

# GREATER CAMBRIDGE LOCAL PLAN - THE FIRST PROPOSALS

Land South of Bartlow Road, Castle Camps, CB21 4SY

- Representation on behalf of landowners

## Client:

The Critchley Family

## Landowners:

M. Haylock

D. Critchley

M. Tinker

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# Representations on Land South of Bartlow Road, Castle Camps, CB21 4SY

1.1 Cheffins has been instructed by the Critchley Family to promote their interests in 'Land South of Bartlow Road, Castle Camps, CB21 4SY'. The site could deliver dwellings in a sustainable location, adjacent to the settlement boundary of a group village.

#### **Site Location and Context**

- 1.2 The site is located immediately adjacent to the settlement boundary of Castle Camps and extends to approximately 0.75ha. The site constitutes an infill site, bounded by residential development to the north, south and east. The central part of the site is currently used for allotments, whilst the northern, western, and eastern boundaries of the site are heavily vegetated, with a number of mature trees and shrubs.
- 1.3 Castle Camps is a sustainable location with a primary school, post office facilities, community facility, a public house, and shops. In addition to the amenities within Castle Camps, the site would benefit from the existing 59 bus service which provides a direct connection to facilities in Haverhill and Saffron Walden, the train station in Audley End which provides a direct link to Cambridge and London, and employment opportunities in the rapidly expanding Haverhill Research Park.
- 1.4 The site is wholly located within Flood Zone 1 and there are no physical constraints that would prevent residential development coming forward.
- 1.5 There is no recent planning history.

## Principle of Development

- 1.6 Castle Camps is a sustainable location, hosting ample local services and connections to facilities in other, nearby conurbations. It is classified as a group village within adopted policy S/7 of the Local Plan and emerging policy S/SH of the GCLP, where schemes of up to 8 dwellings would generally be appropriate within the settlement boundary. In exceptional cases, developments of up to 15 dwellings may be allowed, where "this would make the best use of a single brownfield site".
- 1.7 The site lies adjacent to, but outside of, the current settlement boundary for Castle Camps (as defined in the South Cambridgeshire Adopted Policies Map). In such locations, new residential development is generally restricted. However, it is noted that the development envelopes are due to be reviewed as part of the plan-making process for the Greater Cambridge Local Plan, "with boundaries defined to take into account the present extent of the built-up area as well as planned new development." Following recent approvals on Bartlow Road notably \$\frac{5}{4469}\$/17/OL and \$\frac{5}{415}\$/17/OL the site now appears as something of an anomaly in an otherwise continuous built-up frontage along this part of Bartlow Road. It would therefore be appropriate for the LPA to consider extending the settlement boundary to include the proposed site.
- 1.8 Notwithstanding any future review of the settlement boundary for Castle Camps, it is considered that there are material considerations sufficient to justify a relaxation of the

adopted policy in order to allow the development of this site. As noted in a recent appeal decision<sup>1</sup>, the underlying aim of Policy S/7 is to, "ensure that the countryside is protected from gradual encroachment on the edges of villages and to help guard against incremental growth in unsustainable locations." It is accepted that settlement boundaries are a tool which support efficient, plan-led decision-making but there is no logic in precluding the development of this particular site. The land does not have the character of 'open countryside', being well-related to existing development and close to the village core. Due to the particular location and context, there would be no encroachment into the open countryside and no significant adverse impact on the environment, landscape or the natural beauty of the countryside as a result of its development.

- 1.9 A masterplanning exercise has yet to be completed, however, indicatively the site could accommodate 8–10 dwellings, including the provision of a new vehicular access and onsite open space provision. This is an appropriate scale of development for a group village and would help to support existing services and facilities.
- 1.10 Due to its location beyond the settlement boundary, under the current policy framework, the proposed development would represent a technical conflict with the overall spatial strategy for the area. However, each case should be taken on its merits, with some flexibility afforded in exceptional cases. For example, draft policy S/SH would benefit from the inclusion of an 'exceptions' approach whereby residential development could be allowed under certain strict circumstances, including where the development of a site would not cause significant harm or materially undermine the spatial strategy underpinning the development plan. If carefully worded, such exceptions would be rare.

#### Loss of Allotments

#### Draft policy BG/PO: Protecting Open Spaces

- 1.11 Part of the proposed site is currently in use as private allotments. In line with existing policy, the First Proposals plan seeks to protect open spaces of public value, including allotments. The draft policy indicates that the level of protection will vary according to the type of open space, with a criteria-based policy expected at Submission stage. Draft policy BG/PO also recognises that the development of open spaces may be appropriate in some cases. This location may include areas where the need for allotment space in the area has been met and/or a suitable alternative site can be identified.
- 1.12 Arguably, the quality and quantity of allotment provision in the local area would be a factor for consideration as part of any development proposal. Existing evidence indicates that there is a *surplus* of allotment land in this location. A Recreation and Open Space Study published in 2013 found that allotment provision in Castle Camps exceeded the recommended standard by 0.45ha. The study also rated land south of Bartlow Road as being only of 'average' quality.
- 1.13 However, it is accepted that up-to-date evidence would be required to confirm the current level of need and provision for allotments in the local area. It is hoped that this will be provided as part of the 'new evidence' on open spaces that will accompany the draft GCLP. Ultimately, should a local need for this type of open space be demonstrated then the landowner could explore the possibility of relocating some or all of the allotment provision

<sup>&</sup>lt;sup>1</sup> Abbey Properties Ltd v South Cambridgeshire District Council [2020]

to an alternative site on the edge of the village – land around the village is controlled by the family.

1.14 It may also be possible for some allotment space to be retained alongside a residential development; the current site layout does not constitute an efficient use of land, with much of the site being overgrown and unused. A commuted sum to improve off-site space could also be explored if appropriate.

#### **Technical Assessment of the Site**

1.15 Only limited work has been carried out to date in relation to the proposed development of this site, however, there is every reason to believe that an acceptable scheme could be devised which was sympathetic to the existing built forms of the settlement and nearby heritage assets. There are indications that safe and convenient accesses could be provided to the site, and no known highway capacity constraints.

# The Proposed Policy Framework

1.16 The following section includes comments on the emerging policy direction as published in the Greater Cambridge Local Plan First Proposals.

#### Policy S/SB: Settlement Boundaries

- 1.17 Although much of the Greater Cambridge area has a dispersed settlement pattern, the draft plan does not support the 'organic' growth of smaller settlements. To prevent stagnation and the further loss of key local services, a more flexible and tolerant approach is needed towards development in the rural area.
- 1.18 Through the application of tightly drawn settlement boundaries, development is strictly controlled on sites in the 'open countryside'. But it is not logical to treat all sites equally in policy terms. Whilst sites within sensitive valued landscapes and the green belt should receive a high level of protection, the sensitive development of some sites on the edge of a village would cause no significant harm. Such a pragmatic approach is often taken at appeal. For example, rounding off development where there is a defensible physical boundary or allowing a high-quality scheme with extensive landscaping where it would soften an existing harsh area of built form can be acceptable in certain locations.
- 1.19 A carefully worded criteria-based policy which was supportive of organic growth adjacent to existing built up areas should not perpetuate unfettered incremental growth.

#### Policy BG/GI: Green infrastructure

- 1.20 The adoption of a green infrastructure standard should be a recommendation, not a requirement. Developments should not be opposed where all reasonable steps have been taken to protect and incorporate green infrastructure.
- 1.21 Regardless of the chosen approach, it would be useful to include further guidance/information in a supplementary planning document (SPD).

# Policy GP/PP: People and Place Responsive Design and Policy GP/QD: Achieving High Quality Development

- 1.22 The bold ambitions of draft policy GP/PP are supported particularly the proposed use of design Guides/Codes to set out the design expectations for a particular area. Local community input will also be as stated, and a robust consultation process will be needed since the 'devil will be in the detail'; these documents must go beyond broad requirements for new homes to be 'in keeping' with the character and appearance of the area.
- 1.23 However, it will take time for these design guides to be drafted and adopted. In the interim, developers could be signposted towards an alternative framework. For example, the National Design Guide, which includes 10 characteristics of a well-designed place: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan. Schemes which can demonstrate a high standard of design should be fast-tracked through the application process.

#### Policy H/CB: Self- and Custom-build Homes

- 1.24 The proposed site could be a suitable location for one or more self- or custom-build homes.
- 1.25 The proposed policy approach will require continual updating of the self and custom build register(s) to reflect the permissions that have been granted with a self- or custom-build element. Close monitoring on sales and completions will also be necessary in case plots earmarked for self- or custom-build revert to market dwellings at the end of the prescribed 12-month marketing period.
- 1.26 It is also unclear if the current registers for Cambridge City and South Cambridgeshire are to be combined, with delivery of plots across the wider area. This would not be logical since many prospective self-builders will have preferred locations and few will have a search area as wide as Greater Cambridge. A more focused policy, perhaps split across the two administrative areas, would encourage the development of self-build plots in the right locations to meet local demand. For example, if all the need for plots was in and around Cambridge, it would not make sense to burden developers in other parts of the area.

## Availability and Deliverability

1.27 The First Proposals plan is heavily reliant on the delivery of a handful of strategic developments – particularly large and complex sites which on average take 5-8 years for the first home to be delivered<sup>2</sup>. To ensure that housing delivery doesn't stall, and the affordability crisis worsened as a result, a pipeline of smaller developments which can deliver homes quickly will be needed in the short to medium term. The proposed site – land south of Bartlow Road in Castle Camps – is suitable, available, and deliverable within 0-5 years.

<sup>&</sup>lt;sup>2</sup> Lichfields (2020). Start to Finish: What Factors Affect the Build-out Rates of Large-scale Housing Sites? Second Edition