



Written Representation

Examination into the South Cambridgeshire Local Plan

On behalf of

Peter Stroude (Personal ID no. 2705)

(Phillips Planning) Council Representation Reference No.s 61444,  
61450

Matter 3 Housing Need

## **Introduction**

The following statement sets out our comments with regards to Matter 3 Housing need associated with the proposed submission version of the Local Plan. We have previously made comments at the Issues and Options stage and submitted sites for inclusion within the Plan within the 2011 Call for Sites.

The following statement sets out our client's response to the Inspectors 2 questions. The first section explains why we consider the existing strategy to be flawed and unsound, the second section promotes sites within Longstanton which have hitherto been overlooked by the Council, and finally the conclusion will argue that the Plan is not founded on a robust or credible evidence base.

## **Comments on soundness and sustainability**

We consider that the proposed submission version of the Local Plan is unsound under all four elements of soundness criteria within Para 182 of the NPPF.

### Positively prepared

The proposed submission Local Plan asserts it has been positively prepared based upon objectively assessed needs, we fail to see how the Council can treat these needs figures as robust, when the SHMA states its figures are indicative only and should be treated with caution, and the entire technical assessment appears to be based on the premise that Cambridgeshire as a whole will only deal with the growth expected in Cambridgeshire. We cannot see that any external factors have been included that would arise from co-operation with neighbouring authorities. There is question therefore over whether the Council/councils have complied with the duty to co-operate.

Under paragraph 6.6 of the Council's Statement regarding Compliance with the Duty to Co-operate, it highlights that representations were received from Central Bedfordshire regarding the potential for unmet housing need within the District and how South Cambridgeshire could assist in addressing the shortfall. This is very important issue that appears to have not been adequately addressed. Central Bedfordshire like many of the London metropolitan greenbelt authorities, Central Bedfordshire is having to deal with its own housing needs as well as outward growth from London.

Due to greenbelt restrictions there is a greater pressure on towns and villages beyond the greenbelt that could lead to an in-balance in growth. It is relevant that the authority engages within its neighbours to examine the potential of those districts to assist in accommodating some of the London growth, and we are aware that such engagement is occurring with Bedford, Milton Keynes and Aylesbury Vale. South Cambridgeshire should be part of that discussion. We are therefore of the opinion this alone demonstrates a failure to adequately co-operate with neighbouring authorities, and that in failing to do so has failed to appropriately include this within its technical assessment of housing growth.

It is therefore likely that South Cambridgeshire may need to make additional allocations to take account of increased household and population projections arising from unmet housing need elsewhere.

#### Justified or effective

We have previously made representations to the Council regarding the concern that the chosen strategy is not effective and will not deliver the levels of development targeted. This is based on 15 years of historical growth within the District, only one year was the targeted housing delivery achieved.

The two former development strategies failed to deliver housing on the ground despite aiming for a so called step change in housing delivery, the same style of strategy has been adopted within this plan - the delivery of the majority of the growth within very large allocations at the expense of a greater range of sites.

The figures below indicate that South Cambridgeshire as an authority have not delivered strategies which actually work. The SHMA also confirms that the Council do not have a 5 year land supply in place with around a 50% deficit in figures illustrated. In line with the NPPF, this means that the restrictive housing policies of the Council should no longer apply further indicating a wider failure.



One aspect which may also have caused consistent failure is that on every large site delivery rates have been overestimated, they have rarely met the levels expected, we consider that the same mistake may be made and will exacerbate problems further.

Our conclusions are based on experience of working on larger sites and supported by longer term analysis within 'Housing Research on Strategic Sites – Research Study' (December 2005). This document has looked at a range of sites within the East of England (including Cambourne), the following lag times and delivery rates are applicable for very large strategic sites:

Site Capacity	Lag Time	Annual Completion Rate
1000-1999 Dwellings	4 Years	200
2000-2999 Dwellings	5 Years	250
3000 + Dwellings	5 Years	350

Arguably this document was compiled in an economy of a better state, although the conclusions reached are still considered valid and applicable to the delivery rates of sites within the current economy.

For example, Northstowe currently has permission for 1500 dwellings, the Council should expect a lag time and a delivery rate of around 200 per year yet the Council claims within the 2011/2012 AMR they expect 500 a year.

The NPPF is clear that Council's actually need to deliver housing on the ground, thus the Council cannot just talk about step changes again without a plan in place to

deliver it, the Council need to consider a wider basis for development which will broaden the type of sites and land available.

It seems reasonable to suggest that a more varied strategy would be appropriate, rather than larger allocations as a sole component. Sites within the rural areas should be allocated to allow incremental growth of settlements, with some larger allocations to complement the new towns and ensure strategic delivery. What is also missed is an opportunity to improve the sustainability of the existing settlements.

We see no reasoned justification for the Council to pursue the same strategy and question whether the Council's adherence to a strategy whereby development is lumped into large allocations, which has consistently shown to have failed should be endeavoured again or whether an alternative should be considered justified and likely to be more effective.

For instance, Longstanton is directly adjacent to Northstowe, a so called sustainable new settlement. Yet in the space of 100m, Longstanton is considered unsustainable and only allocated as a Group Village. We find such a designation unjustified, hence we would hope that such a bewildering approach to sustainability is corrected within this Local Plan.

By this archaic definition of sustainability the Council are consigning smaller villages to an on-going future of stagnation and a lack of ability to even deal with their own natural growth levels. Allied to a situation where the Council will not recognise how development they have allocated will deliver more sustainable adjacent settlements, a picture arises where the suppression of development is the main goal rather than promotion of a vibrant strategy which puts its money where its mouth is to get an actual step change in delivery.

Para 2.37 seems to indicate the tone for the strategy, housing figures of 19,000 are the upper limit of delivery rather than a target which can be exceeded if required. Given the critical need for new housing throughout the country, it seems illogical for the Inspectorate to consider plans which set limits to growth as justified and effective.

We therefore propose that additional allocations should be made within the rural area to deliver a broader strategy and a more distributed model of growth. This strategy would have a broader base, allowing a range of sites to be available on the market, existing settlements to grow and improve their sustainability whilst allowing people who wish to reside in the countryside the ability to do so and also delivering growth in the long term as part of new settlements. This would widen the type of sites available, as envisaged within Para 47 of the NPPF.

Para 2.45 claims that a dispersed strategy has already been confirmed as being unsustainable, however, Para 55 of the NPPF encourages support for the vitality of rural settlements, therefore, we see such a suggestion as being contrary to the

NPPF. We would direct the Inspector to seek clarification on this point as we have not seen any evidence that supports this supposition.

900 dwellings over a 20 year period in a mainly rural authority does not appear to allow anyone or anywhere the flexibility to grow or develop. The use of highly restrictive development framework plans ensures constrictions and we consider that they should be relaxed to allow for incremental growth.

We consider that sites at Longstanton, (sites 244 & 246) would be sustainable, a prime example of a smaller site, deliverable in the short term, and adjacent to an existing settlement in a visually constrained location. The sites would not result in the loss of Green Belt land and would aid in supporting the sustainability of the settlement in the short term pending the delivery of Northstowe.

These are the type of sites which the Council should be looking to add to the development strategy to provide sites which they can get away quickly and would make a material difference to their 5 year housing supply situation.

#### Consistent with national policy

Following on from our consideration that the proposed submission plan is neither, effective, justified or positively prepared based upon the most up-to-date information, it therefore cannot be considered as consistent with national policies specified within the NPPF.

The plan would fail to deliver housing numbers sufficient to cater for the growth identified in the SHMA, which is clearly out of date and should be revised upwards in any respect. The current plan therefore offers no comfort that it will deliver a rolling 5 year supply of sites, unable to meet the plan making paragraphs within the NPPF to deliver sustainable development.

In our view, the strategy to have almost no material levels of development within the rural areas when South Cambridgeshire is a mainly rural authority is actually inherently unsustainable leading to settlements which have no future, not because they are poorly located or unpopular, but because the Council's antiquated definition of sustainability consigns them to history. This opposes Para 55 of the NPPF which supports the maintenance of village vitality.

Additionally, policy H/16 counters the NPPF's ethos, by introducing the need for additional marketing evidence prior to the principle of conversion being acceptable, it is overriding the general presumption within the NPPF that the reuse of rural buildings is a fundamentally acceptable form of development, and appears contrary to the key policy objectives delivered through the new prior approval procedure under Class MB of Part 3 of Schedule 2 to the Town and Country Planning (General Permitted Development Order) 1995, as amended by SI 2014/564.

## Promotion of Longstanton site

Sites in Longstanton have the potential to amend the strategy, Land East of the B1050 is already allocated for a business park, with reserve matters granted. We have promoted this for alternative use for residential development along with land west of Over Road.

The site is shown on the red line plans supplied, located on the west side of Longstanton. The wider site was formerly within agricultural use, but planning permission was granted in 2000 for a bypass to the village of Longstanton along with permission for the erection of 500 dwellings and a 6.3ha business park along with ancillary developments.

### The proposal

The proposed masterplan for land west of Over Road extends to an area of 4.18 Ha, we seek allocation for up to 130 dwellings. This has been promoted as it provides a measure of flexibility in the design and make-up of the development.

The indicative masterplan shows 126 dwellings:

- 126 Dwellings at a density of 30 dph (Policy HG/1) comprising:
  - 50 x 1 & 2 Bed Dwellings
  - 38 x 3 Bed Dwellings
  - 38 x 4 & 5 Bed Dwellings
- Of which 50 Affordable Dwellings will be provided (40% (Policy HG/3))
- Landscaping
- Sustainable Drainage System
- Informal Open Space totalling 1200m<sup>2</sup>
- New Pedestrian, Cycle and Vehicle Access to Over Road

In respect of the wider planning situation, a new town, a so called sustainable settlement has been approved adjacent to Longstanton and Oakington. It is bordered to the east by the guided busway and to the west by the existing settlement (see masterplan below).



It is therefore considered that in reality Northstowe is simply an extension of Longstanton and Oakington rather than a new town and spatially should be seen as such. Accordingly we consider it reasonable to consider Longstanton to be similarly as sustainable as Northstowe.

### Delivery

The proposed development will deliver up to 130 dwellings and therefore will make a relatively small, but important contribution to the shortfall.

This site is considered to be:

- Available – It is in a single ownership and is available for development now.
- Suitable – For residential development as it is adjacent to, and well related to existing residential development, located in a sustainable site for new development. Infrastructure surrounding the site requires no additional works.
- Achievable – There is a reasonable prospect of the level of housing below being delivered in the 5 year period.

### Housing Delivery Timetable

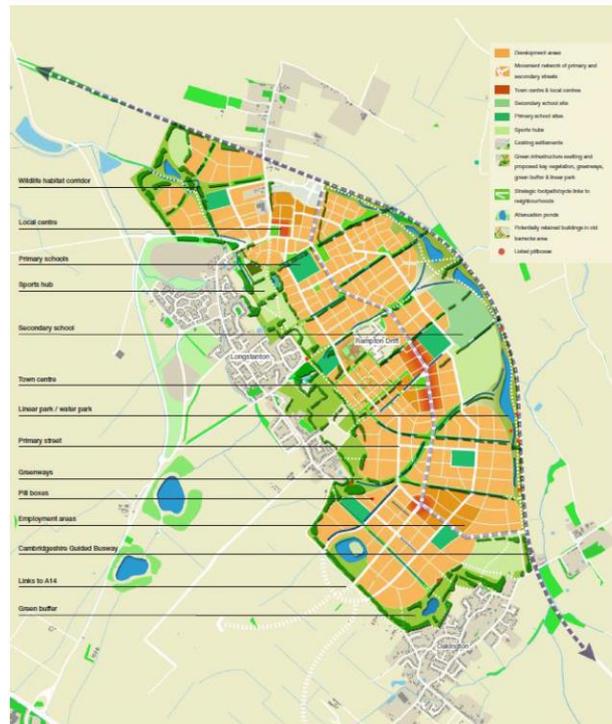
- 2016 – 35
- 2017 – 35
- 2018 – 35
- 2019 – 25

We therefore expect to contribute as many as 100 dwellings to the current 5 year land supply.

The deficit identified is of such a magnitude that it constitutes a strong material consideration in support of an application for development in its own right. However, at this stage it seems to offer a viable and deliverable development site that should be formally identified in the Local Plan.

### Merits of the site

This development is considered to be a logical extension to the Home Farm development and sustainable location for new housing within South Cambridgeshire.



The site lies within the natural defensible boundary of the B1050 bypass, thus well related to existing residential development in Longstanton and proposed development at Northstowe. The site would be well related to public and private transport links in the area and would improve the viability of existing facilities within the village.

While the 130 dwellings (equivalent to 2.4% of the unadjusted total 5 year housing delivery target) would aid South Cambridgeshire in meeting their housing needs for the area in the next 5 years as required by the NPPF, which is not currently being met, it would not prejudice the wider strategy of housing delivery in the District.

Development on the site complies with Policy DP/7 and the supporting paragraphs of the Development Control Policies DPD, as it is not considered to result in any realistic encroachment upon the open countryside.

In terms of sustainability, Longstanton is noted as a Group Village within the settlement hierarchy and deemed unsustainable, this assessment is approximately 12 years old, thus significantly out of date. This assessment fails to take account of the last 12 years of development in the village, including the impact of the Home Farm development in delivering up to 536 dwellings, new supporting shops and services, the impact of the new bypass and the opening of the guided busway. In a more up to date assessment of sustainability the settlement would clearly score higher based on these facts alone.

## **Conclusion**

In summary we consider that the Plan is not founded upon a robust or credible evidence base, it is not based on the up-to-date housing need information that takes account of unmet housing need from constrained neighbouring districts, therefore it would be unsound to proceed on this basis as numerous plans throughout the country have been withdrawn as a consequence of a failure to comply with the duty to co-operate.

We argue that the plan is unsound in respect of the definitions contained within Para 182 of the NPPF, it is not positively prepared, not the most appropriate strategy, would not be effective and as a result would not be consistent with national policy

This is based on overestimation of delivery time and underestimation of housing need, Northstowe's permission for 1500 dwellings should expect a lag time and a delivery rate of around 200 per year, although the Council expect 500 a year.

Moreover, Para 2.37 proposes figures of 19,000 as the upper limit of delivery rather than a target which can be exceeded, it seems illogical for the Inspectorate to consider limits to growth as justified and effective due to the critical need for new housing throughout the country.

We see no reasoned justification for the Council to pursue the same strategy of development lumped into large allocations, which has consistently failed to be endeavoured again, therefore an alternative should be considered justified and likely to be more effective.

With regards to ensuring the Local Plan is sound, this could be achieved by allocating sites within rural areas to allow for incremental growth of settlements, the shift towards allocating large sites for new housing has resulted in viable sites such as Longstanton being overlooked, despite having less capacity than Northstowe, the 130 proposed homes would not cause loss of Green Belt land, would aid in supporting the sustainability of the settlement and has the potential to aid in meeting the housing shortfall.

Ultimately, the changes we seek are for the Council to appropriately engage with its neighbours and beyond the insular confines of the Cambridgeshire (west Suffolk) authorities. The Council has failed to consider the outward pressure from London and yet is a growth area by designation. The housing and population projections should therefore be updated following appropriate consultation.

In addition we also request that the sustainability assessment of settlements be updated, and in particular the status of Longstanton be considered in a sensible manner, as it is a sustainable location, and certainly far more sustainable in the immediate future than the few thousand houses being built at Northstowe. Common sense must prevail on this point alone.