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449385/AM



Greater Cambridge Shared Planning Policy Team

Andy Moffat
E: andy.moffat@savills.com
DL: +44 (0) 1223 347 046

Unex House
132-134 Hills Road
Cambridge CB2 8PA
T: +44 (0) 1223 347 000
F: +44 (0) 1223 347 111
savills.com

Dear Sirs,

SUBMISSION TO GREATER CAMBRIDGE LOCAL PLAN FIRST PROPOSALS ON BEHALF OF HOPKINS HOMES – LAND EAST OF BUSH CLOSE, COMBERTON

SITE REFERENCE: 40501

Savills (UK) Ltd Planning Team are instructed by Hopkins Homes to make further representations on the Greater Cambridge Local Plan First Proposals in respect of development at Comberton. These comments should be read in conjunction with the information submitted in relation to this site in February 2020.

In summary:

- The proposed site has a direct link to the adopted public highway and safe access could be created (contrary to the statement in the HELAA);
- The overall harm of Green Belt release of the site should be categorised as Low harm, and development of this site would provide more recognisable and more permanent boundaries to the Green Belt than at present;
- The site is thereby Suitable (as well as Available and Achievable) having regard to the Site Assessment criteria in the Councils' Housing and Employment Land Availability Assessment;
- The proposed Local Plan is planning for up to 2041/a generation, the Councils' own evidence suggests that housing in the rest of the rural area outside the southern cluster can help support delivery of a range of smaller sites within the area and support the vitality of our villages, and some growth in centres such as Comberton should therefore be included in the Plan to help sustain the village; and
- The east of Bush Close site, which can be delivered within the first five years following adoption of the plan, is well-placed to make an important contribution towards a balanced and resilient housing land supply for Comberton and the Greater Cambridge area.

Site Access

At the time of the SHLAA (August 2013), SCDC were not satisfied that it was possible to provide safe highway access to the site linked to the adopted public highway. The 2021 SHLAA continues to state that "The proposed site does not have a direct link to the adopted public highway. No possibility of creating a safe access." In February 2020 though, a 'Technical Note 01 – Transport and Highways Representations to the Greater Cambridge Local Plan For Hopkins Homes' was submitted which demonstrates that safe highway access to the site can be provided and that the existing Byway Open to All Traffic (BOAT) can be upgraded to provide a link to the surfaced road providing access to Thornbury and thereby directly link the site with the B1046. For convenience, a further copy of the Technical Note is submitted alongside this letter.

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Landscape and Townscape, and Green Belt

We welcome the conclusion in the SHLAA that “The site is within the perceived village envelope and capable of being developed as proposed with little negative landscape impact. Appropriate landscaped perimeter treatments should be included and retention of trees and hedgerows is encouraged”.

The conclusion that “Development of the site would have either a neutral or positive impact (on the Historic Environment), but importantly not have a detrimental impact on any designated or non-designated heritage assets” is also welcomed.

The Councils’ Greater Cambridge Green Belt Assessment August 2021 (GCGBA) concludes that the site/parcel’s P1 Contribution is Limited/No Contribution, its P2 Contribution is Relatively limited, its P3 Contribution is Relatively limited, and it would have only a minor impact on the Contribution of the adjacent Green Belt.

A ‘Green Belt Strategic Site Landscape Appraisal’ was prepared and submitted as part of the February 2020 submission for the site. For convenience, a further copy is submitted alongside this letter. That Appraisal concluded that the site’s P2 and P3 Contributions were both Limited (rather than the Relatively limited conclusion in the Council’s Assessment). Moreover, the Appraisal concluded that “The combination of relatively flat landform, mature vegetated boundaries, byway and watercourse to the Site boundaries form robust strong boundaries and provide a strong degree of separation from the local countryside to the east and south.” It concluded that the site therefore had an overall Limited contribution to Green Belt purpose.

Furthermore and significantly, allocation and development of this site would provide more recognisable and more permanent boundaries to the Green Belt than at present (as advocated by Paragraph 143 of the NPPF). Paragraph 143 of the National Planning Policy Framework states that “When defining Green Belt boundaries, plans should:f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” In this instance, the byway along the eastern boundary of the site and Tit Brook along the southern boundary are more recognisable and permanent physical features than the existing village boundaries (southern boundary of Swaynes Lane development and eastern boundary of Bush Close development).

This would replace a “Weak” (as defined in the GCGBA) existing Green Belt boundary with a “Moderate” (as defined in the GCGBA) boundary upon release with the potential to provide a “Strong” (as defined in the GCGBA) new boundary following planned planting.

The extract below is an extract from Table 3.6 in the GCGBA. Having regard to the conclusions above, including the conclusions in the GCGBA with regards to the site’s contribution to the Green Belt purposes and the impact on contribution of adjacent Green Belt, the overall harm to the Green Belt of development on the site should be categorised as **Low harm** (rather than the Moderate harm)

Table 3.6: Benchmark examples used to inform the assessment of overall harm to the Cambridge Green Belt purposes

Moderate harm	<p>Release of land results in a loss of moderate contribution to one of the Green Belt purposes, and would constitute a minor impact on adjacent Green Belt land; or</p> <p>Release of land results in a loss of relatively weak contribution to one of the Green Belt purposes, and would constitute a minor-moderate impact on adjacent Green Belt land.</p>
Low harm	<p>Release of land results in a loss of moderate contribution to one of the Green Belt purposes, and would constitute a negligible impact on adjacent Green Belt land; or</p> <p>Release of land results in a loss of relatively weak contribution to one of the Green Belt purposes, and would constitute a minor impact on adjacent Green Belt land.</p>

Other Matters

The green rating in the SHLAA for Open Space / Green Infrastructure; Historic Environment; Noise; Vibration; Odour and Light Pollution; and Air Quality is welcome. Accessibility to Services and Facilities is being improved, and Flood Risk, Biodiversity and Geodiversity, Archaeology, Transport and Roads, Contamination and Ground Stability impacts can all be adequately mitigated.

Spatial Strategy

We strongly support the statement in the Councils' Development Strategy Topic paper that "Our (*the Councils*)' evidence suggests that housing in the rest of the rural area outside the southern cluster can help support delivery of a range of smaller sites within the area, and support the vitality of our villages".

This is reflective of national policy in the NPPF, which includes (paragraph 79):

"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."

In addition (paragraph 84):

"Planning policies ... should enable:

...

- a) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship."*

It is therefore incumbent on the Council to reflect this in the strategy. The proposed allocation of only 6 new sites / 384 new homes across the 5 Rural Centres, 13 Minor Rural Centres, 33 Group Villages and 55 Infill Villages does not reflect this and will not achieve the objective set out above. As shown by the table on page 32 of the draft plan, this figure equates to just 3.3% of the new housing allocations proposed.

Comberton is a Minor Rural Centre with many of the attributes of a Rural Centre, having a Village College and sports facilities, Primary School, Surgery, Village Hall, Public House, two Churches, and a range of shops and employment opportunities. Accessibility is also being improved as part of the Comberton Greenway and Cambourne to Cambridge Better Transport Projects.

The Councils' Housing Delivery Study for Greater Cambridge (October 2021) projects a 5.15 year supply in the 5 years following adoption – assumed in the study to be 2025-2030. This is close to the required 5 year supply and relies in part on delivery on a small number of large sites. It would be prudent to reduce the risk of failing to be able to demonstrate a 5 year housing land supply in the future by making proactive provision for a larger buffer than the minimum 10% as part of this Plan (and with the HBF advocating a 20% buffer), and thereby seeking to avoid planning by appeal in the future.

The currently proposed strategy also includes 'additional' / 'faster' delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements. The Councils' own Development Strategy Topic Paper notes on page 74) (our emphasis) that "... Our (*the Councils*)' *Housing Delivery Evidence suggests that our assumptions on housing delivery at Northstowe and Waterbeach can be faster than we previously estimated, such that they could contribute additional homes towards our housing need to 2041. ...*" and does not address whether they are likely to happen.

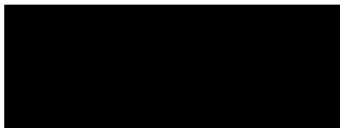
Given the extent of Green Belt around Cambridge and the villages, a review of Green Belt boundaries and the release of sites is required to meet the needs of the villages (to enable them to grow and thrive as required by the NPPF) as part of meeting the overall needs.

The allocation of this site, which has been shown to be suitable, available and achievable, and would be delivered in the 5 year period following adoption of the Plan, should form part of a robust strategy. Its allocation would help mitigate the risk of not having a 5 year housing land supply. Even more importantly, it is in a location where planned improvements will improve accessibility and its allocation would help meet the NPPF requirement and Councils' objective of supporting the vitality of villages. Taken together, the benefits of the scheme outlined in this letter and in the previous submission constitute the exceptional circumstances required to release the site from the Green Belt and allocate it for residential development.

We welcome the opportunity provided to comment on these First Proposals and trust that the Councils will now carefully consider these comments in preparing a Draft Local Plan.

If there is any further information and/or clarification that we can usefully provide to assist your consideration of these proposals, please do not hesitate to contact the undersigned in the first instance.

Yours faithfully



Andy Moffat BA(Hons) MPhil MRTPI
Head of Department

Accompanying documents:

Technical Note 01 – Transport and Highways Representations to the Greater Cambridge Local Plan For Hopkins Homes
Green Belt Strategic Site Landscape Appraisal