

SOUTH CAMBRIDGESHIRE LOCAL PLAN

RESPONSE TO INSPECTOR'S QUESTIONS FOR

MATTER 2- OVERALL SPATIAL VISION AND

GENERAL ISSUES

ON BEHALF OF BLOOR HOMES (EASTERN REGION) 16420

REPRESENTATION NUMBER 61918

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CONTENTS:

Page No:

1.	INTRODUCTION	1
2.	RESPONSE TO MATTER 2: OVERALL SPATIAL VISION AND GENERAL ISSUES	2
	(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?	2
	(b.) Is it clear what other strategic options were considered and why they were dismissed?	7
	(c.) Are the Plans founded on a robust and credible evidence base?	8
	APPENDIX 1: APPEAL DECISION APP/W0530/A/13/2192228	10

1. INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Bloor Homes Eastern Region (my client) in response to the Main Matters and Issues for the joint examination of the draft Local Plan for South Cambridgeshire District Council and Cambridge City.
- 1.2 This response reiterates and references the representations made in October 2011 in relation to the Issues & Options draft and expands upon concerns submitted in September 2012 to the Proposed Submission of the South Cambridgeshire Local Plan.
- 1.3 For the avoidance of doubt, the interest of Bloor Homes Eastern is focused on two particular omission sites located within the rural area of South Cambridgeshire District in the villages of Swavesey and Over. Unless otherwise stated, references to the “local plan” and its policies relate to the South Cambridgeshire Local Plan.

2. Response to Matter 2: Overall Spatial Vision and General Issues

(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?

- 2.1 No- The overarching development strategy, as expressed through the preferred sequential approach is not soundly based as it is not positively prepared, justified, and effective, nor is it consistent with National policy.
- 2.2 The distribution of the planned 19,000 homes as set out in Policy S/6, which falls short of the full objectively assessed needs, represents a continuation of the past planning strategy. The strategy directs the majority of development to the edge of Cambridge, followed by New Settlements and then finally in the rural areas at Minor Rural Service Centres in the belief that this represents the most sustainable pattern of development.
- 2.3 In effect, the strategy proposes that 86% of all new planned development is focused on large, strategic sites that are reliant on strategic new infrastructure. It is acknowledged that infrastructure, and particularly transport infrastructure within the region, is likely to be a constraint to growth if it cannot be adequately funded.
- 2.4 The development strategy does not take into account the most recent population projections or the additional 1000 affordable homes required on rural exceptions sites to meet the condition of the recently signed Cambridge City Growth Deal (RD/Strat/300). A failure to properly plan for this requirement has significant implications for the delivery of infrastructure required to support the new settlements, which form the majority of the housing delivery for the plan period as it is paid in tranches dependent on the delivery of new housing (see Matter 5).
- 2.5 A failure to plan for the full objectively assessed needs, taken together with the overall sequential approach for development, will have an acute impact on meeting the future sustainable development needs of the rural area. The plan will lead to a phased decline in the prosperity and sustainability of the rural villages.

Positively Prepared:

- 2.6 Despite being a predominantly rural authority, the vision of the plan does not mention the prosperity, sustainability or role that the villages and rural area will play in the continued success of the area. Rather, the vision seeks to focus quality of life within a 'beautiful, rural and green' environment. It is submitted that this vision is an extension of the sentiment expressed in paragraph 2.6 of the Local Plan in respect of nervousness amongst those able to live in the village that growth would place living standards at risk. This is not a robust justification. My client submits the plan fails to properly take into account the advice at paragraph 10 of the Framework and the need for local plans to respond to the different opportunities for delivering sustainable development.
- 2.7 Policy S/2 expresses the development strategy setting the objective to "*provide land for housing in sustainable locations that meets local needs and aspiration*" and "*ensure that all new development has access to a range of services and facilities that support healthy lifestyles and well-being for everyone...*". However, criteria C and E of this policy will prevent delivery of this overarching objective as it fails to acknowledge the importance of planned development in the villages and rural areas to ensure that communities remain sustainable, both in terms of important infrastructure such as schools, doctors, employment opportunities and retail units in addition to ensuring that rural communities do not become fragmented and the sense of community, built up through successive generations, is not lost due to an undersupply of homes in these locations.
- 2.8 The strategy for meeting development needs is therefore not positively prepared.

Justified:

- 2.9 The Sustainability Appraisal and evidence base appears to suggest that the principal justification for a continuation of the existing strategy is to reduce the need to travel by private car and counteract earlier planning regimes that had displaced households to the edge of the Green Belt (and beyond), resulting in high distance commuting and a reliance on private car journeys to access jobs in and around the City's limits.
- 2.10 Such assumptions fail to take into account that not all residents within South Cambridgeshire work within the city itself, as acknowledged within paragraph

1.47 of the Employment Topic Paper (RD/Top/020) which states, "*there are many businesses in South Cambridgeshire located in the countryside. Many of these are on recognised business parks.*" Furthermore, there is no clear analysis of the impact of the guided bus, which opened in 2011, and its influence in reducing the number of car trips made from villages such as Swavesey and Over.

2.11 The Transport Strategy highlights that, whilst the proportion of those using a private car to travel to work has fallen, congestion has worsened. This suggests that those working in and around South Cambridgeshire have moved further afield, a matter also supported by the 2011 census data that commutes within Cambridgeshire are 20% longer than the national average (See: RD/T/110). Taken together with high house prices in the district, it is reasonable to assume that rather than delivering a sustainable development, the distribution of development has forced households to move beyond the district boundaries and commute back in to the area.

2.12 This assertion is supported by the AMR which highlights that since 2001 the district has failed to deliver the planned number of homes (See RD/AD/270; 271 and 272) whilst the cost of housing has increased by 13.2%, the greatest increase within the Housing Market Area, compared to just 8% in the wider region (RD/Strat/090). This means that the average house prices for Cambridge (£327,902) and South Cambridgeshire (£291,022) were the most expensive, whilst districts such as Fenland and Forest Heath, which are within the travel to work area are more affordable with average house prices of £148,640 and £175,897. Figure 2 (section 5.2) of the SHMA clearly shows the spatial patterns relating to housing costs in the area. This map also highlights that some of South Cambridgeshire's villages are also relatively more affordable. For example, the average cost of a home in Over is £234,000¹ and £211,000 in Swavesey². This makes these sustainable villages an attractive prospect for those seeking a home within the district that has good access to the wider employment opportunities.

2.13 In summary, there is no evidence to suggest that a continuation of the current strategy, to focus the majority of development on the city and new settlements, will ensure that housing will not perpetuate the current 'ripple'

¹ Over Housing Needs Survey (2012)

² Swavesey Housing Needs Survey (2009)

effect of people being forced to move further away and commute back in to Cambridge and South Cambridgeshire.

- 2.14 It stands to reason that, if increasing public transport trips to access employment and reduce the reliance on private car journeys is a central objective of the plan, it would be logical to have identified a degree of development in those villages with good access to the guided bus way and a wide range of services. Rather, the plan merely seeks a continuation of the existing strategy without full analysis of spatial and other changes that have taken place since the opening of the guided bus.
- 2.15 There is no sound justification, given the predominantly rural nature of the district, for such a low proportion of homes to be allocated in more sustainable villages. The current strategy has failed to deliver the required number of homes to meet needs, whilst the length of the average commute has increased and congestion worsened. It therefore stands to reason that a continuation of the strategy in the submitted plan will simply perpetuate this past trend.

Effective:

- 2.16 Despite a persistent under-delivery of homes, the AMR (RD/AD/270) justify a continuation of the strategy by suggesting historic slow delivery is due to the focus of significant amounts of development at a few large developments "*with a significant lead-in time*" compounded by the economic recession. It states that both these issues can now be overcome, with permissions and infrastructure in place and the market recovering. Due to these large sites, the plan argues that significant development is not required in the rural areas.
- 2.17 However, the economic recession does not account for the poor performance of housing delivery in the district between 2001-2007, nor why the Northstowe extension has taken approximately 15 years to receive planning permission. Moreover, numerous appeal decisions, including that most recently at Waterbeach (RD/Strat 330; 340) have not considered the downturn a legitimate reason to under-deliver.
- 2.18 The Memorandum of Understanding for the Greater Cambridge Joint Housing Trajectory (2014) (RD/Strat/350) proposes a novel approach for addressing housing shortfall in the local area. This involves merging the supply for South Cambridgeshire and Cambridge in order to demonstrate a five year supply of homes. The justification, which was dismissed by the Inspector during the

Waterbeach Appeals (RD/Strat/330;340), is that a large proportion of South Cambridgeshire's supply is reliant on the build out of strategic sites around the edge of the city and new settlements.

2.19 However, this approach is likely to exacerbate issues of undersupply particularly within the villages and rural areas. When taken together with the distribution hierarchy of Policy S/2 and S/8 means that market development within the rural areas is likely to be challenging to deliver through the development management process. This includes the 1000 homes in the rural areas required as a condition of the growth deal.

2.20 It is unclear how a continuation of a strategy, which remains reliant on large, strategic sites, is commensurate with the Framework's goal set out in Paragraph 47. Furthermore, we highlight that it is unclear how reliance on a strategy, which has not historically delivered the required levels of housing, is likely to bring forward 1000 units in the rural area which are a condition of the future release of infrastructure funding. Without sufficient rural development, the strategy is not flexible and will not be effective in delivering sustainable development.

Consistent with National Policy:

2.21 Policy S/8 sets out the hierarchy for the rural areas. Four groupings are used, which, the plan asserts, are based on the relative sustainability. The classifications are based on a review (RD/Strat/240) of the services, facilities, education, public transport and employment available at each settlement. However, it is contended that the methodology and criteria fails to take into account the potential co-dependent role of settlements as advised in paragraph NPPF 55; the online Practice Guidance reaffirms that all settlements can plan a role in delivering sustainable development. In a recent appeal³ in Toft, Cambridgeshire, the Inspector supported this position in allowing three homes in an 'Infill' village, based on the services available in Comberton (See Appendix 1)

2.22 The Framework makes clear that the needs of the rural community must be acknowledged. A failure to plan positively will eventually see the phased retreat of rural settlements and the vitality of these communities will ultimately decline. The plan is therefore in conflict with The Framework by not

³ APP/W0530/A/13/2192228

allocating development in sustainable villages. My client's experience at Swavesey and Over suggests that these are at least two such settlements that could accommodate and benefit from housing growth.

- 2.23 The Village Classification Report (RD/Strat/240) acknowledges the wide range of local facilities available within Swavesey and Over, which when taken together includes primary and secondary education, a library, convenience retail, GP practices, community halls and a range of recreating and sports facilities. The villages are served by both the Guided Bus and the Citi 5, which although presently hourly could see the frequency increased in future. Both villages were identified at the Issues and Options stage as potential candidates for an elevated role in the hierarchy.
- 2.24 However, this proposal was not taken forward and there remains no clear, sound evidence as to why development within these villages has not been taken forward through the plan, when considered against the wider sustainability criteria and the objectives of the plan.

(b.) Is it clear what other strategic options were considered and why they were dismissed?

- 2.25 As part of the assessment of options three scenarios for meeting housing need were assessed through the sustainability appraisal process, which accompanies the plan these were:
- A focus on providing more development on the edge of Cambridge, in part to replace development previously planned on Cambridge airport which is no longer available in the plan period, through a further review of the Green Belt.
 - A focus on providing more development through one or more new settlements, of sufficient size to provide sustainable development, including provision of a secondary school, and with good public transport links to Cambridge.
 - Focus on providing development at the more sustainable villages that have the best levels of services and facilities and accessibility by public transport and cycle to Cambridge or, to a lesser extent, a market town.

- 2.26 The SA review notes *"a village based strategy requiring development at lower levels of the village hierarchy would increase the proportion of growth at*

greater distances from major employment areas than other strategic approaches” this approach fails to acknowledge the matter that the rural area, itself, presents numerous employment opportunities.

- 2.27 Despite these options, there is no clear evidence that we are able to identify that assessed the proportion of development at each of the locations and the relative sustainability. It is unclear how a figure of 86% for new settlements and the edge of Cambridge was arrived at, and a full assessment of the impact that continued under-supply within the rural areas will have.
- 2.28 The generalisation of the SA in seeking to identify the preferred strategy does not take into account specific sustainable transport measures, such as the guided bus way, which is accessible from smaller villages such as Swavesey and Over and would, in respect of the SA, score more positively in terms of encouraging sustainable travel. Nor does it take into account the need for a sustainable rural population to ensure the viability and vitality of rural services and infrastructure, in addition to thriving rural communities.
- 2.29 The SA concludes that the most sustainable option is the focus on the edge of Cambridge, principally due to a reduced need to travel. Selecting this option fails to properly consider the impact of a continuation of the existing planning strategy which has failed to meet the needs of South Cambridgeshire and deliver the required levels of housing growth over the last plan period.
- 2.30 In assessing the reasonable strategic options, my client wishes to reiterate the point made within the previous representation, which highlights policy S/2 (criterion c and e) fails to acknowledge the co-dependent role of rural settlements which make clusters of villages, which may not be ‘sustainable’ in their own right, locations which are able to support appropriate levels of growth. This alternative approach was not considered through the SA process, nor the Issues and Options.
- 2.31 It is considered that in the absence of robust evidence the strategy is not justified.

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

- 2.32 In our answer to questions (a) and (b) we have highlighted a number of issues with the evidence base, which has led to the option to continue the existing strategy. Principally, this includes:

- the failure to properly assess the functional and co-dependent role of villages in the classification report;
- the justification for not elevating the status of Swavesey and Over; and
- the absence of a strategy to deliver 1000 affordable homes on rural exception sites.

2.33 In the absence of evidence, and the conclusion of the Inspector in Toft⁴, we maintain that the sentiments expressed at paragraph 2.6 of the plan that there is "a degree of nervousness amongst residents of the district believing that continuing high levels of growth would put the environment and living standards at risk" has over-ridden the need to justify, through robust evidence, the continuation of the previous strategy. This has resulted in:

- a persistent under-delivery;
- a relative increase in the cost of housing;
- longer commuting patterns.

Summary:

2.34 The strategy is considered unsound for the following reasons:

- Policy S/2 is not positively prepared or consistent with National Policy. Criterion C & E should be revised to allow for growth in sustainable settlements.
- Policy S/8 is unsound as it is not justified, effective or positively prepared. Additional development should be directed to more sustainable villages to ensure that rural communities are able to thrive.

⁴ See Appendix 1

Appendix 1: Appeal Decision APP/W0530/A/13/2192228

Land adjacent to Meridan Court, Comberton Road, Toft