

CAMBRIDGE CITY & SOUTH CAMBRIDGESHIRE LOCAL PLAN EXAMINATIONS

MATTER 8A & B: Housing Land Supply and Delivery

1. This Hearing Statement has been prepared by Boyer Planning pursuant to the duly-made representations submitted on behalf of RLW Estates Ltd and the Defence Infrastructure Organisation (DIO).
2. The majority of our written submissions are made in response to Matter 8A.

Matter 8A

Are the housing trajectories realistic; will they deliver the number of new homes expected, within the Plan period?

i. Are the expectations for existing permissions and new allocations reasonable? Is there too much reliance on new settlements and will this prejudice the delivery of new housing in the plan period. (NB representations regarding individual sites will be heard at a later hearing).

3. The role of new settlements in terms of the overall spatial strategy, both in principle and as regards the specific locations proposed, is a matter for debate at other Hearing sessions. For the purposes of Matter 8 the issue is the extent of their contribution in the overall provision.
4. Over the first half of the plan period the combined housing trajectory indicates a total of 19,455 completions against a target (per the submitted plans) of 16,500¹. Whilst there may be debate over some elements of this provision (a topic for discussion under Matter 8B), it is important to note that it does not assume any completions from the two 'new' settlement sites – Waterbeach and Bourn.
5. Including Northstowe, which already has outline permission and is expected shortly to commence, the Local Plans therefore rely on three new settlements². The joint housing trajectory assumes a total of 9,065 completions out of a total provision of 33,000 additional dwellings over the plan period, ie 27% from these three projects. The RLW/DIO submissions propose that the Waterbeach contribution should be increased to 3,500. Moreover, with scope to further

¹ RD/Strat/350

² Land west of Cambourne should properly be considered an urban extension in this context.

accelerate delivery, this contribution could be increased. This would not increase the proportional contribution of new settlements if there is a corresponding increase in overall provision (as we have previously argued for).

6. Two issues arise from this: first, whether this scale of provision will distort the housing market and undermine the ability to satisfy demand overall; second, whether the practicalities of implementation will prejudice achievement of the trajectory. In addressing these issues, it is important to bear in mind that new settlements are a long-standing and established component of strategic housing provision in the Cambridge area.
7. The report prepared for RLW by Jones Lang LaSalle (RD/RLW & DIO/020) addressed the first of these points, in the context of housing market circumstances at the time of the 2012 consultation. Based on an analysis of demand and supply, sales, rental and investment markets, new build activity etc, it demonstrated the ability of the sub-regional housing market (defined as comprising these two Local Plan areas) to absorb a development of some 12,750³ dwellings at Waterbeach. It identified that the focus for new housing completions outside the city centre and inner suburbs in the period 2006 – 2011 had been in the western sector, including Cambourne, a pattern that has been maintained with the major developments underway to the south and north west of the city.
8. Moreover this southern and western focus to the distribution of new housing is set to continue under the strategy of these Local Plans with Waterbeach being the only major development area for housing on the northern radial out of the city (A10 corridor)⁴. This is of particular significance given the existence of key employment locations lying to the north of the city, which the strategy seeks to intensify with the proposals for Cambridge Northern Fringe East (Policy SS/4), and the accessibility of these locations from the new town at Waterbeach by sustainable transport modes – cycle, bus and rail.
9. These factors serve to reinforce the findings of the JLL report that the Waterbeach new town would have a beneficial effect on the housing market and economy of the sub region.
10. Turning to the second issue (the practicalities of implementation), it has to be acknowledged that large scale mixed use schemes are likely to involve a longer lead-in time than smaller single-use developments. It may be convenient for those opposed to new settlements to point to the chequered performance of Northstowe, the most recent example, which plainly has taken a considerably longer-time to bring forward than envisaged when first allocated in the 2003 Structure Plan. It is however entirely fallacious to use that as a precedent for other cases.

³ The maximum number then under consideration

⁴ See for instance the Key Diagram) in the South Cambs Local Plan (Fig 1, page 28)

11. The matter can only be assessed on a project-specific basis. Relevant factors include the complexity of land ownership and the involvement of development agencies, the engagement of statutory undertakers and other infrastructure providers, the robustness of delivery arrangements, the commitment of the local authorities concerned.
12. As regards Waterbeach, these considerations all point favourably towards prompt delivery. Whilst the details of the proposal are not for debate at this session, the following commentary illustrates the position:

Land ownership/Development managers: There are no landownership constraints preventing timely delivery. Two parties (DIO and The Waterbeach Trust) own virtually all the land within the new settlement boundary⁵ and they are working in tandem. All land is either currently vacant or subject to short term occupational arrangements. Each party has also appointed development managers to drive forward early delivery – in the case of DIO, they have appointed Urban & Civic and the Trust have appointed RLW, who in addition also own or control land outside of the settlement boundary necessary to facilitate delivery.

Infrastructure Providers: RLW/DIO through their consultant teams have been engaged in detailed discussions with the principal infrastructure bodies since well before the current Local Plan process commenced. It is worth bearing in mind in this context that this is not the first comprehensive promotion of the Waterbeach scheme. That took place through the Cambridgeshire & Peterborough Structure Plan (2003), the EIP for which examined the suitability of Waterbeach in detail alongside Northstowe. The dialogue developed at that stage with (among others) County Transportation officers, the Environment Agency, Anglian Water, Network Rail, the Highways Agency, has been maintained and developed since then, incorporating bus service providers, other public utility companies etc. The comprehensive evidence base submitted as part of the 2012 Issues & Options consultation (see Examination Reference Documents in the RLW & DIO series) demonstrates the progress achieved at that stage in relation to various infrastructure matters. Since then further detailed work has progressed, and is progressing, on the key topics, and this will be reflected in Statements of Common Ground to be presented at the appropriate stages of the Examination, including Waterbeach specific hearings.

Delivery approach: The robustness of any project depends on the degree of success in co-ordinating planning and delivery processes, including securing the funding necessary to implement the scheme. Previous information has been submitted on delivery strategy,

⁵ The existing sewage treatment works is owned by AWG. Relocation in conjunction with a new works to serve the development is anticipated on land controlled by RLW

as set out in RD/RLW & DIO/030. The appointment of development managers has further reinforced the commitment to delivery and work is on-going to set out a cohesive, sustainable and deliverable approach. There are good reasons to be confident that the scheme will be delivered in a timely manner. For example, RLW representing the Trust, and U&C representing DIO, are well capitalised and therefore capable of undertaking the upfront investment and long-term commitment necessary for a project of this scale.

Local authorities: Confirmation of a policy commitment to the new town through the Local Plan is important to cement. Moreover, it is essential that, even though an element of the project will extend beyond the plan period, this Local Plan must commit to the full scheme in order to secure the District Council's and landowners' objective to plan comprehensively and ensure deliverability. Positive working and collaboration with the local authorities and various statutory bodies is well-established, having been in place over a number of years. Moving forward, the potential to establish governance and project management arrangements between the landowners, developers and the local authorities is being actively explored in order to enhance delivery of the full scheme.

13. In conclusion on this point therefore we submit that:

- New settlements do not form an excessive part of the housing provision strategy of the current Local Plans;
- The housing trajectory is not dependent on any completions from the two 'new' settlements in the first half of the plan period (notwithstanding that there may be scope for and benefit in allowing earlier development at Waterbeach);
- The spatial distribution of new housing has been and continues to be skewed towards the west and the south of the city. Waterbeach is the only major development area in the northern sector and has a key role to play in serving that housing market;
- The requirements and delivery arrangements for each scheme must be assessed individually. We have illustrated this in relation to Waterbeach, whilst recognising that detailed consideration of the scheme will follow in due course.

ii. Is there sufficient flexibility to deal with changing circumstances and/or uncertainty over when allocations will come forward for development?

14. The concept of flexibility is an integral and essential component of sound plan-making. Para 14 of the NPPF indicates that the presumption in favour of sustainable development means, among other things, that "*Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.*"

15. The RLW/DIO representations in response to Policy 3 of the City Local Plan query the achievability of 7 allocated sites, totalling 893 dwellings. Whilst there is clearly scope for the delivery prospects to change over the plan period, this shortfall and the very limited 'surplus'

margin identified in the Plan (Table 2.3) indicate a clear lack of flexibility. Moreover the Plan contains no real mechanism to address the emergence of a shortfall if and when it arises. The monitoring arrangements set out in Appendix M (in relation to both Policy 3 and Policy 4 (Green Belt) offer only the prospect of *'further engagement with landowners/developers'*.

16. Given the difficulty of identifying additional development opportunities within the city's administrative area (both because of constraints within the built up area and a tight Green Belt boundary at its edge) the task of providing flexibility and identifying additional opportunities for housing to meet objectively assessed needs must realistically fall on South Cambridgeshire. Hence the need for arrangements to be agreed between the two authorities.
17. The South Cambs Local Plan relies on Policy S/12 to provide flexibility, seeking to address any shortfalls in provision by a range of measures including a review of existing commitments, actions to accelerate delivery, or even a review of the Local Plan. Of these measures those relating to current commitments and allocations are best able to provide a timely response to changing circumstances. The identification of new sites, and/or a review of the Local Plan, on the other hand is an inevitably long and uncertain process.
18. Uniquely among the components of housing supply, Policy S/12 introduces phasing restrictions in respect of the two new settlement schemes at Waterbeach and Bourn. In respect of Waterbeach RLW/DIO have submitted through their representations that it is entirely realistic to plan for housing completions from 2021, making a total of 3,500 in the plan period as opposed to 1,400 assumed in the Council's trajectory (see para 5 above). This plainly introduces a welcome additional element of flexibility into the strategy and reduces risks of non-delivery, consistent with NPPF paragraph 14, and we submit that it should be reflected in a change to Policy S/12 as set out in our duly-made representations.
19. At present Policy S/12 indicates that an earlier start at Waterbeach could be contemplated through a review of the Local Plan. This is a purely policy-based constraint that pays no regard to the feasibility of bringing development forward sooner, nor of the benefits of doing so in terms of the robustness of the housing trajectory. The latter consideration is reflected in Policy SS/5 which acknowledges the potential for earlier release in order to maintain a five year supply.
20. Furthermore, there is not only an obligation on local planning authorities to maintain a five year supply of housing land, but also to plan positively in order to significantly boost the supply of housing. In this context there is no basis for imposing a policy constraint on the amount of housing that can be delivered on a site which in other respects is sustainable. Instead policy should be flexible to respond to market demand.
21. The Local Plan envisages that the detailed planning of the Waterbeach New Town will take place through an Area Action Plan which, on the basis of the current Local Development Scheme,

would be completed by Spring 2020. Directed by the Inspector's findings on the most effective contribution that Waterbeach can make to the housing trajectory, it is plainly possible to vary this approach, eg. by bringing forward the AAP programme, preparing a planning application in parallel with the later stages of the AAP, or substituting a different process (such as SPD or development brief).

22. Those matters are not for debate at this stage but emphasise the scope within the detailed planning process to harness the evident feasibility of Waterbeach to deliver housing earlier in the plan period and thereby introduce an important element of flexibility to the strategy.

Matter 8B

Will the Plans ensure a rolling five year supply of specific deliverable sites in accordance with paragraph 47 of the Framework?

23. The following submissions respond briefly to issues raised by the Inspector under questions (iii) and (vi).

Combined or separate housing trajectories? (iii)

24. We do not question that Cambridge and South Cambridgeshire taken together represent a logical housing market area for assessment purposes. Para 47 of the NPPF requires local authorities to ensure that their Local Plans meet the full objectively assessed needs of the housing market area. Thus it is reasonable that the housing needs are assessed on this basis and clearly the two authorities would be failing to discharge their duty to co-operate (NPPF para 178) if they did not do so.

25. We do not however accept that this absolves the authorities from the need to plan for and monitor the achievement of requirements on a district-specific basis. The alternative could only be pursued through the medium of a joint Local Plan. Maintaining individual trajectories should nevertheless proceed in parallel with on-going co-operation by which changing circumstances can more effectively be monitored and addressed. This emphasises the importance of ensuring that there is sufficient flexibility in the strategy (see question (ii) above). It is the case that large scale strategic sites, once they begin to be implemented, are a positive and flexible way of maintaining a five year supply.

Sedgefield v Liverpool? (vi)

26. The thrust of national policy is "to boost significantly the supply of housing". The 'Sedgefield' approach is the more closely aligned with this objective. Whilst there have been decisions in the past giving support to either of the alternative approaches, the matter is clarified by Planning Practice Guidance which states that "Local planning authorities should aim to deal with any

*undersupply within the first 5 years of the plan period where possible.”*⁶ This is a clear endorsement of Sedgefield as the default approach. Again, the matter was addressed in detail at the Waterbeach appeals and the Inspector’s conclusion is firmly to this effect.

***Boyer Planning for RLW Estates
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⁶ 3-035-20140306

