

## South Cambridgeshire Local Plan Examination in Public

### Hearing Statement on behalf of Urban and Civic (Respondent 24293)

#### **C/O:**

Julia Foster  
David Lock Associates  
50 North Thirteenth Street  
Milton Keynes  
MK9 3BP

#### **Matter PM1B: Five-year housing land supply and joint trajectory**

Modification PM/CC/2/C and supporting modifications  
Modification PM/SC/2/B and supporting modifications

##### ***PM1B.1***

***The Framework (paragraph 47) states, amongst other things, that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. Planning Policy Guidance Ref 010 2a-010-20140306 advises: Where there is a joint plan, housing requirements and the need to identify a five year supply of sites can apply across the joint plan area. The approach being taken should be set out clearly in the plan.***

***Are there any local circumstances which justify the use of a joint trajectory without a joint plan? If so what are they?***

1. This statement is submitted on behalf of Urban&Civic Ltd (U&C) pursuant to representations made on the South Cambridgeshire Local Plan Proposed Modifications (respondent reference 24293), and specifically Modifications PM/CC/2/C and PM/SC/2/B.
2. U&C acknowledge the challenge of the authorities using a joint trajectory without a joint local plan, in the light of Paragraph 47 of the Framework and policy guidance (2a-010-20140306). Ordinarily, local authorities should plan for and monitor for housing requirements on a district-specific basis. In this situation there are however considered to be circumstances that could justify the use of both Cambridge and South Cambridgeshire's housing for calculating 5-year housing land supply without a joint local plan, should the Inspectors be so minded. The circumstances relate to viewing policy and guidance in the round and the close functional relationship between the two authorities.

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3. The two authorities have been diligent in applying the Duty to Cooperate under the Localism Act 2011. Paragraphs 178 -181 of the Framework are clear that: joint working should be of mutual benefit to both authorities; strategic priorities should be properly coordinated across boundaries and clearly reflected in local plans; joint working should take place to meet development needs where they cannot be met within own boundary (either due to physical capacity constraints or harm to the principles and policies or the Framework); and that the Duty should be a continuous process from initial thinking through to implementation.
4. The PPG is also relevant where it states that if the supply of housing cannot be met in the first five years, the LPA will need to work with neighbouring authorities under the Duty to Cooperate (Ref: 3-033-201403006).
5. In this context, the proposed Memorandum of Understanding (RD/Strat/350) between the two authorities and subsequent Proposed Modifications of the two local plans is a demonstration of continuous and meaningful Duty to Cooperate through to the *implementation* stage of planning. This level of cooperation is part of a continuation drawing on a long history of partnership working over strategic planning growth, as well as being a positive step towards the production of a joint plan.
6. The close functional relationship between the two authorities is relevant as a local circumstance. The tightly defined boundary of the City administrative area, completely encircled by South Cambridgeshire, means there is a strong interdependency between the two authorities. This is evident in terms of housing markets, employment, commuting patterns, service provision and infrastructure delivery. The close functional relationship is acknowledged through the Greater Cambridge City Deal where it is stated the two authorities (and the County) have worked closely on the local plans and associated documents so that it *“amounts to a single overarching development, infrastructure and delivery strategy for Cambridge”* (RD/Strat/300).
7. Overall, it is accepted that policy and guidance sets out that a joint plan is required to apply a joint trajectory to five-year housing supply calculations. However, in response to the Inspectors’ question, there are circumstances that offer a justification. What is critical, if this approach is endorsed, is that the mechanism for applying the trajectory and addressing any shortfalls is transparent and workable.

**PM1B.2**

***Will the use of a joint trajectory assist in meeting the objectives of the Framework, including the delivery of sustainable development and boosting, significantly, the supply of land for housing?***

8. Notwithstanding the difficulties of applying joint trajectories without a joint plan, the use of a joint trajectory would assist in meeting objectives of the Framework. It would assist in achieving paragraphs 178-181 of the NPPF in terms of Duty to Co-operate and strategic planning. It would also assist in achieving sustainable development in the following ways:

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- *Economic:* Assist in the coordination and implementation of the sustainable development strategy, and the Greater Cambridge City Deal, which would help deliver the necessary infrastructure improvements and longer-term housing and employment growth.
  - *Environmental:* Assist in protecting the Green Belt and avoiding dispersed housing to the least sustainable locations (smaller villages); and helps protect the unique historic character of Cambridge.
  - *Social:* Assist in the implementation of a strategy to deliver new homes now and for future generations, whilst also assisting with the coordination and planning of social infrastructure over the longer-term.
9. It is also considered that the approach would not necessarily undermine the Framework objective to boost significantly the supply of housing providing the right mechanisms are put in place. The approach could deliver the whole of the housing target over the two authority areas but would change where and when housing is delivered. Conversely, the application of separate housing trajectories to the calculation of five-year housing supply could lead to new housing development occurring in less sustainable locations in the short-term (through loss of Green belt or dispersed village developments). In turn, this could have the consequence of undermining longer-term investment in infrastructure and threaten longer-term housing delivery.

**PM1B.3**

***Is it clear how this approach would work in practice; i.e how would the five year land supply would be calculated and updated; and it is clear how any failure to provide a five year supply would be resolved***

10. Regarding PM1B.3, DIO/U&C agrees that, if the joint trajectory approach is to proceed, then it is essential the authorities set out more detail on how it would operate and in particular how any failure to provide five year supply in one authority would be rectified jointly.

**PM1B.4**

***The Memorandum of Understanding (RD/Strat/350) indicated that, as part of the City Deal arrangements, the Councils have agreed to prepare a joint Local Plan and Transport Strategy starting in 2019. Should this commitment be expressly included in the Local Plans?***

11. Regarding PM1B.4, DIO/U&C has no objection to the inclusion of specific reference to the preparation of the joint plan and transport strategy starting in 2019.
12. Moreover, it is relevant that potential exists to deliver new homes within the first five-years of the plan at Waterbeach New Town. South Cambridgeshire District Council has shown in its trajectory Waterbeach New Town delivering new homes from 2022/23 starting at 100 dwellings and increasing to a maximum of 250 dwellings per annum, but has also proposed to remove the restriction through Proposed Modifications to when delivery could commence and how much can be delivered within the plan period.

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13. U&C is progressing with proposals for both the conversion of residential blocks at the barracks site and an outline planning application, with phase 1 details, to ensure the earliest possible delivery. The prospect of delivery is enhanced by a focus on delivering private rental sector housing, as set out in U&C's statement to Matter 8. This will be a matter for the Waterbeach specific hearing in due course.