

Independent Examinations

Cambridge City Local Plan and South Cambridgeshire Local Plan

Matter 2. Overall Spatial vision and general issues

Hearing Statement prepared by Bidwells on behalf of:

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and Bidwells (17324)**

Matter 2. Overall Spatial vision and general issues

[South Cambridgeshire Submission Local Plan Policy S/6]

a. Is the overarching development strategy, expressed as the preferred sequential approach for new development, soundly based and will it deliver sustainable development in accordance with the policies of the National Planning Policy Framework?

1. Our concerns in respect of the overarching development strategy as expressed within Policy S/6 of the South Cambridgeshire Submission Local Plan (and Policy 3 of the Cambridge City Local Plan relate to whether the strategy is sufficiently flexible and robust to enable it to deliver sufficient housing to meet objectively assessed needs.
2. Whilst we are in broad agreement with the continuation of the proposed development hierarchy and associated sequential preferred approach towards development within Cambridge and South Cambridgeshire, we remain concerned that the Policy will not adequately meet the objectively assessed housing needs of the area and is not the most appropriate strategy having regard to the evidence base.
3. As noted in our representations to Matter 3, it is considered that the amount of housing development that is being planned for with South Cambridgeshire (and Cambridge City) is insufficient to meet the objectively assessed housing needs of the District during the Plan period.
4. Moreover, in any event, it is considered that the location of new housing being proposed within the District is not appropriate in the context of the hierarchy in that:
 - i. Delivery of new housing is over-reliant upon the development of new settlements where delivery is dependent on significant infrastructure provision over which there is a high degree of uncertainty and,
 - ii. This approach will not help to address the rolling 5-year housing land supply requirements, particularly the current 5-year land supply deficit within the District.
 - iii. Insufficient regard has been given to the potential for further development in sustainable villages close to Cambridge and the valuable contribution development in such locations could make to ensuring delivery of sufficient housing in a sustainable manner. As a result, further suitable, deliverable sites should be identified in the more sustainable villages such as the Rural Centres

and Minor Rural Centres and, if required, certain Group Villages in order to help support local services and facilities and help to maintain flexibility in housing delivery.

5. We elaborate on each of these points in turn below.

i) Over-reliance on New Settlements

6. The Development Strategy for South Cambridgeshire as detailed within Policy S/6 is heavily reliant on the delivery of housing within New Settlements. The tables below illustrate the distribution of development across the hierarchy and compare this with the distribution of development within the 2003 Cambridgeshire Structure Plan (Ref: RD/AD/010) from where the preferred sequential approach emanates.

Table 1. Housing Distribution across the sequential development hierarchy for Cambridge and South Cambridgeshire

	Existing Completions and Commitments	New Sites Cambridge	New Sites South Cambs	Total	Submission Local Plans %	Structure Plan %
Cambridge Urban Area	3,285	3,324	0	6,611	20	27
Edge of Cambridge	11,361	430	100	11,891	35	25
New Settlements	5,965	0	4,370	10,335	31	18
Villages	3,853	0	895	4,748	14	30
Total	24,466	3,754	5,365	33,585	100	100

Table 2. Housing Distribution across the sequential development hierarchy for South Cambridgeshire only

	Existing Completions and Commitments	New Sites South Cambs	Total	Submission Local Plans	Structure Plan %
Cambridge Urban Area	0	0	0	0	10
Edge of Cambridge	4,211	100	4,311	22	12
New Settlements	5,965	4,300	10,265	53	30
Villages	3,853	860*	4,748	24	48
Total	14,029	5,295	19,289	100	100

* Note, the 895 referred to in first table on page 20 of the South Cambridgeshire Local Plan is incorrect and does not relate to the housing trajectory.

7. It is clearly evident from these tables that the reliance on development within New Settlements as part of the development strategy for South Cambridgeshire has grown from the previous strategy. The proposed development strategy now relies on over half of all the dwellings required to meet South Cambridgeshire's housing needs within new settlements. It is also evident that, whilst the proportion of development proposed for the Cambridge Urban Area / Edge of Cambridge sites remains similar to the previous strategy, the proposed role of the villages has diminished with less than a quarter of the District's housing needs and little more than 10% of the two Authorities' overall housing requirement being met in such locations.
8. We would stress that paragraph 14 of the NPPF requires Local Plans to meet objectively assessed needs, "with sufficient flexibility to adapt to rapid change." Similarly, paragraph 173 of the NPPF advises that Plans should be deliverable. We consider that the development strategy's over-reliance on delivery of housing development within new settlements is not robust or deliverable and will put at risk housing delivery within the District over the Plan period.
9. The significant reliance on new settlements places the housing supply in a precarious position as any difficulties or delays to the delivery of one or more such developments will inevitably expose the Council to a significant shortfall in housing supply and the related impact of having a shortfall against their five-year supply requirement.¹ Indeed, this issue is illustrated by the delays in the delivery of Northstowe since its identification for growth in the 2003 Structure Plan and the resultant impact on the Council's annual housing delivery and 5-year housing land supply position. The increasing reliance now placed on new settlements as part of the development strategy will only serve to increase the risks of this situation continuing to occur over the Plan period.
10. Indeed, given that development at Waterbeach and Bourn requires a further plan process to adopt an AAP before it can be progressed through applications the lead-in times are unrealistic based on past performance (i.e. at Northstowe) and the scale of new homes that will be delivered within the plan period is considered to be too optimistic.
11. Moreover, the Submission Local Plan's over-reliance on larger strategic sites ensures that the delivery of the Plan's housing requirements is unduly dependent on just a few sites with the majority of the new housing being provided in just a few locations.

¹ It should be noted that in a recent case it was considered appropriate to measure the 5-year housing land supply against the housing trajectory of the Local Plan (South Northamptonshire Council v SSCLG (2014) EWHC (Admin) 573). If this approach were to be applied when a new settlement is delayed compared to its proposed commencement on the housing trajectory, the implications for the 5-year housing land supply would be considerable.

12. We therefore have concerns regarding the deliverability of a new settlement growth strategy within the Plan period 2031. New settlements have long lead-in times and the authorities acknowledge that new settlements could only deliver housing late in the Local Plan period. New settlements have major infrastructure requirements, especially in their early stages. This infrastructure is not just 'engineering' infrastructure such as transport and utilities, but also social infrastructure such as schools, health facilities and libraries. It is unlikely that infrastructure will be in place from 'day one'.
13. In addition to the above deliverability issues relating to new settlement proposals there is a major question of the massive cost in terms of hundreds of millions of pounds which needs to be provided to plan and install the necessary physical infrastructure to service the new settlement proposals. Not only will there be no returns on the development for a very long time but affordable housing will not be provided in a timely fashion and the necessary social infrastructure base will be absent in the early development phases.
14. The Council's approach ignores the extensive work undertaken by SCDC to undertake 'Housing Needs Assessments' for many villages within the District to understand what the needs are for each village, including the extent and type of housing need. Much of this identified need will not be met by the 'new settlement' approach; particularly the need to provide affordable housing to meet a local need such as to provide housing for families with a connection to a village.

5-year Land Supply

14. South Cambridgeshire District Council has an acknowledged shortfall against its five-year housing land supply requirement. This has been identified within recent appeal decisions in relation to sites at Bannold Road [Ref: APP/W0530/A/13/2209166] (RD/Strat/340) and Cody Road, Waterbeach [Ref: APP/W0530/A/13/2207961] (RD/Strat/330). Issued in June 2014, these decisions clearly demonstrate that SCDC does not have a demonstrable supply of land to provide five years' worth of housing as required by paragraph 47 of the NPPF. Furthermore, the decisions highlighted that there are unmistakeable errors in the calculation of the District's 5-year housing land supply requirement, most critically the calculation of the correct buffer to be applied. Taking account of these appeal decisions, it is calculated that the Council has a 5-Year Housing Land Supply of approximately 4.1 years supply.

15. It is important to emphasise that the Council's failure to meet its annual housing delivery requirements (The Council has met its annual requirement only one year in the last twelve, which suggests a persistent under delivery) and to maintain a five year housing land supply can be largely attributed to the over-reliance of the Council's current Local Plan on large strategic sites including the new settlement at Northstowe.
16. Clearly, any slight deviation in the assumed housing trajectory will further threaten the supply level and the Local Plan's over-reliance on new settlements is likely to create further pressure, particularly during the early part of the Plan period.
17. Moreover, our representations made in relation to Matter 3 suggest that the proposed housing requirement of 19,000 dwellings is insufficient to meet the objectively assessed needs and that a higher level of housing growth of 24,400 new dwellings should be provided for by the plan. This will clearly have a significant knock-on effect on the five-year supply. To achieve housing delivery in South Cambridgeshire which meets or exceeds the five-year supply requirement is largely dependent on the large strategic scale developments in South Cambridgeshire.
18. It is considered that the more sustainable villages could perform a valuable role in helping to ensure that the Council has a more responsive and deliverable supply of land to help address these five-year land supply issues moving forward.

Sustainable Villages

19. In this context, we consider that insufficient regard has been given to the potential for further development in sustainable villages close to Cambridge and the valuable contribution development in such locations could make to ensuring delivery of sufficient housing in a sustainable manner. As a result, further suitable, deliverable sites should be identified in the more sustainable villages such as the Rural Centres and Minor Rural Centres and, if required, certain Group Villages in order to help support local services and facilities and help to maintain flexibility in housing delivery.
20. SCDC's approach to new development in the District currently provides only 16% of the new housing for SCDC at the villages, amounting to 860 dwellings, 540 (63%) of which will be at Sawston. Whilst sustainable development is a key principle of the NPPF, it is considered that some development at the larger and better located villages can be sustainable. Indeed, some village development can help sustain those villages and bring investment to local services, facilities and infrastructure. Conversely, ignoring the role of villages places a strangle-hold on them and prevents investment projects coming forward.

21. Nonetheless, the Plan fails to direct any new development to a number of sustainable villages within the District despite the sustainable villages being identified by the Council's Settlement Hierarchy and Village Classification Report (2012) (Ref: RD/Strat/240). As a result, the sustainability of the villages is threatened by the lack of development opportunities, and thereby investment opportunities, to help support and improve facilities. For example a large number of Public Houses have closed or are struggling to remain viable; more custom to support such facilities would be of benefit.
22. Whilst it is understood that the distribution of housing across the hierarchy must be underpinned by the need to provide sustainable development it is considered that the villages have a greater role to play in meeting identified housing needs in a flexible and responsive manner at the larger villages, so long as the allocation is of an appropriate scale and it can bring benefits to help support service provision within that village.
23. By including more small sites within the larger villages there would be a more diverse and flexible supply of housing land which is deliverable without extensive infrastructure burdens. This would help to ensure that there is a rolling 5-year land supply including a 20% buffer to take account of past under-delivery, particularly in the event that there are further delays in the delivery of the new settlements and other strategic sites.

Conclusion

24. We therefore consider that the proposed distribution of development across the sequential development hierarchy is insufficiently flexible and robust to ensure housing delivery is reasonably assured over the plan period. The approach is therefore not positively prepared, not consistent with national policy, not justified having regard to the evidence base and is unsound.

c. Are the Plans founded on a robust and credible evidence base?

25. We have significant concerns that there are fundamental flaws in the Council's evidence base, particularly in relation to the Strategic Housing Market Assessment (SHMA) (Ref: RD/Strat/090) and specifically the objective assessment of housing needs provided within Chapter 12 of the SHMA and the CCC Technical Report (Ref RD/Strat/080).

26. Paragraphs 158 and 159 of the NPPF emphasises the importance of using a proportionate evidence base and require that local planning authorities should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence and that their assessment of and strategies for housing, employment and other uses are integrated, and take full account of relevant market and economic signals.
27. Paragraph 159 of the NPPF goes on to highlight that local planning authorities should prepare a Strategic Housing Market Assessment to assess their full housing needs and should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
- meets household and population projections, taking account of migration and demographic change;
 - addresses the need for all types of housing, including affordable housing and the needs of different groups in the community; and
 - caters for housing demand and the scale of housing supply necessary to meet this demand.
28. In assessing housing needs the NPPG recommends that the ONS Sub National Population Projections (SNPP) and the DCLG Sub National Household Projections (SNHP) are used as the starting point for determining housing need. However, the NPPG recognises that these should not be used in isolation and the assessment should take account such as local changes in migration, age structure and employment trends. In addition, NPPG recommends that housing market signals are considered such as land prices, house prices, rents, affordability, rate of development and overcrowding.
29. In this context, we consider that there are a number of flaws in the methodology for the Demographic Projections produced by Cambridgeshire County Council Research Group (CCCRG) which provide the underlying basis for the Council's proposed housing requirement. The approach adopted is not consistent with the guidance within the National Planning Practice Guidance and fails to adhere to the requirements of the NPPF in a number of respects. In particular, we consider that the SHMA and associated Technical Report on Population, Housing and Employment forecasts:
- Fails to set out and apply a robust methodology for the calculation of population or household projections. Instead it simply draws a population trend line through the 2001 and 2011 Census to 2031 and then applies a very simple population to household ratio.

- Fails to give any weight to the various population forecasts set out in the Technical Paper and in doing so fails to properly align with employment and housing requirements.
 - Fails to take the presented information on housing market signals into account in either defining a functioning housing market area, or estimating the objectively assessed housing need.
30. Moreover, there is little detail contained within the CCC Technical Report, or Section 12 of the SHMA which sets out the exact reasoning behind the requirement for 19,000 dwellings – other than it being the middle ground of the various scenarios run (paragraph 7.1.4, CCC Technical Report). This in itself does not satisfy the requirements of the NPPF. Moreover, there is also no indication of the level of migration projected on the basis of 19,000 dwellings.

Conclusions

31. Whilst we are in broad agreement with maintaining the overarching hierarchical approach towards development within Cambridge and South Cambridgeshire, we remain concerned that the Policy will not adequately meet the objectively assessed development needs of the area and is not the most appropriate strategy having regard to the evidence base. As such, the Policy is:
- not positively prepared;
 - not justified having regard to the entirety of the evidence base;
 - not consistent with National Policy within the National Planning Policy Framework (The Framework) in relation to meeting objectively assessed needs.
32. Consequently, it is considered that the development strategy detailed within Policy S/6 is unsound and that changes to the Development Strategy should be made to reflect our proposed increase to the housing requirement detailed in Policy S/5 to 24,400 dwellings and to facilitate the identification of further sites within the more sustainable villages, thereby ensuring greater flexibility for the delivery of housing.
33. This revised wording will ensure that the Policy fully accords with Government guidance in the NPPF paragraphs 47, 54, 55 and 159. As such, this will ensure that the Plan is Sound in this regard.

(2,921 words)