

24 February 2020
449385/AM



Greater Cambridge Shared Planning Policy Team

By email only to Localplan@greatercambridgeplanning.org

Andy Moffat



Dear Sirs,

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

Savills (UK) Ltd Planning Team are instructed by Hopkins Homes to make representations on the Greater Cambridge Local Plan Issues and Options Consultation.

This response covers consultation questions 2, 31, 39, 42 and 47.

Hopkins Homes made a submission for this site (Land at Bush Lane, Comberton) as part of the March 2019 Call for Sites. The consultation documentation makes clear that "There is no need to resubmit sites you have already provided to the Councils as part of the Call for Sites 2019". This submission does however include additional information relating to Green Belt and landscape appraisal, transport, heritage and biodiversity which should be read in conjunction with that earlier submission to demonstrate that the whole of the site is available, suitable and deliverable. This specifically addresses earlier comments set out at the time of the SHLAA (August 2013) including in particular highways and heritage matters. At that time it was concluded that the landscape impacts could be mitigated by retention of robust hedgerows and tree belt.

This submission sets out why a blended spatial strategy including 'Dispersal: Villages' should be adopted, and why Land East of Bush Close, Comberton is a logical and sensible site to help deliver that strategy.

As well as being read in conjunction with the March 2019 submission, this letter should be read in conjunction with the following accompanying documents:

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

Spatial Strategy

We consider that the strategy for locating new residential development should be a blend of the 6 identified options in the consultation. All have a role to play in helping meet the housing needs of Greater Cambridge whilst ensuring existing communities remain vibrant and preserving the most important aspects of our built and natural environment. Further development in villages such as Comberton, that has a Village College and sports facilities, Primary School, Surgery, Village Hall, Public House, two Churches, and a range of shops and employment opportunities should be a key part of a sustainable spatial strategy. Comberton has many

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of the attributes of a Rural Centre. Accessibility is also being improved as part of the Comberton Greenway and Cambourne to Cambridge Better Transport Projects – further details below.

Outline planning permission (S/2204/15/OL) for the erection of up to 90 dwellings, car park, football pitch and changing facilities was granted in October 2016 on land at the western end of the village and this land was allocated as part of the South Cambridgeshire Local Plan 2018 (Policy H/1:h) "to provide a flexible and responsive package of sites that will best meet identified needs (paragraph 2.34 of the Local Plan 2018)". An assessment of the proposed site is set out in more detail below, and demonstrates that allocation of the proposed site at Bush Lane would help deliver a flexible and responsive package of sites that will best meet identified needs in the next Plan period to 2040 without significant harm. Importantly, as the National Planning Policy Framework makes clear, different sized sites can make an important contribution to meet the housing need of an area and, to this end, a three year build programme is expected, with construction able to commence shortly after the necessary planning consent is secured.

The consultation sets out the following advantages and challenges of the 'Dispersal - villages' approach:

Advantages:

1. Can help to sustain existing facilities and infrastructure in the village.
2. Can help provide for a diversity of population in the village.

Challenges:

3. Can result in increased commuting by car, and travel to access to services and facilities, particularly if the village is away from main transport corridors.
4. Small sites are unlikely to significantly contribute to improvements to infrastructure so services capacity within or accessible to a particular village is important.
5. Potential impact on village character needs to be considered.
6. Some of the larger better served villages are surrounded by the Green Belt.

In addition, it is considered that such an approach as part of a blended strategy:

7. Would provide for a mix of small and medium sized sites which would help diversify the number and type of housebuilders and thereby speed up delivery.

Land East of Bush Close

In terms of these advantages and challenges, the East of Bush Close development would:

1. Help sustain existing facilities and infrastructure in Comberton, and ensure that it remains a vibrant community;
2. Provide for a diversity of population and more housing choice in the village, and in the eastern part of the village;
3. Take advantage of planned proposals as part of the Cambourne to Cambridge Better Transport Project, including the Waterworks and Scotland Farm Park and Ride options, and the improved cycleway links to Cambridge as part of the Comberton Greenway Project, to limit commuting by car;
4. Whilst Comberton already has a Village College (and has recently consulted on plans to increase the PAN from 240 to 270) and sports facilities, Primary School, Surgery, Village Hall, Public House, two Churches, and a range of shops and employment opportunities, the development could make contributions towards health and/or education if necessary to mitigate the impacts of the development.
5. Not have a significant impact on the village's distinctive character or setting as demonstrated by the submitted Heritage Technical Note, Green Belt Strategic Site Landscape Appraisal and indicative

masterplan – see further detail below. The development would provide a more sustainable and sympathetic boundary to the site and the overall settlement edge (paragraph 5.9 of the Green Belt Strategic Site Landscape Appraisal).

6. It is acknowledged that, before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the Councils should be able to demonstrate that they have examined fully all other reasonable options for meeting the identified need for development (paragraph 137 of the NPPF). It is though considered important for a review of the Green Belt boundary to be part of the preparation of the Local Plan. When drawing up or reviewing Green Belt boundaries, paragraph 138 of the NPPF highlights the need to promote sustainable patterns of development. This needs to include maintaining the vitality of the better served villages such as Comberton through the consideration of new allocations.

Furthermore and significantly, allocation and development of this site would provide more recognisable and more permanent boundaries to the Green Belt than at present (as advocated by Paragraph 139 of the NPPF). Paragraph 139 of the National Planning Policy Framework states that “When defining Green Belt boundaries, plans should: ...f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.” In this instance, the byway along the eastern boundary of the site and Tit Brook along the southern boundary are more recognisable and permanent physical features than the existing village boundaries (southern boundary of Swaynes Lane development and eastern boundary of Bush Close development).

The Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The submitted Green Belt Strategic Site Landscape Appraisal sets out a detailed analysis of the site and concludes in Table 1 that the site makes only a limited contribution to Green Belt purposes. The report concludes at Paragraph 3.19 that “...the Site could be released from the Green Belt and that a sensitively designed residential development can be successfully integrated into the Site without resulting in unrestricted sprawl or significant encroachment into the wider Green Belt with the enclosure provided by the existing robust mature vegetation and nature of the landform any development within the Site would have no effect on the openness of the wider Green Belt”.

In terms of the functions of the Green Belt, in particular, the enclosure provided by the byway and brook would restrict the extent to which the proposal would be perceived to ‘sprawl’; the development would not lead to towns (or any settlements) merging into one another; and through the proposed landscaping that could be incorporated into the development, development could ensure that the setting and special character of Comberton and Cambridge are, as a minimum, preserved. Moreover, as part of a blended strategy that included urban regeneration to meet the identified need, the release of Green Belt land in this location would not prejudice urban regeneration.

7. In summary, a development of circa 100 dwellings as part of a blended spatial strategy provides the opportunity for diversification in the number and type of housebuilders to ensure timely delivery of the housing required.

Highways

At the time of the SHLAA (August 2013), SCDC were not satisfied that it was possible to provide safe highway access to the site linked to the adopted public highway. The submitted Technical Note 01 – Transport and Highways demonstrates that safe highway access to the site can be provided and that the

existing Byway Open to All Traffic (BOAT) can be upgraded to provide a link to the surfaced road providing access to Thornbury.

Heritage

The submitted Heritage Technical Note demonstrates that there are no overarching heritage constraints that would preclude the allocation of the site, and that the whole of the site could be developed. Whilst the southern part of the site is the most sensitive part, having the fullest views of the Grade I listed Church of St Mary, sensitive development here utilising larger, detached dwellings, surrounded by a greater extent of open space and planting, and with views retained through to the Church “is likely to minimise any harm, or potentially remove it entirely” (paragraph 6.5 of the Note).

Ecology

A Phase 1 Ecology Report has been carried out by Aspect in January 2020, which concludes that the site itself, comprising a single grassland field is unlikely to comprise an important ecological feature and should therefore not form a constraint to development. Any habitats of elevated value are restricted to the site boundaries.

The Phase 1 Ecology Report identifies potential for a small number of faunal species, and therefore further Phase 2 surveys would be undertaken in the event that a planning application is progressed. In the event that species are found, the report identifies appropriate mitigation that could be implemented. It also highlights the potential for ecological enhancements on the site, which could include:

- Native planting along retained hedgerows to increase species richness. Diverse native grassland could be created adjacent to these hedgerows and watercourse to increase their functional width as wildlife corridors;
- Incorporating wildflower grassland within SuDS basins, whilst the opportunity to incorporate permanent standing water should also be explored;
- Incorporating high yielding nectar and pollen species within the planting strategy;
- Incorporating within the landscaping strategy, plant species that absorb pollution;
- Incorporating planting strips along bases of buildings;
- Incorporating appropriate native planting within amenity areas and shared spaces;
- Incorporating ground-level cut-outs in garden fences for Hedgehogs;
- Incorporating bat roosting and bird nesting opportunities within new buildings / on retained trees;
- Incorporating bee bricks within new buildings, providing nesting opportunities for solitary bees;
- Incorporating bug hotels, brush piles and refugia within areas of open space, providing nesting and sheltering opportunities for a range of species including invertebrates and reptiles; and
- Incorporating bat-sensitive lighting.

As such, there are not considered to be any ecological constraints that should prevent this site from being allocated for residential uses.

Utilities and Flood Risk

Utilities

The site is within close proximity to existing statutory provider assets in order that the site may be serviced by electricity, water and telecommunications.

There are existing overhead HV cables the cross the development site which would be diverted below ground as part of the development. This will provided for the point of connection of HV to serve a substation which would provide low voltage supply to the site. The exact point of connection details would be confirmed with UKPN.

There are existing water mains present along the B1046 and within the existing byway. The site would take the nearest point of connection to the existing water mains and via zonal charging, any required reinforcement would be delivered by Cambridge Water as the statutory undertaker of these mains.

For sites over 30 units Openreach provide connection of fibre to the property (FTTP) at no cost to the developer.

There is no gas available in Comberton therefore all heating and hot water will be provided via other means, potentially air source heat pumps.

Drainage

Foul Water - There are existing foul water sewers present within the access road to Thornbury and on the B1046 which could provide a point of connection for the site. Anglian Water will be consulted to confirm the exact point of foul water connection and any reinforcement work required will be undertaken by Anglian Water via zonal charging.

Surface Water – At present the site is a Green field and therefore the natural drainage mechanism has been reviewed. Currently the site falls generally towards the Tit Brook and the brook forms the southern boundary of the site. The Greenfield runoff rate will be assessed and proposed surface water flows will be directed to the brook at a maximum discharge rate to reflect that of the present greenfield runoff. As such, attenuation of flows will be provided in the form of an open basin SuDs feature along with additional SuDs solutions where space permits to store flows over and above the greenfield discharge up to a critical design storm event of 100yr + 40% climate change, with adequate freeboard to accommodate a further 10yr storm within 24 hours. Water quality will be controlled using SuDs features such as swales, permeable paving and filter drains, and will be determined further as the drainage strategy is developed.

Flood Risk

Based on the Environment Agency flood mapping for fluvial and coastal flooding the site is located within Zone 1 and is at a low risk of flooding. Surface water flooding of the site has also been considered and there are extents of low risk surface water flooding along the northern and southern boundaries of the site along with small isolated areas of high risk. In order to manage flood risk for the proposed development the development proposals will avoid the areas of surface water flooding as far as is practicable. Where necessary floor levels will be raised above existing levels to prevent flooding of properties and necessary compensation volume provided. In the most part the depth of surface water flood is below 300mm.

Conclusions

Consultation question 31 – The Local Plan should help to meet the needs for the amount and types of new homes required through adoption of a blend of the 6 identified options in the consultation.

Consultation question 39 – Land should be removed from the Green Belt if evidence shows it provides a more sustainable development option, including adopting new boundaries utilising physical features that are more readily recognisable and likely to be more permanent than existing boundaries (paragraph 137 of the NPPF).

Consultation question 42 – The Local Plan should include new development in those villages like Comberton with a good range of facilities, services, and good and improving accessibility.

Consultation question 47 – Growing villages like Comberton with a good range of facilities, services, and good and improving accessibility should be part of the development strategy.

Consultation question 2 – taking account of its impacts and opportunities for mitigation and indeed enhancements, it is clear and has been demonstrated that allocation and development of the land East of Bush Close, Comberton would deliver sustainable development and should be part of the development strategy in the new Local Plan.



Should you have any queries concerning the contents of submission please do not hesitate to contact me.

Yours sincerely

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