

**SOUTH CAMBRIDGESHIRE LOCAL PLAN**

**RESPONSE TO INSPECTOR'S QUESTIONS FOR**

**MATTER 8 – HOUSING LAND SUPPLY**  
**AND DELIVERY**

**ON BEHALF OF BLOOR HOMES EASTERN**  
**(16420)**

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## **CONTENTS:**

Page No:

1.	MATTER 8A: ARE THE HOUSING TRAJECTORIES REALISTIC; WILL THEY DELIVER THE NUMBER OF NEW HOMES EXPECTED, WITHIN THE PLAN PERIOD?	<b>1</b>
2.	MATTER 8B: WILL THE PLANS ENSURE A ROLLING FIVE-YEAR SUPPLY OF SPECIFIC DELIVERABLE SITES IN ACCORDANCE WITH PARAGRAPH 47 OF THE FRAMEWORK?	<b>6</b>
3.	MATTER 8C: SHOULD THE MORE SUSTAINABLE VILLAGES MAKE AN INCREASED CONTRIBUTION TO HOUSING SUPPLY? WOULD THIS OFFER A MORE RELIABLE CONTRIBUTION TO LAND SUPPLY AND DELIVERY OF NEW HOUSING?	<b>10</b>

**1. MATTER 8A: Are the housing trajectories realistic; will they deliver the number of new homes expected, within the plan period?**

*I: Housing trajectory*

- 1.1 The expectations for existing permissions and new allocations are not realistic. The Plan's strategy directs 86% of the district's housing growth to large strategic sites which are dependent upon strategic infrastructure – particularly transport – coming forward on time. The Cambridge sub-region already suffers from acute congestion without accounting for the impacts of additional development. As noted in the Long Term Transport Strategy (LTTTS) (RD/T/095), "*Development will be subject to sufficient highway capacity being available at all stages of the development*", implying that a lack of capacity will prevent development.
- 1.2 Development at the strategic sites will therefore depend on the delivery of a significant package of transport upgrades to secure the necessary highway capacity. This is in addition to the community and social facilities necessary to support large-scale development such as schools and health facilities.
- 1.3 The cost of providing all necessary infrastructure to support the strategic sites cannot realistically be met in full by developers. The larger sites in South Cambridgeshire will therefore rely upon external funding to deliver the required infrastructure. Key funding sources include Local Growth Fund and the City Deal however the availability of this funding is not certain (especially in a climate of public sector spending restraint) and neither the Plan nor supporting evidence provides adequate clarity or confidence that this funding will be available when needed.
- 1.4 The City Deal (RD/Strat/300) is of particular significance; it allows for up to £500m of central government funding to be provided in three tranches to the City Deal partners to help fund infrastructure. The first is for £100m for the period 2015-2020; the second and third are for £200m each for 2020-2025 and 2025-2030 respectively, but depend upon certain targets relating to housing and economic growth being met. Failure to meet City Deal targets at an earlier stage of the Plan will mean that future tranches may not be released, jeopardising the Plan's ability to deliver infrastructure and housing on time. A Prioritised City Deal Programme (PCDP) (RD/CR/142) has been prepared which identifies £300m worth of potential projects to be brought forward in the first five years of the City Deal.

- 1.5 Notwithstanding funding constraints, the delivery of infrastructure relies on a great deal of work at design and construction stages, and is often susceptible to delays. For instance, the Guided Busway took ten years from initial proposal in 2001 to its eventual (and delayed) opening in 2011. The PCDP, LTTS (RD/T/095) and Action Plan (RD/T/120) present a somewhat optimistic timetable for infrastructure delivery given the amount of design and construction work needed. For many of the infrastructure schemes there is little evidence to provide confidence that they will be delivered on time.

#### Individual sites

- 1.6 The reliance of the plan on strategic sites means the housing trajectory is greatly dependent on their timely delivery. We now look in detail at the three new strategic allocations away from Cambridge, the timing of infrastructure, and projected housing delivery with reference to the housing trajectory (RD/AD/270).

#### Cambourne West and Bourn Airfield

- 1.7 Cambourne West and Bourn Airfield are expected to deliver housing from 2016 and 2022 respectively. A planning application was submitted by developers McA for 2,350 dwellings at Cambourne West in January 2015; there has been no planning application for Bourn as of yet. Three key pieces of infrastructure are required to support these developments; bus priority measures on Madingley Road, a segregated bus route between the M11 and A428, and bus improvements from Hardwick to Bourn. The Action Plan notes that all these schemes are only at the earliest stage of preparation yet according to the PCDP they are expected to be completed in 2019. Further, the PCDP notes that the schemes are at medium or high risk of delay. Funding is not guaranteed as the schemes (totalling £88m) are competing against other priorities for City Deal funding and other external sources may not meet the shortfall.
- 1.8 Cambourne West is expected to deliver 1,200 new homes between 2016 and 2031 at approximately 100-150 dwellings per annum 2016-2026. Policy S/8 requires the preparation and approval of a masterplan to guide development.
- 1.9 Policy S/6 advises that Bourn Airfield will deliver 3,500 homes with a maximum of 1,700 homes (at a rate of approximately 220 dwellings per annum) being delivered between 2022 and 2031 unless more is needed to address five-year

land supply issues. The delivery of these homes cannot begin until an Area Action Plan has been prepared and approved.

- 1.10 Development at both Cambourne and Bourn is dependent on the prior delivery of infrastructure which is not expected to come forward until 2019 at the earliest. Consequently, development at Cambourne between 2016 and 2019 may be unable to come forward as planned if there is insufficient highway capacity. Should the infrastructure provision be delayed past 2019 the delivery of housing at Bourn may also be affected. The lack of progress so far in delivering the requisite new infrastructure, alongside the masterplanning (including the AAP for Bourn) means it is difficult to be certain that development on these sites will come forward within the tight timetable envisaged.

#### Waterbeach

- 1.11 Waterbeach is the next significant location for housing growth and is expected to start delivering from 2026 with 1,400 new homes by 2031 (policy S/5) subject to the prior approval of an Area Action Plan. Existing acute congestion on the A10 corridor (likely to be exacerbated by planned development in East Cambridgeshire) means a major programme of infrastructure (total cost estimated at £162m) will be necessary to support Waterbeach.
- 1.12 As with other sites, there is no clarity as to how this can be funded. The later City Deal tranches may provide much of the necessary funding but this is not guaranteed since these later tranches are dependent on past targets relating to housing and economic growth having been met.
- 1.13 The Action Plan identifies that most of the necessary infrastructure will be in place from 2028/29, immediately putting into doubt the ability of Waterbeach to start delivering from 2026. The Action Plan also sets out optimistic timescales (e.g. allowing only one year for design work on the A10 dualling – one of the largest schemes set out in the plan). The PCDP identifies the schemes to be of medium to high risk of delay.
- 1.14 Since Waterbeach will come forward at a late stage of the plan, we question whether it will realistically provide any housing within the plan period. If infrastructure is delayed past 2030, Waterbeach may not be able to deliver housing at all in the plan period. This will result in the loss of 1,400 units from the housing trajectory and an inability for South Cambridgeshire to demonstrate a

rolling five-year supply of housing land from 2024 until the end of the plan period.

- 1.15 Even taking a more generous view (i.e. taking the timescales as set out in the Action Plan, with infrastructure delivered in 2028/29 and housing coming forward 2029/30 (100 units 2029/30, 200 units 2030/31 in line with the pattern of development set out in the housing trajectory)) we consider Waterbeach will only deliver 300 homes in the plan period rather than the 1,400 set out by the Council. Again the Council will be unable to demonstrate a rolling five-year supply from 2024 until the end of the plan period.
- 1.16 It is apparent that there is limited flexibility in terms of the delivery of the strategic sites. The timely provision of housing will inevitably depend upon the successful outcome of a tight programme of infrastructure funding and delivery, within which there is little scope for slippage or delay. The limited progress achieved so far on many parts of the infrastructure package mean it is difficult to have confidence in the timescales set out or the wider ability to deliver the required infrastructure. Our assessment of the prospects for three of the district's major sites indicates that they are vulnerable to delay; in the case of Waterbeach this could result in up to 1,400 dwellings not coming forward within the plan period as proposed, and a significant gap emerging in the rolling five-year housing land supply at the end of the plan period. The Council's housing trajectory therefore cannot be considered realistic.

## *II: Flexibility*

- 1.17 There is insufficient flexibility to adapt to changing circumstances. The reliance on strategic allocations coupled with only a limited number of smaller allocations means that there is little room for manoeuvre should an allocation fail to deliver on time. Flexibilities are only applied within the strategic sites, which themselves are vulnerable to the delivery of infrastructure. In addition, the 'trigger' mechanisms of the City Deal mean that funding to support future development could be jeopardised by failures to deliver housing in the earlier part of the plan period thereby putting these strategic sites at further risk.
- 1.18 This is compounded by Policies S/7 and S/12 which restrict the scope for alternative sites to come directly forward through the development management process. Realistically, the only way a site lying outside of the Development Frameworks (regardless of its merits, sustainability or deliverability) could be

developed is if there is a failure in the plan and a shortfall in the five-year housing land supply emerges, in which National Planning Policy Framework (NPPF) paragraph 14 would be engaged. This is not a positive approach to delivering sustainable development.

- 1.19 Furthermore, it is noted that whilst the Bourn Airfield allocation is expected to start delivering from 2022, the Council considers that it could be brought forward should a shortfall emerge in its rolling housing land supply (policy S/12). The potential for the site to come forward faster than anticipated will be subject to the delivery of the significant infrastructure that is required. Given the concerns outlined above about the delivery of this infrastructure, the flexibility offered by this policy is highly questionable.
- 1.20 In order to provide a more resilient supply of housing land over the plan period, the Council should be proactive and allocate a wider range of smaller sites in sustainable locations, which face fewer barriers to delivery (e.g. funding major new infrastructure), offer greater market choice, and can provide the additional flexibility needed to ensure the soundness of the Plan. A more flexible policy approach to housing outside of Development Frameworks will also allow schemes to come forward through the development management process when necessary, providing further opportunities for the Council to demonstrate a more flexible supply of housing land.

**2. MATTER 8B: Will the plans ensure a rolling five-year supply of specific deliverable sites in accordance with paragraph 47 of the Framework?**

*III: Memorandum of Understanding*

- 2.1 The Memorandum of Understanding (RD/Strat/350) makes clear that South Cambridgeshire’s plan cannot in isolation provide a rolling five-year supply of housing land, particularly in the early years of the plan period. This is a serious shortcoming and means that the plan will fail the clear requirement of paragraph 47 of the NPPF to maintain a five-year supply of housing. This makes the plan ineffective.
- 2.2 Whilst the sharing of housing supply across two separate plans is certainly a novel approach, it is not one that accords with the requirement of the NPPF to ‘boost significantly’ the supply of housing. Both plans are separate documents and are required by the NPPF to provide for their own full objectively assessed housing needs (unless constraints prevent it from doing so, which is not the case here). The combined trajectory means that South Cambridgeshire will not meet its full need as it relies on Cambridge City to overprovide during the early years of the plan period. This is in spite of the fact that alternative strategies do exist (e.g. through smaller allocations in villages to allow flexible and timely development) which will allow South Cambridgeshire to better meet its needs in that period.
- 2.3 Each plan is dependent upon the other to deliver; if one plan is unsuccessful in meeting its housing target, the other plan will be undermined. Ultimately the two Councils’ plans are discrete documents and their reliance upon each other is not a sound approach to plan-making; this point was made by the Inspector at the Waterbeach appeals (RD/Strat/330&340), who subsequently rejected the combined approach.
- 2.4 *Even if* found sound, for South Cambridgeshire this joint approach means it is doubly important that the plan delivers in the later part of the plan period (i.e. through the strategic allocations and new settlements) to avoid undermining Cambridge City’s plan. As we have explained above, whether the plan can deliver as intended is open to question.
- 2.5 A far more appropriate approach would be for South Cambridgeshire to boost the number of units it can deliver earlier in the Plan period, helping the plan to operate in isolation without relying the support of Cambridge City in the earlier

part of the plan in meeting a combined housing target, and meaning that the plan can be found sound in its own right. This can be done through smaller, more deliverable sites in sustainable locations. This would also ensure that suitable flexibility is built into the plan to address any issues with the pace of delivery of the strategic sites.

*IV: 5% or 20% buffer?*

- 2.6 The evidence on past housing delivery points firmly towards the adoption of a 20% buffer onto housing targets. In the period back to 1999 as set out in table 3 of RD/Top/050 (1999 being the base date of the Core Strategy), the Council met its housing target only once in fourteen years. Whilst the Council cites external factors such as the economic recession and overhauls to the planning system, these also affected other local authorities and are not unique to South Cambridgeshire. This also does not explain shortfall prior to the recession.
- 2.7 Northstowe, which was to provide a significant number of new homes, was delayed by several years owing to uncertainties surrounding infrastructure (e.g. the A14 upgrade and the delays to the opening of the Guided Busway); indeed it is arguable that a more flexible plan at the time might have alleviated the Council's difficulties in meeting its housing targets. This highlights the concerns my client raises with a new plan that is equally reliant on the delivery of significant infrastructure to deliver identified housing sites. The recent appeals at Waterbeach (RD/Strat/330&340) have confirmed that a 20% buffer is appropriate.

*V: Windfall*

- 2.8 The housing trajectory includes a significant windfall element of two-hundred dwellings per annum in South Cambridgeshire. Given the restrictive policy on windfall provision (policy S/12) this would appear to be optimistic and would suggest a lack of confidence in the Council's ability to deliver the sites that it has allocated.

Furthermore, the Council intends to meet its 5% buffer through windfall sites as part of policy S/12, and consider that this conflicts with the assertion at paragraph 2.65 that the council "has not relied on windfall sites". These statements are evidently contradictory. It is my client's case that the Council does not need to rely on windfall sites as there are sites available in other

locations that it could have allocated – my client’s sites at Swavesey and Over are just two examples of these.

*VI: Shortfall*

2.9 The shortfall for South Cambridgeshire is calculated as follows:

- A. Housing target 2011/12 – 2013/14: 2,850<sup>1</sup>
- B. Total supply 2011/12 – 2013/14: 1,823<sup>2</sup>
- C. The shortfall in provision: 1,027 [A-B]

2.10 In accordance with the Planning Practice Guidance (Ref ID: 3-035-20140306) this shortfall should be dealt with in the next five year period of the plan (known as the Sedgefield approach). The Sedgefield approach would also assist the Council in addressing its acknowledged housing affordability issues, as discussed in earlier matter sessions. To that end the five-year housing requirement is calculated as follows:

- D. Housing target for 2014/15 – 2018/19: 4,750<sup>3</sup>
- E. Plus shortfall identified as C above: 5,777[D+C]
- F. 20% Buffer: 1,155 [E x 0.20]
- G. Total housing requirement: 6,932[E+F]

2.11 Over the next five years (2015-2020) the Council has identified a potential housing land supply for 5,907 dwellings. This figure does not properly cater for the shortfall in line with the Sedgefield approach and would mean the Council is unable to demonstrate a five-year housing land supply. The Council should seek to make additional allocations which can be delivered over the next five years to help address the shortfall and ensure a five-year supply.

*VII: Rural exception*

2.12 We consider that the extra 1,000 rural exception homes should not be included in the Council’s windfall provision. NPPF paragraph 48 requires windfall allowances to be based on compelling evidence that windfall units will come forward. However as the Waterbeach inspector noted, there are currently no identified sites and no guarantees that this quantity of rural exception homes will indeed be delivered.

2.13 Given the importance of these 1,000 units to securing further tranches of the City Deal my client considers that the Council should factor these units into the first

<sup>1</sup> 3 x annualised target of 950 dwellings per annum

<sup>2</sup> South Cambridgeshire AMR 2012-13 (RD/AD/270)

<sup>3</sup> 5 x annualised target of 950 dwellings per annum

five years supply of housing. This would add an additional annual requirement of 200 units, which my client considers should be the subject of specific site allocations.

**3. MATTER 8C: Should the more sustainable villages make an increased contribution to housing supply? Would this offer a more reliable contribution to land supply and delivery of new housing?**

3.1 Yes – many of South Cambridgeshire’s existing villages already benefit from the essential local infrastructure needed for them to function as sustainable communities thus avoiding the need for the provision of costly infrastructure that can influence the viability of housing developments. The opening of the Guided Busway means that nearby villages such as Swavesey and Over present the opportunity to deliver housing without the need to provide major transport infrastructure; indeed the sustainability credentials of these existing villages are broadly comparable with those of the planned new settlements (e.g. in terms of local facilities and transport). The delivery of further housing in these locations will help to maintain the ongoing provision of local services, address local affordability issues, and therefore maintain and strengthen rural communities and the rural economy, as set out in paragraph 28 of the Framework.

3.2 As expressed previously, housing sites in these locations can provide a more reliable source of housing than the strategic sites, providing the additional flexibility and choice which is currently missing from the plan.

*Word count 2,996*