

**Representations to the Greater Cambridge
Local Plan First Proposals Consultation 2021
Land at Fen Ditton**

Countryside Properties

December 2021

Turley

Contents

1.	Introduction	1
2.	Response to the First Proposals Consultation Document	2
3.	GCLP Climate Change Theme	27
4.	Land at Fen Ditton	37
Appendix 1: Letter from Mayer Brown		49

Donna Palmer

Client

Countryside Properties UK Ltd

Our reference

COUS3012

29 Nov 2021

1. Introduction

- 1.1 These representations have been prepared by Turley on behalf of Countryside Properties (“Countryside”) and The Quay Estate in respect of the Greater Cambridge Local Plan (“GCLP”) – First Proposals Consultation 2021.
- 1.2 Countryside have interests within the Local Plan area including at Fen Ditton (see accompanying Vision Document). As such these representations focus on issues particularly affecting this site, and should be read in conjunction with the Vision Document that has been prepared for the site.
- 1.3 Each of the responses relates to a particular policy or paragraph proposed within the consultation document, and this report is structured accordingly. Our response to the Climate Change Theme is provided in Section Three.

2. Response to the First Proposals Consultation Document

- 2.1 Within this section, responses are provided on behalf of Countryside to the First Proposals Consultation Document, including the suggested policy directions set out by the Council. These comments are provided in the context of their land interest at Fen Ditton.

How much development, and where?

Policy S/JH: New jobs and homes

- 2.2 The Cambridgeshire and Peterborough Devolution Deal committed to delivering substantial economic growth and to double economic output during the next 25 years. The Cambridge and Peterborough Combined Authority and the Greater Cambridge Greater Peterborough Enterprise Partnership acknowledge and support the economic growth potential of the Greater Cambridge area and consider that there is a need to substantially increase housing delivery in order to support economic growth (that is needed to meet the objective of doubling GVA by 2040) and address the significant housing affordability issues that exist (Cambridgeshire and Peterborough Independent Economic Review). At present there is an imbalance between rates of economic growth and housing delivery in Greater Cambridge.
- 2.3 Countryside are disappointed that the authorities have not taken the opportunity to plan more positively to meet the full need for housing. The evidence base clearly confirms that Greater Cambridge will continue to experience a significant demand and need for new housing, reflecting the strength of the local economy and the scale of investment being made by the Government to support and facilitate even more ambitious levels of growth in recognition of this area's national importance as an engine for economic growth¹.
- 2.4 In proposing to plan for 48,840 homes over the period from 2020 to 2041, the authorities are currently assuming a need for only 44,800 homes, or 2,114 homes per annum. Whilst such a level of need exceeds that calculated using the standard method, it is clear from the supporting evidence base that it directly relates to an economic forecast – under which circa 58,500 new jobs could be created over the plan period – that is described as '*business as usual*'², '*taking into account long term patterns of employment*'³. As we explain in our response, such an approach sits fundamentally at odds with the Government's ambitions and expectations of this area. It also implies a retraction from more recent evidence of stronger job growth that has been sustained, reflecting in no small part the success of significant investment in infrastructure which is set to continue and indeed increase over the plan period.

¹ Greater Cambridge Local Plan First Proposals (2021), page 35

² This term is directly used to describe the scenario at paragraph 9.81 of the Greater Cambridge Employment Land and Economic Needs Study (November 2020)

³ Greater Cambridge Employment Land and Economic Needs Study (November 2020), paragraph 5.17 (bullet 1)

- 2.5 In this context, it is of note that the evidence base itself acknowledges the potential for Greater Cambridge to see a *'higher-growth scenario'* in which more jobs are created, and actually concludes that this should be used to ensure a positive plan-led approach to providing employment floorspace⁴. This scenario is predicated on more positive expectations around the continued growth of identified priority sectors, and assumes that this could lead to the creation of some 78,700 jobs over the plan period. The evidence base concludes that approximately 56,500 homes, or 2,690 homes per annum, could be needed to sustainably support such growth⁵.
- 2.6 Countryside consider that this should be recognised in the GCLP as a minimum level of housing provision, with the reasoning for this conclusion set out in more detail below. In providing for the appropriate housing land response, Countryside would also strongly encourage the authorities to reconsider the length of the proposed plan period, particularly given that the Oxfordshire Growth Plan – also recently subject to a process of consultation – looks to 2050 and Milton Keynes similarly has a “Strategy for 2050”, which indicates (in high-level terms) the ambitions for growth to that point and is set to be supported by an emerging review of the Local Plan. Given the benefit of consistent timeframes in these key parts of the Oxford Cambridge Arc (‘the Arc’) Countryside believe the GCLP should similarly look to 2050, which would necessitate a larger supply of land assuming a sustained need for 2,690 homes per annum, with this equating to a total need for 80,700 homes over a thirty year plan period.
- 2.7 In addition, in light of the requirements of paragraph 22 of the NPPF and the Council’s inclusion of significant extensions to existing villages and towns as part of its current proposed spatial strategy, the plan period should again be extended to a period of 30 years (2020-2050). Additional allocations will therefore be necessary in order to accommodate the additional needs over this extended plan period.

Justifying a higher level of housing need

- 2.8 We commend the authorities on the assembly of a detailed evidence base, which appears to demonstrate compliance with Planning Practice Guidance (PPG) and importantly looks in detail at the crucial relationship between job creation and housing need. It is right to identify that whilst the standard method provides an important starting point, there are still circumstances – established within the PPG – when a higher level of housing need may exist. This confirmation of a potentially higher need, beyond the level implied by the standard method, is therefore fully supported. Indeed, to do otherwise – by aligning with the outcome of the method and planning for a level of need that is inextricably linked to trend-based demographic projections – would fundamentally fail to recognise, as the evidence base acknowledges, the Government’s commitment to continuing sustainable economic growth in Greater Cambridge. This follows the Government’s award of the Cambridgeshire and Peterborough Devolution Deal 2017 and its commitment to the Arc, the spatial framework for which – once prepared – must be adhered to by the GCLP given it will have the same status as national policy.

⁴ *Ibid*, paragraph 6.33

⁵ Greater Cambridge Local Plan: Housing and Employment Relationships (November 2020), paragraph 1.15. It is noted that this level of need assumes a 1:1 commuting relationship in support of the higher job growth scenario. This is consistent with the Councils’ selection of the comparable scenario linked to the ‘central’ job growth forecast.

An area of national economic significance – a Plan for Growth

2.9 The National Infrastructure Commission (NIC) presented to the Government a compelling rationale for recognising the Arc as a national priority in its influential report of 2017, titled '*Partnering for Prosperity*', which advocated a '*New Deal for the Cambridge-Milton Keynes-Oxford Arc*'⁶.

2.10 The Government reaffirmed its commitment to the Arc through last year's Spending Review, identifying additional funding to support its promise to develop a spatial framework that plans for long-term economic and housing growth throughout the area. Reference to this commitment was equally made within the National Infrastructure Strategy⁷, which also generally emphasised – in the context of cities, like Cambridge – a view that they are:

*"...the anchors of successful regions across the world; they are engines of growth. To drive economic growth across all regions of the UK, the government is investing in growth in cities"*⁸

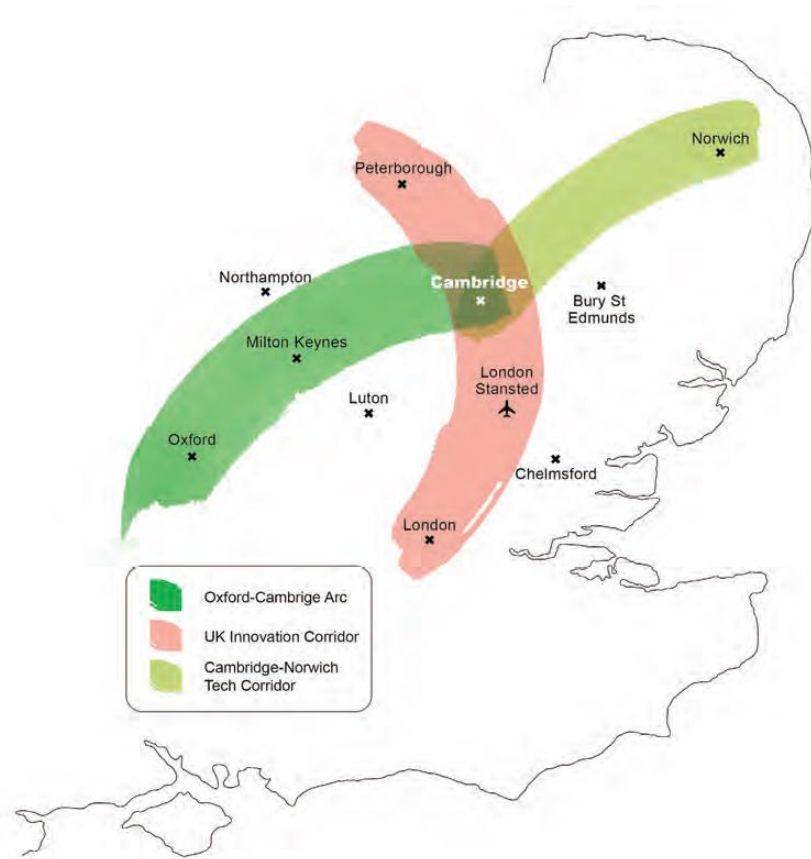
2.11 The spatial significance of Cambridge – and indeed the Greater Cambridge area to be covered by the GCLP – is clear in the spatial context plan included in the First Proposals Consultation Document, which shows it located not only within the Arc but also the UK Innovation Corridor and the Cambridge-Norwich Tech Corridor.

⁶ National Infrastructure Commission (November 2017) *Partnering for Prosperity - New Deal for the Cambridge-Milton Keynes-Oxford Arc*

⁷ HM Treasury (November 2020) *National Infrastructure Strategy*, p41

⁸ *Ibid*, p28

Figure 2.1: Greater Cambridge in the wider region



Source: Greater Cambridge Local Plan First Proposals, replicated Figure 1

2.12 It is evident that Cambridge plays a significant part of the Government’s national economic ambition. The unique economic proposition of the Arc is reflected in its Economic Prospectus, published in Autumn 2020, which set an ambition that:

*“By 2050, the Arc will be the **world leading place for high-value growth, innovation and productivity**. A global hub where ideas and companies are generated and thrive, home to exemplary models of 21st century development, with a high-quality environment and outstanding quality of live, and with a strong economic focus that drives inclusive clean growth”⁹ (emphasis added)*

2.13 In the context of its acknowledged national significance, the Government is playing a leading role in directing its ambition for the growth of the Arc, with the intention of publishing a spatial framework that covers the entire area. To this end, the Government published an ‘Introduction to the Spatial Framework’ in February 2021¹⁰.

2.14 This document, in justifying both the Government’s involvement in planning for the future of the Arc and its designation as a national economic priority, acknowledged that:

⁹ The Oxford-Cambridge Arc Economic Prospectus (Autumn 2020)

¹⁰ MHCLG (February 2021) Planning for sustainable growth in the Oxford Cambridge Arc: an introduction to the spatial framework

“Forecasts vary, but successive studies have found that there is a clear transformational opportunity”¹¹

- 2.15 It proceeds to suggest that, ‘*with the right interventions and investment*’, the Arc could create as many as 1.1 million extra jobs by 2050. It continues in this context to state that:

“The Arc’s success is key to the UK’s national prosperity, international competitiveness, and ability to meet the challenges and opportunities we will face as a country over the next century”¹²

- 2.16 The Government identifies housing provision as one of three areas of particular concern. It observes, in the context of housing affordability being poor, that:

“The wider economic effect of this is to make it harder for businesses to attract the skilled workers they need, to locate in the most productive locations, and is forcing longer and more polluting journeys as people travel longer distances to get to work”¹³

- 2.17 In this context, the report confirms the Government’s commitment to planning for the right level of growth in the Arc through the accelerated delivery of a robust, evidence-based spatial framework over a period of only 30 months.

- 2.18 The implicit recognition of a need for progress by the Government was reflected in its publication of a consultation document in July 2021 titled ‘*Creating a Vision for the Oxford-Cambridge Arc*’¹⁴. This evidently predated the current consultation on the GCLP.

- 2.19 It is clear from this latest document that, in establishing a ‘*vision*’, the Government expects the Arc to be ‘*ambitious and aspirational*’, with it emphasising the importance of looking at ‘*potential opportunities for transformation*’¹⁵. With reference to both the planned level of job growth and the aligned proposed housing provision, Countryside consider that the Greater Cambridge authorities have so far failed to align with and take adequate account of this national ambition. This creates an unjustified inconsistency with the emerging strategic vision for the Arc, thereby undermining its potential to be realised and failing to represent a positive planning approach.

Investment in strategic infrastructure

- 2.20 The PPG is clear that investment in strategic infrastructure improvements, which are likely to drive an increase in the homes needed in an area, can justify a higher level of housing need than implied by the standard method¹⁶.

- 2.21 The Government’s support of the Arc and its component authorities has gone beyond a commitment to assisting in creating policy and strategy. As far back as 2014 the Government signed a City Deal with the Greater Cambridge authorities, with this

¹¹ *Ibid*, paragraph 1.8

¹² *Ibid*, paragraph 1.8

¹³ *Ibid*, paragraph 1.21

¹⁴ HM Government (July 2021) *Creating a vision for the Oxford-Cambridge Arc – Consultation*

¹⁵ *Ibid*, paragraph 1.13

¹⁶ PPG Reference ID: 2a-010-20201216

bringing up to £500m of funding over a fifteen year period towards transport and infrastructure projects managed by the Greater Cambridge Partnership. It is understood that much of this investment is underway and delivering strategic improvements to the area's infrastructure.

- 2.22 The First Proposals Consultation Document includes a map of the existing and proposed major transport projects which are supporting the growth of Greater Cambridge, and are intended to keep doing so.

Figure 2.2: Map of existing and proposed major transport projects



Source: Greater Cambridge Local Plan First Proposals (2021), replicated Figure 11

- 2.23 The Consultation Document itself recognises the role of investment in facilitating growth, noting for example the importance of the committed funding for the new Cambridge South Railway Station in facilitating the further growth of the Cambridge Biomedical Campus¹⁷ and the importance of investment to date in the development of the Babraham Research Campus¹⁸.
- 2.24 This investment also reflects the Government's awarding of circa £150m of Local Growth Funds in 2015 to the Cambridgeshire and Peterborough Combined Authority, all of which is understood to have been assigned to specific projects that have to date leveraged further funding of in the order of £328m. These projects are estimated to have already collectively generated some 6,500 jobs, with over 40,000 jobs forecast to be created in total¹⁹. Projects in receipt of monies in Greater Cambridge include:

¹⁷ Greater Cambridge Local Plan First Proposals (2021), page 88

¹⁸ *Ibid*, page 110

¹⁹ <https://cambridgeshirepeterborough-ca.gov.uk/what-we-deliver/business/local-growth-fund/>, dashboard metrics accessed in December 2021

- West Cambs Innovation Park
- NIAB – AgriTech Start Up Incubator
- Hauxton House Incubation Centre
- TTP Life Sciences Incubator
- Illumnia Genomics Accelerator
- Medtech Accelerator

2.25 The 2016 designation of the Cambridge Compass Enterprise Zone, which comprises of five employment sites, also represents another commitment by the Government to the area and will continue to create further employment-generating opportunities. As set out above, the Government’s continued commitment to the Arc suggests that further monies will be directed at the area to build on these existing significant investments, such that it is reasonable to expect continued above-trend job creation and contributions to the national economy.

A history of economic success and forecasting growth

2.26 The investment noted above, both by the public sector and also by private companies – including internationally renowned businesses like AstraZeneca for example – has been matched by the generation of economic opportunities. Indeed, Cambridge’s economic prominence and success is acknowledged in the First Proposals Consultation Document, which cites recent research by the Centre for Cities in describing Cambridge as *‘one of the most important research and innovation-led hubs in the UK’*²⁰.

2.27 The recent success of Greater Cambridge in creating new jobs is therefore undeniable, as is the pace of this growth. The Employment Land and Economic Needs Study (ELENS) uses data from Cambridge Econometrics to estimate that some 35,800 jobs were created throughout Greater Cambridge between 2011 and 2017, equivalent to almost 6,000 jobs per annum. Even when acknowledging uncertainties associated with the accuracy of historic job figures – which lead different datasets to suggest that job growth in this period may have ranged from 25,588 to 40,160 jobs – it is clear that the area has seen substantial and rapid job growth over this period.

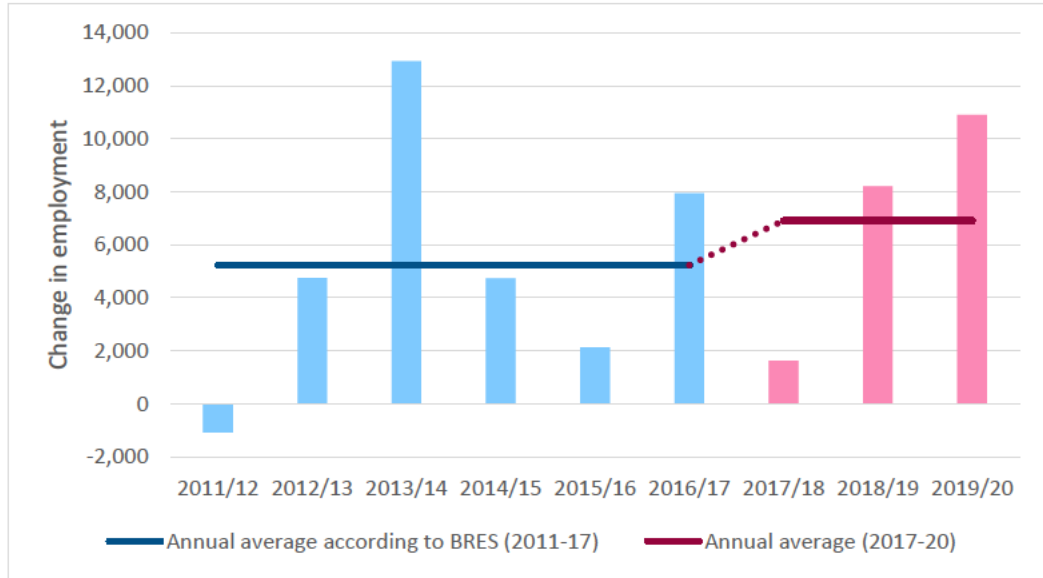
2.28 The Business Register and Employment Survey (BRES) now provides an indication of job growth in three more recent years, which can be used to build on the analysis in the ELENS²¹. Figure 2.3 shows how, according to this dataset, Greater Cambridge has sustained and indeed increased the rate at which new jobs have been generated across the area. It suggests that some 20,700 jobs were created between 2017 and 2020, its use of a mid-September reference point meaning that it technically captures the first six months of the COVID-19 pandemic. Taking an average over this period would suggest growth of almost 6,900 jobs per annum, indicating that job growth has been

²⁰ Greater Cambridge Local Plan First Proposals (2021), page 25

²¹ As referenced in the ELENS, it is of note that the Cambridgeshire and Peterborough Independent Economic Review (CPIER) identified that BRES data for this area may to some extent understate the strength of employment growth here

broadly sustained since 2017 rather than having peaked at that point, as the ELENS prematurely suggested²².

Figure 2.3: Updated picture of employment growth across Greater Cambridge



Source: BRES, 2021

- 2.29 Historic performance in the creation of new jobs forms an important context in the forecasting of future trends, albeit in Cambridgeshire there is notably a history of so-called “off the shelf” baseline forecasts underestimating the job growth that actually occurs, acknowledged first in the Cambridgeshire and Peterborough Independent Economic Review (CPIER) but also more recently in the ELENS²³.
- 2.30 It is acknowledged that the Councils’ evidence base at least attempts to account for this issue, with the ELENS confirming in its consideration of historic job growth data and forecasts that there are ‘*questions about relying too heavily on an econometric model which constrains local potential within parameters which are defined regionally*’²⁴.
- 2.31 The ELENS proceeds to develop alternative scenarios which build from the baseline forecasts and apply judgements to better reflect historic growth rates in a number of key industrial sectors, which are understood to include:
- Health and care;
 - Computer related;
 - Research and development (R&D); and

²² Greater Cambridge Employment Land and Economic Needs Study (November 2020), paragraph 5.22

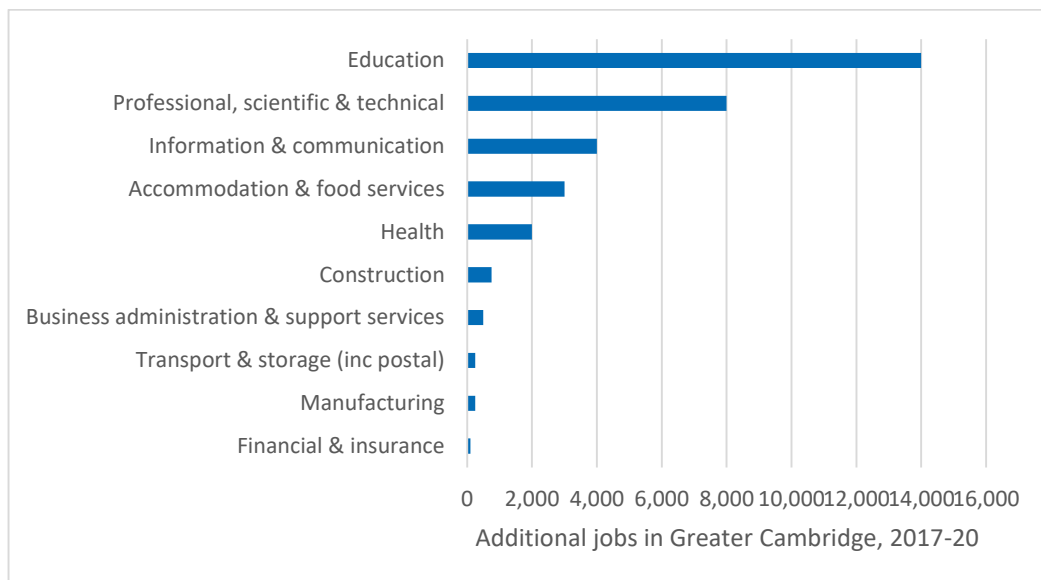
²³ *Ibid*, paragraph 5.8

²⁴ *Ibid*, paragraph 9.27

- Professional services.

- 2.32 The approach taken in the analysis of variant forecasts is not directly challenged by Countryside, given that these sectors are generally those which are both anticipated to remain the focus of investment and have locally experienced growth in recent years. It is separately noted also that the subsequent impact of the pandemic would appear to lend further support to the potential growth of health and care in the region, given the specific link to life sciences in Greater Cambridge, as well as related professional services and R&D.
- 2.33 This is borne out when looking at the ten sectors that have created the most jobs since 2017, illustrated at Figure 2.4.

Figure 2.4: Ten sectors experiencing strongest employment growth (2017-20)



Source: BRES; Turley analysis

- 2.34 The education sector has evidently played a significant role in creating new jobs, with further analysis revealing that this is largely attributable to “First-degree level higher education” and therefore suggesting that this reflects an increase in jobs related to the area’s universities. Separate to this, it is noted that strong growth has also been recorded in the professional, scientific and technical sector, information and communication and health over this period. This affirms the sustained ability of these key sectors to contribute significant growth, with no evidence that their capacity to grow has been curtailed. Indeed, it suggests in contrast that their growth is on course to remain at the higher rates seen over more recent years.
- 2.35 The evidence of sustained growth – most notably in these sectors but also across the economy as a whole – does, however, challenge the notion of a regression to longer-term and lower growth trends, which is implicit in the central scenario presented in the Councils’ evidence base and seemingly favoured as a job target in the First Proposals Consultation Document. In contrast, it is observed in the ELENS itself that the ‘higher growth’ scenario ‘sits broadly in the middle of the longer term historic (1991 or 2001 –

2017) and recent historic (2011 – 17) absolute change²⁵. In the context of the evidence of growth noted above, even this scenario could be viewed as being unjustifiably modest, but it does at least have the advantage of more closely reflecting the proven strength of the local economy.

- 2.36 The analysis of forecasts did also identify a scenario which suggested a still *higher* level of job growth, by allowing for the continuation of job growth rates recorded between 2011 and 2017. This identified the potential for more than 120,000 new jobs throughout Greater Cambridge over the plan period²⁶. Such a level of job growth is dismissed as unreasonable, but it nonetheless serves to highlight that even the so-called “higher growth” forecast scenario could be exceeded.
- 2.37 It is pertinent to note, in the context of the above, that the First Proposals Consultation Document confirms – with reference to the ELENS – that the Councils are *‘mindful that the Study also identified a higher job growth forecast’*²⁷, noting specifically in this regard the conclusion that the GCLP provide *‘flexibility in employment land in case the market delivers more jobs than anticipated’*²⁸. This responds to a clear conclusion of the ELENS itself, which recommends that *‘in planning positively for growth, the KS2 Higher Scenario is planned for regarding B1a/b floorspace, without making any implied assumptions regarding jobs growth’*. In justifying this conclusion, it confirms that this takes account of the fact that it *‘broadly aligns with completions trends and market feedback’*²⁹.
- 2.38 This conclusion was presumably taken into account by the Councils in proposing their more flexible approach to providing for employment floorspace. Where the evidence suggests the target of 58,500 new jobs would translate into a need for circa 416,400sqm, the First Proposals Consultation Document identifies an existing pipeline supply of 624,310 sqm of employment floorspace, as of 2019³⁰, which aligns more closely with the level of floorspace calculated as being required to support the higher growth scenario (541,655sqm)³¹. The Consultation Document suggests that a proportion of this space is expected to build out beyond the plan period³² but even allowing for that it is the case that the Councils currently intend to be supportive of further increases to this pipeline, with Policy J/NE confirming that *‘proposals for new employment development will be considered on their merits’*. Where the provision of new employment floorspace and investment in new facilities has evidently played an important role in supporting the high levels of employment growth achieved over recent years, there is every reason to believe on this basis that the circumstances will be in place and supported to allow this to continue over the plan period.

²⁵ *Ibid*, paragraph 9.82

²⁶ *Ibid*, Tables 50 and 51

²⁷ Greater Cambridge Local Plan First Proposals (2021), page 25

²⁸ *Ibid*, page 26

²⁹ Greater Cambridge Employment Land and Economic Needs Study (November 2020), paragraph 6.33

³⁰ *Ibid*, Table 9

³¹ *Ibid*, Table 19

³² Greater Cambridge Local Plan First Proposals (2021), page 33

A reasonable forecast of economic growth and balancing housing needs

- 2.39 The Councils' Strategy Topic Paper appears to recognise the strength of the Greater Cambridge economy, reflecting on the findings of the CPIER and in turn acknowledging that this *'supports the argument for exploring the relationship between economic growth, future employment and the number of new homes to plan for'*³³.
- 2.40 Critically, however, in arriving at its proposed approach to planning for new jobs and homes, the Councils observe with reference to the higher growth scenario that it is *'considered possible but not the most likely'*³⁴. Countryside strongly believe, in the context of the above – which draws on the Councils' own evidence and reflects the Government's national position – that this position is wholly unsubstantiated.
- 2.41 A more reasonable and positive interpretation of the evidence available, accounting for the Government's clearly stated ambitions for the Arc of which Greater Cambridge is part, is that the GCLP must provide for and support a higher level of future job growth.
- 2.42 As a minimum, the level of job growth associated with the so-called "higher" scenario would be more representative of the assessed economic potential of this area, where it:
- More closely reflects continuing evidence of stronger historic job growth, including in the key sectors that have been consistently identified as local drivers of growth in the published evidence base;
 - Shows a greater alignment with the ambition which continues to be articulated by Government, which expects above-trend growth within its designated nationally significant growth corridors; and
 - More closely aligns with the emerging approach of providing the employment land that will accommodate new business investment and growth, noting specifically the indication in the evidence base that the stronger associated growth aligns more closely with the market.
- 2.43 Based on the Councils' published evidence, where alignment is sought with the higher of the job growth scenarios, the GCLP must make provision for 2,690 homes per annum or approximately 56,500 homes³⁵ if the plan period to 2041 is retained. As referenced at the start of our response to this policy, however, Countryside are of the view that in order to demonstrate consistency with the emerging plans for Oxfordshire and Milton Keynes a plan period of 30 years out to 2050 should be used. This would necessitate a larger supply of land, assuming a sustained need for 2,690 homes per annum, with this equating to a total need for 80,700 homes over a thirty year plan period.

³³ Greater Cambridge Local Plan Development Strategy Topic Paper (2021), page 19

³⁴ *Ibid*, page 24

³⁵ Greater Cambridge Local Plan: Housing and Employment Relationships (November 2020), Paragraph 1.15. It is noted that this level of need assumes a 1:1 commuting relationship in support of the higher job growth scenario. This is consistent with the Council's selection of the comparable scenario linked to the 'central' job growth forecast.

- 2.44 As we consider below, a failure to plan positively for housing provision in the context of sustained job growth over this period would continue to have adverse consequences for the population of Greater Cambridge.

The consequences of failing to positively plan for growth

- 2.45 The First Proposals Consultation Document is clear to acknowledge that to date the plan-led system in Greater Cambridge has not managed to enable a sustainable balance between jobs and homes, observing that:

“Over recent years, jobs have been created faster than new homes have been built, and this has contributed to higher house prices and increased commuting into the area”³⁶

- 2.46 It also notably concedes that there would be adverse consequences if the GCLP fails to provide the homes that are needed in future, stating with reference to the lower level of need implied as a minimum by the standard method that such a level of housing provision ‘would risk increasing the amount of longer distance commuting into Greater Cambridge, with the resulting impacts on climate change and congestion’³⁷.

- 2.47 Such a position was also articulated by the CPIER in its diagnosis of the consequences of failing to plan positively for growth in Cambridge, stating that:

“If nothing is done, the damage to society from the continuing drift away of less well-paid workers may become irreparable, the ageing of the city (whose housing ladder’s bottom rung is out of reach of the vast majority of the young) will threaten its dynamism, and the cost to people’s mental health of commuting-induced stress and housing insecurity will soar”³⁸

- 2.48 Positively, the vision expressed in the First Proposals Consultation Document indicates that the Councils aspire to improve the sustainability of Greater Cambridge, which they ‘want...to be a place where a big decrease in our climate impacts comes with a big increase in the quality of everyday life for all our communities’³⁹.

- 2.49 In this context, and putting aside the scale of job growth planned for, the Councils’ apparent aim of ensuring that Greater Cambridge better balances job growth and housing provision by “consuming its own smoke”⁴⁰ is supported. The assumption of a commuting rate to this effect is, as the Councils confirm, ‘consistent with the local plan theme of net zero carbon’ and also overcomes the lack of ‘certainty that neighbouring authorities would plan for the additional homes in their local plans in order to support the economy in Greater Cambridge’⁴¹.

- 2.50 This is further reinforced, the Councils confirm, in the transport evidence and with reference to the developed transport model which notably suggests that

³⁶ Greater Cambridge Local Plan First Proposals (2021), page 22

³⁷ *Ibid*, page 26

³⁸ CPIER (2018), page 9

³⁹ Greater Cambridge Local Plan First Proposals (2021), page 20

⁴⁰ This is the terminology used in the table on page 41 of the Development Strategy Topic Paper (2021)

⁴¹ Greater Cambridge Local Plan Development Strategy Topic Paper (2021), page 23

“...the approach of providing more homes could help reduce longer distance commuting, which could help limit carbon emissions, and explicitly highlight that if the number of jobs in an area increases faster than the development of homes for the population to service those jobs, then travel distances to access these jobs will increase, and the longer trips that this entails will most often be undertaken by car, leading to large increases in travel distance by car compared to more balanced strategies”⁴²

2.51 Even this ostensibly ‘balanced approach’ to commuting could, however, lead to adverse and unsustainable outcomes if the Councils do not accept and plan for the likelihood of a stronger level of job growth.

2.52 Similarly, underestimating potential job growth and therefore housing need will continue to exacerbate what are already acute affordability challenges facing many households. The CPIER highlighted even in 2018 that:

“Housing affordability pressures are one of the main threats to growth in Cambridgeshire and Peterborough, and one of the main burdens on people’s lives. Demand for housing has risen strongly, while supply, though increasing, has not been able to keep pace”⁴³

2.53 The serious consequences of acute affordability issues are explained in the Councils’ evidence base. The addendum to the study of housing need, for example, confirms that under each of the previously introduced jobs-led scenarios there is expected to be a net need for between 1,093 and 1,246 affordable homes for rent per annum across Greater Cambridge⁴⁴. This evidently represents a significant need when set against the overall need for housing across all tenures, and there is again clearly an imperative on ensuring that the supply of homes will positively address rather than worsen affordability for those households on lower incomes.

2.54 The acknowledged serious consequences associated with failing to better align jobs and homes provides a further compelling justification for the GCLP to more positively anticipate a stronger level of job growth and ensure the provision of the homes required to support it.

Policy S/DS: Development strategy

2.55 The proposed development strategy for Greater Cambridge is stated to be to:

“direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way.”

⁴² *Ibid*, page 35

⁴³ CPIER (2018), page 64

⁴⁴ Housing Needs of Specific Groups – Greater Cambridge Addendum (September 2021) Table 12

- 2.56 The proposed development strategy for Greater Cambridge directs the vast majority of growth to the Cambridge Urban Area, the edge of Cambridge and new settlements. A smaller proportion of growth is directed to the Rural Southern Cluster and the Rest of the Rural Area. Of the allocations proposed, the vast majority of these are existing commitments (adopted allocations, sites with planning permission etc.). The Council are only proposing a need for an additional 11,640 homes to be allocated through the emerging Local Plan. This further emphasises that the Plan is failing to proactively plan for sufficient homes as discussed in respect of Policy S/JH.
- 2.57 Countryside support the principle of the proposed development strategy and recognise that a range of sites will be required in order to deliver this strategy.
- 2.58 Concern however is raised regarding how the proposed strategy has been interpreted into the allocations proposed. Furthermore, in light of our discussions in relation to Policy S/J, it is clear that additional allocations will be required in order to deliver an appropriate and effective quantum of housing to support the wider plan aspirations.
- 2.59 We support the recognition that growth to the edge of Cambridge can be a suitable location including to the east of the City. It is however considered our client's opportunity at Fen Ditton has been incorrectly discounted as an option and should be the subject of further consideration either as a result of a revision to the currently proposed allocations or as an additional allocation to take account of the growth aspirations the Plan is not currently allowing for. It is considered that once the full housing needs are taken account of it will be necessary to reassess the exceptional circumstances for Green Belt release. As is clearly demonstrated in Section Four, the proposed allocation at Fen Ditton is considered to meet the exceptional circumstances test through the provision of much needed housing and the wider benefits it can bring both through the proposals themselves and by its relationship to the wider area and the sustainability benefits growth in this location would bring.
- 2.60 The Sustainability Appraisal (October 2021) prepared by LUC which supports the current consultation recognises the benefits of growth being accommodated in proximity to Cambridge. Whilst it notes the challenges faced by existing services and facilities, it is considered that opportunities such as that at Fen Ditton benefits from the proximity to the existing services and facilities whilst also being of a scale that it will provide its own services and facilities to complement and supplement the existing offer.

Policy S/SH: Settlement hierarchy

- 2.61 Under this policy the Council set out a settlement hierarchy as follows:
- Cambridge
 - Town
 - Rural Centre
 - Minor Rural Centre
 - Group Village
 - Infill Village.
- 2.62 This hierarchy is essentially the same as the adopted hierarchy in the South Cambridgeshire Local Plan (2018), with the addition of Cambridge and Town.

- 2.63 Within the First Proposals, Fen Ditton is identified as a Group Village. Other than some minor amendments to specific settlements, the hierarchy is largely based on the adopted policy position. The adopted South Cambridgeshire Local Plan was supported by the Village Classification Report (2012). At this stage it appears that no similar assessment has been prepared to support the emerging Greater Cambridge Local Plan. It is considered that an updated assessment must be undertaken to support the emerging Plan and to ensure it is both justified and effective.
- 2.64 In undertaking the revised assessment it will be important to consider both the existing services and facilities which are available as well as those proposed either through wider commitments or through potential allocations themselves. Broader connectivity opportunities should also be considered. For instance, Fen Ditton benefits from its strong connectivity and proximity to Cambridge and wider transport links and this should be taken account of and recognised. The site will also benefit from its proximity to the North East Cambridge development and the sustainability measures it will introduce. It is notable that the site is comparable in its proximity to Cambridge to some of the proposed urban extensions to Cambridge. We consider the suitability and sustainability of Fen Ditton to accommodate additional growth in Section Four of this Report and therefore do not repeat these considerations here.

Policy S/SB: Settlement boundaries

- 2.65 In line with their promotion of land at Fen Ditton, Countryside advocate that the site should be released from the Green Belt and included within the settlement boundary of Fen Ditton as part of the allocation of the site for residential-led development.

Biodiversity and Green Spaces

Policy BG/BG: Biodiversity and Geodiversity

- 2.66 The policy wording suggests that there will be a requirement for development to achieve a minimum 20% biodiversity net gain. It is understood that this aspiration has stemmed from the Oxford-Cambridge Arc Environmental Principles and exceeds that in the Environment Act 2021. Whilst Countryside are supportive of this approach to provide significant biodiversity improvements through development and are committed to achieving a net biodiversity gain of at least 10% across all their developments by 2025, this is clearly a high aspiration and it will be important to consider site specific requirements and the overall viability implications of all the Plan requirements considered collectively.
- 2.67 A suggestion to the wording is that this could be phrased as ‘the policy will require development to **aim to** achieve a 20% biodiversity net gain **with a minimum 10% to be achieved**’. By amending the wording in this way the onus is clearly on the applicant to meet the 20% wherever possible, but should there be a slight shortcoming (that would still result in an overall high net gain) this would not prevent otherwise acceptable development.
- 2.68 The mandatory minimum limit should reflect the legislative target. However, policy could still actively encourage schemes to exceed the minimum, recognising that those that do will be considered as a planning ‘benefit’ of development in sustainability terms

(the greater the increase, the greater the weight attached to the assessment of benefit in any planning balance).

- 2.69 Ultimately, the aim of BNG is to leave the natural environment in a measurably better condition than beforehand. Therefore, if it can be robustly demonstrated that on-site provision is not achievable, the opportunity to measurably improve the natural environment of other appropriate receptor sites through off-site provision should still have a significant value attached to it.
- 2.70 The Councils should also consider alternatives to on site provision where the necessary biodiversity net gain cannot be achieved on site. This could include a range of options including biodiversity net gain 'credits' being able to be purchased from other donor sites in order to achieve appropriate levels.

Policy BG/GI: Green Infrastructure

- 2.71 This policy wording sets out that 'all development proposals – appropriate to its type, scale and location - to include green infrastructure, providing the following varied benefits for people, wildlife and planet'. It is suggested that further clarification should be provided within the wording of this policy as to what type, scale and location of development will be required to provide green infrastructure. This will avoid any ambiguity.
- 2.72 Countryside specialise in designing sensitive and innovative masterplans which maximise the potential of the natural landscape. Finding ways to protect and enhance the best aspects so that they can enrich the proposals and deliver a strong character with an instant sense of maturity. Countryside believe in landscape led masterplanning with the aim of creating a living landscape. These principles will be applied to the Fen Ditton proposals to create spaces which allow wildlife, nature and people to thrive together. The proposals are will provide a range of key green infrastructure features to include:
- Pockets of green and expansion of recreation ground to connect new and old;
 - Green corridor from river to railway; and
 - Creation of a landscaped interface with the A14.

Policy BG/TC: Improving tree canopy cover and the tree population

- 2.73 Whilst the spirit of the policy is supported, concern is raised regarding certain elements of the current proposed policy direction.
- 2.74 The current policy direction seems somewhat contradictory stating in one bullet that seemingly all trees should be protected (no matter what their value), whilst another suggests only trees of value (as measured by a recognised tool such as iTree) should be protected. In any event it is considered additional flexibility should be introduced to allow for instances where trees are required to be removed due to disease, age or safety concerns which renders their retention inappropriate. Flexibility should also be allowed for where in some instances the removal of trees, in whole or part, is required in order for the development to be brought forward and this loss should be weighed against the

benefits of the proposals. Countryside are committed to delivering 250,000 trees across their developments by 2025.

- 2.75 Furthermore the necessity of stipulating a recognised tool such as iTree is questioned. Assessment should be undertaken in accordance with relevant professional guidance and supported by tools as appropriate. Further detail is not considered necessary or justified.

Policy BG/EO: Providing and enhancing open spaces

- 2.76 Countryside recognise the importance of the delivery of open spaces as part of new developments. As set out in response to Policy BG/GI, the proposals at Fen Ditton would provide a range of open space opportunities. Countryside would be keen to work with the Council, key stakeholders and the local community to understand how the provision can best respond to local needs and ambitions.
- 2.77 It is suggested that further clarification is added to the policy to address the current ambiguity in the policy wording that ‘open space and recreation provision will be required to be provided by new development, appropriate to the scale and location of the development.’ The wording adds that ‘the type of provision sought will be guided by the needs and opportunities of the local area.’ Again this requires further clarification. It will be important for these requirements to inform site capacities for the proposed allocations and assessments of viability of the Plan as a whole. Flexibility should also be allowed for in the policy wording to allow for on or off site provision of facilities dependent on local circumstances.
- 2.78 We understand that the Council are looking to review their current open space standards, which is supported as this will provide important clarification for development sites and will reflect current needs and aspirations. It is also agreed that the standards should continue to differ between Cambridge and South Cambridgeshire to reflect the differences between these areas.

Wellbeing and social inclusion

Policy WS/HD: Creating healthy new developments

- 2.79 Countryside are supportive of the proposed approach to creating healthy new developments and have experience of working with the Council in this regard, including the preparation and submission of a Health Impact Assessment, as part of the Bourn Airfield proposals which have a resolution to grant planning permission. This experienced would be applied to the Fen Ditton proposals. It is however considered that additional flexibility should be added to the policy to reflect local circumstances. It is suggested that the wording of this policy is amended to state that ‘we will seek to integrate health considerations into policies across the Plan. This would require health principles to be applied to new developments *wherever possible*, drawing on the ten principles developed from the Healthy New Towns initiative *as appropriate*.’
- 2.80 The requirement for a Health Impact Assessment to be submitted with applications is also currently ambiguous. The proposed policy wording states that ‘Health Impact Assessments will be required to accompany planning applications (at a level of detail

appropriate to the scale and nature of the application).’ It is suggested that further clarification should be provided within the wording of this policy as to what scale and nature of development would trigger what level of detail. This would minimise the risk of documents not covering the necessary detail expected by the Council. For example South Cambridgeshire Local Plan 2018 Policy SC/2 specifies that such a report is required for developments of 20 dwellings or more.

- 2.81 The proposed development at Fen Ditton would embody the aspiration for creating a healthy new development. The land at Fen Ditton provides the opportunity to create a happy and healthy community with infrastructure supporting community activity, health, education and quality of life. This would be achieved through the combination of a compact mixed-use urban structure, meeting daily needs within walking distance, and providing integrated green space which creates the conditions for people to lead healthy lives by encouraging ‘active travel’, reducing vehicular traffic, improving the public realm and enhancing social interaction. Countryside believe in landscape led masterplanning with the aim of creating a living landscape. Built in the right way, in the right place, new housing can make a positive contribution to nature and the people who live there. Countryside believe everyone has a right to natural space, and that this can provide ‘equigenesis’ – an equalising environment that uplifts everyone’s health and wellbeing.

Policy WS/CF: Community, sports and leisure facilities

- 2.82 Countryside are supportive of the aspirations of the policy however consider some minor amendments are required to ensure the policy will be effective.
- 2.83 Clarification should be provided as to what is deemed ‘appropriate’ and thresholds for on or off site provision in relation to the requirement for ‘appropriate community, cultural, education, sports and leisure provision to meet the needs generated by new developments.’ Similarly the wording should define what is considered to be large scale development.

Policy WS/IO: Creating inclusive employment and business opportunities through new developments

- 2.84 Countryside support the ambition to support local business and provide local people with employment opportunities and experience through new development. Countryside have committed to having 5% of its workforce in trainee and graduate roles per year from 2022.
- 2.85 The Council note that they need to define ‘appropriate scaled development’ which is supported, to provide clarity on the scales of development that will be required to do this.
- 2.86 Furthermore, depending on local circumstances and labour availability at the time of works, it may not always be possible or realistic to meet the policy requirements. In order to not inhibit progress of sites and delivery of development, it is suggested that the wording is tweaked to add a degree of flexibility. It should state that ‘it is proposed **that wherever possible**, appropriately scaled developments contribute to local training, skills and employment opportunities, for example apprenticeships, to help to ensure that the local community benefits from the development. In addition, appropriately

scaled developments would be required to provide access for local businesses to supply chain opportunities in various stages of development, *wherever possible.*'

Policy WS/HS: Pollution, health and safety

- 2.87 Countryside support the proposed policy however consider that it is important to aid effectiveness that it is reflected the role that mitigation can play in ensuring risks and harm can be appropriately managed. It is therefore suggested that the wording is amended to state that 'we propose that this policy will require that development does not lead to, or is subject to significant adverse effects as a result of noise, vibration, odour, and/or light pollution ***unless these effects can be satisfactorily mitigated against.***'

Great Places

Policy GP/PP: People and place responsive design

- 2.88 Countryside support the vision for achieving high quality design in Greater Cambridge. Given the significant differences in character found across the area, it will be important that developments respond to local context rather than a homogenised Greater Cambridge character. It is therefore suggested that the policy wording is amended to state that this is ***'as appropriate to the local context of the development site'***.

Policy GP/LC: Protection and enhancement of landscape character

- 2.89 The content of this policy is supported by Countryside in order to address landscape character through development. The proposed development at Fen Ditton will meet the aspirations of the policy and will retain and enhance landscape features within the development as well as creating new features as part of an enhanced landscape framework. It is also positive that the policy references the Greater Cambridge Landscape Character Assessment as a clear point of reference in responding to this policy. In considering the suitability of sites for development it will be important that consideration is given to any other known changes in landscape character as a result of development such as infrastructure improvements or other committed developments.
- 2.90 A slight amendment is suggested to the wording to again provide flexibility. The third bullet point is suggested to be amended to state that developments will be required to 'retain and enhance landscape features within new developments ***that positively contribute to the quality and character of the area, wherever possible.***' The wording as it currently stands suggests that any landscape features on sites should be retained and enhanced, whereas the proposed amendment ensures that features of limited value may be appropriately removed, or indeed where features of value may need to be removed, for example to facilitate access. The proposed wording is consistent with that currently set out under Policy GP/QP.
- 2.91 It is also noted that the policy makes reference to the need for protecting 'important green gaps'. The only green gap referenced is Longstanton and Northstowe and therefore it is assumed the policy should be updated to refer to a singular gap.

Policy GP/QD: Achieving high quality development

2.92 Countryside are supportive of the aspiration to achieve high quality design through development which accords with its own ethos and approach to development. The following minor points requiring clarification are however raised:

- the need to successfully integrate waste, recycling and parking is referenced twice in the policy under ‘climate-positive’ and ‘local character’ which does not need to be repeated under the same policy.
- Clarification should be provided within the policy as to what is regarded as ‘significantly taller’ to understand when additional assessment will be required.

Policy GP/QP: Establishing high quality landscape and public realm

2.93 The approach to high quality landscape and public realm is supported. A minor comment is made on the last bullet point of the policy, which sets out the need to ‘provide appropriate types of open space whether in urban or more rural places that link into other sequences of existing or new landscape spaces and wider settings’. It is queried how the measure of ‘appropriate’ will be tested and applied given the significant prospects of variety in how this term is applied.

Policy GP/HA: Conservation and enhancement of heritage assets

2.94 The policy wording on archaeology states that ‘the policy will also require the appropriate treatment of archaeology.’ This is ambiguous and does not appear to identify that this applies to sites where there is likely to be an impact on archaeology. It is suggested that the policy wording is amended to state that ‘the policy will also require the appropriate treatment of archaeology, **where development proposals have the potential to impact archaeological remains or deposits.**’

Jobs

Policy J/RW: Enabling remote working

2.95 Countryside support the approach under this policy to take account of the current and likely future trend for working at home, largely as a result of the COVID-19 pandemic. The Fen Ditton proposals will make appropriate provision to achieving the objectives of this policy through the provision of co-working space and provision of fibre broadband to all homes.

Homes

Policy H/AH: Affordable Housing

2.96 Countryside recognise the importance of the delivery of affordable housing, particular in areas such as Greater Cambridge which experience a high level of need. As preparation of the Local Plan continues further viability assessment will be required to ensure that the overall package of requirements across the Plan read as a whole is viable and deliverable.

2.97 Concern is however raised regarding the proposed restrictive approach to cluster sizes which are seemingly proposed through the requirement to accord with the guidance provided in the Greater Cambridge Housing Strategy Annexe 10: Clustering and Distribution of Affordable Housing (Cambridge City Council and South Cambridgeshire District Council, June 2021) or a successor document. The document referenced sets out maximum cluster numbers in relation to the total number of units proposed. For example, developments of 30 to 200 units must have maximum clusters of 15 units. Concern is raised on this point. It is considered that flexibility should be allowed for clusters to exceed the 15 unit restriction where this has been agreed with the relevant Registered Provider. The clustering of affordable housing units is generally a practical requirement for Registered Providers for management and maintenance reasons. As such, the policy should allow a degree of flexibility here.

Policy H/HM: Housing Mix

2.98 Countryside are supportive of the approach to this policy in that housing mix 'recommendations' are provided, along with these being set out as a 'range'. This is a positive format for the housing mix policy by providing flexibility which will allow developments to respond to changing market conditions and requirements over the Plan period.

Policy H/HD: Housing Density

2.99 Countryside are supportive of this policy in that no density figure is stipulated, with this needing to be appropriate to each site specifically, taking into account local character and the need to provide higher densities where appropriate in order to accord with the requirements of the NPPF to boost supply of housing and make best use of land.

Policy H/SS: Residential space standards and accessible homes

2.100 Countryside are supportive of the proposed requirements. Clearly the requirements will need to be factored into considerations of site capacity and viability of the sites and the Local Plan as whole to ensure deliverability.

Policy H/SH: Specialist housing and homes for older people

2.101 This policy states that 'provision of specialist housing will be required as part of the housing mix of new developments, particularly at new settlements and within urban extensions, to create balanced and mixed communities and to meet the identified need for specialist housing.' Clarity should be provided within the wording of this policy as to the threshold and level of provision for this type of housing. The current wording suggests that this could be a requirement for all scales of development. Whilst there is understood to be a need to deliver housing for older people, it would be unreasonable to expect this provision on every housing development. Furthermore, the NPPF does not seek delivery of such housing on every residential development site. Clarity on this requirement will be necessary to inform site capacities of proposed allocations and the overall viability of the Plan. Countryside would be happy to engage with the Councils regarding the appropriate mix of homes on the Fen Ditton site which could include the provision of specialist housing and homes for older people if it can be demonstrated there is the need and market for these.

Policy H/CB: Self-and custom-build homes

- 2.102 This policy states that ‘5% of all new homes in residential developments of 20 dwellings or more will be required to be custom and/or self-build, provided that the Greater Cambridge self and custom build register is recording a demand for self and/or custom build homes when a planning application for 20 or more homes is considered.’ It is notable that the Homes for our future Greater Cambridge Housing Strategy 2019 – 2023 evidence base document sets out that there are just under 400 applicants on the South Cambridgeshire self-build register. Based on the current Plan housing requirement of 44,400 new homes this requirement would deliver up to 2,220 new custom and self-build, over five times those on the current register. We would contend therefore that the high quantity of provision aspired to in the Policy is not truly justified by the number of registered interested parties.
- 2.103 Notwithstanding the above, Countryside are supportive of the suggestion that ‘a mechanism will be included within the policy to allow for plots identified to be for self and/or custom build homes to be delivered by the developer or others if the plot has not been sold as a self or custom build plot after at least 12 months of appropriate marketing.’ However, 12 months is a long period of time, and concern is therefore raised regarding the implications this may have for the timescales for delivery of developments and the associated increased costs with developers potentially having to revisit earlier phases in order to complete the dwellings. This timescale should therefore be reduced to 6 months.

Policy H/BR: Build to Rent Homes

- 2.104 Build to Rent (BTR) Homes are an important housing model for diversifying the housing market as has been recognised by the Government through the NPPF and PPG and there is a requirement to plan positively for rented homes in Local Plans. The inclusion of a policy specifically addressing this form of development is therefore supported. BTR expands residents’ access to, and choice of, good quality housing, helping affordability in the widest sense.
- 2.105 BTR is different from the existing private rented sector offer through the professional management and longer tenancies for those who want them of high-quality, purpose-built homes. It is important to recognise that whilst the BTR sector may have initially been focused on town/city centre developments of apartments the model has diversified to include all types of homes including family homes. BTR can also increase the overall supply and accelerate the construction of new homes due to the different market it serves.
- 2.106 Countryside recognise the important role that the BTR sector can play as part of the overall mix of housing to be provided at the Bourn Airfield development which will include a policy compliant 40% affordable housing. It is considered that the provision of BTR will further broaden the appeal of living as part of a new community by widening the choices available and will assist in bringing forward the proposed development more swiftly than originally envisaged by the Council. It is considered these principles could also be applied to the proposed development at Fen Ditton.

- 2.107 The PPG provides the following guidance to LPAs in preparing Local Plans which consider BTR:

“As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent. Specific demographic data is available on open data communities which can be used to inform this process. The assessment will enable an evidence-based planning judgement to be made about the need for build to rent homes in the area, and how it can meet the housing needs of different demographic and social groups.

If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent. This should recognise the circumstances and locations where build to rent developments will be encouraged – for example as part of large sites and/or a town-centre regeneration area.”

Paragraph: 001 Reference ID: 60-001-20180913

- 2.108 The PPG is therefore clear that the onus is on LPAs to consider how BTR can meet housing needs and create mixed and balanced communities. Concern is therefore raised that the proposed policy direction seemingly seeks to direct this requirement on to the applicant rather than being considered in a Plan led manner. It is considered there is a clear and evidenced need for BTR provision in the Greater Cambridge area and therefore the Local Plan should be positively planning to support this as part of a diversified housing market.
- 2.109 The proposed policy direction also seeks to seemingly restrict how much BTR could be brought forwards, although a decision on the exact quantum is deferred for later stages of plan-making. Concern is raised regarding this proposed approach. Whilst we understand from the supporting text that the Council are concerned that the provision of a significant quantum of BTR would result in a reduction in the level of the overall affordable housing delivery (as BTR would likely be subject to a 20% affordable housing requirement rather than the 40% of general market housing locally) it is necessary to consider the needs for all forms of housing. Although no quantum is proposed at this stage, it is noted that the draft North East Cambridge Area Action Plan (AAP) proposes a restriction of no more than 10% of the total housing across the AAP being BTR. Importantly the AAP is only in draft and we are unaware of any similar restrictions being successfully introduced elsewhere in the country. Clearly no such restriction could be applied to other forms of private rented accommodation by private landlords. It is therefore considered such an approach is unjustified.
- 2.110 A variety of business models will exist for the provision of BTR and therefore flexibility should be allowed within the final policy wording to reflect this. It should be noted that Countryside are committed to delivering BTR at Bourn Airfield whilst also delivering a 40% policy compliant level of affordable housing and therefore this scenario should be allowed for and tested in the Council’s viability assessment work.

Infrastructure

Policy I/ST: Sustainable transport and connectivity

2.111 Countryside support the proposed policy aspiration and consider the proposed development at Fen Ditton would adhere to the approach advocated through delivering a sustainable and inclusive community. The site is in a highly accessible location by cycle, with a number of proposed sustainable transport improvements coming forward. In particular, the site is even at its eastern most extent less than 2 miles to Cambridge North (and under a mile at its closest) and to the Newmarket Road Park and Ride (with the eastern parcel being the closest and under a mile away) and less than 3 miles from the centre of Cambridge city and the Science Park. In addition it is envisaged that the development would be supported by a range of transport measures which could include:

- Potential to divert an existing bus service into the site;
- Free/discounted bus travel for residents;
- Cycle initiatives such as cycle training for residents and e-bike incentives;
- Marketing information for residents and the surrounding area to promote travel by sustainable means;
- The introduction of the Fen Ditton Smarter Choices and Better Points schemes for residents of the development and the surrounding area to incentivise sustainable travel with a reward based scheme; and
- IT assistance campaign to promote working from home or a work hub and reducing the need to travel.

2.112 A concern is however raised on part of the wording of this policy. The policy states that ‘developers will be required to contribute to improvements to public and community transport and to deliver new and improved sustainable active travel connections for non-motorised users including for equestrians appropriate to the scale and nature of the proposal.’ This policy wording suggests that all developments will be required to deliver improvements, and clarity should therefore be provided on the types and thresholds of development that would trigger this requirement.

Policy I/EV: Parking and electric vehicles

2.113 Countryside support the principle of the proposed policy and the aspirations it seeks to achieve. It will be important that the policy wording allows sufficient flexibility to respond to changing travel habits and technologies over the course of the Plan period. It is also important that the policy allows for changes in requirements depending on the location of developments and the availability of alternative modes of travel, existing cycle provision etc. These are all key considerations in relation to the delivery of the Fen Ditton proposals and will be used to inform the development of the reserved matters applications following the grant of outline planning permission.

Policy I/DI: Digital Infrastructure

2.114 Whilst we support the aspirations of the policy and Countryside recognise the importance of the necessary digital infrastructure to support new developments, it is important that the eventual policy wording recognises to what degree these elements are under the control of the developer themselves as opposed to statutory undertakers.

3. GCLP Climate Change Theme

3.1 These representations to the Greater Cambridge Local Plan (GCLP) have been produced by Turley Sustainability on behalf of Countryside with respect to their existing and potential future land interests within the Greater Cambridge Area and specifically those at Fen Ditton. These representations are focused on the Climate Change Theme of the GCLP and the following policies:

- CC/NZ: Net Zero Carbon in New Buildings
- CC/WE: Water Efficiency in New Developments
- CC/DC: Designing for a changing climate
- CC/ FM: Flooding and Integrated Water Management
- CC/ RE: Renewable Energy projects and infrastructure
- CC/ CE: Reducing Waste and supporting the local economy
- CC/ CS: Supporting land-based carbon sequestration

3.2 Countryside fully supports the strategic commitment by the GCLP to positively address the issue of climate change mitigation and adaptation within the plan period and welcome the opportunity to comment on the draft policies to ensure they evolve to meet the tests of soundness and are both deliverable and viable whilst supporting the delivery of much needed high quality, private and affordable homes within Greater Cambridge.

3.3 Countryside's proposed interests at Fen Ditton have been discounted by the plan as a sustainable location for residential development.

3.4 As described in Section 3 of these representations, the land at Fen Ditton is considered to be in a sustainable location for development with access to a network of footpaths and cycle networks and a train station. Locating homes in sustainable locations is one of the most powerful steps to reducing carbon emissions given that approximately one third of UK Greenhouse gas (GHG) emissions are emitted from the transport sector and private vehicles is to locate housing close to sustainable modes of transportation.

Countryside's Corporate Commitment to Net Zero.

3.5 Countryside supports the emphasis placed on responding positively and proactively to climate change in the Greater Cambridge Local Plan (GCLP). This aligns closely with Countryside's own ambitions for their business operations and future development sites.

3.6 Countryside recognises the recently published findings by the International Panel on Climate Change (IPCC), which makes clear that the chances of crossing the global

warming level of 1.5°C in the next few decades is likely unless immediate, rapid and large-scale action is taken.

- 3.7 To ensure Countryside plays its part, the company has recently published its Corporate Strategy 'Path Finder – Marking Out the Route to Net Zero'⁴⁵ which sets out the company's strategy to achieving net zero. As part of this strategy Countryside have set science-based carbon targets which have been verified by the Science Based Carbon Institute, and are to:
- Reduce our absolute Scope 1 and 2 emissions by 42% by 2030
 - Reduce our Scope 3 emissions by 52% per sqm built by 2030.
- 3.8 The GCLP Plan, and its emphasis on climate, will also play a very important role in meeting the challenges put forward by the IPCC. It is important to note that in meeting its net zero ambitions, one of the most important steps that the GCLP can take is to ensure that its spatial distribution strategy directs growth to locations that are sustainable and help to facilitate reductions in GHG emissions by reducing the need to travel by private car for work and leisure.
- 3.9 As a general theme, Countryside support the strategic objectives of the policy but note that the targets presented within the GCLP will introduce some of the highest sustainability standards in the UK at a time when the housebuilding industry is already responding at pace to the introduction of the Governments Future Homes Standard.
- 3.10 Given the volume of new homes required within Greater Cambridge there is a risk that the introduction of these standards will restrict the delivery of new homes particularly given that the supply chain is currently not able to deliver these standards at volume. These challenges will also be particularly acute for smaller housebuilders which may further restrict delivery and diversity within the market.
- 3.11 Whilst Countryside note the ambition of the GCLP, it is important that the sustainability policies do not restrict the delivery of much needed new private and affordable housing across the county. To meet the requirements of the National Planning Policy Framework, these policies must be supported by a robust evidence base and viability assessment that demonstrates these policies and targets are deliverable.

The Greater Cambridge Local Plan Policies.

- 3.12 Countryside have reviewed each of the draft policies within the climate change section of the GCLP and have provided representations for each policy which we hope is of assistance to the Greater Cambridge Shared Planning authorities. Our focus is to ensure that each policy is both viable and deliverable whilst facilitating a shared objective of delivering more high quality affordable and private homes in an area with current and growing demand.

⁴⁵ <https://investors.countrysideproperties.com/sustainability-approach>

- 3.13 Where necessary these representations make reference to the GCLP Climate Change Topic Paper⁴⁶ which summarises the evidence to support each of the policies and is hereafter referred to as the Topic Paper.
- 3.14 For draft Policy CC/ NZ, we have also reviewed the evidence base supporting these specific policies which is the Greater Cambridge Net Zero Carbon Evidence Base Non-Technical Summary and which is hereafter referred to as the Evidence Base document. Unfortunately a more detailed review of the full evidence is not possible as only the non-technical summary has been published and therefore Countryside reserve the right to amend our representations once this material has been reviewed.
- 3.15 Countryside welcome the opportunity to comment on these draft policies and would be happy to discuss our comments in greater detail with the authorities. We also recognise that these are currently policy options which will be informed by consultation feedback. Countryside look forward to reviewing the next iteration of the draft GCLP.

Policy CC/ NZ: Net Zero Carbon New Buildings

- 3.16 This policy introduces new levels of energy use that will be allowed for new development and how renewable energy should be used to meet that energy need. It also introduces requirements for the assessment of whole life carbon by new development and address the potential issue of carbon offsetting.
- 3.17 The policy introduces the following parameters for energy use for new buildings in order to achieve **Net Zero for Operational emissions**:
- A space heating demand of 15-20kwh per meter square per year for residential and non-residential buildings.
 - All heating provided through low carbon sources and not fossil fuels with no new development connected to the gas grid.
 - All buildings should achieve a total Energy Use Intensity (EUI) target for both regulated and unregulated energy of no more than 35kWh per m² per year with a range of different EUI targets for non-domestic buildings as set out in the policy.
 - New development should generate at least the same amount of renewable energy (preferably on-plot) as they demand over the course of a year and this should include all regulated and un-regulated energy. In large developments the energy generation can be averaged across the development to compensate for the inability of specific dwellings to meet the target
 - Offsetting can only be used as a last resort and the building should be future proofed to allow residents or tenants to enable the achievement of net zero dwellings.

⁴⁶ <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/GCLP%20Climate%20Change%20Topic%20Paper.pdf>

- To target Net Zero for Construction residential developments of greater than 150 dwellings or 1,000m² should calculate the whole life carbon of the development and present measures to reduce these.

3.18 Whilst Countryside recognise the importance of addressing climate change, we do have a number of concerns that draft Policy CC/ NZ is unsound on the basis that it is not viable or deliverable and may reduce the delivery of much needed affordable and private housing within the Greater Cambridge (GC) area. We have summarised our concerns below which we hope are helpful to the authorities in their search for sound and effective climate change policies within the GCLP.

- It is noted that the dwelling energy efficiency targets within draft Policy CC/ NZ go significantly beyond building regulations including the proposed Future Homes Standard 2025 although the Topic Paper (page 17) states that the standards proposed are not as onerous as the passivhaus standard but do go beyond the proposed FHS. The passivhaus standard is widely recognised as the highest construction standard that is currently available in the UK for residential development as it requires complex construction techniques and therefore carries a cost premium. Analysis of this standard and others compared to the targets within Policy CC/ NZ have identified the following:
 - The passivhaus standard⁴⁷ requires an EUI of less than 120 kWh m² per annum compared to the policy target of 35KWh per m² thereby suggesting that the draft policy target is in fact considerably more onerous than passivhaus.
 - The EUI within the draft policy CC/NZ appears to have been taken from the recommendations from the London Energy Transformation Initiative (LETI) climate emergency guide⁴⁸ which was created to introduce higher standards in Greater London where new development is dominated by low/ high rise apartments that are inherently more energy efficient than typical single and family housing types.
 - The passivhaus standard⁴⁹ requires a space heating demand of 15 kWh m² per annum compared to a draft policy target of 15 – 20 kWh m² thereby suggesting close alignment between the two on this specific issue.
 - Draft Policy CC/NZ requires applicants to address both regulated and unregulated energy as opposed to the FHS which deals with regulated energy alone. The Government have made this important differentiation because the use of unregulated energy (e.g. power used by televisions and appliances) is the responsibility of the homeowner and not the housebuilder and is extremely difficult to quantify accurately at construction stage.

⁴⁷ https://www.passivhaustrust.org.uk/what_is_passivhaus.php#2

⁴⁸ https://www.leti.london/_files/ugd/252d09_3b0f2acf2bb24c019f5ed9173fc5d9f4.pdf

⁴⁹ https://www.passivhaustrust.org.uk/what_is_passivhaus.php#2

- To hit the EUI target of 35KWh per m² the Evidence base document estimates that the following will be required although no exact details are available:

- (a) Low U-values that exceed the requirements of the proposed FHS
- (b) Mechanical Ventilation with Heat Recovery (MVHR) to recover waste heat from the dwellings
- (c) A high level of air-tightness to prevent cold air ingress and heat loss from the dwelling

All of the measures identified above are characteristic of implementing the passivhaus standard.

- The cost of implementing Policy CC/ NZ has been estimated at between 10% and 13% above that required to build to current Building Regulations. No detailed analysis of the assumptions behind this calculation were available however. It is claimed that this cost is achievable on the basis that significant costs are required to implement the FHS and therefore the costs identified by the Evidence base are an over-estimate and are therefore acceptable. Countryside believe it is extremely important to obtain the detailed evidence behind these costs as in our experience the cost of building to passivhaus standards (or extremely close) is likely to be significantly higher than those quoted in the Evidence base paper.
- Given the above it would appear that the Policy CC/ NZ is implementing on-site energy efficiency standards much more closely aligned to passivhaus which presents significant challenges to the housebuilding industry for the following reasons:
 - Building to passivhaus requires a complete transformation of the on-site construction process and supply chain which would significantly delay housing delivery and increase costs of new dwellings particularly for the small and medium sized house builders.
 - The cost of constructing houses to passivhaus is likely to be significantly higher than that identified in the evidence base although a direct comparison is difficult in the absence of the detail behind the assumptions in the Evidence Base. Achieving air-tightness levels close to passivhaus and installing MVHR are extremely costly forms of construction.

3.19 The GCLP states that it has considered alternatives to the draft policy and targets with one being the use of the Government’s FHS as the principal metric for sustainable housing. Countryside fully support the introduction of the FHS in 2025 as it will deliver many of the strategic requirements of draft Policy CC/ NZ which include:

- An all-electric energy strategy thereby allowing the carbon footprint of the dwelling to fall each year in line with grid decarbonisation

- Dwellings will have very high levels of insulation and likely require triple glazing to ensure maximum heat retention.
 - Each home built to the FHS will require the extensive use of renewable energy technologies in which are likely to include Air Source Heat Pumps and Photovoltaic cells.
 - There would a consistent, deliverable standard for all new dwellings in Greater Cambridge thereby providing a level playing field for all housing developers.
- 3.20 Whilst the detailed energy demand / performance metrics for the FHS is unknown at this time the Government have confirmed that dwellings built to this standard will reduce carbon emissions by 75% compared to those built under the current 2013 Building Regulation.
- 3.21 Countryside therefore believe that Policy CC/ NZ of the GCLP should utilise the FHS as the main metric for the construction of energy efficient housing. The use of this standard will also provide greater support to the small and medium (including self-build) housing sector which we believe is critical to ensure greater supply and diversity of affordable housing to the consumer.
- 3.22 In addition to the concerns with respect to the on-site standards presented in draft Policy CC/ NZ, Countryside also have reservations with respect to other aspects of the Policy which are:
- It is unreasonable to prohibit all new developments to connect to the gas grid as it is possible that for buildings such as care homes and health facilities gas may still be the most suitable fuel for heating given the bespoke heating requirement of these health facilities. Given that some of Countryside's sites are large enough (such as Bourn Airfield) to permit the delivery of critical social infrastructure such as schools and health facilities, there may be a technical requirement for gas in some form to our large sites.
 - The requirement for new dwellings to generate at least the same amount of renewable energy as they demand over the course of the year is extremely challenging given that it must include both regulated and unregulated energy for which it is difficult to estimate the exact quantum of energy needed given it is entirely dependent on the occupiers use of appliances.
 - The offsetting policy (although lacking in detail) would appear to be based on the cost of providing additional PV cells to generate the quantum of energy that remains from the development site after all on-site measures have been deployed. At this time however there appears to be no data with respect to the cost of this offsetting policy and how any money will be spent with absolute certainty to ensure 'additionality'. Without any costs or viability information this aspect of the policy fails the test of soundness. It is evident however that this policy will add a significant (albeit unknown at this time) cost to new housing which ultimately will feed into higher house prices and greater affordability challenges. We look forward to seeing the detail of this policy but would urge

the authorities to fully explore the viability of this carbon offsetting and its impact upon the delivery of affordable housing before it is adopted.

- The requirement to calculate Whole Life Carbon (WLC) in construction would increase the importance of reducing embodied carbon within the supply chain, particularly for small and medium sized developers. Countryside have however already committed to reducing our embodied (scope 3 emissions) within the supply chain and have set ambitious targets to reduce these over time. The requirement to submit a WLC assessment for each application places an unnecessary burden upon our new development activities as this work is already part of our corporate commitments. To ensure this policy does not negatively affect housing delivery we would request that the acceptable evidence to demonstrate policy compliance could be details of our corporate commitment and progress to date.

Summary of Representations to Policy CC/ NZ:

3.23 In summary, Countryside support the strategic objective of the GCLP to positively address climate change through progressive policies in the plan. We are concerned however that the policies as they stand are unsound as they propose to introduce some of the highest sustainability requirements in the country without a complete evidence base. In order to make this policy sound and facilitate the delivery of much needed high-quality affordable and private housing we recommend the following amendments to Policy CC/ NZ:

- Publication of a complete and full evidence base for stakeholder comments before these draft policies are developed further.
- Adoption of the FHS as the energy efficiency target for new housing and remove the requirement for additional renewable energy deployment.
- Allow flexibility with respect to the use of gas in new developments where gas use is necessary for health/ occupant wellbeing.

Policy CC/ WE: Water Efficiency in new developments.

3.24 This policy introduces requirements for water efficiency in new domestic and non-domestic development in the form of the following:

- 80 litres per person per day for domestic development; and
- Full BREEAM credits for Wat 01 for non-domestic development.

3.25 Countryside acknowledge that the Greater Cambridge area is under water stress and there is a strong encouragement for all new development to improve water efficiency however with respect to draft Policy CC/ WE we have the following comments:

- We agree with the statement on Page 26 of the Topic Paper that the highest water efficiency standard that can be requested by local authorities is 110 l per person per day (pppd).

- We also agree that achieving 80lppd will require either rainwater harvesting and/ or greywater recycling. Both systems introduce significant maintenance requirements (and therefore cost) for homeowners and introduce technology that has not been tested 'en-masse'. Countryside's experience of trialling grey water recycling is that it is unreliable and likely to cause maintenance issues for homeowners
- Given the unreliability of greywater recycling Countryside believe the only practical mechanism to achieve the 80lppd would be through the use of rainwater harvesting systems which have the following constraints;
 - Such systems are more difficult for flats given that communal harvesting tanks (which are more expensive) would be necessary; and
 - Greater Cambridge is already one of the driest areas in the UK⁵⁰ and climate change is predicated to reduce rainfall in Greater Cambridge by 47% it is highly likely that rainwater harvesting will not capture sufficient rain to meet the policy target and will therefore be ineffective.
- Given the above, Countryside believe that the GCLP should implement the Government's technical standard for water efficiency for Policy CC/ WE which is 110 lppd. This would be viable, deliverable and achievable for all new dwellings within GC. Should technology such as grey water recycling become viable during the lifetime of the plan then this could be considered as a means to improve water efficiency beyond the target of 110 lppd.

Policy CC/ DC Designing for a Changing Climate.

- 3.26 This draft Policy introduces requirements to design buildings in accordance with the Good Homes Alliance Overheating in New Homes Tool and Guidance⁵¹. Countryside recognise the fact that all buildings will need to be designed to adapt to a warming climate and that, depending on the building type and location, this may necessitate the use of a range of measures as recommended in the Good Homes Alliance toolkit such as shading, thermal mass and different modes of ventilation. The policy requires new development to complete the Good Homes Alliance toolkit and implement the cooling hierarchy to minimise the impact of overheating.
- 3.27 Countryside believe that this policy may be ineffective as it requires each developer to implement the guidance in a manner that is appropriate for their site and which therefore may differ from one development to the next.
- 3.28 In January 2021, the Government confirmed the introduction of the FHS and also consulted on the introduction of a range of new building regulation requirements one of which was the introduction of an overheating testing requirement⁵² for residential

⁵⁰ <https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021-08/GCLP%20Climate%20Change%20Topic%20Paper.pdf>. Page 20, Section 5.1

⁵¹ <https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance.pdf>

⁵² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953752/Draft_guidance_on_heating.pdf

development. This will require all new homes to undergo modelling during detailed design to identify any impact from overheating and then implement mitigation measures accordingly.

- 3.29 As this requirement is proposed to be introduced with the revised changes to the Building Regulation in 2022, Countryside believes that the policy would be unsound on the basis that it is introducing an unnecessary additional burden on development given that it duplicates the requirement of the building regulations.
- 3.30 Countryside believe that to reduce the planning and administrative burden upon the housebuilding sector in Greater Cambridge, Policy CC/ DC should be deleted on the grounds that its objectives will be required via Building Regulations.

Policy CC/ CE: Reducing Waste and Supporting the Circular Economy

- 3.31 This policy places requirements upon new development to manage their waste and embrace the principles of the circular economy. The policy requires the following from new development proposals:
- The submission of a Construction Environmental Management Plan (CEMP) proportionate to the size and scale of development
 - Provision of adequate waste and material storage facilities on site in accordance with the RECAP Waste Management Design Guide (or successor)
 - Submission of a Circular Economy Statement with each application.
- 3.32 Countryside fully support the strategic objective of the policy in terms of its objectives to reduce waste and, perhaps more importantly, encourage circular economy principles in development. As explained earlier in these representations, reducing waste is one of our key objectives and one in which progress is clearly being made on our sites.
- 3.33 We fully support the requirement to submit a CEMP for our sites as this is something that we already commit to as part of our best practice approach to waste management and environmental protection.
- 3.34 With respect to the provision of waste management facilities on site, Countryside agree that the correct storage and handling of waste and raw materials is a critical step to responsible management of materials and the prevention of pollution. All of our construction sites deploy best practice measures for the prevention of pollution and provide facilities for the separation and recycling of waste. We therefore support this objective of draft Policy CC/ CE but would ask that the policy recognises that large housebuilders such as Countryside with large and efficient supply chains may use bespoke techniques and practices on site which are not referenced in any guidance but which fully comply with all legislation and best practice.
- 3.35 With respect to the submission of a circular economy statement, Countryside are happy to provide such information with an application although we would request that this is proportionate to the size and scale of the development in question.

Policy CC/ CS Supporting land-based carbon sequestration.

- 3.36 This policy will protect important land based carbon sinks such as peatland and woodland projects whilst encouraging new development to promote biodiversity and carbon sequestration.
- 3.37 We recognise the importance of peatlands and woodland to carbon sequestration and agree that these should be protected where possible. It is important to note however that with respect to new development, there can often be many carbon sequestration benefits associated with the creation of multi-functional green infrastructure and on-site planting which should be recognised when considering the overall ‘carbon performance’ of new development.
- 3.38 Countryside therefore believe that the draft policy should contain text to support new development if it can be demonstrated that the green infrastructure and woodland it provides will sequester carbon. We believe this should be recognised as one of the many environmental benefits that new development can provide.

Summary of representations

- 3.39 Countryside are pleased to provide our representations to the GCLP in order to ensure the policies are sound and deliverable and facilitate the delivery of much needed private and affordable homes within Greater Cambridge.
- 3.40 Countryside have a strong corporate commitment to positively address the causes of climate change and reduce our environmental impact and we believe we are making positive progress towards our targets.
- 3.41 We fully support many of the strategic objectives of the policy but do feel that some of the detailed targets and requirements within each policy (and specifically Policy CC/ NZ) will bring significant additional financial and technical burden to the house building industry and particularly those in the small, medium and self-build sectors. If the recommendations contained within these representations are implemented then we believe this will create a policy framework capable of meeting the significant demand for housing within the region.
- 3.42 We would be pleased to discuss our representations in greater detail with the joint authorities.

4. Land at Fen Ditton

- 4.1 Full details of Countryside’s interest at Fen Ditton are provided within the accompanying Vision Document. A summary is however provided here, for context of the comments provided on the consultation document.

Site Description and Context

- 4.2 The site at Fen Ditton is located south of the A14 on the north east of Cambridge. The site is in a highly accessible location by cycle, with a number of proposed sustainable transport improvements coming forward. In particular, the site is even at its eastern most extent less than 2 miles to Cambridge North (and under a mile at its closest) and to the Newmarket Road Park and Ride (with the eastern parcel being the closest and under a mile away) and less than 3 miles from the centre of Cambridge city and the Science Park. The site will also benefit from its proximity to the North East Cambridge development which will further enhance the sustainability of this area. There is also a good network of footpaths and cycle routes in the vicinity, with new ‘super’ cycleways proposed nearby providing a range of sustainable transport opportunities.
- 4.3 The site has good potential to become a sustainable extension to Fen Ditton that enhances the natural landscape assets and connects to sustainable movement corridors coming forward, whilst respecting the setting of the necklace village of Fen Ditton.
- 4.4 Land at Fen Ditton is characterised by the rich heritage architecture and landscapes within the Conservation Area that runs along the High Street and River Cam. The site is visually well contained from the wider landscape and Green Belt, with the A14 forming a visual detractor in the Green Belt. To the north of the of the A14 is the proposed site for the relocation of the Cambridge Waste Water Treatment Works (WWTW) which if consented would change the character of the landscape of this area and block long distance views towards the site.

The Proposed Vision

- 4.5 Development could take the form of a cluster of smaller settlements, collectively forming ‘The Dittons’, which would be set within and amongst its landscape, connected by a network of landscape and wild infrastructure, and not imposing on it. The site would benefit from its existing connectivity to Fen Ditton as well as to Cambridge City and its associated transport opportunities.
- 4.6 The Dittons would respect the existing Conservation Area and views to key listed buildings such as the Church tower. Development parcels could be carefully sized and placed so they do not compete with the historic necklace villages of Fen Ditton and Little Ditton. Each cluster will draw inspiration from character generators in the historic village and landscape, creating places that are distinctively local and beautiful.
- 4.7 There is an opportunity to improve the biodiversity of land currently within the Green Belt through connecting the fen edge to the riverine landscape with green corridors and a nature recovery network.

- 4.8 The proposals would establish a green link from Milton Country Park, across and through the site, linking with High Ditch Road and the Marleigh development to the south and beyond to the regeneration at Cambridge Airport.
- 4.9 Landscaping along the A14 would be reinforced to form a robust and defensible edge to the Green Belt and transition to the wider landscape.
- 4.10 The new community at Fen Ditton will cater to a wide range of families and individuals by facilitating flexible lifestyles and choices. Including opportunities to work from home or shared co-working spaces, creating vibrant spaces and a work-life balance. Co-locating schools and care services with community spaces, flexible working and mixed-uses, will create better connected communities that shorten the commute and take the juggle out of people’s daily lives.
- 4.11 The land at Fen Ditton provides the opportunity to create a happy and healthy community with infrastructure supporting community activity, health, education and quality of life.

Green Belt and Exceptional Circumstances

- 4.12 The western parcel of the site (assessed in the LUC Green Belt Assessment August 2021 as parcel FD4) is assessed as Very High; Moderate High harm for Green Belt Release. For the eastern parcel (FD5) this is assessed as Very High; High. We set out below the findings of the LUC Assessment and provide our own commentary.

Green Belt Purpose	LUC Assessment FD4	LUC Assessment FD5	Countryside Assessment
1 – to preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre	Land is open and is adjacent to Fen Ditton, which is nearly contiguous with Cambridge but which retains some distinction from the main City area. The parcel has some relationship with the urban area but also a degree of distinction from it. Overall, the parcel makes a relatively significant contribution to Cambridge Purpose 1.	Land is open and is adjacent to Fen Ditton, which is nearly contiguous with Cambridge but which retains some distinction from the main City area. It has strong distinction from the urban area, which increases the extent to which development would be perceived as diminishing Cambridge’s compact character. Overall, the parcel makes a relatively significant contribution to	The site is located on the opposite side of Fen Ditton from the city of Cambridge. Whilst Fen Ditton benefits from the connectivity to the City it is a distinct settlement in its own right as recognised by the Council’s classification of Fen Ditton as a separate settlement in the settlement hierarchy. The proposals would be designed to positively respond to its relationship with Fen Ditton and its special character and heritage. The proposed development would round off the settlement of Fen Ditton creating a new defensible Green Belt

		Cambridge Purpose 1.	<p>boundary of the A14 and the landscaping which would be established in this area.</p> <p>Overall, the parcel is considered to make a weak contribution to Cambridge Purpose 1.</p>
2 - to maintain and enhance the quality of Cambridge's setting	Land comprises open farmland that has a strong distinction from the edge of Fen Ditton, meaning it contributes to an open rural setting that is fundamental to the character and identity of the village. Land also contributes to the rural landscape setting experienced when approaching the wider city along Horningsea Road (B1047) from the north-east, creating positive perceptions of the city on arrival. Overall the parcel makes a relatively significant contribution to Cambridge Purpose 2.	Land comprises open farmland that has a strong distinction from the edge of Fen Ditton, meaning it contributes to an open rural setting that is fundamental to the character and identity of the village. Land also contributes to the rural landscape setting experienced when approaching the wider city along the A14 from the east and along Horningsea Road (B1047) from the north-east, creating positive perceptions of the city on arrival. Overall the parcel makes a relatively significant contribution to Cambridge Purpose 2.	<p>As set out in relation to Cambridge Purpose 1, Fen Ditton is a separate settlement to Cambridge city forming one of a necklace of villages around the city. The proposals would add to this necklace pattern of development and respond positively to the character, landscape and heritage of the area. As shown by the proposals in the Vision Document the development would integrate with the existing village and would create a new settlement edge. The proposals would be landscape led with significant areas of Green Infrastructure and public open space provided. This would include a landscaped edge along the A14 which forms a clear boundary between the settlement and the wider countryside, which would be further emphasised if the WWTW were to be consented and developed.</p> <p>Overall it is considered that the site would have a minimal impact on Cambridge Purpose 2 and through careful design could achieve a positive impact.</p>
3 - to prevent communities	The land is adjacent to Fen Ditton but there is no other	Land lies in a wide gap between Fen Ditton and Stow-	We support the conclusion that the western parcel

<p>in the environs of Cambridge from merging into one another and with the city</p>	<p>settlement close enough to be considered neighbouring. Overall, the parcel does not make a contribution to Cambridge Purpose 3.</p>	<p>cum-Quay, with the A14 transport corridor as a significant separating feature. Although the settlement gap is robust, there is strong distinction between the parcel and the inset area, which increases the extent to which development would be perceived as narrowing the gap. Overall, the parcel makes a Moderate contribution to Cambridge Purpose 3.</p>	<p>makes no contribution towards this objective. Whilst it is factually correct that the eastern parcel is closer to Stow-cum-Quay, there is a significant intervening distance and the clear barrier of the A14. As shown in the accompanying Vision Document, the built development is proposed to be set to the west of the abandoned railway line and would therefore be a comparable distance from Stow cum Quay as the consented and under construction WING development. Overall the site is considered to make no contribution to Cambridge Purpose 3.</p>
---	--	--	--

4.13 As has clearly been demonstrated, the site makes at most a minimal contribution to the Green Belt purposes. Release of the site from the Green Belt would create a new defensible Green Belt boundary and the proposals would respond positively to creating this new boundary.

4.14 In preparing the Greater Cambridge Local Plan the Councils have concluded that in their view they:

“do not consider our housing needs alone provide the ‘exceptional circumstances’ required in national policy to justify removing land from the Green Belt on the edge of Cambridge in this Local Plan, having regard to the identification of the proposed emerging strategy that can meet needs in a sustainable way without the need for Green Belt release.”

4.15 As set out in Section Two of this Report, it is considered that the Local Plan should be planning a more ambitious housing target and additional sites will be required to meet this higher housing target. In determining the distribution of development it is important that the Councils consider the appropriate distribution in order to achieve balanced sustainable growth across the Plan area which may include Green Belt release in certain locations. It is considered land at Fen Ditton would be an appropriate location for Green Belt release given its, at most, minimal contribution to the Green Belt purposes. It is considered that the proposed revised Green Belt boundary would create a defensible boundary which would endure beyond the plan period as required by the NPPF.

Response to the HELAA

- 4.16 The evidence base for the GCLP First Proposals document includes the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) (September 2021). Within the HELAA the site is assessed under two separate parcels: east of Horningsea Road (site reference 47647) and west of Ditton Lane (site reference 40516). The document provides a site assessment through a ‘traffic light’ colour coding, with both parcels receiving a ‘red’ outcome for suitability and ‘green’ for both availability and achievability.
- 4.17 The suitability assessment contains a number of issues that the Council have considered. These are set out within the table below, with comments provided in response to this on behalf of Countryside together with our revised assessment of the site when considered as a whole.

Issue	HELAA Assessment 47647	HELAA Assessment 40516	Countryside comments	Countryside assessment
Adopted Development Plan Policies			Whilst it is agreed that the site is currently outside of the development framework and within the Green Belt, these are both policy designations which are appropriate to be reviewed through the Local Plan process.	
Flood Risk			As identified by the HELAA the site is wholly within Flood Zone 1. Whilst less than 1% of the site lies in a 1 in 1000 year surface water flooding event, given the scale of the site this can be appropriately mitigated through the design of the development.	
Landscape and Townscape			It is disputed that the site is typical of	

The Fens landscape character. The western parcel of the site is adjoined by existing development on the southern and western boundaries with development set on the opposite side east of the B1047 and therefore is considered to read as part of the existing settlement. Whilst the eastern parcels are less enclosed by development they are separated from the wider landscape by the A14 and this will be increased by the WWTW if approved. The WING development has extended the built form of the settlement to the east and this will be further extended along the full length of the site boundary if the Marshalls site is developed. Furthermore it is notable that the Wicken Fen Vision and the Cambridge Nature Network both define the boundary of the Fen landscape as the A14 and then extending northwards. It is considered the proposed development will

		form a new and enhanced settlement edge which will be contained by the A14 as a defensible new Green Belt boundary.	
Biodiversity and Geodiversity		The proposed development would be landscape led and would achieve a minimum 10% biodiversity net gain. It is considered that the onsite biodiversity areas, which are the reason behind the different scoring of the sites, can be accommodated within the site and will form a strong landscape framework for the proposals. The proposals would allow for the ongoing management and maintenance of these features and therefore this would be a benefit of the proposals.	
Open Space / Green Infrastructure		As explained in the vision for the site above and the accompanying Vision Document, the proposals would deliver significant areas of open space and green infrastructure for the benefit of new and existing residents. This	

		would include connecting in to wider links.	
Historic Environment		The historic environment of Fen Ditton is a key feature of its character and the proposals would seek positively to respond to these and enhance them. It is therefore considered any impacts on the historic environment can be appropriately mitigated.	
Archaeology		It is recognised that the site could have archaeological potential and appropriate levels of assessment would be required in due course to inform the proposals. At this stage there is nothing to suggest that any archaeological remains could not be appropriately mitigated. Indeed the development of the site would have benefits through archaeological investigation in increasing understanding of the area.	
Accessibility to Services and Facilities		It is considered that the site is highly accessible to services and facilities both within	

Fen Ditton and through connectivity to the wider area including Cambridge City. The site will also benefit from its proximity to the North East Cambridge development and the further enhancements to the sustainability of the area that it will bring. The site is within 2 miles of Cambridge City centre and the transport opportunities as well as services and facilities that it affords. The site at Fen Ditton benefits from both the services and facilities of the village as well as a comparable level of accessibility to the City as an urban extension of the city. The proposed development would also benefit from the delivery of additional services and facilities within it and Countryside would look to engage with the Council, stakeholders and the local community on the nature of these services and facilities to complement the existing offer and

		mitigate the impacts of the proposals.	
Site Access		We support the conclusion that the proposed site access is acceptable in principle subject to detailed design. Whilst we note the reference to potential access constraints it is unclear what these are, and as the note from Mayer Brown confirms (Appendix One) appropriate access to the site can be achieved.	
Transport and Roads		As confirmed in the note from Mayer Brown (Appendix One) it is considered that the potential impacts identified are capable of being overcome. Countryside have a strong track record in promoting alternative modes to the private car and as set out in the Vision Document would seek to implement a range of measures as part of the proposed development.	
Noise, Vibration, Odour and Light Pollution		Given the commentary from the HELAA confirming that the site is capable of being developed subject to mitigation it is unclear why the	

			site has been scored as amber.	
Air Quality			As confirmed by the HELAA the site does not lie within an AQMA. The Council's anticipated impacts are dependent on the level of traffic generated. As set out above, it is considered that appropriate mitigation can be secured and will encourage sustainable modes of travel. It should be reflected that a greater quantum of development also brings the potential for a wider package of mitigation measures to be secured.	
Contamination and Ground Stability			The comments are noted but are considered to be capable of being overcome through appropriate assessment and mitigation.	
Constraints to Development	Agricultural Land Classification : 81% Grade 2; 19% Grade 3	Agricultural Land Classification: 58% Grade 2; 18% Grade 3; 24% Grade 4 Public Right of Way is on or crosses the site	The Council have acknowledged they will need to release greenfield land to accommodate development and this will therefore result in the loss of agricultural land. The Public Right of Way will be accommodated	

			within the proposals for the site.
Strategic Highways Impact			As confirmed in the note from Mayer Brown (Appendix One) it is considered that the potential impacts identified are capable of being overcome. Countryside have a strong track record in promoting alternative modes to the private car and as set out in the Vision Document would seek to implement a range of measures as part of the proposed development.
Employment	-	-	-
Green Belt – Assessment of Harm of Green Belt Release	- Very High; High	- Very High; Moderate High	We have considered Green Belt matters above and as such do not repeat this here.

4.18 It is therefore considered that the issues identified by the Council as being ‘red’ or ‘amber’ would not prohibit the allocation and eventual development of the site. All of these issues can be dealt with through the provision of additional information to a planning application or through mitigation as part of the development of the site. As such, the site is considered to be suitable for the development proposed, and the Council are therefore urged to reconsider the site for allocation as part of the Greater Cambridge Local Plan.

Appendix 1: Letter from Mayer Brown



10th December 2021

Letter sent via email only

Our Ref rg/cp.fenditton.1
Your Ref

Liz Connell
Countryside Properties
Countryside House
The Drive
Great Warley
Brentwood
Essex
CM13 3AT

Dear Liz

Land at Fen Ditton

Thank you for asking for an updated view in terms of the Transport Evidence for the Vision Document, in the context of the Local Plan consideration of the potential allocation, which is contained in the HELAA assessments, for which site references 47647 and 40516 provide a proxy for your proposed allocation.

I would note that in Transport terms, the HELAA concludes;

- (i) Regarding Site Access – that the access proposals are acceptable in principal subject to detailed design
- (ii) Accessibility to Services and Facilities – The site achieves the highest score available in the context of distances to Primary and Secondary Education, Healthcare facilities, employment and other facilities within the approving authority criteria
- (iii) Transport and Roads – the site is afforded an amber rating, but the report concludes that ‘any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.

In that context, there doesn’t seem to be any requirement to update the Transport section of the Vision document since the conclusions drawn are appropriate for Local Plan consideration.

I note as for all sites that are within this area of Cambridge, there is red Assessment in relation to the Strategic Highways Assessment, noting the lack of available capacity on the Trunk Road network. However, a way forward is clearly set out with the HELAA, stating ‘Sites would need to ensure no net increases in vehicle trips on the Strategic Highway Network.’

This would allow for a submission to be made in advance of any Local Plan Examination in Public, to National Highways demonstrating the net amount of vehicle trips the development might add to the Strategic Highway network, noting its high score in relation to accessibility to all services and any mitigating Trip Banking proposals, to meet the criteria of National Highways.

I would note that addressing the concerns of National Highways on sections of road, which they consider to be at or near capacity, has formed a significant part of your portfolio, including within this region, impacts at the MA11/A428 junction Cambridge, impacts at the M11 junction 8 Bishops Stortford, impacts at A12 junction 19 Boreham Interchange Chelmsford and impacts at A12 junction 21 Witham.

Mayer Brown Limited
Web: www.mayerbrown.co.uk

Woking (Head Office)
Tel: 01483 750 508
e: wokingoffice@mayerbrown.co.uk

Aldershot Office
Tel: 01252 329 603
e: aldershotoffice@mayerbrown.co.uk

Birmingham Office
Tel: 0121 224 7630
e: birminghamoffice@mayerbrown.co.uk

Bristol Office
Tel: 0117 925 1027
e: bristoloffice@mayerbrown.co.uk

Ilminster Office
Tel: 01460 259 731
e: ilminsteroffice@mayerbrown.co.uk

Isle of Wight Office
Tel: 01983 866 234
e: iowoffice@mayerbrown.co.uk

Leeds Office
Tel: 0113 385 4697
e: leedsoffice@mayerbrown.co.uk

London Office
Tel: 0207 874 1574
e: londonoffice@mayerbrown.co.uk





Page 2

We do not see this as a matter that cannot be addressed and indeed that appears to be conclusion of the HELAA.

Yours sincerely

Rebecca Godden
Associate Director

mobile
email

enclosure

cc.

Ian Mitchell

Mayer Brown

Turley Office
The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830