

13 December 2021

Greater Cambridge Shared Planning
Planning Policy Team
Cambridge City Council
PO Box 700
Cambridge
CB1 0JH

Our ref: 434

Submitted by email:

Dear Sir / Madam

Greater Cambridge Local Plan First Proposals Consultation: Representation on behalf of Mill Stream Developments

We act on behalf of our client, Mill Stream Developments, and have been instructed to submit this representation to the Greater Cambridge Local Plan First Proposals Consultation. We look forward to continuing to work with the Shared Planning Service as it prepares a new Local Plan for the Greater Cambridge area and would welcome the opportunity to comment on further iterations of the Plan.

We have previously promoted our client's site at Whaddon Road, Meldreth (west of The Burtons) through the Call for Sites 2019-20 process as part of preparation of the new Local Plan. The location and extent of the site may be seen at **Figure 1** below.



Figure 1. Extent of site at Whaddon Road, Meldreth, as promoted

As advised by the Planning Service website, given that our client's site has not been taken forward into the First Proposals, we comment further on this matter against the policy for allocations in the relevant

broad location. As also advised by the website, in addition to this representation, we will also be submitting updated information about our client's site via the online site information form (Ref: HSZXRQDM) for consideration at the next plan-making stage.

We acknowledge that advice on the Shared Planning Service website encourages respondents to avoid emailing comments or documents because officers will have to manually enter them into the consultation system and ascribe them to polices or sites. However, we submit this representation in letter form because this allows for a full response to be made on all relevant matters in one place. Comments relating to the proposed polices are in any event set out under relevant headings below.

This representation focuses on whether the new Local Plan, as progressing, would be capable of meeting the National Planning Policy Framework's (NPPF) four tests of soundness (which are: 'positively prepared', 'justified', 'effective' and 'consistent with national policy') at this stage in the development plan preparation process.

General Comments

Our client is generally supportive of the Plan's vision and overall aims as set out at Section 2 of the consultation document, and in particular with the aim to plan for enough housing to meet needs, including significant quantities of housing that is affordable to rent and buy, and different kinds of homes to suit diverse communities.

Policy S/JH: New jobs and homes and Policy S/DS: Development strategy

The First Proposals document supports the delivery of 44,400 new homes over the Plan period 2020 to 2041. This reflects an objectively assessed need for 1,771 homes per year to be built in the Greater Cambridge area and evidence showing a need to plan for about 550 additional homes per year to meet need for housing. The Plan explains that this is the number associated with the most likely future level of jobs and assumes that all the additional homes generated by forecast jobs above those supported by the Standard Method will be provided in full within Greater Cambridge.

The Plan's strategy is 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. The strategy proposes 19 additional sites for development, and states that these sites together with those already within the Cambridge City and South Cambridgeshire 2018 Local Plans, will be adequate to meet this housing need.

Addressing Housing Delivery

As set out above, the Plan's strategy proposes 19 additional sites for development, and states that these sites, together with those already within the Cambridge City and South Cambridgeshire 2018 Local Plans, will be adequate to meet this housing need. Figure 4 of the consultation document shows the proposed new housing allocations together with locations of additional new homes on existing allocated sites, locations for faster delivery of homes already planned, and currently planned development to be delivered by adopted allocations, existing permissions and windfall allowance.

The majority of the locations for proposed new housing shown on the Figure 4 illustrative map are large sites of 500 or more homes which will deliver a slower rate in the early years being less likely to make a contribution to housing completions within the first five years in comparison with smaller or medium sized sites. NPPF paragraph 69 states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.

We contend therefore that Policies S/JH and D/DS would not be sound on the basis because they would not be justified or effective. Our view is that for a housing delivery strategy to be effective, it will be

required to take into account all reasonable alternatives to deliver the right amount of housing in the right place, including further small and medium sized additional housing sites.

Rural Housing Needs

The First Proposals consultation document confirms that Greater Cambridge wants its rural villages to continue to thrive and sustain their local services but doesn't want to encourage lots of new homes in places where car travel is the easiest or only way to get around. The strategy is for some development in and around larger villages that have good transport links and services, and to support important employment clusters. In smaller villages, the two authorities will continue to support infill development and affordable housing on suitable sites, but that village growth is not proposed. The Plan explains that the evidence shows that villages should play only a limited role in meeting future development needs to support delivery of a range of smaller sites and support the vitality of our villages. Alongside rolling forward a number of existing housing sites, the consultation explains that a limited number of new sites for housing have been identified at more sustainable villages and a design-led approach has been taken to identifying housing capacity at these sites.

The development strategy proposes some development in the rural area south of Cambridge, the Rural Southern Cluster, where homes and jobs can be located close to each other and served by good quality public transport, cycling and walking links. In the rest of the rural area, the Plan proposes a very limited amount of development including small new sites for housing and employment at villages that have very good public transport access, to help our rural communities thrive.

The Plan acknowledges that providing a limited amount of development in the rest of the rural area can help meet the specific needs of specific employment sectors, support delivery of a range of types and sizes of housing across the Greater Cambridge area, and can support the social sustainability of villages and help support community aspirations but that this must be balanced with the implications for climate change of distributing development.

It is clear from Figure 4 (illustrative map showing the locations of proposed new housing development) that no new housing is proposed across the rural southwestern part of South Cambridgeshire except for housing allocations proposed at Melbourn: Moor Lane (up to 20 homes – site ML) and land to the west of Cambridge Road (up to 140 homes – site CR).

A considerable body of evidence demonstrates that there is a lack of affordable housing in rural areas across the UK and this is particularly acute in the Cambridgeshire. In South Cambridgeshire the affordability ratio of the 25% lowest house prices and 25% lowest incomes is 10.8 (September 2020, Housing Market Bulletin) is more than 3 times the level considered to be affordable. Failure to deliver an appropriate supply of new homes within this part of the Greater Cambridge rural area will mean that affordability will worsen.

We consider that for the housing delivery strategy to be effective, it will be required to take into account all reasonable alternatives to deliver the right amount of rural housing, the right type of rural housing and in the right place to meet local needs for this part of Greater Cambridge, including much-needed affordable homes. The absence of additional housing allocations within the rural southwestern part of South Cambridgeshire other than the two sites at Melbourn, means that Plan is unlikely to meet the specific housing needs of this part of Greater Cambridge.

Additional growth arising from Oxford-Cambridge Arc

The consultation document acknowledges that Greater Cambridge sits at the heart of several economic corridors including the Oxford-Cambridge Arc and that an Oxford-Cambridge Spatial Framework is in the process of being prepared by Government. Reference is made to the consultation undertaken in September and October 2021 which sought views on a vision for the Arc. The First Proposals

Consultation acknowledges that the outcome of the Oxford-Cambridge framework is unknown at this point but that it is hoped that by developing a clear and positive vision for the future of the Greater Cambridge area, the joint authorities will be able to shape the proposals.

Notwithstanding that the level of growth to be delivered in the Arc has yet to be quantified - a July 2021 statement by the Housing Minister clarified that the National Infrastructure Commission 2017 report target of up to one million new homes within the Arc is not Government policy - our view is that the development strategy proposed by Greater Cambridge is unlikely to be sound in terms of providing an effective housing strategy given the limited number of additional housing sites would be likely to be incapable of providing a sufficient level of flexibility to deliver additional growth which will come through the Oxford-Cambridge Arc.

Policy S/RRA: Site allocations in the rest of the rural area

This policy proposes to allocate sites for homes or employment that support the overall development strategy within the rural area, excluding the rural southern cluster. The policy includes two new housing allocations proposed at Melbourn (Moor Lane and land to the west of Cambridge Road) together with allocations at Caldecote to the west of Cambridge and Oakington to the northwest of Cambridge.

As we have commented above in respect of Policies S/JH and S/DS, we consider that for the housing delivery strategy to be effective, it will be required to take into account all reasonable alternatives to deliver the right amount of rural housing, the right type of rural housing and in the right place for this part of Greater Cambridge to meet local needs, including much-needed affordable homes. The absence of additional housing allocations within the rural southwestern part of South Cambridgeshire (other than at Melbourn) means that Plan is unlikely to meet the specific housing needs of this part of Greater Cambridge.

Assessment of our client's proposed housing site

Our client's site and 725 other sites with potential for residential and economic development were assessed as part of the Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) against a "RAG" scoring system. According to the HELLA, sites were deemed to be unsuitable if they were assessed as 'Red' against any of the criteria used, sites were deemed to be unavailable where there was no evidence that the site was available, or alternatively, there was evidence that the site was unavailable. Sites were deemed to be unachievable where it was considered there was no reasonable prospect that the site could be developed.

Section 6 of the Development Strategy Topic Paper (p165) explains the detailed rationale followed in the assessment of proposed site allocations submitted through the Call for Sites process. The Topic Paper indicates that evidence suggests that housing in the rest of the rural area outside the southern cluster can help support delivery of a range of smaller sites within the area and support the vitality of villages. The Topic Paper states that the approach adopted to identify new rural locations for housing was consistent for both the rural southern cluster and the rest of the rural area and included the following key criteria:

- Locations with sustainable access: Rural Centres and Minor Rural Centres, but also Group villages with very good Public Transport Access.
- Sites with a green or amber rating in the Housing and Employment Land Availability Assessment.

The Strategy Topic Paper indicates that other relative factors were also considered (but not necessarily defining a judgment) including account for parishes which already have lots of committed development with the aim for those sites to be built and the new community to bed-in before considering further development, informed by scale of village and committed development. A further factor was to consider

the support for community aspirations for development, including responses to recent engagement with parishes regarding the Call for sites which provided awareness of those parishes with aspirations for development. The Topic Paper also explains that for sites meeting above criteria, officers used judgement, Housing and Employment Land Availability Assessment information on site constraints and assessment of suitability, and awareness of sites' planning history to inform emerging proposed draft list of sites.

The assessment of our client's site not taken forward into the First Proposals, forms part of HELAA Appendix 4 (Part C) under site reference 55082. A copy of the assessment proforma is included at **Appendix 1** of this letter. The HELAA site assessment summary provides a red rating against 'suitable', with green ratings against both 'available' and 'achievable'. Breaking this down further, the site assessment criteria under 'suitable' were all scored as amber or green, with the exception of a red rating against the landscape assessment criterion. Notwithstanding that this red rating against 'suitable' was on the basis of impact of the site on rural countryside character, the assessment nevertheless concludes that a reduced development *"...may be acceptable subject to responding to the surrounding character and with landscape mitigation"*.

Although the proposed new housing allocations at Melbourn are both sites which were assessed with a green or amber rating in the HELAA, in terms of the key criteria applied, it is less clear how these sites fared better in sustainability terms than our client's site. Meldreth is well placed to supply additional rural housing given it is a Group Village that benefits from a train station and has good sustainable transport links to London and Cambridge. This contrasts with Melbourn which, although defined as a Minor Rural Centre one tier higher in the settlement hierarchy than Meldreth, does not have a station.

We continue to be of the view that our client's site represents a sustainable opportunity to deliver residential development with significant benefits and only very limited adverse impacts. The site is well located such that future occupants of dwellings would be able to walk to the village using the existing path through The Burtons, into West Way and then along the footpath of Kneesworth Road and Whitecroft Road into the centre of the village. A local bus stop is located on Kneesworth Road, just outside West Way and the train station is within 1,500 metres of the site and would therefore be in walking distance for future occupiers. Development of the site would therefore in an appropriate location to access the facilities of the village.

Our client continues to offer the entire site or, alternatively, part of the site for residential use including a minimum of 50% affordable homes across the entire site or 100% affordable homes on the partial site. Our client remains willing to do all he can to assist the Council in ensuring a development fulfils this role. The site would support NPPF paragraph 79 which states that to promote sustainable development rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Allocation of the site for new housing would also adhere to NPPF paragraph 69 which requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services. The site would also represent a small sized site capable of making an important contribution to meeting the housing requirements of the area, and would also be capable of being built-out quickly.

We consider that a potential impact on Landscape Character identified by the HELAA assessment could reasonably be addressed in design and layout terms, particularly in the context that the assessment concludes that a reduced development may be acceptable subject to responding to the surrounding character and with landscape mitigation.

Against this background, we would request that our client's site is included for consideration at the next plan-making stage.

Summary

We act on behalf of our client, Mill Stream Developments, and have been instructed to submit this representation to the Greater Cambridge Local Plan First Proposals Consultation. We look forward to continuing to work with the Shared Planning Service as it prepares a new Local Plan for the Greater Cambridge area and would welcome the opportunity to comment on further iterations of the Plan.

We contend therefore that Policies S/JH and D/DS would not be sound on the basis because they would not be justified or effective. Our view is that for a housing delivery strategy to be effective, it will be required to take into account all reasonable alternatives to deliver the right amount of housing in the right place, including further small and medium sized additional housing sites.

We consider that for the housing delivery strategy to be effective, it will be required to take into account all reasonable alternatives to deliver the right amount of rural housing, the right type of rural housing and in the right place to meet local needs for this part of Greater Cambridge, including much-needed affordable homes. The absence of additional housing allocations within the rural southwestern part of South Cambridgeshire other than the two sites at Melbourn, means that Plan is unlikely to meet the specific housing needs of this part of Greater Cambridge.

Our view is that the development strategy proposed by Greater Cambridge is unlikely to be sound in terms of providing an effective housing strategy given the limited number of additional housing sites would be likely to be incapable of providing a sufficient level of flexibility to deliver additional growth which will come through the Oxford-Cambridge Arc.

Finally, we continue to be of the view that our client's site represents a sustainable opportunity to deliver residential development with significant benefits and only very limited adverse impacts. Against this background, we would request that our client's site is included for consideration at the next plan-making stage.

We trust that you will consider our comments and respond accordingly.

In the meantime, we would welcome the opportunity to discuss the comments with you further should you find this of assistance. If you have any queries, please do not hesitate to contact me at this office.

Yours faithfully,

Ben Borthwick MRTPI
Associate Director

Enc.

Appendix 1: Extract of HELAA Appendix 4 (Part C) including site reference 55082

Greater Cambridge HELAA (2021)

Appendix 4: Proformas for all HELAA sites (Part C)

Land north east of Woodside, Longstanton, CB24 3BU	692
Land at Hazlewell Farm, Lolworth, CB23 8DS	698
East of bypass, Longstanton, CB24 3BW.....	704
Land to the south west of St Michaels, Longstanton, CB24 3BZ.....	710
Clive Hall Drive, Longstanton, CB24 3DT.....	716
Land south of Hattons Road, east of Home Farm Drive, Longstanton, CB24 3BW	721
Land to the east of Wilson's Lane, Longstanton, CB24 3DA.....	727
Longstanton: N of Hattons Road (Policy E/4(1)), CB24 3BW	732
Land at 92 Old North Road, Longstowe, CB23 2UB	738
Land and buildings off High Street, Longstowe, CB23 2UN	744
Land at Burnt Farm, High Street, Madingley, CB23 8AB.....	750
Land at Home Farm, Cambridge Road, Madingley, CB23 8AH	756
Land north of Whitwell Way, Coton, CB23 7PW.....	762
Land between New Road and Water Lane, Melbourn, SG8 6EQ	767
Land off New Road, Melbourn, SG8 6DL	773
East Farm, Bramley Avenue, Melbourn, SG8 6HG	779
9a Bridge Street, Whaddon, SG8 5SG.....	785
The Moor, Moor Lane, Melbourn, SG8 6FL.....	790
Land off Water Lane, Melbourn, SG8 6EQ.....	795
Land south of Cambridge Road, Melbourn, SG8 6EU.....	801
Land to the west of Cambridge Road, Melbourn, SG8 6EE	807
Land at Tostock Farm, Cambridge Road, Melbourn, SG8 6NH	813
Land North East of New Road, Melbourn, SG8 6FE	819
Land east side of Cambridge Road, Melbourn, SG8 6EY	824
Land to east of A505 and south of A10, Melbourn, SG8 6DH.....	830
Land to the west of Cambridge Road, Melbourn, SG8 6EU	836
Land to the west of Cambridge Road, Melbourn, SG8 6.....	842
Heydon Grange Golf Club, Fowlmere Road, Heydon, SG8 7NS	848
Heydon Grange Golf Club, Fowlmere Road, Heydon, SG8 7NS	855
Land adjacent to A10 and Royston Road, Melbourn, SG8 6DG	861
Land east of Station Road, Meldreth, SG8 6JP.....	867
44 North End and Land at Bury End Farm, North End, Meldreth, SG8 6NT	873
Land north of Kneesworth Road and west of West Way, Meldreth, SG8 6LL.....	879
Land at Chiswick End, Meldreth, SG8 6LZ.....	884
Land to the west of Fenny Lane Farm, Meldreth, SG8 6LP	889
Site on Whaddon Road, Meldreth (west of The Burtons), SG8 5RL	894
Land to the rear of 124 High Street, Meldreth, SG8 6LB.....	900
Willow Tree Stables, 110-112 Whitecroft Road, Meldreth, SG8 6LP	906
Land south of Melrose, Meldreth, SG8 6ND.....	911
Land off Whitecroft Road, Meldreth, SG8 6LS	916

Site on Whaddon Road, Meldreth (west of The Burtons), SG8 5RL

Site Reference: 55082

Map 529: Site description - Site on Whaddon Road, Meldreth (west of The Burtons)



Site Details

Criteria	Response
Site area (hectares)	1.25
Parish or Ward	Meldreth CP
Greenfield or previously developed land	Greenfield
Category of site	Dispersal: Villages / Transport Corridor
Category of settlement	Not within or adjacent to an existing settlement
Current or last use	Commercial/industrial
Proposed development	Residential, Market and affordable housing, Key worker housing, Older persons housing, Public open space
Proposed employment floorspace (m ²)	-

Proposed housing units	30-78
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Site Assessment Summary

Criteria	Outcome
Suitable	Red
Available	Green
Achievable	Green

Site Assessment

Suitable (Outcome = Red)

Issue	Assessment	Comments
Adopted Development Plan Policies	Amber	Outside Development Framework
Flood Risk	Amber	Flood zone: Wholly in Flood Zone 1 Surface water flooding: 2% lies in a 1 in 100 year event 14% lies in a 1 in 1000 year event
Landscape and Townscape	Red	National Landscape Character Area (NCA) 87: East Anglian Chalk Local Character: The Chalklands The site is atypical of the local character. The local character has a distinctive landform of smooth rolling chalk hills and gently undulating chalk plateau. A mostly large-scale arable landscape of arable fields, low hedges and few trees, giving it an open, spacious quality. Landscape Character Assessment (2021) Landscape Character Area - 4C: Hatley Wooded Claylands The site forms part of an L shaped parcel of scrubland. The site is outside of the Development Framework Boundary and therefore in the countryside. Preservation of the rural countryside character is important, and the site would essentially see development in the countryside. The range for the number of units proposed is far too high. A reduced development may be acceptable subject to responding

Issue	Assessment	Comments
		to the surrounding character and with landscape mitigation.
Biodiversity and Geodiversity	Amber	<p>All new housing developments will require assessment of increased visitor pressure on nearby SSSI. There are no apparent priority habitats within the site; however, there are grasslands, woodland areas, scrub, hedges, and wooded boundaries on site that are likely to have ecological value. Applications may find provision of a 10% net gain in biodiversity difficult within their red line boundaries and may need to find off-site compensation to comply with up-coming National legislation and developing local policies.</p> <p>Development of the site may have a detrimental impact on a designated site, or those with a regional or local protection but the impact could be reasonably mitigated or compensated.</p>
Open Space / Green Infrastructure	Green	Site is not on protected open space designation. Any impact of the proposed development could be reasonably mitigated or compensated.
Historic Environment	Green	Development of the site would have either a neutral or positive impact, but importantly not have a detrimental impact on any designated or non-designated heritage assets.
Archaeology	Amber	Post medieval features recorded on adjacent site
Accessibility to Services and Facilities	Amber	<p>Distance to Primary School: Greater than 1,000m</p> <p>Distance to Secondary School: Greater than 2,000m</p> <p>Distance to Healthcare Service: Greater than 2,000m</p> <p>Distance to City, District or Rural Centre: Greater than 2,000m</p> <p>Distance to Local, Neighbourhood or Minor Rural Centre: Greater than 2,000m</p> <p>Distance to Employment Opportunities: Less than or Equal to 1,800m</p> <p>Distance to Public Transport: Less than or Equal to 450m</p> <p>Distance to Rapid Public Transport: Less than or Equal to 1,800m</p> <p>Distance to proposed Rapid Public Transport: Greater than 1,800m</p>

Issue	Assessment	Comments
		Distance to Cycle Network: Greater than 1,600m Adequate accessibility to key local services, transport, and employment opportunities Proposed development would not require delivery of accompanying key services
Site Access	Amber	The proposed site is acceptable in principle subject to detailed design. There are potential access constraints, but these could be overcome through development.
Transport and Roads	Amber	The Highway Authority recognises that this site is already allocated within other Local Plans, which would have had a strategic transport test. The site will still require a full Transport Assessment at the planning application stage. The site will also need to deliver strategic transport infrastructure in order to allow the local highway network to accommodate the growth on the network caused by the site. Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.
Noise, Vibration, Odour and Light Pollution	Amber	The site is capable of being developed to provide healthy internal and external environments in regard to noise / vibration/ odour/ Light Pollution after careful site layout, design and mitigation.
Air Quality	Green	Site does not lie within an AQMA. Minimal traffic impact on AQMA.
Contamination and Ground Stability	Amber	Potential for historic contamination, conditions required.

Further constraints

Issue	Assessment	Comments
Constraints to development	-	Agricultural Land Classification: 100% Grade 2
Strategic Highways Impact	Green	Within Highways England Zone 10 - South West <2,000 dwellings / 5,000m2 employment - Capacity for growth

Employment	-	-
Green Belt – Assessment of Harm of Green Belt Release	-	Parcel ID: -

Available (Outcome = Green)

Question	Response
Is the site controlled by a developer or landowner who has expressed an intention to develop?	The site was submitted by the landowner and/or site promoter who has confirmed that the site is available for development in the timescales indicated.
Are there known legal or ownership impediments to development?	No
Is there planning permission to develop the site?	No relevant recent planning history
When will the site be available for development?	0-5 Years

Achievable (Outcome = Green)

Question	Response
Is there a reasonable prospect that the site will be developed?	The land has been promoted by the landowner and or developer and is known to be available for development. The site has a low existing use value and residential development is likely to be economically viable at an appropriate density.

Development Potential

Capacity and Delivery	Response
Estimated dwellings per hectare	36
Estimated dwelling units	45
Estimated employment space (m ²)	-
Estimated start date	0-5 Years

Estimated annual build-out rate (pa)	40-75
Development completion timescales (years)	0-5 Years