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387197/A3/JD



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Dear Sirs,

**GREATER CAMBRIDGE LOCAL PLAN – THE FIRST PROPOSALS
REGULATION 18: PREFERRED OPTIONS 2021
REPRESENTATIONS ON BEHALF OF REDROW HOMES LTD
LAND SOUTH OF HIGH STREET, HAUXTON**

Savills (UK) Ltd has been instructed by Redrow Homes Ltd to submit representations to the Regulation 18 consultation, and in addition to submit further site-specific information in relation to land south of High Street, Hauxton.

This response has been formatted as per the published guidance, and includes representations to the following proposed policies / parts of the draft Plan:

- Policy S/JH: New Jobs and Homes, in respect to 'Housing Needs'
- Policy S/DS: Development Strategy, in respect to 'Housing Supply' (and in particular in respect to 'The Buffer', and 'The 5-Year Housing Land Supply'), and 'Development Strategy / Spatial Distribution'
- Section 2.6: Rest of the Rural Area

In addition, we are submitting further commentary in relation to 'Land to the South of High Street, Hauxton, which was assessed in the HELAA under site ref. 40283.

Please note that these representations have been submitted by email and via the online portal. We have provided a summary in relation to each policy / part of the Plan.

VISION AND DEVELOPMENT STRATEGY (SECTION 2.1)

Housing Needs

The Housing Requirement

Under proposed Policy S/JH: New Jobs and Homes (commencing page 24), and the sub-heading of 'Proposed Policy Direction' (also commencing page 24) the draft Plan states (again page 24) (our emphasis):

"We propose that the new Local Plan will meet the following objectively assessed needs for development in the period 2020-2041:

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

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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The 'Development Strategy Topic Paper' explains (page 23):

"The Greater Cambridge Housing and Employment Relationships Report identified that the medium level jobs would generate a need for 44,400 homes (reflecting an annual objectively assessed need of 2,111 homes per year, which is rounded for the plan period), assuming all the additional homes to support the additional jobs (being those above the jobs supported by the standard method homes) are located in Greater Cambridge. This would have the effect of providing opportunities for workers in those additional jobs to live close to where they work. The total homes associated with the medium jobs are considered to represent the objectively assessed need for homes in Greater Cambridge."

The Topic Paper goes on to say (also page 23):

"The Report also demonstrated that if existing commuting patterns were carried forward, the homes that would be provided in Greater Cambridge would be 41,900. However, this approach is not consistent with the local plan theme of net zero carbon and there is no certainty that neighbouring authorities would plan for the additional homes in their local plans in order to support the economy in Greater Cambridge."

It then notes (page 24):

"... the Employment Land Review stated that the higher employment scenario places greater weight on fast jobs growth [as] seen in the recent past, particularly in key sectors. By implication from the wording included in the Employment Land Review regarding the central scenario, this outcome is considered possible but not the most likely."

By this the Topic Paper is explicitly acknowledging that the Employment Land Review (2020) identified that the rate of jobs growth in Greater Cambridge as seen 'in the recent past' would result in a demand for housing in excess of either 41,900 or 44,400 homes. The Topic Paper also notes (page 20) that this relationship is addressed in the 'Housing and Employment Relationships Report', dated November 2020.

The table on page 21 of the Topic Paper provides a helpful summary, making it clear that if recent jobs growth were to continue then the comparable housing need would be between 53,500 and 56,500 homes.

The 'Greater Cambridge Employment Land and Economic Development Evidence Study', dated November 2020, explains (para. 5.17) that the two employment growth scenarios are:

- The 'central' growth scenario: considered the most likely outcome taking into account long term (2001 to 2017) patterns of employment growth; and
- The 'higher' growth scenario: a higher outcome placing greater weight on fast growth in the recent past.

Notably, the Study states that the methodology adopted is such that the 'higher' growth scenario figure is still lower than the year-on-year 'fast growth' seen during the period 2010 to 2017.

Whilst the 'higher' growth scenario might not be the most likely, it is the pattern of growth that has been experienced over recent years (noting that it is lower than the year-on-year 'fast growth' experienced between 2010 and 2017) and thus should not simply be dismissed in favour of what is considered to be the 'most likely' of just two scenarios.

Were a 2:1 weighting to be applied to the two ('central' and 'higher') scenarios, in favour of the 'most likely', but not dismissing the potential continuation of the most trends, one would arrive at a projected jobs growth of c. 65,200 and a consequential need for between c. 45,800 and 48,300 homes. Adopting the same approach that leads to the proposed housing requirement of 44,400 homes would result in a requirement for 48,300 homes – approximately 9% more than is proposed.

Instead, the Topic Paper dismisses the higher growth scenario and simply states (page 24):

“... As such, the maximum level of homes, associated with the higher employment scenario, is not considered to represent the objectively assessed need for homes in Greater Cambridge. ...”

Summary

It is thus evident that:

- The draft Plan, knowingly, focusses only on the ‘most likely’ of just two employment growth scenarios, with no weighting given to the scenario that is based on the most recent trends.
- Were weighting to be given to the scenario that is based on the most recent trends, it is likely that the associated housing requirement would increase by c. 9% to 48,300 homes.

Housing Supply

The Buffer

Many of the problems with the delivery of housing stem from the fixing of a housing requirement at plan-making stage that is too low and does not allow sufficient flexibility. Doing so means that:

- a) there is insufficient flexibility should allocated sites in the plan not come forward as anticipated;
- b) the sites allocated in the plan have a monopoly position and the LPA is under great pressure to grant planning permission even where concerns exist around one or more aspects of the proposal; and
- c) if housing delivery does not keep pace with needs, the immediately available recourse is to increase housing land supply through speculative planning applications predicated upon the presumption in favour of sustainable development – the plan-making system being too slow to respond quickly enough when a shortfall is identified.

The NPPF states (para. 74):

“The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply⁴¹.”

PPG states (ID: 68-022-20190722):

“To ensure that there is a realistic prospect of achieving the planned level of housing supply, the local planning authority should always add an appropriate buffer, applied to the requirement in the first 5 years (including any shortfall), bringing forward additional sites from later in the plan period. This will result in a requirement over and above the level indicated by the strategic policy requirement or the local housing need figure.

Buffers are not cumulative, meaning that an authority should add one of the following, depending on circumstances:

- 5% - the minimum buffer for all authorities, necessary to ensure choice and competition in the market, where they are not seeking to demonstrate a 5 year housing land supply;
- 10% - the buffer for authorities seeking to ‘confirm’ 5 year housing land supply for a year, through a recently adopted plan or subsequent annual position statement (as set out in paragraph 74 of the Framework), unless they have to apply a 20% buffer (as below); and
- 20% - the buffer for authorities where delivery of housing taken as a whole over the previous 3 years, has fallen below 85% of the requirement, as set out in the last published Housing Delivery Test results.”

Under proposed Policy S/DS: Development Strategy (commencing page 27), and the sub-heading of ‘Proposed Policy Direction’ (commencing page 29) the draft Plan states (page 31) (our emphasis):

“In order to provide greater confidence that the identified housing needs in Policy S/JH New Jobs and Homes can be met, and that a continuing supply of housing can be demonstrated, we are proposing to allocate enough sites to provide approximately a 10% buffer so we have the flexibility to deal with unforeseen circumstances. ...”

A 10% buffer is generally considered the minimum possible if an authority is seeking to be able to demonstrate, on a rolling basis, a 10% buffer within its 5YHLS.

However, the ‘Greater Cambridge Housing Trajectory and Five Year Housing Land Supply’, published 1st April 2021, explains that the Councils consider it appropriate to apply ‘lapse rates’, of between 6% and 10% to some projected delivery to take into account that some sites never come forward. So far as we can tell the Councils have not included reference to lapse rates, or made any provision for sites not coming forward, within the draft Plan.

Many Local Plans have been adopted with a 10% buffer built into the projected housing supply, which has proven to be insufficient, resulting in the consequences outlined above. The solution is relatively straightforward – include a larger buffer in the form of additional allocations. The former of these is generally preferable as, again as noted above, the plan-making system is too slow to respond quickly enough when a shortfall is identified.

Inclusion of a larger buffer would have a number of benefits for all parties and provide greater certainty over the delivery of housing. It would:

- 1) provide greater democratic oversight of housing supply, putting LPAs in control and able to respond proactively to housing delivery should a shortfall occur;
- 2) reduce uncertainty for local communities and the propensity for ‘speculative’ planning applications where a shortfall in housing is encountered;
- 3) remove the monopoly of land supply caused by the current plan-making system and increase the likelihood of the Councils being in a position to secure policy compliant proposals;
- 4) provide a source of housing land which the Councils can draw upon to maintain delivery if the plan-making process takes longer than anticipated; and
- 5) reduce the number of planning appeals, thereby making cost savings for both the Councils and the Planning Inspectorate.

Summary

It is thus evident that:

- The 10% buffer proposed is not sufficient and additional sites should be allocated across the Greater Cambridge area to provide sufficient flexibility. Further work will be required to identify the size of an increased buffer but Savills would suggest that this be at least 15% (equivalent to 6,660 homes on a housing requirement of 44,400 homes, or 7,245 homes on a housing requirement of 48,300 homes – see above).

The 5-Year Housing Land Supply

The NPPF states (para. 74):

“... Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing ...”

It is usual practice for assessments of housing need and supply to be calculated over periods commencing on 1st April.

PPG states (ID: 68-003-20190722):

“The purpose of the 5 year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next 5 years. ...”

The draft Plan does not explicitly address this need to demonstrate a 5YHLS.

The ‘Greater Cambridge Housing Trajectory and Five Year Housing Land Supply’, published 1st April 2021, concludes that, applying a 5% buffer to the calculation, across the Greater Cambridge area, the Councils can, as of 1st April 2021, demonstrate a 5YHLS of 6.1 years.

The ‘Housing Delivery Study for Greater Cambridge’, October 2021 projects the 5YHLS for an assumed adoption date of the emerging Local Plan of 1st April 2025. However, in doing so it makes a number of errors and a number of assumptions are adopted that are flawed. We discuss just two of these below

Firstly, it calculates the baseline requirement as being 2,111 dws x 5 years = 10,555 dws. Based on the emerging Local Plan including an overall housing requirement of 44,400 homes, the correct baseline requirement would be 2,114.3 dws x 5 years = 10,571 dws.

Secondly, the revised trajectory promulgated in the Delivery Study adds 516 dws to the delivery projected identified in the April 2021 Trajectory for the period 2020/21 to 2025/26, and a further 1,641 dws to the delivery projected for the period 2025/26 to 2029/30. This additional delivery has not been properly tested against the requirements for inclusion in a 5YHLS with a base date of 1st April 2021 and the Study ‘assumes’ that it will be able to be included.

If this 516 and 1,641 dws were removed from the supply and the figures in the April 2021 Trajectory relied upon, there would be a shortfall over this period of 414 dws.

Taking into account just these two corrections results in the following:

| Calculation Stage | Draft Plan) | Savills |
|--------------------------------------------------------|-------------------|-------------------|
| Baseline average annual requirement | 2,111 | 2,114.3 |
| Five-year baseline requirement | 10,555 | 10,571 |
| Requirement to date (20/21 to 25/26) | 10,555 | 10,571 |
| Supply to date (20/21 to 25/26) | 11,132 | 10,616 |
| Shortfall from base date | 0 | 0 |
| Baseline plus shortfall | 10,555 | 10,571 |
| Buffer (10%) | 1,056 | 1,058 |
| Baseline plus shortfall plus buffer (i.e. Requirement) | 11,611 | 11,629 |
| Supply | 11,970 | 10,329 |
| 5YHLS | 5.15 years | 4.44 years |

Summary

It is thus evident that:

- Whilst the Councils have been nominally able to show that they will be able to demonstrate a 5YHLS on adoption of the Plan, this projection is prone to challenge and is not robust.

Development Strategy / Spatial Distribution

(NB See also our discussion above in relation to: 'Development Strategy / Spatial Distribution'. This is repeated (in part) here due to the manner in which we will need to submit the representations / the way in which they will be considered separately to each other.)

Under proposed Policy S/DS: Development Strategy (commencing page 29), and the sub-heading of 'Proposed Policy Direction' (commencing page 29) the draft Plan states (page 31) (our emphasis):

"In the rest of the rural area, we propose a very limited amount of development:

- *Small new sites for housing and employment at villages that have very good public transport access, to help our rural communities thrive;*
- *New employment sites in the countryside meeting specific business needs; and*
- *Windfall development - an allowance for homes on unallocated land, which would need to be consistent with policy requirements in the Plan, including Policy SS/SH: Settlement Hierarchy, which sets out scales of development in different categories of village."*

It is considered that this is akin to the abandoning of the rest of the rural area; whilst those villages identified as having 'very good public transport access' will be allowed to 'thrive', essentially no provision is being made, over the course of the next generation, to enable any other communities to grow. In short, other than a limited number of villages the Development Strategy will lead to the stagnation and decay of the rural area.

As we discuss below in relation to the 'rest of the rural area', the rural area accommodates 5 Rural Centres, 13 Minor Rural Centres and 33 Group Villages, not to mention 55 Infill Villages. The draft Plan proposes the allocation of only 6 new sites (4 new and 2 existing) / 384 new homes, to this area – a 'paltry attempt to meet local needs. As evidenced by the table on page 32 of the draft plan, this figure equates to just 3.3% of the new housing allocations proposed.

This is directly contrary to national policy in the NPPF, which includes (para. 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 (para. 84):

"Planning policies ... should enable:

...

- d) *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."*

The draft Plan completely fails to recognise that by not allowing rural communities to grow, irrespective of whether they have a full range of services and facilities and 'very good' public transport links, it will run counter to the guidance in paragraphs 79 and 84 and almost certainly lead to the loss of services and facilities and a reduction in rural sustainability.

This national policy is a far more nuanced and sustainable approach than the blunt tool being proposed in the draft Plan.

Two easy options for a solution to this are to either:

- i) increase the housing requirement as discussed above and accommodate the additional 1,900¹ to 4,700² homes on sustainable sites in sustainable locations (the HELAA process makes it clear that these do exist) within the rural area; and/or
- ii) not include the ‘additional’ / ‘faster’ delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements, thereby providing increased flexibility and relieving the pressure to continue the high rate of delivery experienced in recent years, and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.

With regard to the latter option, the Development Strategy Topic Paper notes (page 74) (our emphasis):

“... Our 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. ...”

The ‘evidence’ included in the ‘Housing Delivery Study for Greater Cambridge’, dated October 2021, is scant and apparently based solely, and entirely, on the expectation that Modern Methods of Construction (MMC) will facilitate faster delivery than previously expected. However, virtually no evidence to support this contention, which also fails to take into account whether the higher rate of delivery can be sustained in all other respects (e.g. highway and other infrastructure improvements not capable of adopting MMC), or whether the demand will persist for the higher rate.

The suggestion in the draft Plan is notable for its use of ‘can’ and ‘could’ – in particular the expected delivery of an additional 1,500 new homes at Northstowe and Waterbeach is readily accepted as being something that ‘could’ happen – whether it is ‘likely’ to happen is not addressed.

This conflicts with the approach taken to the expected level of employment growth as discussed above in relation to ‘Housing Needs’ / ‘The Housing Requirement’, where the Councils have entirely set aside the higher level of employment growth that their own evidence identifies ‘could’ happen in favour of what they consider is ‘most likely’ to happen. Noting this, in regard to the Development Strategy and distribution of development, it would appear that the draft Plan is seeking to have its cake and eat it, or to put it another way, adopting one approach in one regard, and a contrasting one in another. At best this suggests a lack of consistency in the Plan.

Summary

It is thus evident that:

- The quantum of housing allocated to the rural area is ‘paltry’ and insufficient to enable existing communities to ‘thrive’ and/or ‘grow’.
- The approach taken to the distribution of development, especially the ‘additional’ / ‘extra’ on the edge of Cambridge / at Northstowe and Waterbeach, is not supported by robust evidence, and is an approach that conflicts with that taken to employment growth.
- Two options for a solution would be to either:
 - increase the housing requirement by 1,900 to 4,700 homes as discussed; and/or
 - not include the ‘additional’ / ‘faster’ delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements,
 and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.

¹ 48,300 – 44,400 = 1,900

² 1,900 (as above) plus increased buffer: 7,245 – 4,400 = 2,845; total = 4,745

REST OF THE RURAL AREA (SECTION 2.6)

(NB See also our discussion above in relation to: 'Development Strategy / Spatial Distribution'. This is repeated (in part) here due to the manner in which we will need to submit the representations / the way in which they will be considered separately to each other.)

Section 2.6 of the draft Plan opens by stating (page 122):

"We want our rural villages to continue to thrive and sustain their local services, but we don't want to encourage lots of new homes in places where car travel is the easiest or only way to get around. We therefore propose some development in and around villages that have good transport links and services, while in smaller villages, we propose that only small-scale infill development and affordable housing would be permitted. ..."

This sounds reasonable, but in reality, only 13 allocations are proposed across the entirety of the rural area. Of these only four new sites are proposed that include housing, totalling 224 new homes – equivalent to just 10 new homes for every year of the plan period. And this notwithstanding that some of these homes are on sites already granted planning permission and that some of the homes have already been completed.

Taking into account that the rural area accommodates 5 Rural Centres, 13 Minor Rural Centres and 33 Group Villages, not to mention 55 Infill Villages, the proposed allocation of only 6 sites / 384 new homes are figures that can only be described as 'paltry' and completely inadequate and incapable of facilitating the achievement the objective set out above. As evidenced by the table on page 32 of the draft plan, this figure equates to just 3.3% of the new housing allocations proposed.

This is directly contrary to national policy in the NPPF, which includes (para. 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 (para. 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."*

This national policy is a far more nuanced and sustainable approach than the blunt tool being proposed in the draft Plan.

The draft Plan completely fails to recognise that by not allowing rural communities to grow, irrespective of whether they have a full range of services and facilities and 'very good' public transport links, it will almost certainly lead to the loss of services and facilities and a reduction in rural sustainability, and thus be contrary to national policy in paragraphs 79 and 84 of the NPPF.

It is considered that the approach taken in the draft Plan to the distribution of development, and the determination of what constitutes a sustainable (broad) location for development and a sustainable site should be reviewed in the context of needing to ensure that rural communities are allowed to "thrive and sustain their local services" as stated.

As identified above in our representations to Section 2.1, two options for a solution to this would be to either:

- increase the housing requirement by 1,900 to 4,700 homes as discussed; and/or

- not include the ‘additional’ / ‘faster’ delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements, and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.

Summary

It is thus evident that:

- The quantum of housing allocated to the rural area is ‘paltry’ and insufficient to enable existing communities to ‘thrive’ and/or ‘grow’.
- National policy advocates a far more nuanced and sustainable approach than the blunt tool being proposed in the draft Plan.
- By failing to recognise that by not allowing rural communities to grow, the draft Plan will lead to the loss of services and facilities and a reduction in rural sustainability, and thus be contrary to national policy in paragraphs 79 and 84 of the NPPF.
- Two options for a solution would be to either:
 - increase the housing requirement by 1,900 to 4,700 homes as discussed; and/or
 - not include the ‘additional’ / ‘faster’ delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements, and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.

Land South of High Street, Hauxton

The land to the south of High Street, Hauxton, was assessed in the HELAA under site ref. 40283.

Changes to the Proposal

Following on from changes to national policy and wider context since the site was originally proposed for development, Redrow Homes has decided to reduce the area of land promoted for development, and in consequence the number of dwellings proposed from 240 – 280 to just 80 homes. The reduced site area is identified on the Figures attached to the revised ‘Landscape and Visual Appraisal and Green Belt Review’ (The Landscape Partnership, November 2021), as attached to these representations.

Consideration of HELAA Assessment and Response Thereto

The HELAA proforma for the site sets out a summary of the Councils’ assessment as follows::

| Criteria | Outcome |
|------------|---------|
| Suitable | Red |
| Available | Green |
| Achievable | Green |

Against the various issues (aka ‘sub-criteria’) assessed under ‘suitability’, the site was scored ‘green’ on three, ‘amber’ on eight, and ‘red’ on three; the proforma does not give a score on 3 issues. Many of the ‘scores’ were awarded with a degree of subjective commentary.

At Appendix 1 to these representations, we have considered some of the issues covered by the HELAA’s assessment of the site’s ‘suitability’, broken down by the assessment score – i.e. Red, Amber and Green, and those not given a RAG score.

In doing so we have had reference to Annex 1 of the HELAA, which sets out in detail the methodology that the Councils have used in assessing the site.

It is important to note (as discussed in Appendix 1) that the stated figure of 350 homes is incorrect. This appears to have been calculated by the Councils using an average net density of 27 dph across the full 12.80 ha site area, and is one third more than the 240 – 280 homes promoted (which was based on a density of 30 – 35 dpa on 8 ha – approximately two thirds of the total site area).

The re-assessment of ‘suitability’ at Appendix 1 hereto concludes that the following changes should be made to the HELAA assessment:

| Criteria | Outcome |
|-------------------------|---------------------------|
| Landscape and Townscape | Red Amber |
| Site Access | Red Green |
| Flood Risk | Amber Green |
| Air Quality | Amber Green |

Overall, this re-assessment would thus mean that against the various issues assessed under ‘suitability’, the site should be scored ‘green’ on six, ‘amber’ on seven, and ‘red’ on just one – ‘Strategic Highways Impact’.

Strategic Highways Impact

The HELAA (Main Report) notes (page 22):

“A site which scored one or more ‘Red’ impacts and constraints has been identified as unsuitable.”

However, this conclusion of ‘unsuitable’ apparently does not necessarily mean that the site will not become a proposed allocation – proposed allocation S/RSC/HW at Great Shelford, falls within Highways England Zone 8 - M11 North, which automatically results in a ‘RED’ score under ‘Strategic Highways Impact’, as per the land south of High Street, Hauxton.

As such, under the re-assessment, the only issue on which the site scores ‘Red’ is an issue applicable to all sites in Zones 3 and 8, where the draft Plan continues to promote many thousands of homes, and even make new allocations. As such, it is considered somewhat of a blunt and unjustifiable approach.

Green Belt

Against the HELAA conclusion that the harm resulting from the release of Parcel HX7, which essentially correlates with the revised site boundary, from the Green Belt as an expansion of Hauxton, would be High, the Green Belt Review concludes (para. 7.31):

“... it is difficult to understand the conclusion that the overall harm of releasing the Site from the Green Belt would be High which, more appropriately, should be identified as Moderate.”

Overall, with regard to the impact on the Green Belt, the Landscape and Visual Appraisal (LVA) concludes (para. 7.32):

“In summary, taking account of the NPPF purposes as well as the Cambridge purposes, it is considered that potential development of the Hauxton Site would bring about a no greater than Moderate harm rating upon the Cambridge Green Belt were it to be released. Whilst the Hauxton Site makes a Limited/No Contribution in contributing to the perceived setting of Cambridge it is considered that it does have a relatively limited role in contributing to the perceived physical and visual

separation of Hauxton from Little Shelford and any potential development of the Site would need to be sensitive to this and incorporate appropriate and integral landscape mitigation and enhancement measures if this aspect of the Site's contribution to Green Belt purposes is not to be unacceptably compromised."

Summary

Given the above, and setting aside the one issue of 'Strategic Highways Impact', the re-assessment of the site would result in an overall summary as follows::

| Criteria | Outcome |
|------------|---------|
| Suitable | Amber |
| Available | Green |
| Achievable | Green |

SUMMARY

Savills (UK) Ltd has been instructed by Redrow Homes Ltd to submit representations to the Regulation 18 consultation, and in addition to submit further site-specific information in relation to land south of High Street, Hauxton.

In summary, it is considered that:

Policy S/JH: New Jobs and Homes, in respect to 'Housing Needs'

- With regard to the Housing Requirement (Section 2.1 of the draft Plan):
 - The draft Plan, knowingly, focusses only on the 'most likely' of just two employment growth scenarios, with no weighting given to the scenario that is based on the most recent trends.
 - Were weighting to be given to the scenario that is based on the most recent trends, it is likely that the associated housing requirement would increase by c. 9% to 48,300 homes.

Policy S/DS: Development Strategy, in respect to 'Housing Supply' (and in particular in respect to 'The Buffer', and 'The 5-Year Housing Land Supply'), and 'Development Strategy / Spatial Distribution'

- With regard to Housing Supply (Section 2.1 of the draft Plan):
 - The 10% buffer proposed is not sufficient and additional sites should be allocated across the Greater Cambridge area to provide sufficient flexibility. Further work will be required to identify the size of an increased buffer but we would suggest that this be at least 15% (equivalent to 6,660 homes on a housing requirement of 44,400 homes, or 7,245 homes on a housing requirement of 48,300 homes – see above).
 - Whilst the Councils have been nominally able to show that they will be able to demonstrate a 5YHLS on adoption of the Plan, this projection is prone to challenge and is not robust, such that there is a high potential that the Councils will fail the 5YHLS test soon after adoption of the new Plan.
- With regard to the Development Strategy / Spatial Distribution (Section 2.1 of the draft Plan):
 - The quantum of housing allocated to the rural area is 'paltry' and insufficient to enable existing communities to 'thrive' and/or 'grow'.
 - The approach taken to the distribution of development, especially the 'additional' / 'extra' on the edge of Cambridge / at Northstowe and Waterbeach, is not supported by robust evidence, and is an approach that conflicts with that taken to employment growth.
 - Two options for a solution would be to either:
 - increase the housing requirement by 1,900 to 4,700 homes as discussed; and/or

- not include the 'additional' / 'faster' delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements, and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.

Rest of the Rural Area (Section 2.6)

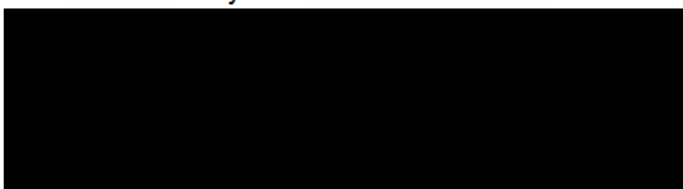
- With regard to the Rest of the Rural Area (Section 2.6 of the draft Plan):
 - The quantum of housing allocated to the rural area is 'paltry' and insufficient to enable existing communities to 'thrive' and/or 'grow'.
 - National policy advocates a far more nuanced and sustainable approach than the blunt tool being proposed in the draft Plan.
 - By failing to recognise that by not allowing rural communities to grow, the draft Plan will lead to the loss of services and facilities and a reduction in rural sustainability, and thus be contrary to national policy in paragraphs 79 and 84 of the NPPF.
 - Two options for a solution would be to either:
 - increase the housing requirement by 1,900 to 4,700 homes as discussed; and/or
 - not include the 'additional' / 'faster' delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements, and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.
- The site (HELAA ref. 40283) to the south of High Street, Hauxton is a sustainable site in a sustainable location and is suitable, available and achievable.

CONCLUSION

It is clearly evident that the overall housing requirement should be increased to properly reflect the potential for employment growth. It is also evident that the proposed housing supply is overly reliant on large sites, prone to challenge and not robust, such that there is a high potential that the Councils will fail the 5YHLS test soon after adoption of the new Plan. The quantum of development allocated to the rural area is 'paltry' and will not allow existing communities to thrive and grow as required. The solution is to increase the overall housing requirement, including the buffer, and identify additional sites for housing development in the rural area. The site (HELAA ref. 40283) to the south of High Street, Hauxton is a sustainable site in a sustainable location and is suitable, available and achievable.

We trust that you find the above of assistance; should you have any queries, please do not hesitate to contact us.

Yours sincerely



Jonathan Dixon
BA (Hons) MA MRTPI FRSA
Director

Enc. Appendix 1: Consideration of HELAA Assessment and Response Thereto Landscape and Visual Appraisal and Green Belt Review', The Landscape Partnership, November 2021 (in two volumes: i) main report and ii) supporting figures and photographs)
Potential Site Access Plan (drawing ref. 3541-F02), Eddisons, September 2021
Air Quality Assessment, Crestwood Environmental, October 2019

**GREATER CAMBRIDGE LOCAL PLAN – THE FIRST PROPOSALS
REGULATION 18: PREFERRED OPTIONS 2021
REPRESENTATIONS ON BEHALF OF REDROW HOMES LTD
LAND SOUTH OF HIGH STREET, HAUXTON**

APPENDIX 1: CONSIDERATION OF HELAA ASSESSMENT AND RESPONSE THERETO

Below we have considered some of the issues covered by the HELAA’s assessment of the site’s ‘suitability’, broken down by the assessment score – i.e. Red, Amber and Green, and those not given a RAG score.

In doing so we have had reference to Annex 1 of the HELAA, which sets out in detail the methodology that the Councils have used in assessing the site.

Red Issues


| Issue | Outcome |
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| Landscape and Townscape | <p>HELAA:</p> <p>National Landscape Character Area (NCA) 87: East Anglian Chalk.</p> <p>Local Character: The Chalklands The site is typical of the local character which is a mostly large-scale arable landscape of arable fields, low hedges and few trees, giving it an open, spacious quality, and has a rural character.</p> <p>Landscape Character Assessment (2021) Landscape Character Area - 3D: Cam & Granta Tributaries Lowland Farmlands</p> <p>This large site on the east edge of Hauxton, if developed, would effectively double the size of the main village of Hauxton. Development would encroach on the gap which provides valuable landscape buffering between the main settlement and the M11. Overall, the potential scale of development would cause irreversible harm to the character of this very small village. The development framework boundary should be considered with higher value as development to the edges would harm the character of the landscape surrounding the village as well as the character of the village itself.</p> <p><i>Savills response:</i></p> <p><i>The latest estimate of the population of Hauxton puts it at just under 700 people. On that basis the Councils are correct in suggesting that the proposed development (based on their assessment of the site’s capacity) would “effectively double” the size of the village. However, the figure of 350 homes appears to have been calculated by the Councils using an average net density of 27 dpa across the full 12.80 ha site area, and is a third more than the 240 – 280 homes promoted (which was based on a density of 30 – 35 dpa on 8 ha – approximately two thirds of the total site area).</i></p> <p><i>The approach taken to this issue is set out in Annex 1 to the HELAA. This explains that a site will be given a Red score if it is considered that “development of the site would have a significant negative impact which cannot be mitigated”. A Green score is only given where it is considered that “development of the site would have either a neutral or positive impact”. An Amber score is to be given where it is considered that “development of the site would have a detrimental impact which could be satisfactorily mitigated”.</i></p> |

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| | <p><i>Following on from changes to national policy and wider context since the site was originally proposed for development, Redrow Homes has decided to reduce the area of land promoted for development, and in consequence the number of dwellings proposed from 240 – 280 to 80 homes on just the western part of the site (the density being calculated as previously – see above).</i></p> <p><i>The reduced site area is identified on the Figures attached to the revised ‘Landscape and Visual Appraisal and Green Belt Review’ (The Landscape Partnership, November 2021), as attached to these representations.</i></p> <p><i>The Landscape and Visual Appraisal (LVA) concludes that:</i></p> <p><i>“... the introduction of development on the Site (subject to achieving an appropriate scale, layout and massing of development) is likely to result in limited and localised effects on landscape character and visual amenity.”</i></p> <p><i>In more detail, the LVA finds (para. 8.1):</i></p> <p><i>“The Site is well-contained visually by a combination of existing vegetation and existing built development such that there are relatively few visual receptors likely to be affected by the introduction of development on the Site.”</i></p> <p><i>and that there is an:</i></p> <p><i>“Opportunity to ‘stitch’ the new development into the existing local landscape through the incorporation of framework planting that would consolidate the existing hedgerow along the south east site boundary and which would relate well to the Hauxton Local Green Space and areas of local woodland within the immediate vicinity of the Site. ... [and] ... A broader opportunity to build upon the wooded and well-treed character of the area and to strengthen local landscape character.”</i></p> <p><i>Given the reduction in the size of the proposal and the conclusions of the LVA, it is considered that site should now be scored ‘Amber’.</i></p> |
| <p>Site Access</p> | <p>HELAA:</p> <p>If over 100 dwellings two points of access are required to accord with the advice of the Cambridgeshire Fire and Rescue.</p> <p>No possibility of creating a safe access.</p> <p>Savills response:</p> <p><i>The approach taken to this issue is set out in Annex 1 to the HELAA. This explains that a site will be given a Red score if it is considered that there is “no possibility of creating a safe access”. A Green score is only given where it is considered that “access by all means is possible”. An Amber score is to be given where it is considered that “there are potential access constraints, but these could be overcome through development”.</i></p> <p><i>The highway design requirement that all developments of more than 100 homes must have at least two points of access (one can be an emergency-only access if there are less than 200 homes) was finally adopted by Cambridgeshire County Council in May 2021. It is a requirement that is now being applied across the County.</i></p> |

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| | <p><i>It is unclear how the Councils have reached the conclusion that there is “no possibility of creating a safe access”.</i></p> <p><i>The proposed reduction in the capacity of the site (see under ‘Landscape and Townscape’ above) from 240 – 280 dwellings to just 80 dwellings means that a second point of access is not required.</i></p> <p><i>In addition, a drawing has been prepared by a transport consultant that clearly demonstrates that suitable and deliverable access can be achieved for all users, including pedestrians, cyclists and vehicles.</i></p> <p><i>Given the reduction in the size of the proposal and the attached Site Access Plan, it is considered that site should now be scored ‘Green’.</i></p> |
| <p>Strategic Highways Impact</p> | <p>HELAA:</p> <p>Within Highways England Zone 8 - M11 North</p> <p>No capacity for growth. Sites would need to ensure no net increase in vehicles trips on the Strategic Road Network.</p> <p><i>Savills response:</i></p> <p><i>The approach taken to this issue is set out in Annex 2 to the HELAA. This makes it clear that all sites located within Zones 3 (A14 Cambridge Northern Bypass) and 8 (M11 North) will be scored ‘Red’.</i></p> <p><i>On its own this approach results in all sites promoted in Zones 3 and 8 scoring ‘Red’ on at least one suitability issue, and given the comment in para. 22 of the HELAA, therefore automatically being deemed ‘unsuitable’. Given that the draft Plan continues to promote many thousands of homes within these areas, and even make new allocations within Zone 3, this is considered somewhat of a blunt and unjustifiable approach.</i></p> |

Amber Issues


| Issue | Outcome |
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| <p>Flood Risk</p> | <p>HELAA:</p> <p>Flood zone: Wholly in Flood Zone 1</p> <p>Surface water flooding: 1% lies in a 1 in 30 year event; 3% lies in a 1 in 100 year event; 10% lies in a 1 in 1000 year event</p> <p><i>Savills comment:</i></p> <p><i>The approach taken to this issue is set out in Annex 1 to the HELAA. This explains that to achieve a Green score, it is necessary to demonstrate that: “The site is at low risk of flooding (within flood zone 1) and no / limited areas identified as at risk surface water flooding.”</i></p> <p><i>The site satisfies the first part of this test (i.e. it is all within Flood Zone 1), however the EA mapping of surface water flood risk (see extract below) shows some localised risk of surface water flooding.</i></p> |

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| |  <p><i>The HELAA methodology does not explain what is used as the threshold to determine whether sites have more or less than a 'limited' area at risk of surface water flooding, however it would appear that in relation to the reduced site area (see under 'Landscape and Townscape' above), only 'limited' areas are at risk of (limited) surface water flooding.</i></p> <p><i>Given the reduction in the size of the proposal and the attached Site Access Plan, it is considered that site should now be scored 'Green'.</i></p> |
| <p>Transport and Roads</p> | <p>HELAA:</p> <p>There are proposed improvement works for M11 Junction 11 which will have to be taken into consideration. Due to the edge of village location, this site will have to consider connectivity and encourage sustainable modes. Consideration for any committed or allocated sites near to the site will have to be taken. Due to the site's location to Cambridge the Highway Authority would expect the site to promote walking and cycling.</p> <p>Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.</p> <p><i>Savills comment:</i></p> <p><i>The approach taken to this issue is set out in Annex 1 to the HELAA. This explains that: "Cambridgeshire County Council undertook transport assessments of each site above 50 dwellings" and sets out the factors that would contribute to a site being scored 'Red'. The HELAA explains that a Green score is given where: "Development of the site will not have a detrimental impact on the functioning of trunk roads and/or local roads." An Amber score is given where: "Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated."</i></p> <p><i>With the reduction in the site area now being promoted, and the potential capacity of 80 dwellings, it is considered highly unlikely that the proposed development would have a detrimental impact on the functioning of trunk roads and/or local roads – in short, it is considered that if there were likely to be any impact that this could be reasonably mitigated.</i></p> |
| <p>Air Quality</p> | <p>HELAA:</p> <p>Reasonably large site and lots of residential units - potential for AQMA traffic impact without mitigation.</p> <p><i>Savills response:</i></p> |

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| | <p><i>The approach taken to this issue is set out in Annex 1 to the HELAA. This explains that the Councils' Environmental Health Officers have taken a judgement-based, rather than threshold-based, approach and that a Green score is given where: "The site is at low risk in regard to air quality." An Amber score is given where: "The site is capable of being developed to provide healthy internal and external environments in regard to air quality after careful design and mitigation. 'Amber' is the default score for sites within an Air Quality Management Area (AQMA) in case of changes to the AQMA and potential mitigation measures that can be put in place."</i></p> <p><i>The comment in the HELAA is unclear but appears to suggest that it is not an impact 'on' residential properties on the site that has resulted in the Amber score, but the potential for traffic generated by the site to have an air quality impact within an AQMA (Air Quality Management Area).</i></p> <p><i>The only AQMAs in close proximity are: i) Cambridge City Centre and Savills considers it unlikely that development on the site would have an impact on that AQMA; and ii) the A14 Corridor between Bar Hill and Milton – an AQMA that has the potential to be impacted by many sites around Cambridge.</i></p> <p><i>If it is the potential, off-site, impact of traffic on an AQMA that has resulted in the Amber score, then Savills considers that this would be contrary to the methodology set out in the HELAA, which focusses on the ability to develop the site itself.</i></p> <p><i>Annex 1 of the HELAA explains: "Each Local Planning Authority's Environmental Health team had been consulted to provide this assessment. Their assessments were informed by Air Quality Management Areas where negative impacts were most likely. Sites were then assessed using a range of evidence." and "The assessments focused on considering the potential for unacceptable or significant impacts on current or future sensitive developments such as residential and the scope for mitigating these impacts." This suggests a different approach to that set out in the RAG categorisation that is more focussed at off-site impacts.</i></p> <p><i>Savills has looked at a selection of other sites both in close proximity to the site and in other areas. The scoring appears to be somewhat haphazard and without logical reasoning, albeit smaller sites appear more likely to be scored Green, even when nearby / in similar locations.</i></p> <p><i>An air quality assessment has been undertaken by Crestwood Environmental in relation to the former larger proposal and was submitted alongside our representations during the 'First Conversation' Local Plan consultation in February 2020; a copy is attached as to these representations. This demonstrated that pollutant concentrations on the site were expected to fall well below the threshold criteria.</i></p> <p><i>With the reduction in the site area now being promoted, and the potential capacity of 80 dwellings, the site is considered at low risk of air quality and should be scored Green in this regard.</i></p> <p><i>Given the reduction in the proposal to just 80 homes, it is considered that the site is at 'low risk' and thus should now be scored 'Green'.</i></p> |
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Issues not Scored

| Issue | Outcome |
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| <p>Constraints to development</p> | <p>HELAA:</p> <p>Agricultural Land Classification: 100% Grade 2</p> <p><i>Savills response:</i></p> <p><i>The approach taken to this issue is set out in Annex 1 to the HELAA. It is noted that the information will inform the sustainability process.</i></p> <p><i>It is considered that the identification of the site as most likely being Grade 2 is correct, however much of South Cambridgeshire is also 'best and most versatile' (Grade 1, 2 and 3a).</i></p> |
| <p>Green Belt – Assessment of Harm of Green Belt Release</p> | <p>HELAA:</p> <p>Parcel ID: HX7; HX6; OA8</p> <p>Very High; High</p> <p><i>Savills comment:</i></p> <p><i>The approach taken to this issue is set out in Annex 1 to the HELAA. This explains that the conclusions above are taken from the 'Greater Cambridge Green Belt Study' (2021).</i></p> <p><i>Savills and The Landscape Partnership have undertaken an initial review of the Study and disagree with some of the methodology and conclusions reached. Detailed discussion on this issue is set out in Section 7 of the revised 'Landscape and Visual Appraisal and Green Belt Review' (The Landscape Partnership, November 2021), as attached to these representations.</i></p> <p><i>The site falls within Green Belt parcels HX6 (part thereof) and HX7:</i></p> <div data-bbox="416 1368 1417 1709">  </div> <p><i>In summary the Study reaches the conclusions set out below in relation to Parcels HX6 and HX7. To this has been added the conclusions of the Landscape and Visual Appraisal (LVA), which given the proposed reduction to the site size, expressed as a response in relation HX7:</i></p> <p><i>Continued .../</i></p> |

| Green Belt Purpose | HX6 | HX7 |
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| <i>Green Belt Purpose 1. To preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre</i> | <i>Limited/No contribution</i> | <i>Limited / No contribution</i> <i>LVA: Limited / No contribution – see Table 7.4 and para. 7.22.</i> |
| <i>Green Belt Purpose 2. To maintain and enhance the quality of Cambridge’s setting.</i> | <i>Relatively limited</i> | <i>Relatively limited</i> <i>LVA: Partial / Limited – see Table 7.4 and paras. 7.23 to 7.26.</i> |
| <i>Green Belt Purpose 3. To prevent communities in the environs of Cambridge from merging into one another and with the city.</i> | <i>Significant</i> | <i>Moderate</i> <i>LVA: Limited / Low – Moderate – see Table 7.4 and paras. 7.27 to 7.29.</i> |
| <i>Impact on contribution of adjacent Green Belt</i> | <i>Minor-moderate</i> | <i>Minor</i> <i>LVA: Incorrect – see Table 7.4 and para. 7.30.</i> |
| Overall harm of Green Belt release | <p><i>Parcel HX6 makes a significant contribution to preventing communities in the environs of Cambridge from merging with one another, and a relatively limited contribution to maintaining and enhancing the quality of Cambridge’s setting. The additional impact on the adjacent Green Belt of the release of the parcel would be minor-moderate.</i></p> <p><i>Therefore, the harm resulting from its release, as an expansion of Hauxton, would be Very High.</i></p> | <p><i>Parcel HX7 makes a moderate contribution to preventing communities in the environs of Cambridge from merging with one another, and a relatively limited contribution to maintaining and enhancing the quality of Cambridge’s setting. The additional impact on the adjacent Green Belt of the release of the parcel would be minor.</i></p> <p><i>Therefore, the harm resulting from its release, as an expansion of Hauxton, would be High.</i></p> <p><i>LVA: Moderate - See para. 7.31.</i></p> |

The Landscape and Visual Appraisal (LVA) concludes that:

“In summary, taking account of the NPPF purposes as well as the Cambridge purposes, it is considered that potential development of the Hauxton Site would bring about a no greater than Moderate harm rating upon the Cambridge Green Belt were it to be released. Whilst the Hauxton Site makes a Limited/No Contribution in contributing to the

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| | <p><i>perceived setting of Cambridge it is considered that it does have a relatively limited role in contributing to the perceived physical and visual separation of Hauxton from Little Shelford and any potential development of the Site would need to be sensitive to this and incorporate appropriate and integral landscape mitigation and enhancement measures if this aspect of the Site's contribution to Green Belt purposes is not to be unacceptably compromised."</i></p> |
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END