

Greater Cambridge Local Plan – Issues & Options Consultation (January 2020)
Final Representations
North Barton Road Landowners Group (North BRLOG)

Introduction

This note sets out the final representations to the Issues & Options consultation to the Greater Cambridge Local Plan including the Sustainability Appraisal of Issues & Options December 2019 (prepared by LUC).

The following reports will be submitted alongside and in support of the representations:

- Vision Document (David Lock Associates)
- Landscape and Visual Appraisal and Green Belt Review (The Landscape Partnership)
- Initial Noise Assessment (WSP)
- Air Quality Constraints Report (WSP)
- Archaeological Desk Based Assessment (Cambridge Archaeological Unit)
- Preliminary Ecological Appraisal (The Landscape Partnership)
- Flood Risk and Drainage Appraisal (Peter Brett Associates)
- Greater Cambridge Housing Trajectory Analysis (Bidwells)
- Greater Cambridge Housing Market Economics Analysis (Bidwells)
- Initial Heritage Impact Assessment (Bidwells)
- Greater Cambridge Housing and Economic Development Needs Assessment (Iceni Projects Ltd)
- Transport Technical Note (WSP)

The Vision Document incorporates the conclusions and recommendations of all of the other technical reports. The conclusions and recommendations of the technical reports are referred to in the responses to relevant Issues & Options consultation questions.

The final version of the representations will be uploaded to the Council's online consultation system.

Questions

1. How do you think we should involve our communities and stakeholders in developing the Plan?

The Issues & Options consultation material and publicity seeks to encourage a wide range of individuals and organisations to respond, all of which is positive and to be welcomed. It should be acknowledged that feedback from local communities and organisations is only one of the factors that should inform decisions about the strategy and policies for emerging Greater Cambridge Local Plan (GCLP). For example, national planning guidance, technical evidence and feedback from statutory consultees will have a key role in informing decisions, and it would not be a sound approach to ignore these other factors. It will also be important that the emerging GCLP fully meets the development needs of businesses and organisations, and residents in terms of housing, employment space and community/social needs.

2. Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan. Provide as much information and supporting evidence as possible.

Land north of Barton Road in Cambridge (referred to as South West Cambridge) was promoted to the call for sites process in March 2019. A number of technical documents have subsequently been prepared for the site and are submitted with these representations to the Issues & Options consultation. The findings of the site-specific technical reports are referred to in response to some of the consultation questions.

3. Please submit any sites for green space and wildlife habitats you wish to suggest for consideration through the Local Plan. Provide as much information and supporting evidence as possible.

The promoted development at South West Cambridge would include a comprehensive new green infrastructure network in conjunction with a landscape-led urban extension. The promoted development would include open space and sports pitches, a new country park with potential connections to Coton Countryside Reserve, wildlife areas, biodiversity enhancement, and strategic landscaping. It will be a development characterised by its strong environmental characteristics and will embrace fully the principles of natural capital.

4. Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?

Agree. This accords with paragraph 22 of the National Planning Policy Framework (NPPF 2019) which advises that strategic policies should look ahead over a minimum 15-year period from adoption.

5. Do you think we have identified the right cross-boundary issues and initiatives that affect ourselves and neighbouring areas?

Yes. The identified cross-boundary issues are highly relevant. However, it is requested that employment matters are included as cross-boundary issue to be discussed with neighbouring authorities (in Section 3.6.5). Employment matters are identified as a strategic matter in Paragraph 20 of the NPPF, and should be subject to the duty to cooperate (see Paragraph 24). The reason why employment matters are particularly relevant is that Cambridge and its immediate surroundings are a focus for employment development which has an impact on commuting patterns, but because of limited supply compared to demand, high housing costs (buying and renting) in the City and affordability issues generally it is difficult for residents in neighbouring areas to live closer to where they work.

6. Do you agree with the potential big themes for the Local Plan?

Disagree. The four potential big themes are related to the social and environmental objectives of sustainable development and are supported. However, there is no economic theme, despite the fact that the Cambridge and Peterborough Devolution Deal commits the authorities in the area to planning to double economic output by 2040 and Greater Cambridge will have a significant role in delivering that commitment. It is requested that the emerging GCLP must include a specific economic theme.

It is requested that the relationship between the big themes and the overarching theme of sustainable development is however further explained in the emerging GCLP. It is also suggested that additional issues are referred to under the well-being and social inclusion theme.

Paragraph 8 of the NPPF identifies the three overarching objectives of sustainable development (economic, social and environmental), and notes that these objectives are interdependent and suggests that they need to be pursued in mutually supportive ways. The NPPF is clearly framed such that sustainable development is the overarching theme of the planning system to which all other themes relate. It is requested that sustainable development is identified as the overarching theme, to be consistent with the approach in Paragraph 8 of the NPPF, and in order to avoid one of the identified big themes (and the requested additional economic theme) being given greater importance than another; in the response to Question 7 it is suggested that the big themes are not prioritised.

It is noted that the social strand of sustainable development (contained in Paragraph 8 of the NPPF) specifically relates meeting housing needs with strong, vibrant and healthy communities. There are substantial affordability issues in Greater Cambridge associated with the high cost of buying and renting housing, and those that cannot afford to live in Cambridge or South Cambridgeshire close to employment opportunities having to endure longer and unsustainable commuting. Therefore, it is requested that meeting housing and affordable housing needs in a sustainable manner is specifically referred to in the well-being and social inclusion theme.

7. How do you think we should prioritise these big themes?

We don't. It is inappropriate to seek to prioritise these big themes. All of the themes fall within and under the overarching theme of sustainable development and represent the three objectives of sustainable development. As stated in Paragraph 8 of the NPPF, *"Achieving sustainable development means that the planning system has three overarching objectives [economic, social and environmental], which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):..."*. Therefore, national guidance expects all of the objectives of sustainable development to be considered jointly, with no priority given to one objective over another. The emerging GCLP will need to balance all three objectives of sustainable development, and as such balance all of the big themes too.

8. How should the Local Plan help us achieve net zero carbon by 2050?

Carbon Neutral Cambridge identifies a number of actions to achieve net zero carbon, which in summary are as follows:

- buildings – to reinstate zero carbon standards and require new buildings to be energy efficient;
- transport – to phase out the use of petrol and diesel vehicles and improve facilities to encourage the use of public transport, walking and cycling; and
- energy – to use low carbon and renewable energy. It is acknowledged that there are social, economic, ecological, and health benefits associated with a policy of net zero carbon.

It is anticipated that the emerging GCLP will include policies to deliver net zero carbon. It is expected that decisions about the development strategy and which sites to allocate for development will also reflect the vision to achieve net zero carbon. It is considered that the emerging GCLP should support the following to achieve net zero carbon:

- residential development that is located close to employment opportunities;
- development that is accessible by walking, cycling and public transport;
- development that provides green infrastructure including wildlife areas; and, development that includes high sustainability standards.

It is considered the promoted development at South West Cambridge is a prime example of a prospective development that could contribute towards the net zero carbon aims and would represent a far more sustainable option than one based on dispersal of housing growth.

9. How do you think we should be reducing our impact on the climate? Have we missed any key actions?

The suggested mitigation measures identified in Section 4.1.3 of the Issues & Options consultation document are supported. It is considered that the selection of suitable development sites which could deliver those climate mitigation measures will be key to reducing the impact on the climate. The promoted development at South West Cambridge is an example where the identified climate mitigation measures could be delivered.

10. Do you think we should require extra climate adaptation and resilience features to new developments?

Yes. There may be opportunities to incorporate additional climate adaptation and resilience features into new development, but it is more likely that those opportunities will emerge at detailed design stage and on a site by site basis. It is also likely that new solutions and good practice examples will emerge during the plan period for emerging GCLP.

11. Are there any other things we should be doing to adapt to climate change? We want to hear your ideas!

It is requested that the policies in the emerging GCLP are consistent with national guidance on adapting to climate change.

12. How should the Local Plan help us improve the natural environment?

Natural Cambridgeshire has a vision to double nature by 2050 and has produced a 'Developing with Nature Toolkit' to achieve the aim of a net gain in biodiversity through new development. The Toolkit identifies ten actions for nature, which relate to the following:

- site selection;
- strategic planning and design of developments;
- appoint professional ecological expertise;
- understand context of development site within landscape and ecological networks;

- plan green and hard infrastructure at the same time; provide sustainable drainage systems; undertake an audit of green infrastructure including biodiversity;
- demonstrate a clear rationale for landscape design and species selection;
- provide the full range of breeding sites, shelter and all year round food resources; and
- demonstrate continuity of management of important natural features.

It is noted that Natural Cambridgeshire's vision and toolkit acknowledge the role that development has in supporting the delivery of net biodiversity gain. It is agreed that development, and in particular large-scale development with sufficient land available, can deliver significant biodiversity enhancements. It is suggested that in deciding which sites to allocate for development, the emerging GCLP assesses not only whether the potential impacts on protected species and habitats can be mitigated but also whether development can deliver biodiversity enhancements.

The promoted development at South West Cambridge would include a new country park with potential connections to Coton Countryside Reserve, wildlife areas and strategic landscaping. It would retain and enhance existing ecological features on the site and provide biodiversity enhancement including a new wetland habitat at Bin Brook which, in addition, would also retain floodwater. It is considered that the promoted development would score very well against the nature matrix system in the 'Developing with Nature Toolkit'. A Preliminary Ecological Appraisal (prepared by The Landscape Partnership) is submitted with these representations.

13. How do you think we should improve the green space network?

It is considered that one approach to improving the green space network is to create significant new green spaces within strategic developments. The selection of suitable strategic sites within the emerging GCLP provides an opportunity to create new green spaces that connect with existing spaces and the surrounding countryside; new spaces would provide alternatives to existing green spaces and divert and reduce recreational pressure from those spaces.

The promoted development at South West Cambridge would include a comprehensive new green infrastructure network in conjunction with a landscape-led urban extension, including a new country park with potential connections to Coton Countryside Reserve and an extensive green corridor from Cambridge to the surrounding countryside.

A Vision Document and Masterplan for the promoted development at South West Cambridge is submitted with these representations.

14. How do we achieve biodiversity net gain through new developments?

The response to Question 12 refers to Natural Cambridgeshire's 'Developing with Nature Toolkit', which aims to achieve the aim of a net gain in biodiversity through new development. The Toolkit acknowledges the role that development has in supporting the delivery net biodiversity gain. It is agreed that development, and in particular large-scale development with sufficient land available, can deliver significant biodiversity enhancements. It is suggested that in deciding sites to allocate for development the emerging GCLP assesses not only whether the potential impacts on protected

species and habitats can be mitigated but also whether development can deliver biodiversity enhancements.

The promoted development at South West Cambridge would include new accessible parkland and green infrastructure with potential connections to Coton Countryside Reserve. It would retain and enhance existing ecological features on the site and provide biodiversity enhancement including a new wetland habitat at Bin Brook which in addition would also retain floodwater. It is considered that this approach would result in significant net gain in biodiversity.

Cambridge Past Present & Future (CPPF) owns and manages the Coton Countryside Reserve, which involved taking land out of agricultural use to create habitats for wildlife including trees, hedges, orchards and meadows. It is considered that the proposed new wetland habitat within the promoted development at South West Cambridge would represent a continuation of the environmental work that CPPF undertakes at Coton Countryside Reserve; subject to discussions, the consortium behind these proposals would be amenable to the possibility of CPPF taking on the management of the wildlife and countryside areas within the promoted site at South West Cambridge.

15. Do you agree that we should aim to increase tree cover across the area?

Yes. It is noted that the existing adopted Tree Strategy is focussed on the protection and management of existing trees and will need to be updated. It is also noted that the Councils are actively promoting small local initiatives to plant additional trees, which is laudable, but is a limited approach and mostly involves public land. It is suggested that significant increases in tree cover is more likely to occur in conjunction with new strategic developments, which requires suitable sites being allocated in emerging GCLP.

The promoted development at South West Cambridge would retain the existing trees and hedgerows on the site, and would provide additional hedgerows and woodland planting, street trees, and a new community orchard including fruit trees.

16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?

As set out in the response to Question 6 it is suggested that meeting housing and affordable housing needs must be part of the well-being and social inclusion theme of the emerging GCLP, since housing falls within the social objective of sustainable development as contained in Paragraph 8 of the NPPF. There are substantial affordability issues in Greater Cambridge associated with the high cost of buying and renting housing, and those that cannot afford to live in Cambridge or South Cambridgeshire close to employment opportunities often have to endure longer and unsustainable commuting. Therefore, 'good growth' must include meeting housing and affordable housing needs within emerging GCLP by allocating suitable sites that can meet those needs in the most sustainable locations. It has long been recognised by the Councils that the most sustainable locations in the GCLP area are the City of Cambridge and its urban edge, and that these locations are preferable in these terms to dispersed growth including at new settlements.

As set out in Paragraph 8 and Chapter 8 of the NPPF the other factors that relate to the wellbeing and social inclusion theme are about creating well-designed and safe developments, providing access to services and facilities, and providing open space. It is suggested that the emerging GCLP will need to allocate suitable sites that are accessible to services and facilities or can provide those facilities on site; the promoted development at South West Cambridge includes a local centre and substantial areas of open space. It is also highly proximate to the City Centre of Cambridge and the wide range of services and facilities available there.

17. How do you think our plan could help enable communities to shape new development proposals?

It is anticipated that strategic allocations would be subject to detailed community involvement at supplementary guidance, pre-application, outline application and detailed design stages. It is both normal and good practice to undertake community engagement for large scale developments, and this should continue. The consortium behind the proposals at South West Cambridge would expect to fully consult on their emerging proposals.

18. How do you think we can make sure that we achieve safe and inclusive communities when planning new development?

Section 4.3.3 of the Issues & Options consultation document identifies the factors that are relevant to the creation of safe and inclusive communities. As set out in the response to Question 16, there are substantial affordability issues in Greater Cambridge associated with the high cost of buying and renting housing, and those that cannot afford to live in Cambridge or South Cambridgeshire close to employment opportunities having to endure longer and unsustainable commuting. It is considered that the emerging GCLP should be informed by a cogent development strategy that seeks to meet housing and affordable housing needs in full, and which prioritises the location of new housing closer to employment opportunities to assist in reducing unsustainable in-commuting.

It should be noted that the examining Inspectors for the Cambridge Local Plan 2018 and South Cambridgeshire Local Plan 2018 acknowledged that affordable housing needs within Greater Cambridge would not be met in full by the development strategy proposed at that time.

It was noted that developer contributions would provide for only half of the affordable housing needs in Cambridge (see Paragraph 37 of the Cambridge Inspector's Report) and that developer contributions would provide for affordable housing needs in full in South Cambridgeshire (see Paragraph 36 of the South Cambridgeshire Inspector's Report).

It should be further noted that the conclusions on whether affordable housing needs in South Cambridgeshire would be met was based on the assumption that all of the strategic sites would provide policy compliant levels of affordable housing, but as set out in the responses to Questions 44 and 46 below the strategic sites at Northstowe, Waterbeach, Cambourne West, and Wing (at Cambridge East) are not providing sufficient or policy compliant levels of affordable housing as intended; on this basis affordable housing needs in South Cambridgeshire will not be met.

In addition, it is noted that the strategic developments in neighbouring Huntingdonshire at Alconbury Weald and at St Neots East are also not providing policy compliant levels of affordable housing.

Therefore, affordable housing needs are not being met by current development strategies in Cambridge, South Cambridgeshire or in neighbouring Huntingdonshire. It is considered that this outcome is unacceptable in terms of delivering socially inclusive communities and meeting the affordable housing requirements of the area. It is requested that the development strategy for emerging GCLP seeks to meet affordable housing needs in full by allocating sufficient sites that are capable of delivering policy compliant levels of affordable housing.

19. How do you think new developments should support healthy lifestyles?

Paragraph 91 of the NPPF seeks to deliver healthy, inclusive and safe places, and identifies a number of approaches to support healthy lifestyles. It promotes social interaction through mixed-use developments, strong neighbourhood centres, street layouts that include pedestrian and cycle connections, and active street frontages for example. It enables and supports healthy lifestyles, by providing green infrastructure, sports facilities, local shops, access to healthier food, allotments, and layouts that encourage walking and cycling for example.

NHS England's 'Healthy Towns Initiatives' identified ten principles to deliver healthy places, which relate to the provision of health services, meeting local and community health needs, and development design matters. In terms of design matters it is suggested that compact neighbourhoods, active travel, healthy eating opportunities, play and leisure facilities would contribute towards the delivery of healthy places.

The promoted development at South West Cambridge would be consistent with guidance and initiatives to support healthy lifestyles e.g. it would include open space and recreation areas, a local centre, allotments and a community orchard, as well as numerous walking and cycling routes connected to the wider local existing infrastructure.

20. How do you think we should achieve improvements in air quality?

Paragraph 103 of the NPPF acknowledges the relationship between managing patterns of growth, reducing the need to travel and encouraging the use of sustainable modes of transport in order to reduce congestion and emissions and improve air quality. Paragraph 181 suggests that traffic and travel management and the provision and enhancement of green infrastructure may provide an opportunity to improve air quality.

It is considered that the selection of suitable development sites in emerging GCLP will be an important factor in improving air quality. For example, development sites which are accessible by walking, cycling and public transport would enable travel by sustainable modes of transport leading to reductions in congestion and emissions. The promoted development at South West Cambridge provides an opportunity to locate development where travel by walking, cycling and public transport are realistic, and the site would connect with planned sustainable transport infrastructure improvements. An Air Quality Constraints Report (prepared by WSP) is submitted with these representations, which concludes that development at the site would be acceptable in terms of air quality, and a buffer with the M11 is included in the submitted Masterplan.

21. How should the Local Plan protect our heritage and ensure new development is well-designed?

Chapter 16 of the NPPF provides guidance on preserving and enhancing heritage assets. As noted in Figure 17 of the Issues & Options consultation document the Greater Cambridge area has a significant number of Listed Buildings and Conservation Areas. The adopted Cambridge Local Plan 2018 and the adopted South Cambridgeshire Local Plan 2018 contain detailed policies that seek to protect heritage assets. There are adopted appraisals for most of the Conservation Areas in Greater Cambridge and additional heritage supplementary guidance. Therefore, heritage assets are already well protected. It is requested that the emerging GCLP includes similar policies to protected heritage assets that are consistent with national guidance.

22. How do you think we should protect, enhance and adapt our historic buildings and landscapes?

The impact on heritage assets is one of a range of matters that will inform decisions about which sites to allocate in emerging GCLP, and it is considered that good design can be used to protect heritage assets from harmful impacts; the promoted development at South West Cambridge is an example where heritage and landscape assets have been assessed and where they are not considered to be a meaningful barrier to new development, adopting sensitive layouts and designs.

An Initial Heritage Impact Assessment (prepared by Bidwells) and Landscape and Visual Appraisal and Green Belt Review (prepared by The Landscape Partnership) has been undertaken for the promoted development at the South West Cambridge site. The Masterplan for the promoted site has taken into account the significance and setting of the identified heritage assets and landscape character, in order to ensure that any impacts are mitigated wherever possible. In summary, the promoted development includes a substantial central east-west open corridor through the site which takes into account some of the primary viewpoints towards the City from the west, retains existing landscape features, and locates development to avoid potential adverse effects on the setting of landmark/taller heritage assets in the City. This approach of detailed heritage and landscape assessments followed by careful and sensitive design demonstrates that heritage and landscape assets within and on the edge of Cambridge can be protected in conjunction with a strategic site allocation at South West Cambridge.

23. How do you think we could ensure that new development is as well-designed as possible?

The NPPF and PPG provide guidance on design. Paragraph 124 stresses the importance of design in built development. Paragraph 127 identifies some aspirations for the design of new development. Paragraph 006 (Id.26) of the PPG provides further information on design in the planning process. It states:

“Design impacts on how people interact with places. Although design is only part of the planning process it can affect a range of economic, social and environmental objectives beyond the requirement for good design in its own right. Planning policies and decisions should seek to ensure the physical environment supports these objectives. The following issues should be considered:

- *local character (including landscape setting)*
- *safe, connected and efficient streets*
- *a network of greenspaces (including parks) and public places*
- *crime prevention*
- *security measures*

- *access and inclusion*
- *efficient use of natural resources*
- *cohesive & vibrant neighbourhoods*

It is suggested that the design policies in the emerging GCLP should closely reflect this national guidance. In addition, there are a number of design tools already in existence in Greater Cambridge e.g. Design and Conservation Panel, Design Enabling Panel and Design Workshops, and it is normal for design codes to be prepared for strategic sites. It is suggested that the existing approach towards assessing design matters for developments should continue.

24. How important do you think continuing economic growth is for the next Local Plan?

Very important.

A Housing and Economic Development Needs Assessment has been prepared by Iceni Projects Ltd on behalf of North BRLOG and is submitted with these representations. Paragraph 6.3 provides a summary of the local economy and states: *“The Greater Cambridge area is at the heart of the UK’s knowledge economy. It is an economy which has been growing rapidly over a sustained period and has further growth potential, focused in particular on some key sectors such as bioscience, digital/ IT and AI. The success and growth potential of the area is underpinned by the concentration of high-tech, knowledge-based businesses; the universities and research institutes based in Cambridge; an unrivalled skills base, with 60% of the workforce having degree level skills; an enterprise culture; and an ability to capture foreign direct investment and venture capital.”*

The National Infrastructure Commission, the Cambridge and Peterborough Combined Authority and the Greater Cambridge Greater Peterborough Enterprise Partnership also acknowledge and support the economic growth potential of the Greater Cambridge area.

The Cambridge and Peterborough Devolution Deal commits the authorities in the area to planning to double economic output by 2040. The Cambridge and Peterborough Independent Economic Review (CPIER) considered that *“the aim of doubling GVA in this area by 2040 is realistic, and will be achieved in part by attracting knowledge-intensive businesses which would not locate elsewhere in the UK. Success here is of national significance. But it will only be attained if there is more ambition with regard to the development of new housing, and a careful prioritisation of infrastructure projects.”* (CPIER Final Report, September 2018, Preface)

Therefore, Greater Cambridge is experiencing strong economic growth which is expected to continue into the future. The growth potential of the area is acknowledged at a national and regional level. There is already a commitment to substantially increase economic output. Therefore, it will be very important for the emerging GCLP to support economic growth in Greater Cambridge. In turn this will improve the life chances of those residing in the Greater Cambridge Area.

25. What kind of business and industrial space do you think is most needed in the area?

No comment.

26. Do you think we should be protecting existing business and industrial space?

No comment.

27. How should we balance supporting our knowledge-intensive sectors, with creating a wide range of different jobs? What kind of jobs would you like to see created in the area?

No comment.

28. In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry?

No comment.

29. How flexible should we be about the uses we allow in our city, town, district, local and village centres?

No comment.

30. What approach should the next plan take to supporting or managing tourism in Cambridge and the rural area?

No comment.

31. How should the Local Plan help to meet our needs for the amount and types of new homes?

The emerging GCLP will need to be consistent with national guidance on meeting housing needs. Paragraph 59 of the NPPF confirms the Government's objective to significantly boost the supply of housing, and to achieve this by ensuring that a sufficient amount and variety of land for housing is identified. Paragraph 60 expects the standard method to be used to determine the minimum number of houses needed. Paragraph 61 expects the size, type and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need, students, renters and self-builders. Section Id.2a of the Planning Practice Guidance explains how housing and economic needs assessments should be undertaken, including how to calculate local housing needs using the standard method. Paragraph 010 of Id.2a makes it clear that the standard method is the minimum starting point for determining local housing needs and acknowledges that there may be circumstances where actual housing need is higher than the standard method indicates. As set out in Paragraph 010 the circumstances where increases to housing need that exceed past trends are as follows:

- there is a growth strategy in place to promote and facilitate additional growth;
- strategic infrastructure improvements are likely to lead to an increase in the number of homes needed locally; and
- an authority has agreed to accommodate unmet housing needs from a neighbouring area.

As set out below, the first two circumstances are relevant to Greater Cambridge. Paragraph 024 of Id.2a explains how the need for affordable housing is calculated, and it is suggested that the overall housing target should be increased where it could help deliver the required number of affordable homes. As set out below, there is an urgent need to improve the affordability of housing and to boost affordable housing delivery in Greater Cambridge.

Therefore, the emerging GCLP should use the standard method to calculate the minimum local housing need, and then make appropriate adjustments taking into account the growth strategies and strategic infrastructure improvements identified for Greater Cambridge, and a further adjustment to ensure affordable housing needs are met.

Our response to Question 32 sets out the assessment of housing requirements undertaken for North BRLOG.

32. Do you think we should provide for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?

Yes. The 2018 Cambridgeshire and Peterborough Independent Economic Review (CPIER) identified that recent employment growth has been faster than anticipated, and the aim of doubling GVA in the area by 2040 was realistic. The predicted economic growth could be achieved by attracting knowledge-intensive businesses that would not locate elsewhere in the UK, by delivering new housing, and by prioritising infrastructure projects. The economic success of Greater Cambridge is of national significance. These factors support a significantly higher number of homes than would be derived from the use of the standard method.

A Housing and Economic Development Needs Assessment has been prepared by Icení Projects Ltd on behalf of North BRLOG and is submitted with these representations. The Report has examined the inter-related issues of economic growth, affordability and housing need in Greater Cambridge.

The National Infrastructure Commission, 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 that economic growth and address the significant housing affordability issues that exist.

The evidence in the Icení Assessment identifies a fundamental imbalance between rates of economic growth and housing delivery, which is leading to acute housing affordability issues. It is noted in the Report that median house prices are more than 11 times average earnings across the Greater Cambridge Area (with a higher ratio in Cambridge City). The undersupply of homes presents a fundamental challenge to the area's future economic growth because workers are being priced out of the area and firms in the Greater Cambridge area finding it increasingly difficult to recruit.

It is recommended in the Assessment that planning for housing should be based on a blended economic growth rate of 2.8% per annum i.e. based on short-term economic trends to 2031 and longer-term economic trends thereafter; this recommendation is consistent with the findings of the Cambridge and Peterborough Independent Economic Review (CPIER), the Cambridge and Peterborough Devolution Deal, and the Local Industrial Strategy for the area. It is common planning practice to seek to align housing and economic strategies. Cambridge and Peterborough Independent Economic Review

Icení's analysis demonstrates that 101,200 dwellings are required in the Greater Cambridge area between 2017 and 2040, which equates to 4,400 dwellings per annum.

It is acknowledged that this level of growth in housing is transformational, but so is the economic growth potential of Greater Cambridge and the scale of planned infrastructure investment.

33. What kind of housing do you think we should provide?

Paragraph 61 of NPPF expects the size, type and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need, students, renters and self-builders. As noted in the response to Questions 16, 18 and 46 the existing planned new settlements (Northstowe and Waterbeach) and other strategic sites (Cambourne West and Wing at Cambridge East) are not delivering policy compliant levels of affordable housing. As such, it is considered that the emerging GCLP should seek to allocate sites which are capable of delivering policy compliant levels of affordable housing; for example developments on greenfield land on the edge of Cambridge have sufficient residual value to meet affordable housing and other planning obligations.

The promoted development at South West Cambridge could provide a mix of house types, sizes and tenures, including housing and affordable housing for key workers (including but not limited to University and College staff) and residential accommodation for the elderly (including care provision). The fact that this site is owned by a consortium of Colleges and the University means that it would be in the landowners' interests to ensure that housing is provided to meet the needs of their students and research staff, and that those facilities could be managed by those institutions.

34. How should we meet the need for additional Gypsy, Traveller and caravan sites?

No comments.

35. How should we ensure a high standard of housing is built in our area?

As set out in the response to Question 23 above, national guidance on design already exists which should be reflected in design policies in the emerging GCLP. A number of methods are used in Greater Cambridge to ensure the delivery of high standards for housing e.g. Design and Conservation Panel, Design Enabling Panel, and Design Workshops. Therefore, the tools already exist to ensure a high standard of housing. In addition, it should be noted that a number of developments on the edge of Cambridge are award winning e.g. Eddington and Trumpington Meadows and provide examples of innovative design and solutions.

36. How should the Local Plan ensure the right infrastructure is provided and developed in line with growth?

It is considered that the selection of appropriate sites will be an important part to the successful delivery of infrastructure in conjunction with growth. It will also be important to consider the cost and availability of funding for the infrastructure required for development; the costs of providing initial primary infrastructure for larger strategic scale developments often means that less affordable housing is provided given challenging scheme economics. It is requested that the allocation of strategic sites in emerging GCLP is informed by the potential opportunity for those sites to support the delivery of infrastructure projects and also provide affordable housing.

The Greater Cambridge Housing Market Economics Analysis (prepared by Bidwells on behalf of North BRLOG) demonstrates that there is sufficient residual value from development sites on the edge of Cambridge to support infrastructure and planning obligations in full.

37. How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?

Paragraph 103 of the NPPF seeks to ensure that development is located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. Therefore, the site selection process for potential allocations in emerging GCLP will be an important part of increasing travel by sustainable modes of transport. It is considered that the site promoted by North BRLOG at South West Cambridge is well related to the sustainable transport projects to the west of Cambridge i.e. Cambourne to Cambridge Public Transport Corridor, the potential future Cambridge Autonomous Metro, Comberton Greenway and Barton Greenway. An urban extension at South West Cambridge would support the delivery of these transport infrastructure projects and increase access by walking, cycling and public transport. It is partly for these reasons that land at South West Cambridge should be allocated in the emerging GCLP. In addition, it is noted that Paragraph 138 of the NPPF suggests that sites which are accessible by public transport should be one of the preferred locations to be released from the Green Belt, where it has been assessed that a release is necessary; the promoted development at South West Cambridge would meet this requirement.

38. What do you think the priorities are for new infrastructure?

One of the priorities for new infrastructure should be improvements to transport. The Greater Cambridge Partnership is progressing a number of sustainable transport projects, including to the west of Cambridge i.e. Cambourne to Cambridge Public Transport Corridor, Comberton Greenway and Barton Greenway, and the Combined Authority is pursuing the Cambridge Autonomous Metro. As set out above, all of these projects are well-related to the promoted development at South West Cambridge and could support the delivery of these projects by providing land and/or funding for them.

39. Should we look to remove land from the Green Belt if evidence shows it provides a more sustainable development option by reducing travel distances, helping us respond to climate change?

Yes, undoubtedly. Paragraph 136 of the NPPF allows Green Belt boundaries to be altered through the plan-making process provided exceptional circumstances exist, and that those exceptional circumstances are based on evidence and are fully justified. Therefore, it is appropriate to consider whether to review Green Belt boundaries through the emerging GCLP.

Paragraph 137 requires plan-making authorities to examine all other reasonable options to meet identified development needs before considering whether exceptional circumstances exist to justify changes to Green Belt boundaries i.e. they should make as much use of previously developed land as possible, increase the density of development to the extent this is appropriate, and consider whether development needs could be accommodated in neighbouring areas. In the case of Cambridge increasing densities and reusing previously developed land is not straightforward and may be inappropriate because of heritage assets and the difficulty of finding alternative sites for existing uses. It is noted that the housing trajectory for Greater Cambridge already assumes that a substantial

number of previously developed sites would be redeveloped for housing, on sites where planning permission has been granted or are allocated in the Cambridge Local 2018. The examining Inspectors for the Cambridge Local Plan 2018 acknowledged the limited availability of options for residential development within the urban area in accepting the release of land from the Green Belt (at north and south of Wort's Causeway). The Inspectors acknowledged that exceptional circumstances existed, relating to the level of need for homes and jobs, to justify the release of three parcels of land from the Green Belt; two for housing and one for employment.

Paragraph 138 requires any review of Green Belt boundaries to consider the need to promote sustainable patterns of development, and that where the release of land from the Green Belt is necessary that priority is given to previously developed land or sites that are well-served by public transport.

As set out above, national guidance allows the release of land from the Green Belt through the plan-making process. It has previously been accepted that exceptional circumstances exist to release land from the Green Belt, which are related to housing and economic needs - see Paragraph 2.56 of the adopted Cambridge Local Plan 2018. As demonstrated in the Housing and Economic Development Needs Assessment (prepared by Icen Projects Ltd) submitted with these representations, there continues to be a significant need for housing and affordable housing in Greater Cambridge and a need to support economic growth related to local, strategic and national needs. Therefore, it is considered that exceptional circumstances still exist to justify the release of land from the Green Belt through the emerging GCLP.

The promoted development at South West Cambridge is an example of land that should be released from the Green Belt through the emerging GCLP in order to reduce travel distances and respond to climate change. For example, the promoted development is well-related to the significant employment site at West Cambridge (predicted in the recent 'densification' application to have scope for some 14,000 jobs) and other employment facilities in the City, thus enabling some residents to live closer to employment opportunities. The close proximity of the promoted development to employment opportunities and other facilities in the City would increase the likelihood of travel from the site by walking, cycling and public transport, with associated benefits for air quality. The promoted development would retain and enhance existing ecological features on the site and provide biodiversity enhancement including a new wetland habitat at Bin Brook, which in addition would also retain floodwater.

40. How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages?

There may be some scope for village development as part of an overall development strategy, but the priority must be to develop sites for jobs and homes in the most sustainable locations, meaning in the City of Cambridge and on its urban edge.

41. Do you think the Local Plan should be more flexible about the size of developments allowed within village boundaries (frameworks), allowing more homes on sites that become available?

No comments.

42. Where should we site new development?

As set out below, there are limited opportunities and constraints to development within the urban area of Cambridge, there are limited opportunities for development on the edge of Cambridge which are not in the Green Belt and those opportunities typically require the relocation of existing uses, and new settlements are complex and seldom provide policy compliant levels of affordable housing. The option of focussing development on the edge of Cambridge in the Green Belt and along public transport corridors are preferred; the promoted development at South West Cambridge would be consistent with both of these approaches.

43. What do you think about densification?

It is agreed that increasing densities at development in all locations (urban area, urban extensions, and new settlements etc.) is a valid policy approach. It is noted that Paragraph 117 of the NPPF encourages effective use of land and to make as much use as possible of previously developed land. Paragraph 122 supports the efficient use of land, and Paragraph 123 encourages higher densities particularly in areas where there is a shortage of land to meet identified development needs. However, there are a number of potential constraints to increasing densities and reusing previously developed land within Cambridge for the following reasons:

- higher density development including taller buildings might not be appropriate in some part of the urban area affected by heritage assets;
- the housing trajectory already assumes that a substantial number of previously developed sites would be redeveloped for housing, on sites where planning permission has been granted or are allocated in the Cambridge Local 2018. As such, there are few opportunities for additional development in the urban area that have not already been assessed and have some planning status in terms of an allocation or permission etc.; and
- previously developed sites in the urban area are typically occupied by an existing use, but redevelopment for housing cannot start until an alternative site for the existing use is found, which can often be difficult where land values are high.

Therefore, it is considered that higher densities within the urban area of Cambridge are not straightforward to achieve and are not always appropriate. In any event we do not consider that this approach would meet future development needs in full given the level of new housing we consider is required.

It is considered that higher density development would be appropriate for development on the edge of Cambridge, subject to an assessment of impacts on landscape setting and heritage assets; the Eddington development at North West Cambridge provides an example where higher densities are being provided, as part of a high quality development that provides a mix of house types and supports a range of services and facilities. It is considered that higher density development on the edge of Cambridge is consistent with the concept of maintaining a compact city and supports the use of sustainable modes of transport.

44. What do you think about developing around the edge of Cambridge on land outside the Green Belt?

There are two potential large-scale development opportunities on the edge of Cambridge which are not within the Green Belt and where development is likely to commence during the plan period for emerging GCLP; Cambridge Northern Fringe East and Cambridge East. Cambridge Northern Fringe East is allocated in the Cambridge Local Plan 2018 (Policy 15) and South Cambridgeshire Local Plan 2018(Policy SS/4) for a mixed use development. Cambridge East is also allocated in both Local Plans (Policy 13 in Cambridge and Policy SS/3 in South Cambridgeshire) for residential development and as safeguarded land for future development beyond 2031. It is acknowledged that these sites involve the re-use of previously developed land. However, the redevelopment of these sites is complex and involves the relocation of the existing uses. It is considered that the delivery of development at these sites will need to be realistic, taking into account all of the challenges that need to be overcome prior to the commencement of development - see Greater Cambridge Housing Trajectory Analysis (prepared by Bidwells on behalf of North BRLOG). It is also considered that the ability of these sites to deliver policy compliant levels of affordable housing should also be assessed fully - see Greater Cambridge Housing Market Economics Analysis (prepared by Bidwells on behalf of North BRLOG). For example, it is noted that the Wing development at Cambridge East is required to provide 30% affordable housing, against a policy requirement for 40%.

It is considered that, in order to improve housing affordability in Greater Cambridge, the emerging GCLP should allocate sites that can demonstrate that policy compliant levels of affordable housing can be delivered, and allocate additional sites to compensate for the under-delivery of affordable housing from some of the strategic sites.

45. What do you think about developing around the edge of Cambridge in the Green Belt?

This is strongly supported. As set out in our response to Question 39 national guidance allows the release of land from the Green Belt through the plan-making process, and that exceptional circumstances exist to release land which is related to the significant need for housing and affordable housing in Greater Cambridge and the need to support economic growth. Our responses to Questions 43, 44 and 46 comment on the other spatial distribution options. For example, higher densities within the urban area of Cambridge is not straightforward and is not always appropriate because of heritage impacts, and this approach would not meet future development needs in full. The experience of new settlements and the redevelopment of previously developed land on the edge of Cambridge demonstrates that these options do not deliver policy compliant levels of affordable housing, and in the case of new settlements these types of development typically have much longer lead-in times than originally predicted. Therefore, releasing land from the Green Belt on the edge of Cambridge is a realistic option. It is considered that in reality the development strategy will be based on a combination of spatial distribution options.

North BRLOG promoted land at South West Cambridge through the call for sites process for the emerging GCLP for a landscape-led urban extension to Cambridge. The aim for the promoted development is to deliver a high-quality development with high sustainability standards, and delivering a net gain in biodiversity. North BRLOG are committed to such aims and their long-term stewardship of the site will assist in delivering these.

The promoted development contains the following mix of uses:

- Between 2,500 and 2,800 dwellings including market and affordable/social housing with a range of tenures and densities to include housing for University and/or College staff, housing for elderly people (including care) and student accommodation;
- a comprehensive new green infrastructure network comprising open space and sports pitches, a new country park with connections to Coton Countryside Reserve, wildlife areas and biodiversity enhancement, and strategic landscaping including new woodland planting;
- Creation of new flood meadows and the potential re-wilding of Bin brook in certain locations to enhance capacity and its ecological benefits;
- A green landscape edge to the M11 to provide a landscape setting to the South West of Cambridge;
- a community facility including primary school, community centre, health centre;
- a neighbourhood centre including food store and other shops, services and facilities; to serve the local community, nearby residents and the West Cambridge campus;
- enhanced pedestrian and cycle connections to the existing and planned walking, cycling and public transport network in the local area, and a development which places the needs of pedestrians and cyclists ahead of car users;
- a network of streets and spaces that are diverse in their function and character;
- a public transport corridor that will link the site with other service and routes and to other City destinations;
- high levels of energy performance in building design that follows best practice in energy and carbon reduction; and
- sustainability measures including a water recycling system, district heating system and underground waste collection system.

The benefits of the promoted development include the following:

- the provision of housing and affordable housing for key workers and others, including but not limited to University and College staff;
- the provision of residential accommodation for the elderly, including care provision;
- the provision of new tenures such as 'Build to Rent', co-living and intra-generational housing;
- accessible parkland with potential connections to Coton Countryside Reserve offering significant scope for biodiversity enhancement;
- delivery of a green infrastructure in the form of publicly accessible open space providing access from the City to the countryside to the west of Cambridge;
- other green infrastructure and strategic landscaping, including new woodland planting to address visual impact and provide a buffer with the M11 to address noise and air quality impacts;
- improvements to walking and cycling routes to encourage travel by non-car modes of transport, which is far more attainable for an edge of City Centre site;
- potential to provide land for the Cambourne to Cambridge Bus (C2C) Strategy, the Cambridge Autonomous Metro (CAM), and the Comberton and Barton Greenways which are Greater Cambridge Partnership or Combined Authority projects, and a potential Western Orbital Route bus corridor in the future if required;

- the creation of additional north south public transport and cycle routes, connecting Barton Road to Madingley Road, and the provision of connections to existing developments at NW Cambridge, West Cambridge and Addenbrookes/Cambridge Biomedical Campus;
- the provision of a new local centre for the west Cambridge area as well as additional health and education facilities.
- the provision of housing and affordable housing for key workers, including but not limited to University and College staff;
- the provision of residential accommodation for the elderly, including care provision;
- an accessible country park with potential connections to Coton Countryside Reserve offering significant scope for biodiversity enhancement;
- delivery of a green 'wedge' of publicly accessible open space providing access from the City to the countryside to the west of Cambridge;
- other green infrastructure and strategic landscaping to address visual impact and provide a buffer with the M11 to address noise and air quality impacts;
- improvements to walking and cycling routes to encourage travel by non-car modes of transport (which is far more attainable from an edge of Cambridge site than from more distant locations away from the city);
- potential to provide land for the Cambourne to Cambridge Bus Strategy and the Comberton Greenway which are Greater Cambridge Partnership projects, and a potential Western Orbital Route bus corridor in the future if required;
- the creation of additional north south public transport and cycle routes, and the provision of connections to existing developments at NW Cambridge, West Cambridge and Addenbrookes/Cambridge Biomedical Campus; and,
- the provision of a new local centre for the west Cambridge area as well as additional health and education infrastructure.

For all these reasons, the site at South West Cambridge should be allocated for a landscape-led urban extension in emerging GCLP.

46. What do you think about creating planned new settlements?

It should be noted that new settlements were a key part of the development strategy for the adopted South Cambridgeshire Local Plan 2018 i.e. the delivery of the existing new town at Northstowe, and planned new settlements at Waterbeach and Bourn Airfield, in addition to an extension of Cambourne an earlier planned new settlement. Housing has started to be delivered at Northstowe within the last couple of years, and the developments at Waterbeach and Bourn Airfield are currently proceeding through the planning application stages. The delivery of these existing and planned developments will continue during the plan period for emerging GCLP and beyond, and as such will continue to be a key part of the development strategy.

The GCLP Issues & Options consultation document highlighted the advantages and challenges to the delivery of new settlements. However, there is no mention of the difficulties that new settlements have in terms of delivering policy compliant levels of affordable housing – see Greater Cambridge Housing Market Economics Analysis (prepared by Bidwells on behalf of North BRLOG). For example, Northstowe is required to provide 20% affordable housing overall. The DIO/Urban & Civic part of

Waterbeach new settlement is required to provide 30% affordable housing overall and subject to a review mechanism, but it is noted that no affordable housing will be provided in the first phase. The proportion of affordable housing to be provided from the RLW part of the Waterbeach new settlement is unknown at this stage. The Bourn Airfield new settlement is required to provide 40% affordable housing, but the proportion that will actually be provided is unknown at this stage (there is a live planning application). It is clear that the existing and planned new settlements are not providing enough affordable housing, which should be a concern in an area such as Greater Cambridge which has significant housing affordability issues. In contrast most of the existing urban extensions on the edge of Cambridge do deliver policy compliant levels of affordable housing; the one exception is the proposed developments within Cambridge East, where there were specific abnormal costs related to the proximity of Cambridge Airport and the need for noise mitigation.

Therefore, no additional new settlements should be identified in the development strategy for emerging GCLP, partly because of the inability of these types of development to deliver policy compliant levels of affordable housing. It is considered that housing affordability will be improved in emerging GCLP if there is more emphasis on developments that are capable of providing policy compliant levels of affordable housing from the outset and throughout the development e.g. edge of Cambridge, and additional sites which provide affordable housing are allocated to address the shortfall in the delivery of affordable housing from the existing and planned new settlements.

In addition, the experience from the examination for the emerging Uttlesford Local Plan, which proposed three new settlements, highlights the complexity of delivering this type of development including the funding and delivery of infrastructure.

47. What do you think about growing our villages?

No comments.

48. What do you think about siting development along transport corridors?

Supported. Paragraph 102 of the NPPF expects transport issues to be considered at the earliest stages of plan-making. Those issues include opportunities created by existing or proposed transport infrastructure in terms of the scale, location and density of development, and opportunities to promote walking, cycling and public transport use. Paragraph 103 expects significant development to be focused on locations which are or can be made sustainable.

It is noted that the area to the west of Cambridge is the focus for a number of proposed and potential transport infrastructure projects i.e. Cambourne to Cambridge Bus Corridor, Comberton Greenway, Barton Greenway, Madingley Road Cycle Improvements and Cambridge Autonomous Metro. It is considered that the site promoted by North BRLOG at South West Cambridge is well related to all of these proposed projects; the Cambourne to Cambridge Bus Corridor, Comberton Greenway, Barton Greenway are either within or immediately adjacent to the site. An urban extension at South West Cambridge would support the delivery of these transport infrastructure projects and increase access by walking, cycling and public transport. It is for these reasons that land at South West Cambridge should be allocated in the emerging GCLP.

49. Do you have any views on any specific policies in the two adopted 2018 Local Plans? If so, what are they?

No comments.

50. What do you think should be in the next Local Plan? Are there issues, ideas or themes that you don't feel we have yet explored?

No comments.

Representations to Sustainability Appraisal of Issues & Options (December 2019)

The Sustainability Appraisal (SA) of the Issues & Options consultation document includes an assessment of a range of spatial distribution options, which are as follows:

- Option 1: Densification;
- Option 2: Edge of Cambridge – Outside the Green Belt;
- Option 3: Edge of Cambridge – Green Belt;
- Option 4: Dispersal – new settlements;
- Option 5: Dispersal – villages; and
- Option 6: Public transport corridors.

It is acknowledged in the SA the preferred spatial distribution strategy may be based on a combination of these options, but the assessment is based on each option individually. It is considered that some of the commentary on each of the spatial distribution options and likely effects is not correct, and it is requested that a more detailed analysis of the options is required in the SA for the Draft Greater Cambridge Local Plan.

The North Barton Road Landowners Group (North BRLOG) is promoting land at South West Cambridge which is located within the Green Belt; the site would fall within Option 3: Edge of Cambridge – Green Belt. The findings of technical work undertaken to support the promoted site at South West Cambridge will be referred to in these representations where relevant.

The following representations are focussed on the SA of the spatial distribution options at Paragraphs 3.38 to 3.119 and associated tables including Table 3.1.

General Comments

It is acknowledged in the SA that the scale of development, its design, and associated impacts will depend on the circumstances present at individual sites. It is considered that strategic sites will need to include appropriate services and facilities to meet local needs and capacity, and will need to be well-designed and include mitigation measures and enhancements to address impacts, but there is no reason why these matters cannot be satisfactorily addressed. For example, a Vision Document has been prepared for the promoted development at South West Cambridge, which has been designed to take into account landscape, heritage and ecological impacts. Mitigation measures are included to address any adverse impacts. Ecological and flood risk/drainage enhancements are provided, and the proposal includes a local centre and primary school and open space and recreation areas. Therefore,

the promoted development at South West Cambridge is capable of delivering positive outcomes when assessed against the sustainability objectives.

SA Objective 1: To ensure that everyone has the opportunity to live in a decent, well-designed, sustainably constructed and affordable home

It is not certain when Option 2 (Edge of Cambridge – Outside the Green Belt, which relates to development at Cambridge East) will be available for development because the existing uses need be relocated, and it is also not certain whether development at the site will provide policy compliant levels of affordable housing. The existing operations and businesses at Cambridge Airport will need to be relocated prior to the commencement of development. The Wing development at Cambridge East, for example, is required to provide 30% affordable housing against a policy requirement for 40%. It is requested that the assessment of Option 2 against the criteria for SA1 needs to take into account these factors.

It is incorrect to assume that Option 3 (Edge of Cambridge – Green Belt) do not deliver policy compliant levels of affordable housing. The Greater Cambridge Housing Market Economics Analysis (prepared by Bidwells on behalf of North BRLOG) demonstrates that there is sufficient residual value in strategic greenfield sites on the edge of Cambridge to support planning obligations and policy requirements including affordable housing. It is requested that the assessment of Option 3 against the criteria for SA1 needs to take into account the fact that such sites are capable of providing policy compliant levels of affordable housing.

It is agreed that Option 4 (Dispersal – new settlements) do take a long time to be delivered largely because such developments are complex, and it is noted that initial predictions about the lead-in timetable for the delivery of new settlements are often unrealistic. It is also relevant to SA1 that new settlements typically do not deliver policy compliant levels of affordable housing; the amount of affordable housing provided and proposed in the initial phases of Northstowe and Waterbeach are examples where this has occurred. It is requested that the assessment of Option 4 against the criteria for SA1 needs to take into account realistic assumptions about lead in times for new settlements which will affect the supply of housing and affordable housing, and the fact that such developments are not capable of providing policy compliant levels of affordable housing.

SA Objective 12: To minimise Greater Cambridge's contribution to climate change

It is considered that the assessment of effects for Option 3 (Edge of Cambridge – Green Belt) includes negative commentary about the accessibility of edge of Cambridge sites by sustainable modes of transport, although it is acknowledged that these locations score well against this objective. The outcome of those effects will to a certain extent depend on the strategic sites selected.

It should be noted for the SA for the Draft Greater Cambridge Local Plan that the area to the west of Cambridge is the focus for a number of proposed and potential transport infrastructure projects i.e. Cambourne to Cambridge Bus Corridor, Comberton Greenway, Barton Greenway, Madingley Road Cycle Improvements, and Cambridge Autonomous Metro. It is considered that the promoted site at South West Cambridge is well related to all of these proposed and potential projects; the Cambourne

to Cambridge Bus Corridor, Comberton Greenway, Barton Greenway are either within or immediately adjacent to the site.

Carter Jonas – 10th February 2020