



# Greater Cambridge Local Plan 2020-2041

## **First Proposals Consultation**

December 2021



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## CONTENTS

<b>1</b>	<b>Introduction .....</b>	<b>3</b>
1.1	Introduction.....	3
1.2	Context.....	3
<b>2</b>	<b>National Planning Policy.....</b>	<b>4</b>
2.1	National Planning Policy Framework.....	4
2.2	Planning Practice Guidance .....	5
<b>3</b>	<b>Legal Requirements .....</b>	<b>6</b>
3.1	Duty to Cooperate .....	6
3.2	Sustainability Appraisal .....	7
<b>4</b>	<b>Greater Cambridge in 2041.....</b>	<b>7</b>
4.1	Policy S/JH: New Jobs and Homes .....	7
4.2	Policy S/DS: Development Strategy .....	9
4.3	Policy S/SH: Settlement Hierarchy .....	11
4.4	Policy S/SB: Settlement Boundaries.....	12
4.5	Policy S/RSC: Other Site Allocations in the Rural Southern Cluster .....	12
	Land at Balsham Road, Linton.....	12
	Land at Back Road, Linton.....	14
4.6	S/RRA- Site Allocations in the Rest of the Rural Area .....	15
	Land at Balsham Road, Linton.....	15
	Land at Back Road, Linton.....	17
	Land at Brook Road, Bassingbourn.....	18
	Land at Whitecroft Road, Meldreth.....	19
	Land at New Road, Melbourn .....	20
	Land at Station Road, Over .....	21
	Land at Willingham Road, Willingham.....	22
<b>5</b>	<b>Climate Change .....</b>	<b>23</b>
5.1	Policy CC/NZ: Net Zero Carbon New Buildings.....	23
<b>6</b>	<b>Biodiversity and Green Spaces .....</b>	<b>23</b>
6.1	Policy BG/BG: Biodiversity and Geodiversity .....	23
<b>7</b>	<b>Great Places .....</b>	<b>24</b>

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7.1	Policy GP/LC: Protection and Enhancement of Landscape Character .....	24
7.2	Policy GP/GB: Protection and Enhancement of the Cambridge Green Belt .....	24
7.3	Policy GP/HA: Conservation and Enhancement of Heritage Assets .....	24
<b>8</b>	<b>Homes .....</b>	<b>25</b>
8.1	Policy H/AH: Affordable Housing.....	25
8.2	Policy H/HM: Housing Mix .....	25
8.3	Policy H/HD: Housing Density .....	25
8.4	Policy H/CB: Self and Custom Build Homes .....	26
<b>9</b>	<b>Conclusions .....</b>	<b>27</b>
9.1	Summary.....	27

# 1 INTRODUCTION

## 1.1 Introduction

1.1.1 These representations provide Gladman’s response to the Greater Cambridge Local Plan (GCLP) First Proposals consultation.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the Development Plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Local Plan and Neighbourhood Plan examinations.

1.1.3 Through these representations, Gladman provides an analysis of the GCLP, and the policy choices promoted within the draft Plan.

1.1.4 The First Proposals consultation represents the starting point of the plan preparation process and provides an early opportunity to provide comments on key issues and areas for the new Local Plan to address. This consultation is therefore welcomed, and Gladman look forward to engaging further with the Councils as the plan preparation process progresses over the next few years.

1.1.5 Through this submission, Gladman have sought to provide our thoughts on a number of the key themes and issues and also provided site submissions for land being promoted for residential development.

1.1.6 Gladman submit that the Councils will need to carefully consider some of its policy choices and ensure that its evidence base is up-to-date and robust in light of changing circumstances and the changes brought about by the revised National Planning Policy Framework (2021).

## 1.2 Context

1.2.1 The Cambridge City Local Plan and South Cambridgeshire Local Plan were adopted on 18th October 2018 and 27th September 2018 respectively. This followed a long and protracted examination process over a number of years. These Local Plans set out the planning policies and land allocations up to 2031. Although a number of the large-scale developments

included within the Local Plans (such as Northstowe and Bourne Airfield) will take longer to complete.

**1.2.2** Both adopted Local Plans include a policy commitment to undertake a Local Plan Review. For South Cambridgeshire this comes in the form of Policy S/13 which outlines a requirement to commence the Local Plan Review before the end of 2019, with submission to the Secretary of State for examination by the end of Summer 2022. This policy requires the new Local Plan to be prepared jointly for the combined districts (Greater Cambridge).

**1.2.3** Consequently, Cambridge City Council and South Cambridgeshire District Council are now in the process of working jointly in undertaking a new Local Plan for the Greater Cambridge area. This new Plan will cover the period up to 2041, providing the policy framework and site allocations for this period.

**1.2.4** The revised Framework (2019) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order for the Greater Cambridge Local Plan to be sound it is fundamental that the Local Plan:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

## 2 NATIONAL PLANNING POLICY

### 2.1 National Planning Policy Framework

**2.1.1** The National Planning Policy Framework (the Framework) sets out the Government’s planning policies for England and how these are expected to be applied.

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- 2.1.2 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making and decision-taking. This means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed housing needs, with sufficient flexibility to adapt to rapid change.

## 2.2 Planning Practice Guidance

- 2.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 24th June 2021. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans.

## 3 LEGAL REQUIREMENTS

### 3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.<sup>1</sup>
- 3.1.2 The revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more SoCGs, throughout the plan making process<sup>2</sup>. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with, such as unmet housing needs.
- 3.1.3 Gladman are supportive of the two Councils working jointly to prepare the new Local Plan for Greater Cambridge, as this both aligns with the policy commitment in the existing Local Plans and allows for strategic matters which cross between the two LPAs to be considered comprehensively in a joined-up manner. Notwithstanding this, it still remains of critical importance for Cambridge City and South Cambridgeshire to work alongside the other Cambridgeshire authorities to ensure that any wider cross boundary issues are addressed. It may be the case that these need to be addressed through SOCGs with the other LPAs.
- 3.1.4 As demonstrated through the outcome of the Coventry, Mid Sussex, Castle Point and St Albans examinations, if a Council fails to satisfactorily discharge its DtC a Planning

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<sup>1</sup> PPG Reference ID: 61-021-20180913

<sup>2</sup> PPG Reference ID: 61-001-20180913

Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.

## 3.2 Sustainability Appraisal

3.2.1 In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).

3.2.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the emerging Local Plan proposals on sustainable development when judged against all reasonable alternatives. The Councils should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Councils' decision-making and scoring should be robust, justified, and transparent.

## 4 GREATER CAMBRIDGE IN 2041

### 4.1 Policy S/JH: New Jobs and Homes

4.1.1 This policy identifies an objectively assessed need of 44,400 new homes and 58,500 new jobs to be provided in the Greater Cambridge area up to 2041.

4.1.2 Continued economic growth across the Greater Cambridge area is of fundamental importance and needs to be properly considered and planned for through the Local Plan. Greater Cambridge forms part of the nationally significant Oxford to Cambridge Growth Arc, thus the role the GCLP plays is of pivotal importance in delivering transformational scales of growth.

4.1.3 It is essential that economic growth opportunities are recognised and maximised and the Councils work alongside other LPAs in the Arc to ensure that the potential is realised through robust housing and job requirements.

- 4.1.4 The Local Plan First Proposals document acknowledges the Councils' commitment to the Cambridgeshire and Peterborough Devolution Deal. If the scale of job growth required by this is achieved, around 2,900 homes a year would be needed across Greater Cambridge, resulting in a housing requirement of 66,700 homes between 2017-2040- a significantly higher figure than the initial policy direction suggests.
- 4.1.5 Gladman strongly believe that the new Local Plan should be planning for a significantly higher number of homes than the minimum identified by the standard method if the plan is to align with the scale of economic growth planned for the Arc. While the housing requirement in this plan are above the standard method figure, Gladman believe that this figure will need to be higher yet, in order to achieve the economic growth aspirations of the area.
- 4.1.6 In this regard, Gladman refer to the Cambridgeshire and Peterborough Independent Economic Review (CPIER), published in 2018 which sets out a compelling case for higher levels of housing across the Greater Cambridge area. Of particular note is Key Recommendation 5, which points to the need to review the housing requirement based on the need for high economic growth. Importantly, the report warns of significant negative impacts to both the national and local economy should housing needs continue to be constrained.
- 4.1.7 The Arc aims to create 1,000,000 jobs before 2050. For this target to be realised, LPAs across the Arc must work together to ensure that appropriate job requirement figures are allocated to authorities that are capable of providing employment. At present the first proposals consultation suggests looking to providing 58,500 jobs between up to 2041. Gladman consider that Greater Cambridgeshire should be seeking to deliver significantly greater economic and employment growth to ensure the Arc economic aspirations are realised.
- 4.1.8 Further to this, the Local Plan needs to recognise the importance of the Councils' position within the Oxford to Cambridge Growth Arc and the implications of this in terms of growth in the area. The Arc is a key economic priority and one of the publicly stated key objectives of the Arc is to deliver up to 1 million high quality homes across the area, up to 2050. Gladman believe it is of imperative importance that the new Local Plan seeks to deliver a higher number of homes than required by the standard method to ensure that it is in line with nationally significant economic growth. As outlined in the PPG, the standard method

for assessing local housing need is the minimum starting point in determining the number of homes needed in an area. It doesn't account for future government policy, changes in economic circumstances or other demographic changes that might affect the level of housing required in an area. For this reason, it is necessary to consider that housing need in an area may be higher than the standard method calculation and the plan should be positively prepared for this.<sup>3</sup>

- 4.1.9 Gladman reserve the right to comment on housing and job growth proposals when these are developed further and the Draft Plan is issued for public consultation.

## 4.2 Policy S/DS: Development Strategy

- 4.2.1 The proposed direction of this policy focuses development in and around the City of Cambridge and through new settlements. Some development is proposed in the Rural Southern Cluster area of South Cambridge, including Green Belt land, and minimal development is proposed in the rest of the rural area.

- 4.2.2 The Councils should seek to allocate a range of sites, by size, type and market locations to ensure that the Local Plan delivers identified housing need for the region. Growth should be dispersed across the settlement hierarchy and the region to ensure future sustainability and vitality. Growth should also be focused along sustainable transport corridors, such as the Melbourn to Cambridge corridor in the southwest of the area. This corridor is a sustainable location for growth, offering sustainable transport options in to Cambridge whilst allowing housing needs to be met without releasing Green Belt land in the rural southern cluster.

- 4.2.3 While Gladman recognise that some Green Belt land may need to be released to meet the needs of Cambridge City, the release of Green Belt land in excess to meeting the City's needs is unnecessary. As outlined at paragraph 140 of the NPPF (2021);

*'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having*

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<sup>3</sup> Paragraph: 010 Reference ID: 2a-010-20201216

*regard to their intended permanence in the long term, so they can endure beyond the plan period.'*

4.2.4 The Councils must ensure that the methodology used to assess Green Belt land is suitably robust and can clearly demonstrate that exceptional circumstances exist to justify the release of Green Belt land.

4.2.5 Furthermore, the release of Green Belt should not be the primary source of developable land when other suitable and sustainable sites are available outside of the Green Belt. This is clearly outlined at paragraph 141 of the NPPF (2021) which states;

*'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.'*

4.2.6 It is recognised that there may be no alternative to Green Belt release to meet some of the needs of Cambridge on the edge of Cambridge, however that is unlikely to justify Green Belt release on in the villages and towns. It is imperative that the Councils have considered, assessed, and rejected all other reasonable options to get to that point.

4.2.7 The site submissions at Section 10 and the accompanying appendices demonstrate several available sites that would not require the loss of Green Belt and supports the NPPF's (2021) assertion later within paragraph 141 that sites in 'other locations well served by public transport' should be optimised. Currently, the proposed spatial strategy disproportionately directs growth towards Cambridge City and fails to account for and direct growth towards the sustainable villages on key transport corridors in South Cambridge.

4.2.8 Many settlements, including rural service centres, are sustainable and capable of accommodating growth which ensures their continued vitality. The accompanying Linton StoryMap and Meldreth StoryMap explore this in greater detail. While Gladman support growth in Cambridge, there should be sufficient growth directed towards the rural areas, particularly in South Cambridge in line with the housing needs of the area. The Council must recognise that residential development performs a key role in maintaining and enhancing the sustainability and vitality of settlements. Growth should be directed to those settlements which have not experienced development in the current plan period to ensure the future prosperity of the area and ensure the vitality and continued use of services and facilities within the villages remain over the plan period.

- 4.2.9 In addition, while strategic sites in close proximity to economic hubs and Cambridge City will form an important aspect of the Plan's strategy, it is vital that the Councils are not overly optimistic in the projected delivery rates of such sites. Additionally, the Councils should not be overly reliant on strategic developments to deliver identified need as such sites are often subject to significant infrastructure costs and provision. The Councils should also be mindful that new settlements may not be delivered within the plan period up to 2041 and are often subject to lengthy delays. To ensure that this does not impact overall housing delivery, the Councils should seek to allocate small to medium sized sites in sustainable locations that can be delivered by smaller housebuilders and are less likely to incur significant delays.
- 4.2.10 Fundamentally, the distribution of development should not be a politically driven decision, but one based on robust evidence and consideration of a number of factors such as local housing needs and settlement sustainability. Green Belt land should not be released unless exceptional circumstance can be demonstrated and all other reasonable, suitable alternative sites have been considered.
- 4.2.11 Overall, the Local Plan will need a balanced strategy, including a variety of different elements to ensure delivery over the course of the plan period and to meet the needs across the plan area. It is important that the Councils do not place an over reliance on just one type of approach, in this case, large scale urban extensions and new settlements, as this could hinder delivery of much needed housing.

### 4.3 Policy S/SH: Settlement Hierarchy

- 4.3.1 This policy aims to group similar settlements into categories that reflect their scale, characteristics, and sustainability. Gladman support the use of a settlement hierarchy, but in line with previous comments regarding the development strategy, do not agree that schemes in Minor Rural Centres should be limited to 30 dwellings and this would not be in keeping with the national policy imperative that seeks to boost significantly the supply of housing. Additional development should be directed across the hierarchy and to villages to support their vitality and future viability, and larger schemes are capable of delivering more affordable housing and significant benefits to local residents.
- 4.3.2 The NPPF (2021) is clear that development in rural areas should be supported 'where it will enhance or maintain the vitality of rural communities.' The policy direction does not currently identify opportunities for villages to grow and thrive, nor does the settlement

hierarchy explicitly consider how development in one village may support services in other nearby villages such as is the case with villages such as Meldreth and Melbourn.

## 4.4 Policy S/SB: Settlement Boundaries

4.4.1 This policy will define the boundaries of settlements and proposes that outside of settlement boundaries, no development would be permitted unless they meet a specific set of requirements. Gladman recommend that the new Local Plan should take a flexible approach to development and growth within and on the edge of villages. A rigid approach to development beyond settlement boundaries, except for specific circumstances, may act to unnecessarily stifle sustainable growth opportunities. This is at odds with national policy which seeks to significantly boost the supply of housing and applies a presumption in favour of sustainable development.

4.4.2 Gladman recommend that the settlement boundaries policy incorporates a criterion based balancing exercise so that the Plan can protect against unsustainable development whilst being open and flexible to additional development opportunities to come forward to meet identified needs.

## 4.5 Policy S/RSC: Other Site Allocations in the Rural Southern Cluster

4.5.1 Gladman submit the following sites in Linton for your consideration. The boundary for the Rural Southern Cluster is not clearly mapped within the consultation document, therefore these site submissions are repeated under Policy S/RRA so that they can be considered under both policies.

### **Land at Balsham Road, Linton**

4.5.2 Gladman are promoting a site in Balsham Road, Linton. The site is 3.07 hectares and capable of delivering approximately up to 65 dwellings. We would welcome an opportunity to discuss the site with the Councils and the development it could deliver.

4.5.3 The site is capable of delivering up to 65 new homes, including up to 26 affordable homes, a programme of ecological and biological enhancement, and new green infrastructure and recreation routes. The site is suitable for development as it is sustainably located near to local services and facilities, within Flood Zone 1, well contained by existing landscape features and will not adversely impact any heritage assets. Measuring 3.07 hectares, the site is an ideal opportunity to provide much needed market and affordable housing in Linton,

alongside recreational green space, and wider economic benefits such as increased spending in local shops.

The site is sustainably located within the settlement, with the secondary and infant schools, pharmacy, pub, newsagents, health centre and Co-op food store all being between 0.8-1.6km from the site, meaning that many will be accessible by foot. A bus stop is located in the centre of the village where buses to Cambridge and Haverhill are available.



*Figure 1: Land at Balsham Road, Linton*

### **Land at Back Road, Linton**

- 4.5.4 Gladman are promoting a site in Back Road, Linton. The site is 3.98 hectares and capable of delivering approximately up to 95 dwellings. We would welcome an opportunity to discuss the site with the Councils and the development it could deliver.
- 4.5.5 Gladman consider that the development could deliver 95 homes, including 38 new affordable homes and a programme of ecological enhancement. The provision of recreational green space and the potential economic benefits of development in this location makes this an ideal sustainable location for growth. Safe access can be achieved off Back Road and the site is within Flood Zone 1.
- 4.5.6 The site is sustainably located within the settlement, with the secondary and infant schools, pharmacy, pub, newsagents, health centre and Co-op food store all being between 1.1-1.6km from the site, meaning that many will be accessible by foot. A bus stop is located 1.2km away where buses to Cambridge and Haverhill are available.



Figure 2: Land at Back Road, Linton

## 4.6 S/RRA- Site Allocations in the Rest of the Rural Area

4.6.1 Gladman are promoting sites in several villages in the Rest of the Rural Area. These sites are submitted below. As previously stated, the site submissions for Linton are repeated here owing to the lack of clearly boundary for the Rural Southern Cluster.

### **Land at Balsham Road, Linton**

4.6.2 Gladman are promoting a site in Balsham Road, Linton. The site is 3.07 hectares and capable of delivering approximately up to 65 dwellings. We would welcome an opportunity to discuss the site with the Councils and the development it could deliver.

4.6.3 The site is capable of delivering up to 65 new homes, including up to 26 affordable homes, a programme of ecological and biological enhancement, and new green infrastructure and recreation routes. The site is suitable for development as it is sustainably located near to local services and facilities, within Flood Zone 1, well contained by existing landscape features and will not adversely impact any heritage assets. Measuring 3.07 hectares, the site is an ideal opportunity to provide much needed market and affordable housing in Linton, alongside recreational green space, and wider economic benefits such as increased spending in local shops.

4.6.4 The site is sustainably located within the settlement, with the secondary and infant schools, pharmacy, pub, newsagents, health centre and Co-op food store all being between 0.8-1.6km from the site, meaning that many will be accessible by foot. A bus stop is located in the centre of the village where buses to Cambridge and Haverhill are available.

4.6.5 The Story Map is available here:

<https://storymaps.arcgis.com/stories/f710d9c21073423da8ba1883430f816c>.



*Figure 3: Land at Balsham Road, Linton*

### Land at Back Road, Linton

- 4.6.6 Gladman are promoting a site in Back Road, Linton. The site is 3.98 hectares and capable of delivering approximately up to 95 dwellings. We would welcome an opportunity to discuss the site with the Councils and the development it could deliver.
- 4.6.7 Gladman consider that the development could deliver 95 homes, including 38 new affordable homes and a programme of ecological enhancement. The provision of recreational green space and the potential economic benefits of development in this location makes this an ideal sustainable location for growth. Safe access can be achieved off Back Road and the site is within Flood Zone 1.
- 4.6.8 The site is sustainably located within the settlement, with the secondary and infant schools, pharmacy, pub, newsagents, health centre and Co-op food store all being between 1.1-1.6km from the site, meaning that many will be accessible by foot. A bus stop is located 1.2km away where buses to Cambridge and Haverhill are available.
- 4.6.9 The Story Map is available here:  
<https://storymaps.arcgis.com/stories/f710d9c21073423da8ba1883430f816c>.



Figure 4: Land at Back Road, Linton

### Land at Brook Road, Bassingbourn

- 4.6.10 Gladman are promoting Land at Brook Road, Bassingbourn. The 6.46ha site is suitably and sustainably located adjacent to Bassingbourn, near to key facilities such as the Primary School, Village College and Sports Centre. The site would provide for a high-quality design-led scheme of up to 80 homes, of which up to 32 would be affordable, within a green network of ecological enhancements.
- 4.6.11 The site offers a unique opportunity to create a naturalistic green corridor, improve biodiversity on site through wetland creation, hedgerow planting, native planting and provision of new bird nesting opportunities. Landscaping will be provided on site to ensure local character is retained and enhanced, whilst providing much needed market and affordable housing in Bassingbourn.
- 4.6.12 The Story Map is available here, exploring the potential for a green corridor and design-led scheme: <https://storymaps.arcgis.com/stories/96d66134b8944193951cb1ddcb40f937>.



Figure 5: Land at Brook Road, Bassingbourn

### Land at Whitecroft Road, Meldreth

- 4.6.13 Gladman are promoting 3.77ha of land at Whitecroft Road, Meldreth. The site is capable of delivering 90 homes, up to 36 of which will be affordable. Development at this location offers significant opportunities for community benefits through CIL-compliant financial contributions and increased local spending through new residents.
- 4.6.14 The site is in a highly sustainable location, well contained by residential dwellings to the east and Whitecroft Road to the west. The settlement is served by excellent transport links, including a train station with regular services to Cambridge and London. The site presents no harm to heritage assets and is not at risk of flooding, as demonstrated in the Modelling Report attached to Gladman's submission. Details of the modelling results are included in the ArcGIS StoryMap for this settlement.
- 4.6.15 The Story Map is available here:  
<https://storymaps.arcgis.com/stories/8e5946807d4e4d8cba275f1fobadof27>.



Figure 6: Land at Whitecroft Road, Meldreth

### **Land at New Road, Melbourn**

- 4.6.16 Gladman are promoting 5.88ha of land for residential development at New Road, Melbourn. The site is capable of delivering 140 new homes, up to which 56 will be affordable whilst maintaining and enhancing existing vegetation, allowing the new development to integrate into the wider existing landscape.
- 4.6.17 The site is within Flood Zone 1, presents no harm to heritage assets and compliments the recent developments to the north and northwest of the site. The site can also provide ecological enhancements through recreational green space, biodiversity net gain and new habitats created through the provision of a sustainable drainage system.



*Figure 7: Land at New Road, Melbourn*

### Land at Station Road, Over

- 4.6.18 Gladman are promoting 3.46ha of land for residential development comprising 65 new homes, of which 16 will be affordable. The site is well contained by Station Road and New Road and is sustainably located adjacent to existing development. Over is a sustainable settlement benefitting from the Cambridgeshire Guided Busway.
- 4.6.19 The development retains open space to create a sensitive transition to the existing recreation ground and offers several benefits for Over. CIL compliant financial contributions will allow the Council to reinvest in Over, potentially providing improvements for the local community centre and sports facility and an extension to the existing recreation ground.



Figure 8: Land at Station Road, Over

### Land at Willingham Road, Willingham

- 4.6.20 Gladman are promoting land at Willingham Road, Willingham. The site presents the opportunity to provide up to 100 new homes, including 40 affordable homes, biodiversity and ecological enhancement opportunities, publicly accessible open space, and CIL-compliant contributions towards local community benefits.



Figure 9: Land at Willingham Road, Willingham

## 5 CLIMATE CHANGE

### 5.1 Policy CC/NZ: Net Zero Carbon New Buildings

- 5.1.1 This policy will set the levels of energy use that will be allowed for new development and the specific requirement regarding the energy needs of new buildings. Residential developments of 150 homes or more and non-residential development of 1,000 m<sup>2</sup> or more should calculate whole life carbon emissions through a nationally recognised Whole Life Carbon Assessment and demonstrate actions to reduce life-cycle carbon emissions. This should include reducing emissions associated with construction plant. Gladman are supportive of attempts to reduce carbon, however new buildings and residential developments will be built in accordance with the Building Regulations at the time of their construction.

## 6 BIODIVERSITY AND GREEN SPACES

### 6.1 Policy BG/BG: Biodiversity and Geodiversity

- 6.1.1 Gladman are supportive of the overarching aim of the policy to increase biodiversity in the Greater Cambridge area but consider the minimum requirement of 20% biodiversity net gain to be excessive and above national policy requirements. The Environment Act 2021, when the legislation is enacted, will introduce a requirement for new development to deliver a 10% net gain in biodiversity.
- 6.1.2 An additional 10% BNG on top of the forthcoming national requirement could stop smaller sites that would be capable of delivering much needed homes from coming forward and may also lead to schemes which do not take account of local site densities and characteristics of the surrounding area. Any policy requirement should be fully tested and justified through a viability assessment.
- 6.1.3 It is also important that the long-term impacts are considered when reviewing proposals for BNG, accounting for the fact that many of the measures provided will need to mature beyond the build period.
- 6.1.4 Gladman support the recognition that more significant and long-lasting biodiversity benefits are often delivered off-site and the policy should be flexible enough to allow for this.

- 6.1.5 These considerations should be considered when drafting a policy with regards to achieving biodiversity net gain.

## 7 GREAT PLACES

### 7.1 Policy GP/LC: Protection and Enhancement of Landscape Character

- 7.1.1 Gladman generally support the protection of special and valued landscapes but have concerns that the proposed policy direction does not provide a suitably balanced approach and could stop sustainable development in the countryside coming forward when needed. The justification for and inclusion of Important Countryside Frontages needs to be robustly evidenced and the policy needs to provide the necessary flexibility at the edge of villages.

### 7.2 Policy GP/GB: Protection and Enhancement of the Cambridge Green Belt

- 7.2.1 Gladman support the inclusion of a Green Belt policy but the policy must not simply duplicate national policy set out in the NPPF (2021). Other issues relating to the protection of the Green Belt with regard to the spatial strategy have been outlined in Section 4.2.

### 7.3 Policy GP/HA: Conservation and Enhancement of Heritage Assets

- 7.3.1 With regards to the conservation of the historic environment, Gladman refer to the NPPF (2021), paragraphs 199-204, which outline the policy tests which should be applied where development affects designated and non-designated heritage assets. The Councils need to ensure the policy within the GCLP reflects the national policy and aligns with these varying tests.

- 7.3.2 Specifically, the NPPF (2021) states that developments leading to substantial harm of a designated heritage asset should be refused unless it is necessary to achieve substantial public benefits that outweigh the harm, where proposals would lead to less than substantial harm then this harm should be weighed against the public benefits. With regards to proposals impacting on non-designated heritage assets, a balanced judgement will be required.

## 8 HOMES

### 8.1 Policy H/AH: Affordable Housing

8.1.1 The provision of affordable housing should be a key priority for the new Local Plan. Affordability of housing across the Greater Cambridge area is a significant issue, with the Median Affordability ratios being 12.95 and 10.25 for Cambridge City and South Cambridgeshire district respectively.

8.1.2 It will be important that the affordable housing requirement set through the new Local Plan is tested through the Local Plan Viability Assessment and that it is set at a deliverable level, whilst also ensuring that the housing needs are met.

8.1.3 It may be necessary for the Local Plan to include varied affordable housing requirements based on site type and location. This will need to be considered further through the preparation of the Plan. Gladman support the provision of affordable housing through a balanced and robust spatial strategy.

### 8.2 Policy H/HM: Housing Mix

8.2.1 In terms of housing mix, Gladman would recommend that the Local Plan avoids a prescriptive housing mix requirement, rather that the policy should allow for schemes to determine the most appropriate housing mix for the particular location. The Plan could include an indicative mix which may be encouraged if appropriate rather than a strict requirement. The housing provided will need to reflect the needs across the area and any policy will need to be flexible and recognise that the specific housing needs may change over the course of the plan period.

### 8.3 Policy H/HD: Housing Density

8.3.1 Gladman are supportive of the efficient use of land, as required by paragraph 124 of the NPPF (2021):

*"Planning policies and decisions should support development that makes efficient use of land, taking into account:*

- a) *the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;*

- b) local market conditions and viability;*
- c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
- d) the desirability of maintaining an area’s prevailing character and setting (including residential gardens), or of promoting regeneration and change; and*
- e) the importance of securing well-designed, attractive and healthy places.”*

8.3.2 Paragraph 125 also highlights that, *‘where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.’*

## 8.4 Policy H/CB: Self and Custom Build Homes

8.4.1 Gladman would welcome the addition of a policy in relation to self-build housing within the Greater Cambridge Local Plan. This would be in line with current government thinking and objectives. It is key that the development industry is able to understand the implications of any such policy requirement, to assist with the design of schemes and the consideration of financial viability.

8.4.2 Gladman recommend that any policy requirement in relation to self-build housing has an element of flexibility built in to allow for negotiation over self-build plots on the basis of identified demand and also viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include self-build plots should be tested through the Councils’ viability assessment of the Local Plan policies to ensure that the cumulative impacts of all proposed local standards and policy requirements do not put the implementation of the Plan as a whole at risk.

Further to this, Gladman urge the Councils to ensure the policy has added flexibility as there is no guarantee that these units will be delivered and there may be situations when they are difficult to deliver which may result in the non-delivery of otherwise sustainable land for housing. Therefore, Gladman recommend that any policy specific requirement needs to include a mechanism whereby if the self-build plots are not taken up within a given time period, then these revert back to market housing to be provided as part of the wider

scheme. This would provide flexibility and help to ensure that the required housing is delivered.

## 9 CONCLUSIONS

### 9.1 Summary

9.1.1 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.

9.1.2 Gladman have raised concerns regarding the spatial strategy and believe that a more balanced approach is needed to ensure that the housing requirements are met across both Council areas. The Councils should seek to allocate a range of sites, by size, type and market locations to ensure that the Local Plan delivers identified housing need for the region. Growth should be dispersed across the settlement hierarchy and the region to ensure future sustainability and vitality.

9.1.3 While it is recognised that there may be no alternative to Green Belt release to meet some of the needs of Cambridge on the edge of Cambridge, it is unlikely to justify Green Belt release on in the villages and towns. It is imperative that the Councils have considered, assessed, and rejected all other reasonable options to get to that point.

9.1.4 The villages in South Cambridgeshire offer several opportunities for development beyond the Green Belt, in sustainable locations, with transport links into Cambridge that can meet local housing requirements and these should be considered as part of the plan making process.

9.1.5 The strategic policies that will be included in the plan need to clearly be evidenced and provide appropriate levels of flexibility so that sustainable development can come forward when necessary.

9.1.6 The sites submitted in Section 10, and the greater detail provided in the Appendices are examples of sustainable locations that are available for development, beyond the Green Belt, in villages with a range of local centres and transport connections into Cambridge.

9.1.7 For further communication on any of the information included above, please contact 



