



## GREATER CAMBRIDGE LOCAL PLAN – THE FIRST PROPOSALS

Land West of Fox Road, Bourn, CB23 2TU

– Representation on behalf of landowners

---

**Client:**

Mr Peter Crow  
Mrs Jean Crow  
Mr Michael Crow

**Landowners:**

Mr Peter Crow  
Mrs Jean Crow  
Mr Michael Crow

**Date:**

December 2021

**Prepared by:**

Vaughan Bryan BA (Hons), MPhil (Cantab)

**Checked by:**

Adam Tuck BSc (Hons), MRICS

## 1. Representations on Land West of Fox Road, Bourn, CB23 2TU

- 1.1 Cheffins has been instructed by Mr Peter Crow, Mrs Jean Crow and Mr Michael Crow to promote their interests in Land West of Fox Road, Bourn, CB23 2TU'. The site could deliver up to 50 dwellings in a sustainable location, adjacent to the settlement boundary of a group village.

### Site Location and Context

- 1.2 The site is located within the development framework for Bourn (currently classified as a Group Village) and extends to approximately 3.3 hectares. The site constitutes an infill site, bounded by existing development to the north and east.
- 1.3 Bourn is a sustainable location and hosts various local facilities, including a primary school, post office facilities, a village hall, restaurants and cafés, a church, a local garage, and a range of local shops and professional services. In addition to the amenities within Bourn, the site would benefit from the hourly 18 bus service, which provides a direct connection to facilities in Cambourne and Cambridge.
- 1.4 The site is wholly located within Flood Zone 1 and there are no physical constraints that would prevent residential development coming forward.

### Principle of Development

- 1.5 Bourn 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".
- 1.6 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.
- 1.7 A masterplanning exercise has yet to be completed, however, indicatively the site could accommodate up to 50 dwellings, including the provision of a new vehicular access and on-site open spaces. This is an appropriate scale of development for a group village and would help to support existing services and facilities.

---

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

- 1.8 We accept that 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.

### Comments on the Scoring Methodology and System

- 1.9 The performance of sites previously submitted to the Greater Cambridge Partnership for allocation in the emerging local plan have been coded using a traffic light system (red/amber/green). Although traffic light scoring systems are commonly used in this context, the particular performance criteria applied by the Greater Cambridge authorities appears overly stringent and inconsistent.
- 1.10 According to the published assessment criteria and supporting text within the HELAA, a site will generally be scored as amber where there is a detrimental impact which could be satisfactorily mitigated. This is an unusually strict approach which results in sites seeming to score more poorly than they should. It is more common for such assessments to apply an amber score to indicate that there is a potential issue that would need to be addressed through further detailed technical work or masterplanning. The current scoring matrix indicates deliverability issues where there are none. Where there are clear opportunities for effective mitigation of an impact or evidence to suggest that the matter is unlikely to constrain development, then a green rating would be more appropriate.
- 1.11 Ultimately, the key question that needs to be answered by a site assessment would be, "is development of this site acceptable in planning terms?". A revised scoring system based on the following key principles would be easier for stakeholders to understand a site's suitability for development:
- **Red:** NO. This is a major concern which would likely result in planning permission being refused.
  - **Amber:** POSSIBLY. This is a potential concern for which there may be a design solution (i.e. further site-specific work is needed).
  - **Green:** YES. This is unlikely to be a significant concern or constraint on development.

### Technical Assessment

- 1.12 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.
- 1.13 The following sections outline how development of the site may impact locational factors assessed within a HELAA; the GCLP's traffic light scoring system is used as the basis for the suggestions outlined below.

### *Landscape and Townscape*

- 1.14 The site is a greenfield site to the north of the B1046 and west of Fox Road. There are partial mature trees and hedge rows along the northern and southern boundaries forming a defensible block that is well connected to the main settlement. The boundary treatments could be improved and enhanced with development, while the site itself could be integrated with the rest of Bourn by adjoining with the existing residential development to the east and south.
- 1.15 We do not anticipate that development of the site would have any major impacts on the settlement that could not be reasonably mitigated through planning conditions or detailed design strategies.
- 1.16 Tree planting and wilding could be undertaken along the southern and western boundaries of the site to maintain rural views along the B1046 and provide a natural buffer for Bourn.

### *Accessibility to Services and Facilities*

- 1.17 Various local facilities are available in Bourn, including a primary school, post office facilities, a village hall, restaurants and cafés, a church, a local garage, and a range of local shops and professional services. In addition to the amenities within Bourn, the site would benefit from the hourly 18 bus service, which provides a direct connection to facilities in Cambourne and Cambridge.
- 1.18 In terms of connectivity to employment opportunities, public transport services (via the 18 bus service) would grant incoming residents direct access to Cambridge City Centre and, subsequently, the major biotech industry clusters within and around Cambridge. The site is also proximal to employment opportunities in Cambourne – a growing settlement which is set for further expansion following allocation of land on the adjacent Bourn Airfield.

Overall, the site has adequate accessibility to key local services, transport, and employment opportunities by a range of modes of transport – an outcome sought after by proposed policy *I/ST: Sustainable Transport and Connectivity*. However, notwithstanding this assessment, it is clear that the current scoring system is in need of updating. The scoring system needs to reflect changes in modern living and technological advancements, including increased homeworking, more widespread use of remote services (e.g. GP and pharmacies), increased online shopping (including groceries), and the growth in micro-mobility (e.g. e-bikes and electric scooters).

### *Site Access*

- 1.19 The exact location and layout of vehicular accesses would be designated following a detailed transport and access study.
- 1.20 However, there are clear indications that safe access to the site – and subsequent integration with the rest of Bourn – could be achieved through the development of a new vehicular/pedestrian access along Fox Road which falls within a 30-mph limit with visibility splays achievable in both directions. There is an existing footpath link to the village from Fox Road, which could be enhanced by development and connected with any forthcoming active transport infrastructure.
- 1.21 As such, we would advise a 'Green' rating for site access.

### *Transport and Roads*

- 1.22 In terms of public transport accessibility, the site would benefit from the hourly 18 bus service, which provides a direct connection to both Cambourne and Cambridge.
- 1.23 Masterplanning exercises will be conducted to outline the most efficient distribution of road and active travel routes across the site. This would ensure a sustainable modal share can be accommodated by the development's layout – an outcome sought after by emerging *Policy I/ST: Sustainable Transport and Connectivity*.
- 1.24 We do anticipate any major detrimental impacts on the functioning of trunk roads or local roads as a result of site development.
- 1.25 Considering the above, a 'Green' or 'Amber' rating for transport and roads would be appropriate.

### *Archaeology*

- 1.26 An appropriate investigation strategy will be undertaken to assess the impact of development, which will be agreed with the Local Planning Authority. As such, a 'Green' or 'Amber' rating would be appropriate in this context.

### *Historic Environment*

- 1.27 The site is situated with the Bourn Conservation Area. Acknowledging this, we would promote a mid-to-low density residential area during masterplanning exercises to allow the site to reflect the character of its surrounding settlement. Moreover, detailed design measures and appropriate planning conditions can be implemented at the planning application stage to mitigate any possible impact on nearby heritage assets.
- 1.28 Considering the mitigation measures that can be implemented through detailed design and planning, a 'Green' or 'Amber' rating would be appropriate in relation to historic environment factors.

### *Flood Risk*

- 1.29 The site is situated wholly within Flood Zone 1.
- 1.30 Surface water runoff can be managed on site through soakaways and on-site attenuation systems.
- 1.31 Considering the above, a 'Green' rating would be accurate and consistent with the grading of other sites for flood risk factors.

### *Biodiversity and Geodiversity*

- 1.32 The site is an arable field and, in itself, appears to be of low ecological value. There are no apparent priority habitats within the site, though vegetation along the site's boundary may be of ecological value. Development of the site could be designed in such a way that it integrates existing ecological features (e.g. hedgerows and treelines along the site boundary) with wildlife corridors or open space, therein contributing towards a 20% biodiversity net gain as sought after by emerging *Policy BG/BG Biodiversity and Geodiversity*.

- 1.33 To mitigate any possible detriment to the environment and ensure that development can deliver a 20% net gain in biodiversity, ecological assessments can be undertaken as part of a planning application. It is also worth noting that allocation of the site for development would put less pressure on the allocation of more sensitive ecological sites (e.g. sites within the green belt).
- 1.34 Furthermore, consultations with Natural England can be undertaken at the planning application stage to further ascertain how ecological impacts may be reasonably mitigated and further environmental benefits may be facilitated by the development.
- 1.35 Therefore, given the broad range of measures that can be taken to mitigate ecological harm, we recommend that the site be granted a 'Green' rating in relation to impacts on the site's biodiversity and geodiversity.

#### *Air Quality*

- 1.36 The site is not situated within an AQMA. We anticipate that the site will have a minimal impact on traffic and air pollution if developed. Therefore, we advise a 'Green' rating for air quality factors.

#### *Noise, Vibration, Odour, and Light Pollution*

- 1.37 The site is not located close to any significant sources of noise, vibration or odour, and there is no reason to suggest that noise, vibration, or odour mitigation measures will need to be incorporated into the development.
- 1.38 Based on the above, a score of 'Green' would reflect the minimal noise, vibration, odour, or light pollution issues associated with development of the proposed site.

#### *Contamination and Ground Stability*

- 1.39 The site comprises greenfield land, so it is unlikely that significant contamination is present. Sites of this nature would normally receive a green rating in a sustainability assessment. If contamination was found, this should not preclude development as any necessary conditions can be applied at the planning application stage. Therefore, a 'Green' rating for contamination and ground stability would be appropriate for this site.

#### *Site Density*

- 1.40 The proposed development would deliver a density of approximately 16 dwellings per hectare, implying a moderate-density development. A residential development of this density would deliver housing in a quantum needed to satisfy local housing needs, while also allowing the development to be compliant with the aesthetic of the surrounding settlement.

### **The Proposed Policy Framework**

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

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

- 1.42 The widespread promotion of Neighbourhood Plans (page 24) is likely to act as a constraint on development in the rural area. Research on the progress and effectiveness of neighbourhood plans found that 55% of the draft plans published for consultation have 'protectionist' agendas and many are openly anti-development. Therefore, there is a likelihood that this agenda will create inevitable conflicts between the national aim to significantly boost housebuilding and local community NIMBYism. The idea of 'top down' housing targets being set by the local authority may also dissuade some areas from engaging with the neighbourhood planning process altogether.
- 1.43 The landowner is supportive of the Partnership's decision to plan for higher levels of growth than the standard method, though it is disappointing that the Council have decided to base their strategy on the medium rather than the higher growth scenario. The Greater Cambridge economy is dynamic and does not readily align with national or regional forecasts for jobs growth. It has a world-renowned life sciences cluster which has the potential to drive growth beyond typical regional or national rates.
- 1.44 We would strongly advise the Greater Cambridge Partnership to ensure that their objectively assessed housing proposals are more closely aligned with the higher jobs growth aspirations. An indicative calculation based on Cambridgeshire and Peterborough Independent Economic Review suggests that, if the jobs growth targets are to be achieved, around 2,900 homes a year would need to be built in Greater Cambridge – an indicative total of 66,900 homes over 2020–2041.
- 1.45 As set out in the Government's most recent consultation document, the OxCam Arc has the potential to be one of *'the most prosperous, innovative and sustainable economic areas in the world'*. However, this transformational growth will only be achieved if local authorities make asserted efforts to provide the residential capacity needed to support sustainable growth across the region. On this basis, we would strongly urge the Council to plan for the higher growth scenario, which is more closely aligned with past growth rates in the Greater Cambridge area.

### *Policy S/SB: Settlement Boundaries*

- 1.46 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 ensure that local housing needs can be fulfilled and prevent any further loss of key local services, a more flexible and tolerant approach is needed towards development in the rural area.
- 1.47 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. Although 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 (e.g. Bourn). Such a pragmatic approach is often taken at appeal; rounding off development where there is a defensible physical boundary or allowing a high-quality development with extensive landscaping that would soften an existing harsh area of built form can be acceptable in certain locations.
- 1.48 Furthermore, for Group Villages such as Bourn, the current strategy to restrict developments to an indicative maximum of 8 dwellings (or 15 dwellings where this would make the best use of a single brownfield site) within settlement boundaries will not deliver the quantum of

development required to meet the existing need for affordable homes or the projected need that could follow nearby expansions in employment. For example, to deliver 25 affordable homes within Bourn, a minimum of 63 dwellings will need to be permitted as part of major developments. Resultant affordability problems could arise across the rural area (stimulated by a paucity in affordable housing supply), particularly if the Greater Cambridge area continues along its current growth trajectory.

1.49 With limited scope for development within tightly drawn settlement boundaries, it will be necessary to find suitable locations on the edge of sustainable settlements. Therefore, to discourage the development of less suitable sites and assist in the delivery of much-needed affordable housing, the most logical approach is to allocate further sites on the edge of sustainable villages such as Bourn.

1.50 Overall, 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 CC/NZ: Net Zero Carbon New Buildings*

1.51 Draft Policy CC/NZ sets a high threshold of 150 homes for calculating whole life carbon emissions. Support should also be expressed for developments of <150 dwellings where this information is provided voluntarily.

1.52 What support will be available for developers in seeking to meet the high standards proposed? Will the potential impact on viability be taken into consideration? Regardless of the chosen approach, it would be useful to include further guidance/information in a supplementary planning document (SPD).

#### *Policy CC/WE: Water Efficiency in New Developments*

1.53 What support will be available for developers in seeking to meet the high standards proposed? Will the potential impact on viability be taken into consideration? Regardless of the chosen approach, it would be useful to include further guidance/information in an SPD.

#### *Policy BG/GI: Green Infrastructure*

1.54 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.

1.55 Regardless of the chosen approach, it would be useful to include further guidance/information in an SPD.

#### *Policy WS/HD: Creating Healthy New Developments*

1.56 Health Impact Assessments should be a requirement for major developments only. For minor developments, providing this information should be simplified. For example, health impact information could be attained through a short questionnaire (similar to the Cambridgeshire Biodiversity Checklist).

#### *Policy GP/PP: People and Place Responsive Design and Policy GP/QD: Achieving High-quality Development*



- 1.57 It is accepted that good design is highly subjective. However, the planning system has allowed the steady homogenisation of built environments, with a dominance of bland, monotonous “identikit” housing estates from major housebuilders.
- 1.58 Design Guides/Codes are acceptable on large scale, strategic developments, but should not be imposed on smaller scale developments where other mechanisms, including parameter plans, can adequately achieve similar and proportionate outcomes. 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 well beyond broad requirements for new homes to be ‘in keeping’ with the character and appearance of the area.
- 1.59 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, such as 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. Developments which can demonstrate a high standard of design should be fast-tracked through the application process.
- 1.60 Additional measures should be introduced for strategic scale development to avoid monotony. For example, the policy could introduce a minimum number of individual house types, appropriate to the scale of development.

#### *Policy H/AH: Affordable Housing*

- 1.61 The First Proposals plan sets a challenging target for affordable housing to reflect the acute and substantial need for affordable housing across Greater Cambridge. This places a great responsibility on all major developments to provide an element of affordable housing.
- 1.62 Policy H/AH will have a significant bearing on the viability of individual residential developments, so it is vital that the affordable housing requirement is achievable in practice. Although the First Proposals plan indicates that viability evidence will be reviewed as appropriate as part of the plan-making process, this is not sufficient. Planning Practice Guidance indicates that plans should set out circumstances where review mechanisms may be appropriate, as well as a clear process and terms of engagement regarding how and when viability will be reassessed over the lifetime of a development to ensure policy compliance and optimal public benefits through economic cycles. Draft Policy H/AH does not do this. For example, changes in affordable housing tenure models or continued increases in build costs may render the viability evidence which underpins the affordable housing requirement out-of-date relatively quickly.
- 1.63 Recent analyses of local property market dynamics indicate that affordable housing demands are still a focal concern for local authorities across the Greater Cambridge area. According to recent housing needs projections, an annual net need of 435 affordable rental units and 105 affordable units for homeownership will be needed across South Cambridgeshire to satisfy housing demands. Dependence on the allocation of strategic sites with already high infrastructure burdens is unlikely to offer sustainable, long-term solutions to the chronic and worsening affordability issues manifesting across the Greater Cambridge area. Strategic sites alone do not deliver policy-compliant levels of affordable

housing, so, if this is the target, more smaller sites that are far more likely to deliver a policy-compliant level of affordable homes at a faster rate need to be allocated.

- 1.64 Draft Policy H/AH of the First Proposals plan requires 40% affordable housing on sites of 10 or more dwellings. With a total of up to 50 dwellings deliverable on site, 20 dwellings – of which at least 5 will be allocated as 'First Homes' under the national First Homes initiative – would be sought for affordable housing under this policy. As well as helping to address the current shortage of affordable housing over the Greater Cambridge area, the delivery of up to 30 affordable dwellings would provide significant benefits to the local area's social sustainability.

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

- 1.65 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.
- 1.66 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**

- 1.67 The First Proposals plan is heavily reliant on the delivery of a handful of strategic developments, particularly large and complex sites which, on average, would take 5-8 years for the first home to be delivered. To ensure that housing delivery does not 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. Our proposed site on Land West of Fox Road in Bourn is suitable, available, and deliverable within 0-5 years.