise, Vibration, Odour and Light Pollution	The site can be developed to provide healthy internal and external environments for residents. There are not considered to be any pollutants within the area that would impact on new residents of the site, and the development would not cause any pollution impact to existing residents in the area.
Air Quality	The site is understood not to be within an AQMA and that there would be minimal traffic impact.
Contamination and Ground Stability	The site is not known to have any potential for significant contamination, and this could be confirmed through ground investigations to support a planning application.

In accordance with the structure set out in the HELAA, the site does not raise any insurmountable issues that could not be dealt with through the submission of additional information as part of a planning application. It is considered that the proposal would therefore constitute sustainable development.

The National Planning Policy Framework (NPPF) defines sustainable development as having three roles: economic, social and environmental. Development of the site would achieve sustainable development through complying with these three roles:

Economic – the proposed development will have a positive impact on local services and facilities within Willingham which will see an increase in demand by increasing the consumer base, therefore maintaining those existing and encouraging new ones. There would also be capital investment in local labour through construction work.

Social – the proposed development will help contribute towards the supply of housing to meet the needs of Greater Cambridge. Furthermore an increase in the population will add to the mix within the local community.

Environmental – there will be enhancements to the natural environment through additional planting and landscaping that will result in opportunities for gains in biodiversity. There is not considered to be any harmful impact on any heritage assets or environmental designations, along with no increase in flood risk.

Consequently the development of the site would be sustainable in line with national planning policy.

The site is considered to be suitable, available and achievable for residential development within the plan period, in accordance with the definition of deliverable set out within the NPPF. The site is available now for development, has a development partner on board (Silverley Properties Ltd) and would provide a small sized development that could be built out quickly and early on in the Local Plan period. The landowners have provided confirmation of agreement in **Appendix 3**. There are not considered to be any significant constraints that would delay the delivery of the development, and the site is within a sustainable location that is considered suitable for the development proposed.

It is highlighted that as part of the HELAA the Council have considered a further 12 sites within Willingham, none of which are proposed for allocation. Many of these sites are much larger scale and would not be delivered as quickly with the Local Plan period. Furthermore, the majority of these sites have issues identified as 'red' by the Council, including landscape and townscape, site access, flood risk and heritage. As set out, Land South of Newington, Willingham would not be subject to any of these constraints and the site therefore forms a suitable location for small scale new housing within the village.

RESPONSE TO FIRST PROPOSALS CONSULTATION DOCUMENT

Within this section, responses are provided on behalf of Silverley Properties Ltd to the First Proposals Consultation Document, including the suggested policy directions set out by the Council. These comments are provided in the context of the land interest at Land South of Newington, Willingham.

How much development, and where?

Policy S/JH: New jobs and homes

The Council states that the new Local Plan will meet the following objectively assessed needs for development in the period 2020-2041:

- 58,500 jobs
- 44,400 homes, reflecting an annual objectively assessed need of 2,111 homes per year, which is rounded for the plan.

This figure equates to an average of 2,114 homes per annum, with a suggestion that this will meet an objectively assessed housing need for 2,111 homes per annum that has been rounded upwards in deriving the total figure. It is noted that the Plan seeks to provide for approximately 10% more homes than are calculated as being needed, a total of around 48,840 homes.

In justifying a housing need figure above the standard method, the First Proposals cite evidence assembled in the following two studies, with the higher need predicated on supporting anticipated economic growth within Greater Cambridge:

- Greater Cambridge Local Plan: Housing and Employment Relationships (November 2020), GL Hearn; and
- Greater Cambridge Employment Land and Economic Development Evidence Study (November 2020), GL Hearn, SQW and Cambridge Econometrics

The latter of these two studies presents two alternative forecasts of potential economic growth over the plan period:

- A Central Scenario under which 58,400 new jobs would be created, claimed to represent the *'most likely outcome taking into account long term historic patterns of employment'* with the Housing and Employment Relationships study also describing it as *'a 'business as usual' growth scenario'*
- A Higher Scenario under which 78,700 new jobs would be created, with this *'higher outcome placing greater weight on fast growth in the recent past, particularly in key sectors'* and the Housing and Employment Relationships study describing it as *'a plausible but more aspirational growth outcome'*

The Housing and Employment Relationships study concludes that housing provision in line with the standard method will not support either of these economic growth scenarios. It estimates the housing need associated with supporting both as follows:

- Central scenario – 41,900 to 44,310 homes (1,996-2,110dpa) with the range reflecting alternative commuting assumptions, the upper end assuming that there is a 1:1 or balanced commuting ratio for new jobs and the lower end assuming continued in-commuting
- Higher scenario – 53,500 to 56,490 homes (2,549-2,690dpa) with the range again reflecting alternative commuting assumptions

The proposed housing requirement evidently aligns with the Central scenario (58,400 jobs), with the First Proposals therefore not looking to provide the housing infrastructure that would appear to be needed to accommodate a more ambitious level of employment growth.

Whilst Silverley Properties Ltd support that the Council have set a housing figure higher than the Standard Method, it is their view that the Council should be more ambitious in planning for what has been presented as a reasonable and higher forecast of employment growth. This is particularly when considering the important strategic position of Greater Cambridge within the Oxford-Cambridge Arc.

Policy S/DS: Development strategy

The proposed development strategy for Greater Cambridge directs the vast majority of growth to the Cambridge Urban Area, the edge of Cambridge and new settlements. Only a very small level of growth is directed to the Rest of the Rural Area. Of the allocations proposed, the majority of these are existing commitments (adopted allocations, sites with planning permission etc.). The Council are only proposing a need for an additional 11,640 homes to be allocated through the emerging Local Plan.

As part of their strategy, the Council have stated that their top priority is to reduce carbon emissions and to that end provide jobs and homes in close proximity to one another and major public transport routes. Some villages within South Cambridgeshire are however in close proximity to employment opportunities and major public transport routes, as well as benefiting from their own services and facilities, with Willingham being one such settlement.

Such housing delivery would help meet the needs of smaller settlements over the plan period, providing greater variety in the types and location of development delivered. It is important to highlight that the NPPF is clear in paragraph 69 that *'small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly'* and that local planning authorities should *'promote the development of a good mix of sites'*. It is considered that the Council strategy focuses on the delivery of very large sites with a much lesser number of smaller allocations. Silverley Properties Ltd are therefore of the view that the Council should look to deliver a greater number of smaller allocations to ensure that there is a supply of housing that can be built out sooner within the plan period. The site in Willingham subject to this representation is one such site that could be built-out relatively quickly, particularly as there are no undue physical constraints on development.

Furthermore, paragraph 79 of the NPPF is clear that in order 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.' By delivering more housing in settlements such as Willingham, development will continue to support local services and facilities, supporting their retention and growth.

Policy S/SH: Settlement hierarchy

Under this policy the Council set out a settlement hierarchy as follows:

1. Cambridge
2. Town
3. Rural Centre
4. Minor Rural Centre
5. Group Village
6. Infill Village

This hierarchy is essentially the same as the adopted hierarchy in the South Cambridgeshire Local Plan (2018), with the addition of Cambridge and Town.

Within the First Proposals, Willingham is identified as a Minor Rural Centre, which is again the same as adopted policy. This suggests that Willingham is central within the overall hierarchy, but towards the top end of the village categories.

Willingham benefits from a large number of services and facilities including a primary school, a medical practice, a Post Office, shops, pubs, take aways, a library, various social, leisure and recreational facilities. Willingham is also served by the '5 citi' bus which provides regular services Monday-Saturday to Cambridge City Centre, as well as other surrounding villages including Bar Hill, Longstanton and Swavesey. The site is also less than 2 miles from Longstanton Park and Ride which is a stop on the Cambridge Guided Busway. There are regular daily services to various locations within Cambridge including the Science Park, both railway stations, Addenbrookes Hospital and the city centre. The busway also provides access to St Ives and Huntingdon.

It is highlighted that despite Willingham being a sustainable settlement for growth, no sites are proposed for allocation within the village. Land South of Newington, Willingham would therefore offer the opportunity for a site that benefits from many sustainable travel opportunities, as well as access to service and facilities within the village.

Policy S/SB: Settlement boundaries

In line with their promotion of Land South of Newington, Willingham, Silverley Properties Ltd advocate that the entirety of the site should be included within the settlement boundary of Willingham as part of the allocation of the site for residential development.

Rest of the rural area

Policy S/RRA: Site allocations in rest of the rural area

This policy is considered to only illustrate further the lack of distribution in housing sites across villages within South Cambridgeshire. The vast majority of proposed allocations are carried forward, with only 3 new residential allocations and a single new mixed use allocation. These sites are in Melbourn, Caldecote and Oakington. The latter two of these both being Group Villages, lower in the hierarchy than Willingham. The residential allocations propose a total of 104 homes and the mixed use allocation 120 homes. This is considered to be a small additional contribution to housing allocations in the entirety of the rural area.

The Greater Cambridge Local Plan Development Strategy Options – Summary Report (November 2020) sets out work undertaken to assess further whether the spatial choices set out in the Greater Cambridge Local Plan: First Conversation consultation were indeed reasonable.

Consequently, eight choices were taken forward for testing as strategic options, which included:

‘Spatial Option 5: Focus on Dispersal: Villages - this approach would spread new homes and jobs out to the villages.’

The document sets out that such distribution would ‘result in multiple smaller sites that are likely to be deliverable in the short to medium term; this would also meet the NPPF requirement to allocate a percentage of small sites.’

It was however considered to be the worst for carbon emissions with the worst transport links. However, this is a rather sweeping statement and does not recognise the different attributes of individual settlements. Key to a sustainable scheme is accessibility. As set out, Willingham benefits from a range of services and facilities that would meet the day-to-day needs of residents, and there are also many opportunities for local employment within the village. These could be accessed by residents by foot or bicycle.

Furthermore, Willingham benefits from bus services within the village, in addition to very close proximity to Longstanton Park and Ride with Guided Busway connections. It would take residents of the site less than 10 minutes to cycle to the Park and Ride, and although a longer journey time of around 30 minutes, there is in fact footway provision connecting the site directly to the Park and Ride. Consequently, residents of the site would have the opportunity to make use of sustainable travel options.

It is therefore considered that the conclusion reached in the evidence base is not representative of Willingham, and that the Council should give further consideration to the delivery of housing in this location.

Biodiversity and Green Spaces

Policy BG/GI relates to green infrastructure. Under this policy Land South of Newington, Willingham is located within the Great Ouse Fenland Arc, which is a 'strategic green infrastructure initiative'. The current suggestion under the policy wording is that 'all new development' will be required to 'help deliver or contribute to support delivery of the green infrastructure strategic initiative objectives. Contributions will include the establishment, enhancement and the on-going management costs.'

The evidence base document Greater Cambridge Green Infrastructure Opportunity Mapping Final Report (2021) sets out that the objectives for this area are to:

- Create a resilient network of fen and fen-edge habitat across the northern part of Greater Cambridge through habitat restoration, protection of peatland, sustainable soil, water and habitat management, and natural flood management.
- Enhance accessibility by linking existing and new routes to settlements and promote education of the rich geology, wildlife and heritage.

The wording of the policy is therefore queried in its reference to 'all new development' which is likely to conflict with paragraph 57 of the NPPF in terms of the tests for planning obligations, particularly for small scale developments. It is therefore suggested that it would be more appropriate for this wording to be amended to reference major developments.

Great Places

Policy GP/LC: Protection and enhancement of landscape character makes reference to the need for protecting 'important green gaps' but other than mention to Longstanton and Northstowe these are not defined. It is suggested that for clarity the Council should identify what is likely to make a green gap 'important', taking into account the scope for landscape enhancements as part of new development.

Whilst Land South of Newington, Willingham may form a gap in an otherwise developed frontage, it is considered to be within the confines of the village and as discussed earlier in this representation, could not be considered an important gap or of any significant value in landscape terms.

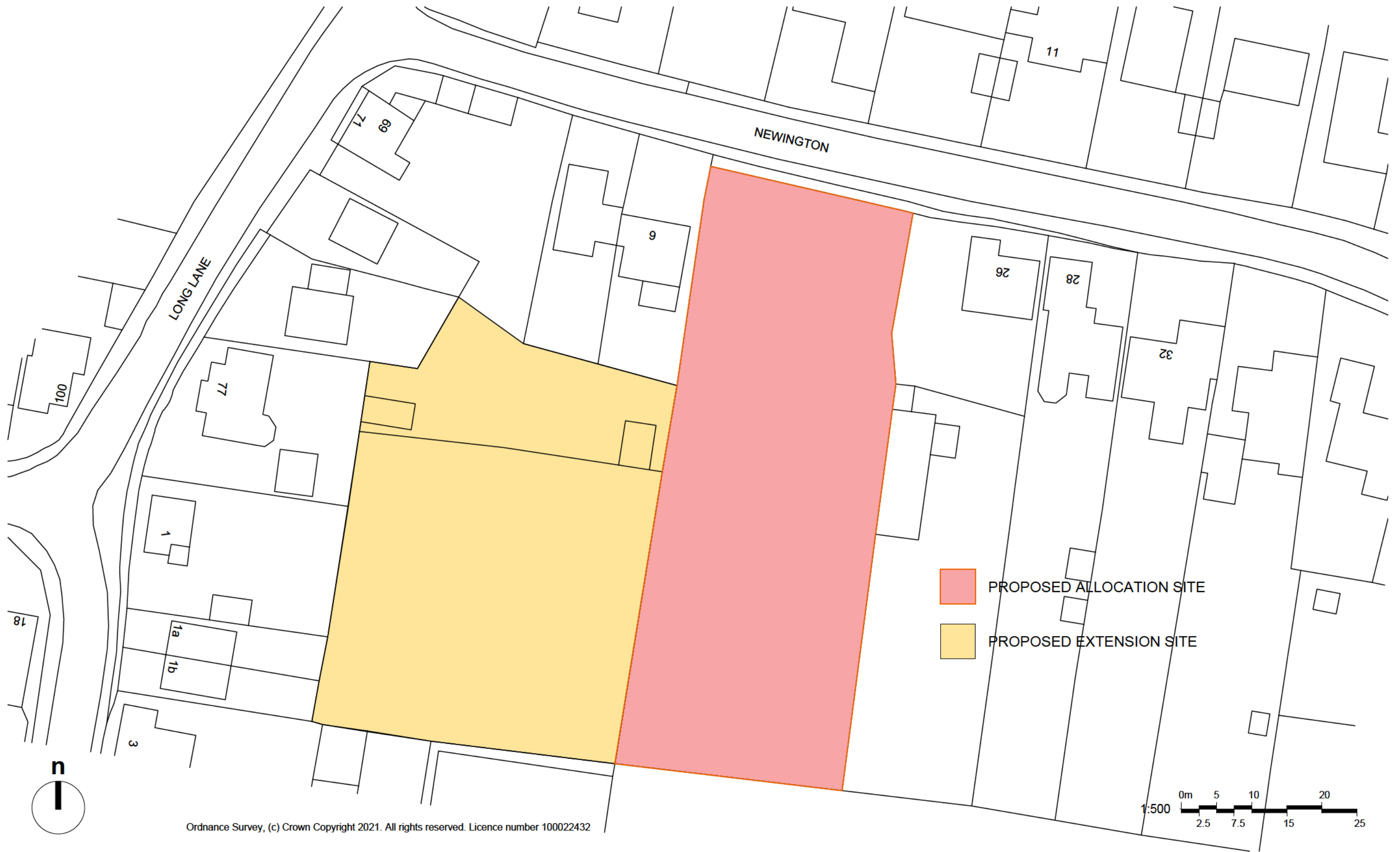
We trust that this representation will be given full consideration by the Council as part of the preparation of the Draft Local Plan. Should any further information be helpful to the Council in their assessment of Land South of Newington, Willingham then please do not hesitate to contact me.

Yours sincerely

Ella Murfet
Senior Planner

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APPENDIX 1 Site Location Plan



Land South of Newington, Willingham, Cambs.

LOCATION PLAN DR-A-1000_rev P2

APPENDIX 2 Indicative Proposed Site Plan



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Land South of Newington, Willingham, Cambs.

INDICATIVE PROPOSED SITE PLAN DR-A-1001_rev P1



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APPENDIX 3 Landowner Agreement

From: [Lindsey Bladen](#)
To: [Ella Murfet](#)
Subject: Land at Newington
Date: 09 December 2021 18:43:21

'Dear Sir/Madam

I confirm that as as a Trustee and beneficiary of the Merle Eastol 2003 Trust I fully support Silverley Properties promotion of the site at Newington, Willingham through the Greater Cambridge Local Plan. I can confirm that the site is available for the development proposed.

Yours sincerely
Lindsey Bladen

9-12-21

Dear Sir/Madam.

I confirm as the landowner of Land South of Newington, Willingham I fully support Silverkey Properties Promotion of the site through the Greater Cambridge Local Plan. I can confirm that the site is available for the proposed development

Yours Sincerely