

CHAPTER 3: DEVELOPMENT NEEDS	
QUESTION NO.	SUMMARY OF REPRESENTATIONS
<p>QUESTION 3: How much new employment do you think the Local Plan should provide for?</p> <p>i. Lower jobs growth – 14,000 additional jobs over the plan period (700 jobs per year)?</p> <p>Support: 61 Object: 7 Comment: 9</p> <p>Questionnaire Question 1: How many new jobs should we provide for? (where a specific preference was expressed):</p> <p>Only for local needs:45 As few as possible:12 Less than 700 jobs: 17 700 jobs: 73 700 to 1000 jobs: 305</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • This target is more realistic in light of the absence of any major new employment sites in the district, the likely long term structural problems in the economy, and the fact that many of the existing hi-tech sites are now mature. • Most realistic estimate given trends in the world economy, especially in the Euro zone. • This is sufficient for the area. If there is a need for more jobs then businesses will move out of Cambridge and the benefit will be shared with other areas. • Campaign to Protect Rural England (CPRE) believe the lower jobs growth to be more realistic, achievable and likely to match the number of houses built. Job numbers can increase if there is demand. • Lowest job scenario is the most realistic in the current economic climate, as job creation generally comes after new homes and it is inappropriate to bring forward a large number of new homes in the hope they will be matched by new jobs. • The minimum number of jobs should be perfectly adequate for the foreseeable future. • Easier to revise targets upwards if necessary, however the Council must encourage new businesses (including small businesses) and occasionally it doesn't. • Only target that can reasonably be accommodated within the infrastructure. • Most realistic, but if jobs growth actually exceeds this rate, then additional housing can be brought forward – plan, monitor, manage. • Economic growth is important in the region but it must be sustainable – the infrastructure is not able to cope as it is. • Minimum employment growth scenario should be used based on the evidence in the Cambridge Cluster at 50 report – the outlook for medium term growth is poor. • This target would have less impact on the rural

	<p>areas and leave more green spaces for people to enjoy.</p> <ul style="list-style-type: none"> • Accepted the lowest target under duress, probably already too much. Great economic growth comes from quality not volume. • Anything other than the low growth scenario would be seen by many as a folly – projections are estimations and major economists predict that the UK economy is not expected to improve for at least another 5-10 years. • Balance needs to be struck between enlarging the economy and keeping the district as a good place to live. • The economic success of the region is important to the well-being of the people who live there, but rapid and excessive economic growth is not. • Cambridge's international reputation won't simply be enhanced by more houses built in the hope of ever-increasing employment. The Local Plan should accommodate responsiveness to change not dictate what will happen. • Economic growth does not necessarily benefit all as has been shown by recent research. • Lower jobs targets are more realistic and take into consideration current job loss trends. There is also more chance of matching housing supply to jobs with a more modest target. • Lower growth in jobs is supported as this would have the least impact on demand for new homes. • Lower jobs growth is supported provided that does not result in loss of Green Belt, makes maximum use of brownfield sites, does not compromise the rural character, and there is sufficient road access and infrastructure. • Appears over optimistic to assume the scale of growth in future will be as great as in the past – at best only likely to see modest growth balanced by reductions elsewhere. If the Council's assumptions are too optimistic, will simply provide for long distance commuters. • Only the lower job and population estimates are appropriate given the evidence across the UK. • There should be minimal local jobs, if any.
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	<p>OBJECTIONS:</p> <ul style="list-style-type: none"> • The target for growth should be as high as possible to ensure there are no constraints to economic growth. • Disagree that more jobs and more people are going to boost the economy. Small can be beautiful and there comes a point when the social fabric of society is jeopardised by overcrowding and dis-affection. • Even if job growth is at this lowest level, the national population would need to grow to an unsupportable level. • Do not believe the figures or accept the basis on which they have been derived.
<p>ii. Medium jobs growth – 23,100 additional jobs over the plan period (1,200 jobs per year)?</p> <p>Support: 33 Object: 14 Comment: 8</p> <p>Questionnaire Question 1: How many new jobs should we provide for? (where a specific preference was expressed):</p> <p>1000 jobs: 31 1000 to 1200 jobs: 13 1200 jobs:33</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Appears to most realistic at the present time, but the Local Plan must allow flexibility for this target to be revised in response to changing economic circumstances. • This would provide reasonable numbers while allowing for a more organic growth and existing transport links to be improved. • Provides more employment opportunities but also gives the district time to consolidate after a period of rapid growth and the infrastructure to catch up with development. • Cambridgeshire County Council believe this is still optimistic when compared with the EEFM ‘lost decade’ forecast. However, this option enables the local authorities to be positive about growth and job prospects, given the uncertainty and little growth over the last few years. • Good steady objective to maintain sustainable growth. • Need to strike a balance between supporting continued economic growth (essential for prosperity) and avoidance of overcrowding adversely affecting quality of life. • Good to have jobs, but the employees need not live in the district. • Continued growth at the higher rate is not sustainable. It is unrealistic to expect jobs to continue to increase at a higher rate as there will be job losses that will cancel out increases in others. • This seems a prudent estimate given the difficulty of making predictions. • Should be regarded as an absolute maximum – the

	<p>district needs to absorb existing growth and this will take time.</p> <ul style="list-style-type: none"> • The lower option is preferable, but actual job creation has exceeded this despite the economic downturn, so it seems sensible to plan for a higher figure. • Considered to be an ambitious but realistic target in the current climate. • Too much job growth could spoil the amenity of this area and in the next 20 years it is reasonable to assume at least one recession, so the medium target is a reasonable assumption. • Most likely scenario given the global economic climate and initiatives to provide enterprise zones elsewhere e.g. Alconbury. • Duxford Parish Council, Shepreth Parish Council – Support. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • The target for growth should be as high as possible to ensure that there are no constraints to economic growth. • Unless there is very significant investment in transport and basic infrastructure the region cannot support this level of development. • To really go for economic growth, only the high growth option is viable. The Council is required to build a substantial number of homes and the residents of these homes will need jobs, otherwise commuting will spiral out of control, causing more strain on already overloaded roads and infrastructure.
<p>iii. High jobs growth – 29,200 additional jobs over the plan period (1,500 jobs per year)?</p> <p>Support: 21 Object: 11 Comment: 2</p> <p>Questionnaire Question 1: How many new jobs should we provide for? (where a specific preference was expressed):</p> <p>1200 to 1500 jobs: 2 1500 jobs: 10 1600 jobs:5 As many as possible:18</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • General principle is that jobs growth is linked to housing growth, therefore a higher jobs target would require more housing to be delivered. Support the principle of a higher jobs target, but wish to see a more detailed demographic and economic assessment undertaken. • University of Cambridge – the higher growth option may be most appropriate if the Council’s policy for selective management of the economy is amended to allow high value manufacturing and hi-tech office headquarters. • Cambridgeshire County Council (represented by Carter Jonas) – support medium to high jobs growth commensurate with the quantum of housing and suggest should embrace Cambridge’s reputation by seeking maximum level of jobs growth. • The target for jobs should be as high as possible to

	<p>ensure there are no constraints to economic growth.</p> <ul style="list-style-type: none"> • The high jobs growth strategy is necessary to continue, sustain and drive forward South Cambridgeshire's pre-eminent role in the regional economy. • This would support the Council's vision to demonstrate impressive and sustainable economic growth and would maintain the role of Cambridge as a world leader. • Essential that planning for new jobs is aspirational in order to meet the objectives of economic policy – 29,200 jobs is the minimum level required to support the economic needs of the Cambridge sub-region given its strategic importance to the economy. • This represents a reduction compared to the past 20 years but sets an optimistic target for the next 20 years. • Hertfordshire County Council – given the City's strong economic drivers, huge housing demand and affordability issues, it seems inevitable that the high growth options for housing and jobs are likely to be necessary [LATE REP]. • Cambridge is precisely the type of location that the Government is looking to lead the UK out of the recession and therefore a high growth strategy is necessary. An NPPF compliant strategy would entail at least 1,500 jobs per year. • If the NPPF is to be followed then a high growth target should be adopted to ensure the district continues to build a strong, responsive and competitive economy. • Lower and medium growth options are inadequate. The higher growth target is the only legitimate option, but it needs to be reviewed against up to date information e.g. 2011 Census. • High jobs growth necessary to ensure economic viability of the area – must be supported by sufficient housing and education facilities, and not solely concentrated on hi-tech and research jobs. • Far better to over provide than risk under provision – it is almost certain that growth will pick up. • Highest level of job growth would provide headroom and allow the opportunity for the 'impressive' economic growth vision and contribute to the economic vitality of the country and county. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • Little evidence to support this target. • Too much and impossible to support – would destroy South Cambridgeshire. • Unless there is significant investment in transport
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	<p>and other infrastructure the region cannot support this level of development.</p> <ul style="list-style-type: none"> • The high growth strategy does not aim high enough.
<p>Please provide any comments.</p> <p>Support: 2 Object: 13 Comment: 40</p> <p>Including additional 658 comments from Questionnaire responses.</p>	<p>COMMENTS:</p> <ul style="list-style-type: none"> • The importance of the Cambridge economy locally, regionally, nationally and internationally must not be jeopardised by the Local Plan insufficiently planning for economic growth. Planning for too few jobs is potentially dangerous and unproductive, therefore the Local Plan should provide for high jobs growth. However the high jobs growth figure suggested is not as aspirational as it could be. • Need to plan for higher level of economic growth resulting in 30,000 new jobs by 2031. • Regular reviews should be undertaken to enable the district council to be responsive to forecast changes in demand driven by forecast changes in growth. Caution should be used in assessing the predicted job target – perhaps consider a shorter time span than 20 years. • Caution should be used in assessing the predicted job target given that we are still in a recession. A shorter time span should be considered. • National and local economic growth will be way below the ‘trend’ from the 2000s. • Cambridge already has one of the lowest unemployment rates in the UK, new jobs to go to locations of high unemployment. Past growth in Cambridge has swamped the road infrastructure – new businesses will be reluctant to set up where their prospective employees will sit in gridlock. • Can’t find any comprehensive research underpinning the 3 options put forward or the relationship between additional housing and new jobs. • The Local Plan needs to allow time for the district to absorb both the new population and the impact of increased demand on social infrastructure. If new development is to be closely linked to new jobs, then if new development is to be restrained then so must the delivery of jobs. Also likely that the Enterprise Zone at Alconbury will leach employment from the Cambridge Sub-Region. • Given jobs have increased by approx. 1,000 per year since the economic downturn, a balance between the lower and medium options would be most appropriate. • Lower jobs growth will not reduce the need for new homes, it will only increase the need for people to commute. • Housing and jobs need to be balanced. Until more

	<p>housing is built, more jobs will lead to more commuting.</p> <ul style="list-style-type: none"> • Ensure that strategies for housing, employment and other uses are integrated. • As the economy recovers from the financial crisis, we should expect and plan for the Cambridge Cluster to grow as before. • Need to give real consideration to the type of jobs required. Only varied job options will prevent the region becoming a commuter belt. • This is a leading and cynical question to include in a consultation – most individuals do not have the required information to make an informed decision. • In an ideal world, we want the maximum number of jobs that are sustainable. • Joint approach with the City Council is necessary to ensure the right decisions are made. Barton, Coton and Madingley Parish Councils would strongly encourage this approach. • The problem is where will the jobs be – location is important to prevent transport problems. • It is not the correct role of Government to centrally plan the economy – the private sector should determine the level of growth and jobs and the Local Plan should ensure that new jobs provided do not harm the quality of life or the natural and historical amenities of the district. • Cambridge City Council Labour Group – support sustainable job expansion provided that there is additional housing to match and effective transport links from the main housing areas. • Cambridge City Council – support the consideration of different levels of provision, but highlight the need to consider the objectively assessed need for employment in the wider Cambridge area and the need for the City Council and SCDC to work collaboratively to ensure that strategic priorities across boundaries are properly co-ordinated and reflected in both Local Plans (particularly where development requirements cannot be wholly met within one authority's area). • Cambridge Past, Present and Future – suggest that any forecasts of future jobs will be speculative and therefore it is inadvisable to decide a jobs target in advance. • Barton Parish Council – No particular view. No particular need in Barton. • Comberton Parish Council – the Council should plan for between 700 and 1000 new jobs (at most) and the plan should be revised in 5 years if there is a stronger economic upturn and more jobs are created. • Great and Little Chishill Parish Council – Somewhere in the middle.
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	<ul style="list-style-type: none"> • Linton Parish Council - Although the local economy seems to be more protected than the country as a whole, there will be knock-on effects. Therefore a growth rate of 1,000 seems more appropriate. • As the economy of South Cambridgeshire and the city of Cambridge will remain relatively buoyant there is no need to encourage the growth of local employment. • Further information is needed in relation to the housing and economic needs for South Cambridgeshire and Cambridge – in the absence of information regarding the options for the sub-region it is not possible to form a view on the appropriate level of development, except that the strategy should support the economy, tackle affordability and affordable housing needs, and deliver community facilities and infrastructure. • There should be a reconsideration of the premise that the growth in jobs must drive policy – Cambridge is getting swamped as the employment ‘hub’. Encouraging employment in less fortunate areas is preferred. • The depth of the recession and severity of budget cuts may require a new approach including support for local and rural entrepreneurial activity, rather than a focus on higher education, research and knowledge based industries. Need to be jobs for unskilled as well as highly skilled. • Gamlingay Environmental Action Group – it is difficult to support any of the options, as even the low growth option would be unsustainable and would have severe adverse impact on the local environment. Instead, should aim for a ‘steady state’ no growth economy which protects the local environment and communities without encouraging further business and residential development. • Consider the envisaged job growth rates and associated new dwelling requirements to be over-inflated and unrealistic. Plans should be based around a more modest and prudent figure of 700 new jobs. • Histon & Impington Parish Council – ONS survey on population places doubt on the one-to-one assumption for jobs and homes. It also demonstrates close linkages between SCDC and Cambridge City. The Council is not competent to predict alternative numbers – plans should adapt to actual growth given the uncertainty, by prioritising and realising land based on the actual levels of growth. • Any new development should be supported by affordable business premises. • Huntingdonshire District Council (HDC) – is using the EEFM forecasts as its primary source of the
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	<p>jobs and housing numbers it is consulting on (unlike SCDC), as this model is capable of taking account of anticipated effects such as the redevelopment of Alconbury Airfield as an Enterprise Zone. This development could have a significant impact on employment prospects in all local authority districts in Peterborough and Cambridgeshire, as well as direct impacts for HDC.</p> <ul style="list-style-type: none"> • Madingley Parish Council – questions the basis of the calculation on which all the long term projections are based. Believe these numbers are far too high and not supported by factual justification. • North Hertfordshire District Council – growth of the Cambridge economy is supported as it is likely to have a positive impact on the North Hertfordshire economy as well. • Local authorities should work co-operatively as people follow jobs. This area is overcrowded, perhaps jobs should be recreated / relocated to the north of England. • The vision could be compromised by too many more jobs, people and homes. • The Council seems to have had no consideration for a very low / no growth scenario. • The plan should not be jobs driven, instead it should be based on the number of homes and people that can be sustained by current resources e.g. water. • St Edmundsbury Borough Council – suggest that whichever growth strategy is selected, there must be a balance between homes and jobs provision to prevent St Edmundsbury BC's efforts to create a more economically sustainable town at Haverhill being undermined. • Suffolk County Council – support local authorities working together to develop economic strategies that realise the benefits of the economic interrelationships, whilst recognising and mitigating negative impacts. • Countryside Restoration Trust – the jobs predicted are likely to be filled by migrant workers rather than residents and the unemployed of South Cambridgeshire. • Trumpington Residents Association – considers the level of growth should be between the lower and medium growth projections, as given the current economic situation it seems prudent to plan for fewer new jobs than were provided in the next 20 years. <p>Other Comments from Questionnaires:</p> <ul style="list-style-type: none"> • Only the number which current/ planned infrastructure can cope with, in sustainable
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	<p>locations, within environmental capacities (33)</p> <ul style="list-style-type: none"> • Create jobs elsewhere in less prosperous areas with high unemployment (22) • Plan flexibly and review/ according to market trends (16) • Not all new jobs will require new homes – question the link between new jobs and need for new homes in the district (12) • Jobs needed throughout the district including rural areas (6) • Focus on high tech and research (6) • Create a range of jobs including manufacturing and industry (5) • More information is needed on the jobs created in the past and jobs which will be created (5) • Council cannot quantify jobs in this way if Cambridge is open for business. • Many jobs created will be part time; • Already many empty business premises. • Need small business units • Jobs should be near to homes. • Continued growth is unsustainable;
<p>QUESTION 4: How much new housing do you consider the Local Plan should provide for?</p>	
<p>i Lower housing growth - additional 4,300 dwellings (equal to 925 dwellings per year)</p> <p>Support:77 Object: 30 Comment:11</p> <p>Questionnaire Question 2: How many new homes should we be planning for? (where a specific preference was expressed):</p> <p>Option I: 87 Lower target or the minimum Needed: 70</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Protect the character of the area, protect villages, limit development of greenfield land, and minimise impact on the environment; • Protect quality of life; • Infrastructure already over-stretched; • Would meet local needs; • Meet local needs, as much of housing growth is being used for London commuting; • Why draw in so many people from elsewhere? • Need for a joint approach with Cambridge City Council; • More work needed to confirm there is actually housing need; • Already a good range and mix of houses available, many existing houses are difficult to sell; • This is still a high target; • Lower figure reflects changes in the economy; • CPRE- Support lower figure in line with lower jobs figure; • Barton Parish Council, Coton Parish Council, Madingley Parish Council- Economic modelling has an optimistic bias, not based on the current situation; • Grantchester Parish Council - The boundary

	<p>between the City and South Cambridgeshire must be maintained.</p> <ul style="list-style-type: none"> • Bourn Parish Council, Caldecote Parish Council, Caxton Parish Council; Comberton Parish Council, Croydon parish Council, Fen Ditton Parish Council, Fowlmere Parish Council, Foxton Parish Council, Great Shelford Parish Council, Hatley Parish Council, Milton Parish Council, Shepreth Parish Council, Waterbeach Parish Council, Whaddon Parish Council - Support • Comberton Parish Council (Supported by 301 signatories, of which 267 signatories have been individually registered) - It would be prudent to plan for fewer additional houses - around 4,300 - and use the acknowledged delay in the economic recovery to develop mostly on truly brown field sites, avoid rush to develop on agricultural land. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • Should be a lower figure. • Development at any level is unsustainable; • Need to protect villages and quality of life; • Should be lower, the area is already being used to commute to London. • New jobs and homes should go to other areas of the UK; • Why more development when there is so much already planned? • Planning should be based on the individual merits of proposals rather than a target; • Will not meet local needs; • The high target represents a continuation of the current target, SCDC has not explored a higher growth option which would meet identified affordable housing needs; • Would not be sound to include a target which did not reflect objectively assessed needs; • Paragraph 47 of the National Planning Policy Framework (NPPF) seeks to boost significantly the supply of housing, and expects local planning authorities to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area. • Council has not taken positive action to resolve shortage of affordable housing; • There are significant consequences associated with an under supply of housing, such as not meeting the local housing and affordable housing need and increased in-commuting and associated traffic congestion; • Should be as high as possible to keep pace with
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	<p>high economic growth;</p> <ul style="list-style-type: none"> • Fears over impacts of higher growth targets are unfounded; <p>COMMENTS:</p> <ul style="list-style-type: none"> • Economic growth in next 10-20 years unlikely to be on scale seen previously; • Fewer start-ups in high tech sector will mean slower growth in 5-10 years time; • If windfalls deliver 200 a year, could meet lower target. • Council should focus on preserving the rural character of the area rather than turning it into an endless suburb. If a housing target higher than zero must be set, however, it should be as low as possible. • Even low growth will place strain on Character of the City and its surroundings; • Bassingbourn cum Kneesworth Parish Council – Lower growth targets are more realistic, otherwise district will be catering for long distance commuters. • Hauxton Parish Council - Do not build large numbers of houses in the hope that the jobs will be created.
<p>ii Medium housing growth - additional 7,300 dwellings (equates to 1,075 dwellings per year)</p> <p>Support: 35 Object: 34 Comment: 4</p> <p>Questionnaire Question 2: How many new homes should we be planning for? (where a specific preference was expressed):</p> <p>Option ii: 47</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Balance between catering for growth and avoiding adverse impacts; • Appears the most realistic at the present time, but need to be flexible in response to changing economic circumstances; • Will enable organic growth of settlements; • Will deliver housing towards meeting local needs; • Balanced with economic forecasts; • Need to consider infrastructure e.g. public transport. Lack of infrastructure means area could not support higher growth; • SCDC should make clear it will not accept speculative development; • Babraham Parish Council, Cambourne Parish Council, Duxford Parish Council, Gamlingay Parish Council, Great Abington Parish Council, Ickleton Parish Council, Litlington Parish Council, Little Abington Parish Council, Over Parish Council, Rampton Parish Council, Steeple Morden Parish Council, Weston Colville Parish Council – Support. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • Too much growth, would not reflect council's vision; • Overoptimistic;

	<ul style="list-style-type: none"> • Would require development of greenfield land, negative impact on green belt, local character, historic environment, infrastructure, and quality of life; • Planning should be based on the individual merits of proposals rather than a target; • Fen Ditton Parish Council – Object. <ul style="list-style-type: none"> • The high target represents a continuation of the current target, SCDC has not explored a higher growth option which would meet identified affordable housing needs; • Would not be sound to include a target which did not reflect objectively assessed needs; • Paragraph 47 of the National Planning Policy Framework (NPPF) seeks to boost significantly the supply of housing, and expects local planning authorities to use their evidence base to ensure that their Local Plan meets the full objectively assessed needs for market and affordable housing in the housing market area. • Council has not taken positive action to resolve shortage of affordable housing; • There are significant consequences associated with an under supply of housing, such as not meeting the local housing and affordable housing need and increased in-commuting and associated traffic congestion. • Under supply of 4827 against previous target to 2016. A reduced target would not cover shortfall; • Should be as high as possible to keep pace with high economic growth; • Fears over impacts of higher growth targets are unfounded; <p>COMMENTS:</p> <ul style="list-style-type: none"> • Need to carefully consider types of housing needs e.g size of dwellings; • Cottenham Parish Council – Medium growth, but subject to regular review to respond to forecast changes in demand.
<p>iii High housing growth - additional 9,300 dwellings (equate to 1,175 dwellings per year)</p> <p>Support:59 Object: 21 Comment:4</p> <p>Questionnaire Question 2: How many new homes</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Prosperous area with thriving economy and demand for housing remains high; • Represents a continuation of the current strategy; • Plan for highest number of homes, linked to highest job growth scenario; • Take account of increasing new household formations arising from current trends such as the growth in single person households and in-migration; • Reduce burden of commuting;

<p>should we be planning for? (where a specific preference was expressed): Option iii: 19 Higher target: 4</p>	<ul style="list-style-type: none"> • High growth option most likely to meet needs; • Lower targets would fall short of household growth forecasts of the east of England Forecasting Model; • Higher rate is achievable, 1,274 homes were built in 2007-2008; • Need to account for previous under supply in the district, as shown in Annual Monitoring Report; • Need to over allocate to ensure delivery, and to respond to changing circumstances; • Should be as high as possible to keep pace with high economic growth; • Help reduce long-term housing costs, address balance between housing and jobs; • London commuting cannot be controlled, need to account for it in housing needs; • Development can make greatest contribution to affordable housing delivery; • Target should be increased to enable greater delivery of affordable housing, and meet affordable housing needs; • The high target represents a continuation of the current target, SCDC has not explored a higher growth option which would meet identified affordable housing needs; <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • To much growth, would not reflect council's vision; • Damage to local environment, historic character; • Lack of infrastructure and amenities; • Based on immigration of workers rather than local needs; • Planning should be based on the individual merits of proposals rather than a target; • Fen Ditton Parish Council – Object. <ul style="list-style-type: none"> • No option put forward that would fully meet anticipated needs; • Too low to meet aspirations for employment within the district; • Fears over impacts of higher growth targets are unfounded; • Key objectives of the Framework, set out in para. 47 is to “<i>Boost significantly the supply of housing</i>”; • 'high' housing growth target has been set at a level which is wholly insufficient to meet even the affordable housing requirement over the next 5 years; • There are significant consequences associated with an under supply of housing, such as not meeting the local housing and affordable housing need and increased in-commuting and associated traffic congestion;
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	<ul style="list-style-type: none"> • Take account of unmet need at beginning of plan period; • Projections rely on 2001 census data, giving a degree of inaccuracy; • Concern that the SHMA 2009 is out of date; • Need to ensure jobs growth is not stifled, adopt an aspirational target which will provide the greatest prospect of the local economy fulfilling its significant potential as a globally significant high-tech cluster; • Need to respond to significant under supply against past targets, Council has failed to respond to residual needs. Ignoring past shortfalls will progressively depress the housing requirement; • Consider 'hidden homeless'; • SHMA should factor in the need for the additional households that would be required to offset the loss of working age population. • Taking the employment-led housing requirement together with the historic shortfall in housing delivery between 2001 and 2011, the Council should be seeking to provide a minimum of 27,200 additional dwellings (1,360 per annum). a further option (Option 4 of 27,200 dwellings) should be considered. • The <i>minimum</i> housing target necessary in South Cambridgeshire should be set at 1,565 dwellings per year for the District (representing a total of 31,300 over the Plan Period). • Must also take account of development constraints in Cambridge City; <p>COMMENTS:</p> <ul style="list-style-type: none"> • Hertfordshire County Council - Given city's strong economic drivers, huge housing demand and affordability issues, it seems inevitable that of the options for housing and employment growth, those at upper end are likely to be necessary.
<p>Please provide any additional comments</p> <p>Support:1 Object: 19 Comment:37</p> <p>Including additional 687 comments from Questionnaire responses to Question 2: How many new homes should we be planning for?</p>	<p>COMMENTS:</p> <ul style="list-style-type: none"> • Cambridge City Council - Need for joined up planning with Cambridge City Council and the wider area; • North Hertfordshire District Council - the current Cambridge sub-regional SHMA was initially prepared in 2007, pre-localism and under the requirements of the East of England Plan, therefore it may be necessary to ensure that this issue is adequately considered in your evidence base and that the housing targets associated with the economic growth strategy take this into account; • St Edmundsbury Borough Council – Need balance between homes and jobs;

	<ul style="list-style-type: none"> • Environment Agency - imperative that any increase in the number of homes is appropriately assessed, particularly in relation to water infrastructure and notably the potential impacts on water quality as a result of increased foul water flows to Waste Water Treatment Works; • Natural England - Whilst acknowledging the need for the right level of development to meet demand, options which have least impact on the natural environment would be preferred; • Great and Little Chishill Parish Council – somewhere between higher and lower figure; • Linton Parish Council - It seems too restrictive and inherently risky to plan solely on basis of a direct correlation between new jobs and new homes. Technology means more people likley to work from home. • Madingley Parish Council – targets have been set too high, based on over optimistic long term projections; • Further information is required on housing and economic needs for South Cambridgeshire and Cambridge City. • Need holistic approach to planing of the Cambridge area; • A level of housing delivery across both authority areas below the 1,750 'Option 1' numbers would not meet policy objectives set out at a national level within the NPPF, and with which Local Plans must comply. • No evidence has been provided as to show how, or even if, Uttlesford District Council and SCDC have co-operated. • There has to be some development in S. Cambs to meet local demand for social and other housing needs. • All viable locations will be developed in due course since little prospect that expansion will cease; all that is uncertain is its rate. Need to plan for infrastructure; • Oppose plans to build 12,500 homes in the Green Belt; • Plan for a growth rate that is achievable; • New housing development should be for local needs; • Thought must be given to the limit of how much more expansion the area can take without ruining the whole reason it is a desirable area; • Too much development, traffic, loss of farmland, impact on village character, increased water stress, • Before further development need to plan for infrastructure; • Proposed need for housing development seems to be based upon very optimistic and unrealistic
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	<p>economic growth estimates;</p> <ul style="list-style-type: none"> • It is not the correct role of government to centrally plan the level of housing; • Make better use of brownfield sites; Re-use existing buildings; Use empty homes first • Plans should reflect anticipated jobs growth; • With state of the economy, high housing growth not needed; • Develop Northstowe and existing planned sites first; • Consider impact on traffic, locate homes with jobs; • Consider impact on the environment, agricultural land, water, the character of the area, quality of life; • Cambridge is becoming too built up and is becoming spoilt; • Development should take place in other areas, Cambridge is full; • Infrastructure needs to be improved / cannot cope. Ensure facilities are in place first; • Plan for natural population increase only / for local people only; • High need for affordable housing, need homeless for the hidden homeless (e.g. Adults unable to move out of parental home). People cannot afford to get on property ladder; • Important to consider the needs of the local Traveller community as well as settled community.
<p>QUESTION 4b: Do you agree with the assumption for delivery of housing at Northstowe of approximately 500 homes per year?</p>	
<p>Support:8 Object: 29 Comment:10</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Should be the focus of development; • CPRE – Should be the minimum figure; • Gallagher Estates – 500 per year reasonable after 2021, due to economic improvements, A14 increased capacity, Guided Bus, construction in 2 or 3 separate phases with a range of housing providers, new secondary school will have opened; • Weston Colville Parish Council – Support. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • Lead in time and delivery rate likely to slip; • Evidence from Cambourne shows lower rates, first residents were on site at Cambourne in 1999, and at 2012 2,600 dwellings had been built; • Cambourne has not maintained its highest delivery rates; • Delivery of new settlements consistently poor due to complexities of delivery;

	<ul style="list-style-type: none"> • Will be delayed by A14 improvements, not planned until 2018; • 300 per annum more likely; • RLW Estates – 400 per year should be assumed; • Will be 2900 or 2250 less over plan period; • Fen Ditton Parish Council - Should be faster, to make best use of the site; • Milton Parish Council – only 1500 before A14 improvements. <p>COMMENTS:</p> <ul style="list-style-type: none"> • Anglian Water – In terms of drainage, no issue with 500 dwelling per year; • Cambourne Parish Council - Need infrastructure at the outset; • Cottenham Parish Council – Reasonable target, but Council cannot afford to have its plan stalled by developers; • Essential that there is not a monopoly of provision. As many landowners and developers as possible should be involved in the development of Northstowe. If the parcels of land are provided in different parts of the site and particularly if they are accessed from different points, it will be possible to secure a higher rate of development.
QUESTION 5: Windfall Allowance	
<p>Do you consider that the plan should include an allowance for windfall development?</p> <p>Support:77 Object: 38 Comment: 16</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • To provide for the required new homes in the district and allow for greater flexibility in the delivery of new dwellings, the Plan should include an allowance for windfall development. Over the past 20 years an average of around 200 dwellings a year have come forward from sites that have not been specifically allocated in Plans. This source of housing development is important in maintaining the variety and flexibility of the overall supply of new housing for the plan period. • Inclusion of windfalls would avoid having to allocate more sites than necessary to meet targets. • Small developments can help maintain village schools and services • Bassingbourn cum Kneesworth Parish Council – Windfalls can make a significant contribution and should include rural exception sites. • Can be appropriate if on a small scale and village character is protected (various comments about what counts as small scale including 5, 8, 10 or an unspecified higher number of dwellings). • Yes, but not if involving the loss of large houses and gardens. • Yes, but making an allowance for the diminishing

	<p>potential as sites are used up. Suggest a 25% reduction to 150 per year.</p> <ul style="list-style-type: none"> • Caldecote Parish Council – Yes otherwise more greenfield sites will be needed. • Whaddon Parish Council, Weston Colville Parish Council, Steeple Morden Parish Council, Papworth Everard Parish Council, Over Parish Council, Madingley Parish Council, Little Abington Parish Council, Litlington Parish Council, Histon & Impington Parish Council, Great and Little Chishill Parish Council, Great Abington Parish Council, Grantchester Parish Council, Gamlingay Parish Council, Foxton Parish Council, Fowlmere Parish Council, Fen Ditton Parish Council, Croydon Parish Council, Coton Parish Council, Comberton Parish Council, Caxton Parish Council – Support • Ickleton Parish Council – Support but emphasis should be on their development for small homes. • Milton Parish Council – Support, allows village children to live in the village. • Waterbeach Parish Council – Allows developments to be more easily assimilated in the village. Helps avoid loss of greenfield sites. • The guidance in the NPPF does not qualify the size of the potential windfall. It makes it clear that larger sites can also be windfall, such as the former cement works at Barrington. • Cottenham Parish Council – Such provision can at least count towards the required ‘buffer’. • Yes, but at a cautious level of 100 per year due to economic circumstances. • Provided that parish councils have the power of veto over exception sites and that the focus is on providing local homes for local people <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • The fact that 200 dwellings per year have been achieved for the past 20 years does not constitute the compelling evidence required by the NPPF given the intentions of the plan-led system to identify as many sites as possible and the inevitability of reducing capacity as a result of urban intensification. • Village infill has already gone too far to the detriment of village character. • The plan should aim to allocate sites to meet identified housing need to provide certainty to developers and landowners. • Over reliance on small windfall sites would greatly reduce the amount of affordable homes that could be provided. • Great Shelford Parish Council – Would involve loss of gardens.
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	<ul style="list-style-type: none"> • Rampton Parish Council –Windfalls can be open to abuse. • The plan should not include an allowance for windfall development as the NPPF discourages such an approach. The Council has a record of under-delivery and consequently the 200 windfall dwellings per annum should only contribute towards 20% additional dwellings requirement to provide greater flexibility and ensure a realistic prospect of achieving the planned supply as required by Policy 47 of the NPPF. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens • Windfalls arise from infill development and cause a loss of rural character. • Cambridgeshire County Council – Such provision can be included if it can be properly justified, but it should not be a substitute for making site allocations to meet identified needs over a 5-15 year period. • Such provision is unpredictable and cannot be relied on. Enough sites to meet all the identified need should be included in the plan. . • The supply of such sites will reduce in future as sites are used up, and because past rates included development on gardens which can no longer count in the supply. The plan should allocate enough sites to meet identified needs. • Such developments are increasingly unviable due to development costs and existing land use values. • The plan should not contain a windfall allowance. Whilst SCDC averaged 200 dwellings per year on windfall sites, a high proportion of this has been on small sites in the villages. This is not a sustainable form of development and one which the 'focussed' strategy of the Core Strategy and the new Local Plan should seek to reduce. It would therefore be contrary to the sustainable objectives of the Plan to assume windfalls at a rate of 200 per year for the next 20 years (4000 dwellings). <p>COMMENTS:</p> <ul style="list-style-type: none"> • Barton Parish Council – Support use of small windfall sites. • Cambourne Parish Council – Such provision increases the flexibility of the plan. • Any windfall allowance should only be for a low percentage of the overall predicted supply. Allocated sites should provide the majority of housing provision across the District. Subject to the evidence showing that windfall provision is a
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	<p>realistic element of the supply.</p> <ul style="list-style-type: none"> • Haslingfield Parish Council - This would allow for local development sponsored by individual villages to support perceived needs in Neighbourhood Plans • Policies in the new Local Plan must be supportive of such development if it is to be relied on as a source of supply.
<p>QUESTION 6: Providing a 5-Year Housing Land Supply</p>	
<p>i 5% buffer</p> <p>Support:58 Object: 5 Comment: 5</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • Papworth Everard Parish Council, Gamlingay Parish Council, Steeple Morden Parish Council, Rampton Parish Council, Great Shelford Parish Council, Fowlmere Parish Council, Grantchester Parish Council, Great Abington Parish Council, Litlington Parish Council, Croydon Parish Council, Over Parish Council, Ickleton Parish Council, Cambourne Parish Council, Caxton Parish Council, Histon & Impington Parish Council – Support • South Cambridgeshire is not a 'persistent under deliverer'. When the present Local Plan was prepared it was anticipated that the level of completions would not meet the target 'until later in the plan period once the major developments came forward' • Haslingfield Parish Council – This would allow for local development sponsored by individual villages to support perceived needs in Neighbourhood Plans • Any buffer will force development into villages and away from planned larger developments so the smaller the better. • Any slippage of delivery will be outside the control of the planning authority and can be addressed through plan, monitor and manage. • If market picks up substantially we may be able to reach the targets at the end of 5yr period. If we were entering from buoyant market then higher buffer would make sense. • A 20% buffer is too high, this is the equivalent to a Trumpington Meadows development size site being sought each year in addition to the low growth housing provision figure. This is not sustainable • The rate of house building is currently low. Therefore the Council should be able to demonstrate more than a 5-year supply of deliverable housing land, so a 5% buffer is adequate. • A 20% buffer would be very challenging, if indeed possible, to achieve.

	<ul style="list-style-type: none"> • Should be covered by windfall supply. • A low level buffer is needed to ensure all sites are developed if possible and avoid uncertainty for those living next door to potential development sites. • A large buffer undermines the local planning processes <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • Allow a 20% buffer given the number of recent development plan Inspectors' reports imposing buffers. Increases to the village framework and an allocation for small scale development in the village of Croydon are an example of local measures that can be undertaken to help identify this additional development land needed. • The buffer should be 20% to provide for flexibility in provision. • Between April 2001 and April 2011 7,683 homes were built against a minimum target of 11,750 homes. Over that 10 year period the annual average was achieved on just one occasion - 2007/08. In 8 of the 10 years completions did not achieve 80% of the target and in 7 out of the 10 years did not achieve 60% of the target. There is a record of persistent under-delivery and accordingly, the five year supply should include an allowance for a 20% buffer. <p>COMMENTS:</p> <ul style="list-style-type: none"> • 5% is required. No more can be justified unless the character of the area is to change significantly towards a suburban environment and the transport network cannot cope.
<p>ii 20% buffer</p> <p>Support:66 Object: 12 Comment: 3</p>	<p>ARGUMENTS IN SUPPORT:</p> <ul style="list-style-type: none"> • South Cambridgeshire has a persistent record of under delivery. • The Council should provide a 20% buffer to their 5-year housing land supply, i.e. effectively planning for a 6 year supply. This would support the Core Vision to deliver impressive and sustainable economic growth and enable the Council to respond to changing market and economic conditions. • The Council should provide a 20% buffer to its five-year housing land supply, which should be moved forward from later in plan period. SCDC has not met its annual average housing requirement since LDF was adopted. Has to be described as "persistent under-delivery" whether it results from difficult market conditions or a failure to plan properly for growth. A 20% buffer is considered necessary to front-load supply of land for housing and assist in boosting delivery of new homes. Rolling supply of sites with a "realistic prospect" of being delivered to provide five years'

	<p>worth of housing, plus a 20% buffer to address past under-delivery, will ensure viability of Local Plan overall.</p> <ul style="list-style-type: none"> • Cottenham Parish Council – Much of this 20% can come from windfalls and such an approach will help the Council meet its targets. • Cambridgeshire County Council – Support. SCDC have had a persistent under delivery through out their recent Plan, as described in the recent AMR (2010/2011): Cumulative net housing completions: 1999 - 2011 = 9,285 Cumulative annualised requirement: 1999 - 2011 = 14,112 Shortfall/Surplus: - 4,827. • Comberton Parish Council – Support • Low level of provision in recent years caused by slow progress of larger sites. Unlikely to change in short-term given economic situation • There has been an under-supply of housing in South Cambridgeshire. Government guidance does not set out any reasons to take into account to consider whether an under supply should, or should not, lead to a 5% or 20% buffer. The question is only a factual one; has there been persistent under supply? There has been a marked and persistent under supply as evidenced by the recent Annual Monitoring Reports, current five-year supply deficit and significant numbers on the housing waiting list. A 20% buffer is appropriate and will assist with meeting the immediate housing need that has built up. • The plan recognises the importance of providing sufficient flexibility to deal with choice and competition in the market over the plan period. It is, therefore, prudent at this stage of the plan-making process, to allow a 20% buffer given the number of recent development plan Inspectors' reports imposing buffers, than to create delays later in the process. • The role of windfall development, in particular housing land, is emphasised in the NPPF (paragraph 48). The key test is whether these will be a reliable supply. In South Cambridgeshire, these sites are usually brownfield or previously developed land. There are examples of brownfield windfall sites in the District that can contribute to the housing land supply, such as CEMEX's site at Barrington. It is significant that the guidance in the NPPF does not qualify the size of the potential windfall. It makes it clear that larger sites can also be windfall, such as the former cement works at Barrington. • For the period 2001 - 2010/11, it is estimated that the under delivery totalled around 4,000 dwellings,
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	<p>which represents a rate of around 400 dwellings per year.</p> <ul style="list-style-type: none"> • Between April 2001 and April 2011 7,683 homes were built against a minimum target of 11,750 homes. Over that 10 year period the annual average was achieved on just one occasion - 2007/08. In 8 of the 10 years completions did not achieve 80% of the target and in 7 out of the 10 years did not achieve 60% of the target. There is a record of persistent under-delivery and accordingly, the five year supply should include an allowance for a 20% buffer. <p>OBJECTIONS:</p> <ul style="list-style-type: none"> • Fen Ditton Parish Council – Disagree as any under delivery has all been down to delays to Northstowe. • A 20% buffer is excessive and unnecessary in South Cambs. <p>COMMENTS:</p> <ul style="list-style-type: none"> • To be effective it is crucial that the 5-year land supply buffer is consistent with the target that is set for the planned number of new homes over the plan period. We therefore believe the Local Plan should provide the high growth land supply buffer.
<p>Please provide any additional comments</p> <p>Object: 1 Comment: 15</p>	<p>OBJECTIONS:</p> <ul style="list-style-type: none"> • Foxton Parish Council – Don't think any land should be allowed to be brought forward to make up a shortfall. <p>COMMENTS:</p> <ul style="list-style-type: none"> • The Council will need to set a revised case for whether it considers that a 5% or 20% buffer will be need to apply and what these figures are likely to be. • Histon & Impington Parish Council - Two sites, Impington 1 for housing and Histon 1 for commercial development, were included in the last LDF. The carry over into the new Local Plan needs confirmation. The houses that could be built on the remaining half of Impington 1 should be included in the calculation of the five year development potential. • Comment is difficult as the Government approach is so vague at present. Some suggested alterations seem to hold little prospect for improvement. Unless the profit element is scaled down, I do not see a point in worrying about land supply. • Giving over land to housing that may in fact not be needed, may sacrifice the need for land for food. • Caldecote Parish Council – A 10% to 15% buffer would be sensible. • Foxton Parish Council – Do not agree that any land should be allowed to be brought forward to make up a shortfall.

	<ul style="list-style-type: none">• With planned high housing growth - which may not materialise - the need is only for the minimum 5%. Were the Council to go for low housing growth then the buffer should be 20%• A sensible policy approach would be for the Council to allow a 20% buffer when calculating the five year supply, but reviewed annually and reduced to 5% where the housing target has been continually met over a five year period.
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