

For and on behalf of
Daniels Bros (Shefford) Ltd

Greater Cambridge Local Plan – First Proposals Consultation Report

Land north of Craft Way, Steeple Morden

**Prepared by
DLP Planning Ltd
Bedford**

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Prepared by:	William Lloyd BSc(Hons) MRTPI Senior Planner
Checked by:	Jon Goodall MA (Cantab) MSc Director
Approved by:	Neil Osborn BA(Hons) MRTPI Senior Professional Director
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DLP Planning Ltd
4 Abbey Court
Fraser Road
Priory Business Park
Bedford
MK44 3WH

Tel: 01234 832740

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0.0 EXECUTIVE SUMMARY

0.1 These representations are submitted on behalf of Daniels Bros (Shefford) Ltd in respect of their interest at land north of Craft Way, Steeple Morden.

0.2 The representations comprise two parts. In the first part our comments on the general strategy and policies set out in the draft text of the emerging Local Plan reflect our client's concern about the ability of the Council's First Proposals to provide for an appropriate strategy and satisfy the relevant soundness tests including consistency with national policy. Specifically, the representation comments on policies;

- **Policy S/JH – New Jobs and Homes:** The representation outlines that the Plan's objectively assessed housing need should be increased to at least 2,549dpa to align housing and economic growth and support the objectives of the Oxford-Cambridge Arc. The Council's 'higher' growth scenario being a reasonable assessment of prospects for jobs growth that must be accommodated to avoid adverse effects on affordability and in-commuting.
- **Policy S/DS: Development Strategy:** This representation outlines that the Plan does not provide for an appropriate strategy which will meet the housing requirement and provide for the necessary flexibility sought. Soundness concerns are raised relating to the delivery of large-scale development proposals; the failure to recognise the role of growth in the rural areas in sustaining levels of housing delivery and the overreliance on assumptions regarding windfall, contrary to paragraphs 71 (regarding expected future trends) and 66 of the Framework (regarding the identifying housing requirements for the rural area).
- **Policy S/SH – Settlement Hierarchy:** The limitations proposed on schemes in Group Villages unnecessarily restrict the potential to secure social and economic benefits from development for communities. It is noted that this policy would not comply with Paragraph 78 of the Framework, which requires policies to be responsive to local needs. The provision of sufficient housing (including affordable housing) in the Councils' strategy for the Rest of the Rural Area (including as part of meeting national policy requirements for the proportion of development on sites under 1 hectare) would result in more sustainable communities, allow existing services to thrive and reduce reliance on the private car.
- **Policy S/SB – Settlement Boundaries:** This representation outlines that the definition of the settlement boundary for Steeple Morden is unsound, not justified and not consistent with national policy
- **Policy H/AH – Affordable Housing:** this representation outlines that the restriction placed on development in 'Group Villages' as defined in the settlement hierarchy (of up to 8 dwellings/15 dwellings in exceptional circumstances) limits the ability of these areas to provide for any additional affordable housing as the threshold for triggering the requirement for affordable housing on schemes will not typically be met.

- **Policy BG/BG – Biodiversity and Geodiversity:** This representation outlines that the proposed 20% Biodiversity Net Gain is not supported by robust evidence to justify the reasons to demonstrate that the higher level is appropriate or necessary in Greater Cambridge

0.3 The second part provides a response to the Housing & Economic Land Availability Assessment (HELAA) and the potential for our client's land to be brought forward for development.

0.4 These representations are supported by an updated Call for Sites submission providing an amended site boundary of 0.89 ha that would satisfy paragraph 69(a) of the NPPF 2021 and address the soundness issues relating to the provision for small and medium sites. The following points must be addressed when in revising the Councils' existing assessment of HELAA Sites 40440 and 40442 and in assessing the suitability of the amended boundary submitted as part of the current consultation;

- Reflect that the site is currently outside of the Development Framework, but it does lie immediately adjacent to this on the southern and western boundaries.
- The landscape assessment is incorrect in the HELAA and needs to be updated to reflect that the woodland is not part of the site and will be retained. The site is also not arable land so does not reflect the wider characteristics of the settlement's surroundings.
- Biodiversity net gain could be provided as part of any development proposal brought forward, with suitable mitigation for adjacent designations.
- The proximity of the Primary School and public transport need revising (with distances from the site reduced accordingly) as set out in section 4 of this representation.
- Correct the rating given to the Surface Water Flood Risk. This affects less than 1% of the site area and can only reasonably be regarded as 'limited' or entirely absent.
- Reflect that suitable access arrangements could be accommodated on either Hay Street or Craft Way (with the amended site boundary served from Craft Way).
- Reflect that the impact on the surrounding road network will not be detrimental.
- Reference that public rights of way could be incorporated into any development proposal with development offering scope to enhance these links.
- Whilst the agricultural land classification of the site is Grade 2, the current use of the site is as residential curtilage with associated paddock with no reasonably prospect

of productive agricultural use.

1.0 INTRODUCTION AND STRUCTURE OF REPRESENTATIONS

- 1.1 These representations are submitted on behalf of Daniels Bros (Shefford) Ltd in respect of their interest at land north of Craft Way, Steeple Morden.
- 1.2 As noted, the representations comprise two parts. In the first part our comments on the general strategy and policies set out in the draft text of the emerging Local Plan reflecting our client's concern about the suitability of the Plan. This includes the apparent failure of the consultation policies to address the needs of rural settlements and reflect their critical role both in terms of rural sustainability and also the contribution they can make towards housing provision, especially in the earlier years of the Plan.
- 1.3 The second part provides a response to the Housing & Economic Land Availability Assessment (HELAA) and the potential for the site to be brought forward for development.

2.0 NATIONAL POLICY CONTEXT

2.1 The National Planning Policy Framework (“the Framework”) sets out the Government’s planning policies for England and how these are expected to be applied.

a) **Presumption in Favour of Sustainable Development**

2.2 At the heart of the Framework is a presumption in favour of sustainable development, which should apply to both plan-making and decision taking (paragraph 11). For plan-making, this means

- a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- b) Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless;
 - i) The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan areas; or
 - ii) Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

b) **Plan-making**

2.3 Paragraphs 15 to 37 of the Framework relate specifically to ‘plan-making’.

2.4 Paragraph 15 states that the planning system should be genuinely plan-led. Plans should provide a positive vision for the future of each area including addressing housing needs.

2.5 Paragraph 20 requires that strategic policies should set out an overall strategy for the pattern, scale and quality of development, making sufficient provision for housing (including affordable housing).

2.6 Paragraph 31 requires that the preparation of policies should be underpinned by relevant, up-to-date, adequate and proportionate evidence and take into account relevant market

signals.

2.7 Paragraph 35 states that plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are;

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodates where it is practical to do so and is consistent with achieving sustainable development.
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with policies in this Framework.

c) **Planning for housing**

2.8 Paragraphs 60 to 80 relate specifically to ‘delivering a sufficient supply of homes’.

2.9 Paragraph 60 requires Local Planning Authorities to ensure that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.

2.10 Paragraph 61 states that in determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance as a starting point, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

2.11 Paragraph 66 requires policy-making authorities to establish a housing requirement figure

for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

2.12 Paragraph 68 states that planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of;

- a) Specific, deliverable sites for years one to five of the plan period; and
- b) Specific, developable site or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.

2.13 Paragraph 69 requires local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown that there are strong reasons why this target cannot be achieved.

2.14 Paragraph 71 sets out that local planning authorities should provide compelling evidence to demonstrate that provision from unidentified sites (i.e., a windfall allowance) will comprise a reliable source of supply. This evidence should have regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

2.15 Paragraph 73 states that supply of large numbers of new homes can be achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Provided they are well located and designed and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

- a) Consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;
- b) Ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself

(without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

- c) Set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;
- d) Provide a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and
- e) Consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.

2.16 In relation to the preparation of strategic policies, Paragraph 22 of the NPPF2021 elaborates on the justification for these considerations. This states that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

2.17 Paragraph 74 states that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific sites, sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- a) 5% to ensure choice and competition in the market for land; or
- b) 10% where the local planning authority wishes to demonstrate a five-year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply

d) Planning Practice Guidance

2.18 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been

updated to reflect the changes introduced by subsequent revisions to the NPPF. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.

2.19 The PPG confirms that for the purpose of calculating Local Housing Need an affordability adjustment is applied in order to ensure that the calculation is consistent with the policy objective of significantly boosting the supply of homes. This is provided in response to concerns that relying on projected household growth alone is insufficient to address household formation issues and indeed the desire of people to live in areas in which they do not currently reside (for example to be close to work and reduce commuting distances)¹. In some instances, and as is the case in Greater Cambridgeshire, the affordability uplift to the standard methodology is insufficient. In this instance, and as is set out in more detail in the following sections, this is on account of jobs growth significantly exceeding both the number of dwellings delivered and growth in the working age population resident in the County.

2.20 PPG confirms the Framework's position that the Standard Method forms only the minimum level of housing need for a local authority area². PPG also sets out that will be circumstances where the housing requirement could be increased to a level which is higher than that identified through the application of the Standard Method³. These circumstances include (but are not limited to):

- Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g., housing deals).
- Where strategic infrastructure improvements are planned that would support new homes;
- Where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground;
- Previous delivery levels, where these have exceeded the minimum figure identified; and

¹ Paragraph: 006 Reference ID: 2a-006-20190220

² Paragraph: 002 Reference ID: 2a-002-20190220

³ Paragraph: 010 Reference ID: 2a-010-20201216

- Changing economic circumstances that might have on demographic behaviour
- Recent assessments of need, such as a SHMA, where these suggest higher levels of need.

2.21 If a policy-making authority can adequately demonstrate that a need in excess of the standard method reflects future demographic trends and market signals, for the purpose of examining Local Plans, the approach will be considered sound as it will have exceeded the minimum starting point⁴.

2.22 Indeed, this is expanded upon in the PPG, where it is confirmed that Plan making authorities will need to take account a wide range of data, which is considered to be current and robust, including, but not limited to;

- Employment forecasts and projections;
- An assessment of current and future local labour supply;
- An assessment of past take-up of employment land and property; and
- Consultation with relevant organisations and an understanding of business, economic and employment statistics⁵.

2.23 The following sections consider how the above factors should be taken into account in terms of determining the housing requirement for the Greater Cambridge Plan area.

⁴ Paragraph: 015 Reference ID: 2a-015-20190220

⁵ Paragraph: 027 Reference ID: 2a-027-20190220

3.0 RESPONSE TO THE FIRST PROPOSALS CONSULTATION

Policy S/JH – New Jobs and Homes

- 3.1 Draft Policy S/JH seeks to adopt a housing requirement of 44,400 new dwellings over the 21-year plan period to 2041, reflecting an annual objectively assessed need of 2,111 homes per year.
- 3.2 As is detailed in the ‘First Proposals’ consultation, it is expected that 1,771 homes per year could be provided within the Greater Cambridge area during the 2020-2041 Plan period based on existing commitments, which would exceed minimum annual local housing need in accordance with the Government’s standard method (1,743dpa). The Council claim that their evidence shows the need to plan for about 550 more homes per year in order to meet a rounded need for housing, relative to existing commitments (37,200 dwellings), effectively comprising:
- c.340 dwellings per annum to meet objectively assessed housing needs (2,111dpa)
 - C. 210 dwellings per annum as part of providing a 10% buffer
- 3.3 The PPG (Paragraph: 010 Reference ID: 2a-010-20201216), sets out some of the circumstances that could justify an uplift on the standard method. These include, but are not limited to, the presence of specific growth deals and the funding and provision of strategic infrastructure. As is set out further within this submission, the economic performance and aspirations of the Greater Cambridgeshire Plan area must be reflected in the housing requirement to be adopted and there is significant evidence that would support an a more meaningful uplift to the standard method than is currently being proposed.
- 3.4 The 2,111 dwellings per annum, referred to by the Council as their ‘consume own smoke’ scenario, applies a sensitivity test, in which there is a 1:1 commuting ratio for housing growth generated by additional jobs above those supported by the Standard Method, assuming that the total additional housing growth generated by additional jobs above those supported by the Standard Method would be delivered in full within the Greater Cambridge area.
- 3.5 The full range of previously identified growth level options are set out below;

Table 1: Growth Scenario Comparisons

Growth Scenario 2020-2041	Employment (jobs) total	Employment (jobs) per year	Housing (dwellings) total	Housing (dwellings) per year
Local Plans 2018 (2011 – 2031)	44,100	2,205	33,500	1,675
Minimum	45,800	2,181	36,700	1,743
Medium continue existing pattern	58,500	2,786	41,900	1,996
Medium 'consume own smoke'	58,500	2,786	44,400	2,111
Maximum continue existing pattern	78,700	3,748	53,500	2,549
Maximum 'consume own smoke'	78,700	3,748	56,500	2,690

Source: *Development Strategy Topic Paper September 2021*

3.6 It is noted that the 'maximum continue existing pattern' requirement of 2,549 dwellings per annum is referred to in the Housing and Employment Relationships (HER) report as being the 'higher growth scenario'.

(a) *The relationship of housing and future economic growth*

3.7 The HER considers three scenarios for growth;

- Standard Method – Housing need derived from the Standard Method, converted to population and then employment growth;
- Central – Central growth employment forecast converted to population and housing; and
- Higher – Higher growth employment forecast converted to population and housing.

- 3.8 As is set out in the Greater Cambridge Employment Land and Economic Needs Study (ELENS), only a single economic model (Cambridge Econometrics (CE)) has been used to generate jobs forecasts. It is standard practice to triangulate all 3 models (Experian and Oxford Economics together with CE) given that there are methodological differences between them regarding how the various job forecasts are derived. This can mean that in certain circumstances, and in certain spatial areas, one may produce a more realistic, or appropriate, level of job growth than another.
- 3.9 The ELENS acknowledges that the Greater Cambridge economy is dynamic and does not readily align with national or regional forecasts for jobs growth. It has a world-renowned life sciences cluster which has the potential to drive growth beyond typical regional or national rates. Since 2011 the Greater Cambridge economy has grown faster than any time in the last three decades, driven by some key sectors.
- 3.10 In recognition of this the ELENS concludes that a preferred range between a central (58,500) and higher growth (78,700) scenario is recommended in respect of jobs growth. As is set out in the table above, the Council's proposed housing requirement would support only the central economic scenario and fails to meet this recommendation.
- 3.11 The 'higher' growth scenario assumes the baseline forecast for most sectors but identifies higher growth sectors particular to Greater Cambridge, being Research & Development (R&D), Professional services, and Health & care (related to R&D). For these sectors, the forecast is increased to halfway between the baseline and the historic growth rate from 2001-17 to reflect their higher potential. It also considers multiplier effects of growth. Overall, this is a plausible but more aspirational growth outcome. Such an approach is entirely consistent with the PPG in terms of how it answers the question on how business needs should be assessed, taking into account evidence of market demand, stakeholder engagement and key sectors from an area's Local Industrial Strategy (ID: 2a-026-20190220)
- 3.12 As is set out below, there is a strong justification for the adoption of the 'higher growth' scenario, that would ensure that housing growth mirrors jobs growth in the Plan area.
- (b) Economic Growth and Investment in Greater Cambridge*
- 3.13 Greater Cambridge forms part of the Oxford-Cambridge Arc ('the Arc') which is considered to be a globally significant area between Oxford, Milton Keynes and Cambridge. It supports

over two million jobs, adds over £110 billion to the economy every year and houses one of the fastest growing economies in England.

- 3.14 In February 2021, the Government published its plan for developing “a spatial framework” for the Arc, including a timeline and how it will work with local partners. The plan cites studies that forecast that by 2050 the area would see economic output growing by between £80.4 billion and £163 billion per annum, with between 476,500 and 1.1 million additional jobs. The plan goes on to note that the Government has identified the Arc as a national economic priority area.
- 3.15 The proposed Oxford-Cambridge Spatial Framework will have the status of national policy and is intended to form a material consideration for plan-making alongside the National Planning Policy Framework.
- 3.16 The Government recently sought views on priorities for the Framework as part of consultation on the document ‘Creating a Vision for the Oxford-Cambridge Arc’ (ending October 2021). The latest consultation proposals set out that it will aim to guide sustainable planning and investment decisions under four policy pillars:
- a) *the environment;*
 - b) *the economy;*
 - c) *connectivity and infrastructure; and*
 - d) *place-making.*
- 3.17 This recent consultation follows publication of an initial policy paper in February 2021 setting out the approach to developing the Framework. Paragraphs 2.10 and 2.11 of the policy paper set out in terms of the strategy for housing and planning in the Arc the role of the Framework will not be to make site allocations or to include detailed policies set elsewhere in national policy or better left to local plans (including for example, setting out the housing requirement). However, the policy paper emphasises the importance of meeting housing needs in full (including the delivery of affordable housing) and therefore relies on the calculation of minimum annual local housing need in accordance with the standard method as its starting point. Opportunities to increase levels of development above this minimum starting point are clearly anticipated as part of the Framework’s aspirations **to support economic development and ensure a balance between the delivery of new jobs and homes** (see paragraph 2.6).

3.18 Paragraph 3.8 of the policy paper sets out that the government expects:

“local planning authorities to continue to develop local plans before the publication of the Spatial Framework. These changes will sit alongside wider planning reforms, and as we take forward our response to the ‘Planning for the Future’ consultation, we will outline transitional arrangements and the role of the Spatial Framework within any new system.”

3.19 The development of the Spatial Framework will be supported by two further public consultations: Towards a Spatial Framework (Spring 2022) and Draft Spatial Framework (Autumn 2022). It is the Government’s intention to commence implementation of the Spatial Framework throughout in 2023.

3.20 In addition to the Arc, Greater Cambridge has benefitted from significant Central Government investment through the Greater Cambridge Partnership (formerly the Greater Cambridge Growth Deal. An initial £100m investment was received in 2015, with the second round of investment, totalling £400m, being received in 2020.

3.21 The initial investment supported work on the first phase of the Cambridgeshire Autonomous Metro (CAM), which has since been suspended following political pressure to scrap the proposals. In addition to this, significant infrastructure improvements, including, the Histon Road scheme, the Abbey Chesterton Bridge, Trumpington Park and Ride were supported.

3.22 The second tranche of money is expected to support housing and jobs growth across the Plan area, including delivering public transport schemes at Histon Road, Milton Road and West of Cambridge along with the enhancements to the energy-grid capacity across the area so as to ensure that housing and employment growth is not restricted.

3.23 Indeed, within the early evidence sitting behind the Greater Cambridge ‘First Proposals’ including the Housing and Employment Relationship Report (HER) November 2020, there is a recognition of the economic growth and infrastructure aspirations across the Plan area.

3.24 Despite this the Employment Land Review considered the central employment scenario, equivalent to the Councils’ medium level of jobs, to be the most likely outcome taking into account long term historic patterns of employment including the fast growth of key sectors for the Greater Cambridge economy in the recent past.

3.25 With a consistent record of jobs creation, and given the objectives and commitments made

as part of the Greater Cambridge’s inclusion in the Arc, along with the significant levels of investment in the area, there is robust evidence that jobs growth targets, as with housing targets, should be aspirational and look to establish the county as a leading economic force in the UK. As such use of the higher scenario is fundamentally supported.

3.26 The PPG (Paragraph: 010 Reference ID: 2a-010-20201216) is clear that where there either growth strategies for the area that are likely to be deliverable, or strategic infrastructure improvements that are likely to drive an increase in the homes needed locally then in these circumstances increases in housing need are likely to exceed past trends. In order to be justified by relevant evidence in accordance with paragraph 35 of the NPPF2021 preparation of an appropriate strategy for Greater Cambridge must likewise have regard to relevant market signals. The elements specified in the PPG comprise directly relevant market signals within the plan area that have been rejected during preparation of the ‘First Proposals’ and thus render the proposed approach unsound (not positively prepared and not justified).

(c) *Market Demand*

3.27 Importantly the PPG states that levels of housing need beyond the standard method will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated. It states that there will be situations where previous levels of housing delivery in an area are significantly greater than the outcome from the standard method and that this will need to be taken into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.

3.28 Paragraph: 015 Reference ID: 2a-015-201902261 of the NPPG highlights that the consideration market signals to justify a higher requirement that that which results from the standard methodology can be considered sound. or calculating housing need. It is therefore also appropriate to consider signals such as historic delivery and affordability.

Table 2: Net additional dwellings 2015-2021

	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021
Cambridge	884	1,178	1,152	877	464	420

South Cambridgeshire	671	545	729	1,154	1,068	1,335
Greater Cambridge	1,555	1,723	1,881	2,031	1,532	1,755

Source: *Live Tables on Net Additional Dwellings*

- 3.29 Taking COVID-19 into consideration, clearly, as demonstrated by output, demand is continuing to grow across the Plan area and can be aligned with the recent trends in jobs growth as is detailed further.
- 3.30 Greater Cambridge, like many parts of the East of England, is characterised by high housing costs and particular affordability pressures.
- 3.31 The average house price in Greater Cambridge in September 2015 was £345,248 and in the most recently available figures, for September 2020, it stood at £402,500; an increase of 16.7%.
- 3.32 Across the Plan area, the City of Cambridge has significantly worse affordability issues than South Cambridgeshire, but the affordability ratios (and thus pressure in terms of access to market housing) are rising more quickly in South Cambridgeshire.

Table 3: Greater Cambridge Affordability Ratios – median workplace based

	2015 – Affordability Ratio	2020 – Affordability Ratio
Cambridge	12.56	12.42
South Cambridgeshire	9.15	10.13

- 3.33 Both of the constituent Local Planning Authorities have seen a worsening trend in workplace-based affordability ratios over the past 5-years as demonstrated above in Table 3 notwithstanding levels of housing delivery.
- 3.34 Given the very strong jobs growth in recent years it would normally be expected that workplace-based affordability would demonstrate the greatest improvement or stabilisation (in keeping with the Government’s aims in introducing the Standard Method).
- 3.35 Assumptions regarding commuting are important in determining the population and future housing needs and ensuring a sustainable relationship between the supply of jobs and homes. In recent years in-commuting into Greater Cambridge has increased significantly.

Housing delivery above that required to sustain the associated level of employment growth will likely result in a reduction of net commuting and an improvement in housing affordability within Greater Cambridge.

- 3.36 This is only likely to be achieved in circumstances where housing growth reflects the outputs of the Councils' 'higher' employment growth forecast. Housing delivery below that required to sustain the associated level of employment growth will likely result in an increase in net commuting and a deterioration in housing affordability. This cannot be regarded as sustainable.
- 3.37 The Councils' HEGER shows net in-commuting to Greater Cambridge in 2011 of 30,173 persons (Table 12). Table 19 anticipates that using the Council's central scenario and a 1:1 commuting ratio forecast jobs growth would result in further net commuting inflows of 6,147 persons. This is because the 1:1 ratio is only applied to jobs growth that is supported through planned housing delivery in excess of that already provided for under the standard method (Paragraph 4.12). A total net flow of in-commuters of 36,347 cannot be regarded as sustainable. Furthermore, Paragraphs 4.31 to 4.33 of the HEGER look at the locational impact of housing additional workers outside Greater Cambridge, as generated under 2011 commuting ratios to support jobs growth under the central and higher scenarios compared to the balance achieved when a 1:1 ratio is applied to jobs growth above that supported by the standard method. The problem for the Council is that while it claims to avoid the impact of a 114dpa locational impact on surrounding authorities of the central scenario through use of the 1:1 ratio any jobs growth above this total will substantially increase in-commuting in order to provide for the number of workers required. Additional sensitivity testing is required to illustrate this, given that jobs growth continues to outpace housing delivery under existing trends.
- 3.38 In terms of the relationship with the affordability ratios set out in Table 3 it should be noted that the residence-based ratio for South Cambridgeshire is lower than the workplace-based figure (2020: 9.68). This ratio has remained relatively stable, albeit substantially in excess of national averages, and has not been significantly reduced by recent levels of housebuilding.
- 3.39 In South Cambridgeshire, the residence-based affordability ratio may be explained by an ageing population, who generally benefit from higher earning, could arguably account for this trend, with residents in the rural district taking the highest paying jobs across Greater

Cambridge, with younger and generally lower paid workers being forced to commute further.

- 3.40 it is recognised that a significant proportion of new employees following recent jobs growth are in-commuters so if they are commuting into Greater Cambridge (and can't afford housing) their earnings won't affect the residence-based ratio (which is made up of the ageing population referred to above). It should also be recognised that not all jobs growth across the county will be high-earning, particularly growth in the service sector, which places upward pressure on workplace-based affordability ratios.
- 3.41 This is a significant negative side-effect of failing to sustain the required balance between the growth in homes and jobs. This scenario is effectively acknowledged at Paragraph 3.77 of the HEGER Report regarding recent increased in-commuting to South Cambridgeshire.
- 3.42 In these circumstances it is correct that use of the 2011-based commuting ratio in these circumstances would not suppress levels of housing need (i.e., it would not seek to lock-in even more unsustainable commuting patterns and sources of net additional labour supply from outside of Greater Cambridge). However, the practical issue is that continued impacts are only likely to be avoided where planned housing growth genuinely reflects a reasonable assessment of potential employment growth.
- 3.43 In these circumstances the 'First Options' proposals to suppress opportunities for growth in the rural area at sustainable settlements including Steeple Morden, in circumstances where this would encourage even greater long-distance commuting, are misconceived and unsound **(not justified and not effective)**.
- 3.44 The present levels of economic growth have resulted in a supply-demand imbalance for housing, contributing to both house price growth and growth in net in-commuting into Greater Cambridge. As such, Greater Cambridge's strong economic performance has led to a supply/demand imbalance which has created a further deterioration in housing affordability.
- 3.45 Greater Cambridge is clearly an expensive place to live and work, but there are clear indications of strong market demand. In the pre-pandemic years of 2018-2019 and 2019-2020, delivery across the Plan area exceeded 2,000 dwellings per annum.
- 3.46 The level growth witnessed in the years 2018-2020 has resulted only in a marginal improvement in the affordability recorded in Cambridge, but not in South Cambridgeshire,

and therefore this height of growth at some 2,000 dwellings per annum is clearly insufficient to address worsening affordability trends. This is in-line with the Government's position on minimum annual local housing need providing the relevant starting point but not confirmation of an appropriate level of supply to address housing market pressure.

- 3.47 The economy in Cambridgeshire remains amongst the most buoyant nationally and, with the Government prioritising the area for growth, it is forecast that economic activity rates, investment and the development of industries within key sectors will continue and grow in the years ahead. Accordingly, once again, there is a clear rationale for adopting a higher approach to housing need that would support the level of job growth that the Plan area has the potential to accommodate and, indeed, is accommodating.
- 3.48 There is sufficient evidence to support **at least 2,549 dwellings per annum** being planned for in accordance with the Plan area's objectively assessed housing need. This is entirely in line with the Council's own evidence base in respect of economic growth and would ensure that jobs growth does not continue to outstrip housing growth.

Policy S/DS: Development Strategy

(i) Introduction

- 3.49 The Plan seeks to identify land to deliver additional homes beyond the 37,200 dwellings currently in the supply. The Plan therefore has identified land that the Councils' consider capable of delivering 11,460 dwellings. This includes a 10% buffer in addition to the proposed housing requirement of 2,111 dwellings per annum set out in Policy S/JH so as to ensure flexibility to deal with unforeseen circumstances.
- 3.50 A 'whole plan buffer' is both supported and considered necessary to enable the housing requirement to be met, with any failure to meet the requirement likely to mean that the Plan area's needs are not met contrary to the objectives of national policy. A whole plan buffer future-proofs the plan and makes it more robust.
- 3.51 Sitting behind the 'First Proposals' is the November 2020 Development Strategy Options Report, which sets out 8 strategic options for growth. These options are as follows;
- Densification of existing urban areas;
 - Edge of Cambridge – Outside Green Belt;

- Edge of Cambridge – Green Belt;
- Dispersal – New Settlements;
- Dispersal – Villages;
- Public Transport Corridors;
- Integrating jobs and homes – southern cluster;
- Growth focussed on Public Transport Nodes – Cambourne/A428

3.52 As set out in the Committee version of the ‘First Proposals’, the proposed development strategy for Greater Cambridge is to “direct development to where it has the least climate impact, where active and public transport is the natural choice, where green infrastructure can be delivered alongside new development, and where jobs, services and facilities can be located near to where people live, whilst ensuring all necessary utilities can be provided in a sustainable way”.

3.53 Development is expected to be focussed on the edge of Cambridge and by expanding the ‘new settlements’ at Cambourne, Northstowe, Waterbeach and Bourn Airfield. Some minor development is proposed in the rural area to the south of Cambridge (the Rural Southern Cluster), with very limited development across the rest of the Greater Cambridge Plan area.

3.54 As set out in these representations it is considered that the higher growth scenarios provide a true reflection of the actual demand for housing linked to reasonable forecasts for employment growth. However, even using the Councils’ ‘medium’ scenario, without prejudice to the reservations in these representations, the Councils’ Preferred Approach represents a significant increase in the requirements for development.

3.55 To address this, the Councils are only proposing a limited number of new allocations at urban extensions and new settlements and is seeking to realise additional capacity from existing allocated and committed sites within the confines of the existing strategy. In practice, the risks to delivery mean that the Councils’ stated provision for the ‘medium’ scenario plus a 10% buffer is unlikely to be achieved within the plan period with very limited additional sources of flexibility.

3.56 This concentration of development in the Cambridge and the ‘new settlements’ will only further exacerbate the affordability problems in the remainder of the rural settlements.

Paragraph 79 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is essential, therefore, that the needs of the sustainable rural settlements across the Plan area are assessed and a meaningful level of growth apportioned to them to ensure their ongoing vitality and viability. This will help to preserve and enhance rural services and facilities and allow local rural communities to meet their own needs for housing whilst providing much needed affordable housing in the parts of the borough that suffer with the greatest affordable housing need.

- 3.57 In addition to the need to support a wider spectrum of settlements, a reliance on strategic scale growth should be carefully considered. With the potential for multiple factors to cause delay in the delivery of the large strategic sites including, for example, infrastructure which often takes longer to come forward than envisaged. Arguably the low contingency and over reliance on strategic sites, exposes the Plan to a greater degree of uncertainty and risk. To remedy this, arguably the Plan should propose the allocation of further, non-strategic sites that could be delivered quicker and would ensure a rolling provision of housing.
- 3.58 Within this context an increase in the overall buffer to at least 20% should be considered. This would better address the need to recognise risks to the planned strategy and would also be a more appropriate measure to reflect the Council's reliance on windfall supply. To ensure that the Plan is effective a significant proportion of any buffer should be accommodated specifically through support for the allocation of sites in the rural area.
- 3.59 In distributing the growth, the Plan could also act to maximize housing supply across the widest possible range of sites, by size and market location, so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. A wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery and the success of the Plan.

(ii) Summary of Housing Delivery Concerns within the First Proposals Strategy Options

- 3.60 There is significant research that considers the lead-in and rate of delivery of development on the scale of that proposed at North-East Cambridge, Northstowe, Cambourne and Waterbeach. The level of infrastructure required and the ability to have multiple builders on one site often results in slower delivery than anticipated by Councils. It should be noted that

as is set out in Policy S/DS, in addition to the expected delivery in line with the adopted Local Plans, additional delivery, or the faster delivery of homes, is expected to contribute to the additional 11,640 homes planned for. Whilst it is not necessary to revisit the allocations that have already been subject to Examination and subsequently adopted, it is reasonable to consider, on the basis of new evidence, the contribution that they can make to meeting the overall housing need of 2,111 dwellings per annum plus 10% buffer over the 2020-2041 plan period.

- 3.61 Lichfields' "Start to finish" (Second Edition) states that the average annual build-out rate for a schemes of 2,000+ dwellings is 160 dpa with a median of 137dpa. It should be acknowledged that not all sites will deliver at this rate. Further, the Lichfields research shows that if a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in approximately 3 years. However, from the date at which an outline application is validated, the average figures can be between 5.0 and 8.4 years for the first home to be delivered; such sites would make no contribution to completions in the first five years.
- 3.62 The largest proposed allocation in respect of contribution to meeting the additional housing requirement of 11,640, is that at **North-East Cambridge (S/NEC)** The Councils are proposing mixed use development including residential uses, with an Area Action Plan currently being prepared. The Councils have assumed that North-East Cambridge will have some early delivery on the Chesterton Sidings parcel, but to date only pre-application discussions have occurred. The build out rates, of 350 dpa are based on the recommendations set out in the Housing Delivery Study. It is unclear how the Councils have determined that the proposed allocation will deliver 3,900 dwellings over the plan period given that the Housing Delivery Study suggests, against an unjustified build-out rate, only 2,200 dwellings will be delivered to 2041.
- 3.63 In respect of **Cambridge Airport (S/CE)**, the main landowner, Marshall of Cambridge, announced in April 2010 that the relocation of Cambridge Airport would not happen before 2031 at least, as there were currently no suitable relocation options. Despite this under Policy S/DS, the site is expected to contribute 2,850 dwellings by 2041. Once again, this figure differs from the yield set out in the Housing Delivery Study, which sets out a maximum contribution of 2,200 dwellings over the plan period.

- 3.64 The Councils have assumed that the site will contribute 50 dwellings in 2033, just two years after the 2031 date for the relocation of the airport. In reality, it is likely that this 2031 deadline for identifying suitable sites and relocating the airport will be missed and even if it were to be hit, given the work that would be required to bring the site into a suitable condition to accommodate residential development, there is very little reasonable chance of anything being delivered in 2033. Realistically, it is unlikely that the site will contribute more than 400 dwellings over the plan period.
- 3.65 In respect of **Northstowe**, it is noted that in addition to the expected delivery set out in the adopted Development Plan, an additional 750 dwellings (faster delivery of homes already planned) are expected to contribute to the 11,640 additional dwellings being planned for.
- 3.66 As is set out in the latest Annual Monitoring Report, even with 5-housebuilders on-site, the average number of dwellings completed between 2016 and 2020 on the Northstowe site thus far, is just 169 per year. The Councils' trajectory, set out in the Housing Delivery Study, requires 300 dwellings per annum to be delivered on-site. If the historic rate of delivery were to be carried through over the 2020-2041 plan period only 3,549 dwellings would be delivered against the Councils' assumption of 6,304 and clearly the additional 750 dwellings being planned for under Policy S/DS would simply contribute to the currently adopted requirement only.
- 3.67 It is noted that significant weight is being placed on the modern methods of construction proposed for Phase II of the Northstowe development and the rate of delivery indicated by Homes England on the other Phases. There appears little by way of clear evidence to suggest that this will result in increased delivery beyond the average already demonstrated.
- 3.68 In line with the standard assumptions being made in respect of delivery, the Housing Delivery Study expects the **Waterbeach New Town** to deliver between 250 and 300 dwellings per year from 2023/2024, or 5,700 over the plan period to 2041. If the average of 160 dwellings per annum, as is set out in the Lichfield's research, were to be applied, the contribution that the site could make to meeting the plan period housing requirement would be just 3,120 dwellings. Further, it is accepted, as confirmed in the South Cambridgeshire Local Plan Inspector's Report, that the site requires significant investment in infrastructure and, realistically, may not start to deliver new housing until the mid or later years of the plan period.
- 3.69 Given the above, there are serious concerns in respect of the ability of a number of strategic

allocations to deliver development at the scale that is required to meet the identified housing proposed housing requirement of 2,111 dwellings plus a buffer, let alone the requirement of 2,549 dwellings plus a buffer that is justified on the basis of economic growth and funding.

(iii) Levels of Growth in the Rural Area and Contribution to Overall Supply

- 3.70 Accordingly, the Greater Cambridge Plan fails to identify sufficient land for housing to meet the housing requirement. The identification of additional land should recognise that allocating a range of sites, both in terms of size and location, will provide the best reasonable prospect of meeting and maintaining the supply of housing as is required by national policy.
- 3.71 Page 40 (Figure 10) of the ‘First Proposals’ consultation indicates that the Greater Cambridge Local Plan strategy (including windfalls) would achieve only 18% of growth in rural areas over the 2020 to 2041 period. This is a substantial reduction on the distribution of growth in previous development plans. The Councils’ evidence base demonstrates that this approach is unsound: not effective and not consistent with national policy including providing for flexibility in accordance with Paragraph 82 of the NPPF2021.
- 3.72 The Councils fail to recognise the role of growth in the rural areas in sustaining the benefits associated with recent increases in delivery.
- 3.73 The most recent April 2021 Housing Trajectory suggests that allocations in rural areas of South Cambridgeshire will comprise around 15% of delivery between 2021/22 and 2025/26. This increases to over 40% (around 930dpa in total) when Unallocated Sites with Planning Permission or Resolution to Grant Planning Permission in South Cambridgeshire are included, which predominantly comprise land within the rural areas and a number of schemes granted when the Council was previously unable to demonstrate a robust five year supply. The Councils’ latest Authority Monitoring Report reflects that this will sustain recent levels of completions being disproportionately concentrated in South Cambridgeshire and not principally related to the delivery of Urban Fringe/New Settlement sites.
- 3.74 Adopting these broad assumptions this total (4650 dwellings) would comprise around 50% of the 18% total growth allowed for in rural areas but forecast for delivery ahead of adoption of the Greater Cambridge Local Plan. This would broadly tally with the Councils’ assumptions that windfall in South Cambridgeshire (2,570) plus small allocations in the southern cluster and rural area villages (384 dwellings) and remaining commitments on allocated rural sites

(1,903) and unallocated sites (1,539) (6,396 dwellings total) would comprise the remaining potential sources of supply in rural areas. A small proportion of these categories would nonetheless relate to other components of the spatial distribution.

- 3.75 The practical implication is that average growth in the rural areas for the remaining 15 years of the plan period is likely to amount to only 310 dwellings per annum. This reinforces that the evidence in the Housing Delivery Study does not support the conclusion that rates of completions exceeding 2,000 homes can be achieved without a significantly greater proportion of supply from rural areas.

(iv) Windfall and Small Sites Delivery Assumptions

- 3.76 The Councils' assumptions for windfall supply over the 2020 to 2041 plan period (5,345 dwellings) exceed the total allowance for flexibility within the trajectory (4,400 dwellings). Within these circumstances the Councils plainly cannot claim that the windfall allowance is not central to achieving the planned requirement. The 'First Proposals' consultation also accepts that windfall supply is relied upon to ensure at least 10% of homes are delivered on sites of less than 1 hectare, in accordance with Paragraph 69(a) of the NPPF2021.
- 3.77 The Councils' approach in relation to windfall supply and managing the delivery of small sites as a component of the planned strategy is unsound: not effective and not consistent with national policy. Increases to the assumed level of windfall supply are not supported by robust evidence. Notwithstanding some evidence that rates of supply from unidentified sites have exceeded past estimates Paragraph 71 of the NPPF2021 also requires consideration of *expected future trends* and the reliability of sources of supply.
- 3.78 The Councils' Housing Delivery Study does not undertake any analysis of the impact of the Councils' proposed development strategy and arbitrary limits to levels of growth across the settlement hierarchy in terms of the effect on windfall supply. This is despite paragraph 3.9 suggesting that the potential for additional large windfall development should be assessed where it would be consistent with the Councils' policies. The arbitrary limits to scheme size are likely to reduce the scale of potential 'large' windfall sites relative to past examples and provide an additional incentive to ensure total potential capacity for development is taken up more slowly (across multiple applications) below the threshold for affordable housing contributions).

- 3.79 The Councils' suggested reasons to depart from the requirements of national policy in NPPF2021 Paragraph 69(a) – stating that if it were to allocate specific sites it would need us to develop large numbers of sites in the rural area in what it claims are potentially unsustainable locations – is not justified or effective.
- 3.80 Allocating suitable sites such as our client's land at Steeple Morden would overcome the risks identified with the Councils' reliance on a high level of windfall supply. This would provide overall flexibility and could secure benefits under the policies of the development plan including contributions towards affordable housing and necessary community infrastructure. This is consistent with the Government's objectives for housing in rural areas, whereas the Councils' suggested approach does not seek to risks deliberately failing to meet the needs of these communities.
- 3.81 For the avoidance of doubt, updated details of our client's land submitted with these representations (including a revised Site Boundary at Appendix 1) confirm that the site could suitably be identified for allocation comprising an area no greater than 1 hectare in accordance with national policy.

(v) *Neighbourhood Planning (S/JH)*

- 3.82 Paragraph 66 of the NPPF2021 strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.
- 3.83 Page 24 of the 'First Proposals' consultation suggests that the approach to providing targets for designated neighbourhood areas will be upon the basis of apportioning a share of the area's windfall figures and will not form part of the target for new homes to be allocated. This approach is unsound: not positively prepared and not consistent with national policy.
- 3.84 It is clear that the Councils are reliant on assumptions for windfall supply in order to deliver the planned strategy and housing requirement. In these circumstances the approach to apportion levels of windfall development as the basis for neighbourhood plan housing requirements is likely to compound risks to relying to a large extent upon supply from unidentified sites and the Councils' arbitrary limits to acceptable scales of development at individual settlements based on the proposed policies of the Greater Cambridge Local Plan.
- 3.85 In these circumstances it is unclear how Neighbourhood Plans would, for example, facilitate

opportunities to increase levels of housing delivery of secure benefits such as sites contributing towards affordable housing. This reinforces how the overall strategy is likely to fail to address needs within the rural area. By extension, the approach presents additional risks to ensuring housing needs are met in full.

- 3.86 In the context of our client's site at Steeple Morden it is suggested that the identification of an appropriate housing requirement should reflect the relative sustainability of the Group Village and the ability of the settlement to support an appropriate level of growth. In suitable locations such as Steeple Morden it would be appropriate for the approach to provide a housing requirement for the neighbourhood area and also to facilitate the allocation of sites that would also assist in the wider Plan area's ability to secure at least 10% of new homes on sites no larger than one hectare.

Policy S/SH – Settlement Hierarchy

- 3.87 In the proposed settlement hierarchy policy (S/SH), Steeple Morden is classified as a 'Group Village', with the definition retained from the previous South Cambridgeshire Local Plan as below.

“Group villages are generally less sustainable locations for new development than Rural Centres and Minor Rural Centres, having fewer services and facilities allowing only some of the basic day-to-day requirements of their residents to be met without the need to travel outside the village. All Group Villages have at least a primary school and limited development will help maintain remaining services and facilities and provide for affordable housing to meet local needs.”

- 3.88 Given the above definition of a Group Village, it is agreed that this is the correct place within the hierarchy for Steeple Morden to be located. However, the settlement does have a good provision of services and facilities within the bounds of the settlement, removing some of the requirement for residents to leave the settlement and providing a range of businesses and facilities that are well-placed to meet day-to-day needs.
- 3.89 Steeple Morden can be considered a fairly sustainable settlement within Greater Cambridgeshire, and as such is capable of facilitating a portion of the housing need. The current wording of the policy restricts the amount of development in Group Villages to 8 dwellings, but in exceptional cases up to 15 dwellings. Capping the amount of development permitted in a settlement without providing an assessment on an individual basis of the sites, could be severely limiting to the enhancing or maintaining the vitality of rural communities as is set out in Paragraph 79 of the Framework.

- 3.90 The PPG reiterates that a wide range of settlements, such as those with the characteristics illustrated at Steeple Morden, can play a role in delivering sustainable development in rural areas. The blanket policies seeking to restrict (through strictly defining arbitrary levels of acceptability in terms of scheme size) housing development in some types of settlement as those advocated by the ‘First Proposals’ consultation proposals are not supported by robust evidence of their appropriateness as required by the PPG (ID: 67-009-20190722).
- 3.91 This is furthered as policies should look to identify opportunities to allow villages to thrive and grow. Limiting this to the provision of 8 dwellings per scheme in the case of Group Villages could prevent additional facilities being provided and arbitrarily limits the potential social and economic benefits of new residents’ utilisation of existing services and businesses. The policy would also not comply with Paragraph 78 of the Framework, which requires policies to be responsive to local needs. For example, given the threshold to seeking contributions towards affordable housing from major development only this means that over the course of the plan period Group Villages will not provide any affordable housing.
- 3.92 Removing the limit of how many dwellings a site in a Group Village may suitably provide would enable each site to be considered on its own merits. This would enable an objective assessment of the contribution of the scheme to the needs of the settlement and as appropriate enable its sustainable growth and vitality.

Policy S/SB – Settlement Boundaries

- 3.93 Firstly, the site at Steeple Morden is surrounded on three sides (north, west and south) by built form, with the settlement boundary for Steeple Morden being immediately adjacent to the west and south of the site.
- 3.94 The context of the site is key as the Councils’ reasoned justification for the proposed approach in the policy is to “*help guard against incremental growth in unsustainable locations.* (our emphasis)” Given that the site is encompassed by built form, it follows that the land forms part of the settlement form of Steeple Morden. Development on the site would be in a sustainable location within Steeple Morden, consistent with the existing settlement pattern and that would not result in the encroachment of the countryside. Furthermore, the site is residential curtilage and paddock land, which when read in the context of the wider site does not align with the features and characteristics of the surrounding countryside and is more akin to the settlement of Steeple Morden. Development of the site could therefore be

achieved without adversely effects upon the intrinsic character and beauty of the countryside.

- 3.95 Definition of the settlement boundary for Steeple Morden is therefore unsound on the grounds of being not justified and not consistent with national policy.
- 3.96 The northern portion of Steeple Morden is largely linear in terms of development along a single road; however, the southern portion of the settlement is more clustered in terms of its built form which extends eastwards from Hay Street.
- 3.97 The site lies in an area of transition between the two distinctive areas so could be designed in a way that would support the transition without overtly impacting upon either of the two areas. The eastern boundary of the site if developed would follow the existing built form edge of Steeple Morden (along Craft Way) to the south of the site, which would act as a continuation of the settlement northwards, highlighting the relationship of the site to Steeple Morden. Therefore, given the characteristics of the site in relation to the identify of Steeple Morden it would be appropriate for it to be included within the settlement boundary to enable a smooth transition for the defined areas, in a sustainable location.

Section 2.6 – Rest of the Rural Area

- 3.98 The introductory text to this section sets out that Greater Cambridgeshire *“want our rural villages to continue to thrive and sustain their local services, but we don’t want to encourage lots of new homes in places where car travel is the easiest or only way to get around.”* However, by severely limiting the amount of development in rural areas this risks having the opposite effect with business not able to thrive without the additional influx of new residents. There is a balance to be struck which enables more services to be provisioned in Group Villages that would mean that both future and existing residents are not required to travel elsewhere which would create a more sustainable community that is less car reliant. This can only sustainably be achieved whilst retaining the rural identity of the area by not unduly restricting the amount of development in these localities.
- 3.99 Within this context Paragraph 105 of the Framework sets out that *“opportunities to maximise sustainable transport solutions will vary between urban and rural areas”*. As such a presumption against development on the sole premise of lack of access to sustainable modes of transport is not in accordance with the Framework.

Policy H/AH – Affordable Housing

- 3.100 As has been set out above, all of the ‘Group Villages’ as defined in the settlement hierarchy are limited to developments of up to 8 dwellings or 15 dwellings in exceptional circumstances, which means that the threshold for triggering the requirement for affordable housing in these localities will not typically arise as this is currently set at a threshold of 10 dwellings. Given that the 15 dwelling threshold is envisaged in relation to single brownfield sites within settlement boundaries the level of development realised under this part of the strategy is expected to be extremely limited and any such sites are highly likely to have already been considered and proposed for allocation.
- 3.101 This is significant given the requirements of Paragraph 64 of the Framework which states that *“Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).”*
- 3.102 The Councils’ proposed approach also appears to ignore that it would encourage piecemeal and incremental development of potentially suitable development sites across multiple applications seeking to comply with the policy criteria in proposed Policy S/SB. This would be likely to result in potentially significant cumulative levels of development wherein individual applications have been determined as being below the thresholds for affordable housing provision.
- 3.103 Thus, the mechanism that has been created by the policy means that there will be no affordable dwellings being provided in rural areas particularly ‘Group Villages’ over the course of the plan period, subject to rural exception and exceptional schemes being brought forward outside of the Local Plan.
- 3.104 Given that the evidence base for the First Proposals consultation does not cite designated rural areas as reasons to apply the lower threshold the maximum number of dwellings that has been imposed on Group Villages should be lifted to allow for sites to be viewed on their individual merits and allow for the provision of affordable housing in all areas of the district. This also complies with Chapter 11 (Making effective use of land) of the Framework which supports the 8 dwelling limit being lifted to allow for the sites to make best use of available land rather than be limited.

Policy BG/BG – Biodiversity and Geodiversity

- 3.105 NPPF paragraphs 174 - 188 outline how planning policy and decisions should contribute to and enhance the natural environment where possible.
- 3.106 The Environment Act 2021 introduced new mandatory requirements for provision of biodiversity net gain and outlines the requirement for developments to provide a minimum of 10% net gain, it is expected that this will apply to all developments from 2023 pending secondary regulations coming into force.
- 3.107 This policy outlines the approach to be taken to biodiversity and geodiversity impacts from development. It is proposed the development will be required to achieve a minimum of 20% biodiversity net gain and notes that net gain calculations should be submitted using Defra Biodiversity Metric 3.0 or any successor. The policy notes that onsite provision of biodiversity net gain will be sought where possible but that off-site habitat measures will also be considered where appropriate and where consistent with strategic aims of the Plan as set out in Policy BG/GI.
- 3.108 While the objectives of biodiversity enhancement are supported in principle the Councils' proposed approach in terms of the levels of net gain sought is unsound: not justified and not consistent with national policy. The proposed approach not supported by robust evidence to justify the reasons to demonstrate that the higher level is appropriate or necessary in Greater Cambridge, also having regard to the policy costs of such an approach, relative to the Government's position of what will be required nationally in future.

4.0 REPSONSE TO SITE SPECIFIC ASSESSMENT

Proposed Development

- 4.1 Following on from the previous submissions to the Great Cambridgeshire Call for Sites in 2019 and the 'First Conversation' consultation in early 2020, the site at Craft Way, Steeple Morden remains available for residential development.
- 4.2 The previous representations included a small area of woodland in the south-western corner of the site which is now excluded from the potential development site. As has been previously set out, the development of the site would retain the existing dwelling on the site with a suitable curtilage, but the remainder of the paddock area would be brought forward for development of circa 30 dwellings.

HELAA Assessment

- 4.3 Following the submission of the site to the Call for Sites and the following 'First Conversation' consultation the LPA have undertaken an assessment of the site through the HELAA. We have set out below our response to the assessment on behalf of our client and highlighted the erroneous elements of the HELAA findings, to allow for these to be corrected and the sites to be re-assessed prior to the publication of the draft Local Plan and associated evidence base.
- 4.4 Due to the revisions to the site red line, neither of the assessments of the site cover the area which is now being put forward as part of the Call for Sites alongside the consultation. The area now being considered is set out in Appendix 1 and measures 0.89ha. Given the new site area this should trigger the need for the site to be re-assessed in addition to the below issues raised with the HELAA assessments of the sites previously put forward.
- 4.5 Although the site area now put forward in Appendix 1 does differ from the previous submissions it is not significantly altered, and the Council could have reasonably considered that the site is potentially suitable as an area under 1ha.

HELAA Assessment 40440

- 4.6 Firstly, the current use of the site is not agricultural and should instead be referred to as domestic curtilage and paddock land associated with the existing dwelling on the site. This fundamentally changes the basis for the Councils' assessment, as it strengthens the site's affiliation to the existing built settlement pattern at Steeple Morden. Given the existing built

form to the north, west and south of the site this highlights that the settlement pattern in this area is no longer linear, and as such this forms a logical infill development on an under-utilised parcel of land.

- 4.7 It is acknowledged that the site currently falls outside of the development framework, but it does lie immediately adjacent to this on the southern and western boundaries, as such this furthers the argument in the paragraph above that this site would be a logical development site.
- 4.8 An ‘Amber’ rating is ascribed to findings on Flood Risk in the Council’s assessment. In accordance with the Environment Agency flood maps the site is located entirely within Flood Zone 1, which is in accordance with the assessment. However, 1% of the site has been suggested to lie within an area of surface water flooding (1 in 1000-year event), which should mean that the site is assessed as green, as the RAG score system states that a site scores green if there are *“no / limited areas identified as at risk surface water flooding.”* The fact that the Council’s own assessment indicates that any potential constraints affect only 1% of the site means that it only reasonably be assessed as falling under the “limited” classification and so the site should be viewed as green.
- 4.9 In regard to the landscape assessment the site is noted as being of a typical local character due to the arable landscape, but as has been previously noted the site is not agricultural and forms a paddock area and residential curtilage and is surrounded by development on three sides. In addition, the woodland area, which is raised as a concern, no longer forms part of the proposed development area (see Plan at Appendix 1), meaning that it is proposed to be retained. The County Wildlife Site (CWS) to the north of site is also raised as a concern, however development on the site could include mitigation that would enhance the already substantive boundary treatments along the northern edge of the site. In addition, the built form located at Woodland Grange is situated as close to the CWS but without the visible screen that is already part of this site. Therefore, in light of the above, the site’s classification as red cannot reasonably be justified and should be amended to amber meaning that impacts can be suitably mitigated.
- 4.10 Further to paragraph 3.9 as part of any scheme on the site the required provision of net gain in biodiversity will be sought as part of the Council’s consultation proposals and this will contribute to securing any mitigation and enhancement necessary to satisfy policy

requirements.

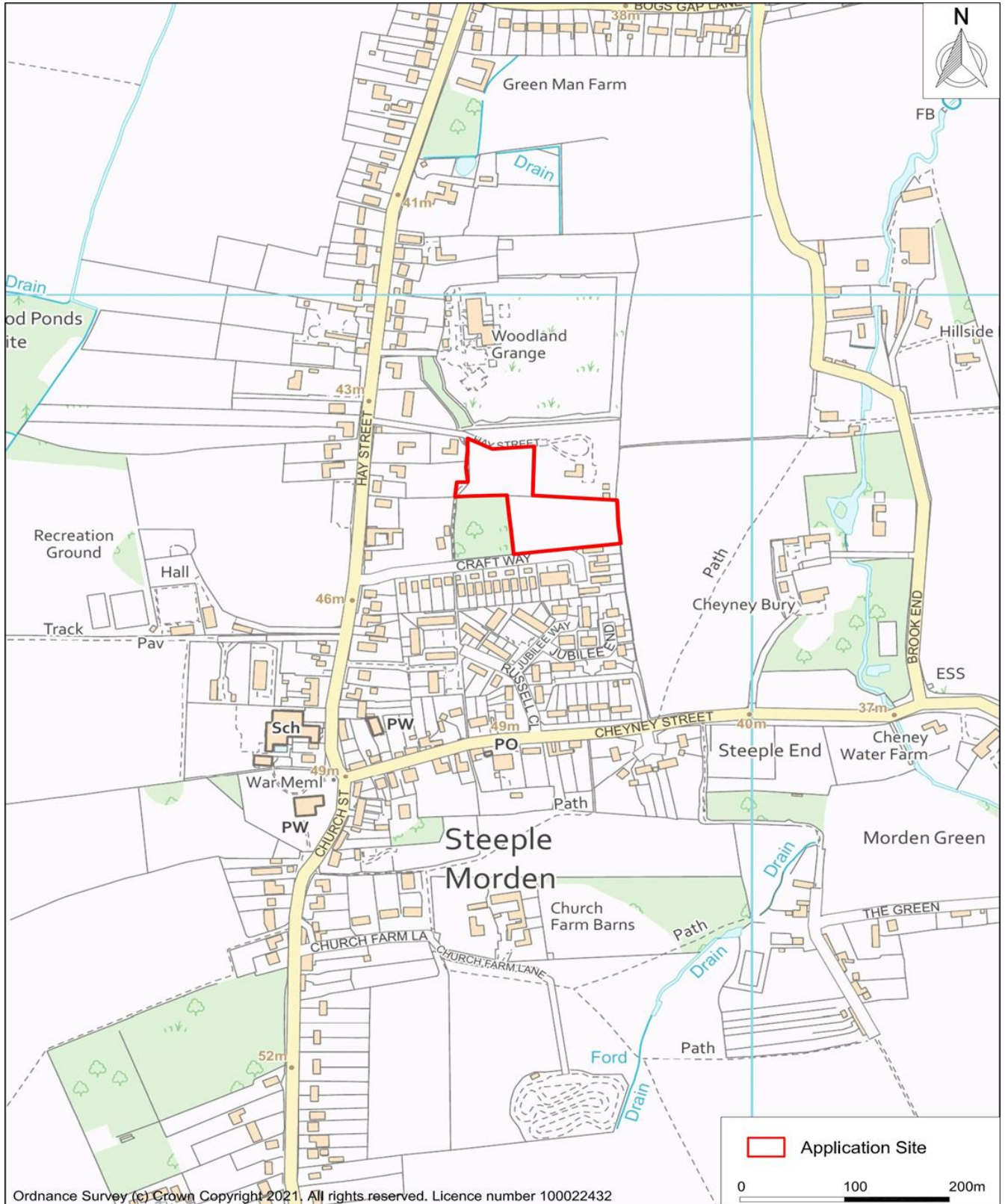
- 4.11 There are some discrepancies in the distances quoted in relation to the access to services with the primary school only being located 300m from the site and the nearest point of public transport, which is a bus stop along Hay Street, being only 100m from the site.
- 4.12 Potential accesses onto the site have been assessed as being 'Red', meaning that there is no possibility of creating a safe access. There is the potential for the development to be served through a new safe access off Craft Way. Therefore, the site should be scored as amber in the RAG system, as *"there are potential access constraints, but these could be overcome through development."*
- 4.13 The Transport and Roads Assessment posits that there is a potential impact on the surrounding road network as a direct result of development on this site. However, there appears to be suitable scope for additional capacity on the road network and this could be evidenced as part of any application that is brought forward or alternatively suitable mitigation measures can be included.
- 4.14 The site has also been given an amber rating for noise, vibration, odour, and light pollution; however, the site is not surrounded by any uses that would impact upon the site in terms of these potential constraints. In addition, the site could be designed in a manner to have a neutral or positive impact on its surroundings so should therefore be assessed as green.
- 4.15 In relation to 'Agricultural Land', as has been stated above, the site is not used for agricultural purposes as it is the curtilage around the existing dwelling, and paddock land. Therefore, the agricultural land classification of Grade 2 is not relevant as the proposals would provide a continuation of the existing dominant use on the site, is not and will not be used for agricultural purposes.
- 4.16 The Local Planning Authority's HELAA assessment notes that the Public Rights of Way that are located adjacent to the site and across the access onto Hay Street do not impact upon the HELAA rating, but they could be incorporated into the development scheme and be an asset to the proposals.

HELAA Assessment 40442

4.17 The below matters replicate those assessment criteria where the Council's findings are inaccurate and cannot reasonably be justified, as highlighted in the above commentary relating to the findings for HELAA parcel 40440:

- Outside Development Framework, but adjacent to the boundary.
- Incorrect landscape assessment as the woodland is not part of the site and will be retained together with the fact that the site is not arable so does not reflect the wider characteristics of the settlement's surroundings.
- Biodiversity net gain could be provided as part of any development proposal brought forward, with suitable mitigation for adjacent designations.
- The proximity of the Primary School and public transport need revising as set out above.
- Any Surface Water Flood Risk affects less than 1% of the site area and can only reasonably be regarded as 'limited' or entirely absent.
- Suitable access arrangements could be catered to on either Hay Street or Craft Way.
- Impact on the surrounding road network is will not be detrimental.
- Public rights of way could be incorporated into any development proposal.
- Agricultural land classification is Grade 2, but the current use of the site is as residential curtilage with associated paddock with no reasonable prospect of productive agricultural use.

Appendix 1 – Craft Way, Steeple Morden: Site Location Plan





BEDFORD

Planning / SDD / SPRU
bedford@dlpconsultants.co.uk

BRISTOL

Planning / SDD / SPRU
bristol@dlpconsultants.co.uk

EAST MIDLANDS

Planning/ SDD
nottingham@dlpconsultants.co.uk

LEEDS

Planning
leeds@dlpconsultants.co.uk

LONDON

Planning
london@dlpconsultants.co.uk

MILTON KEYNES

Planning
miltonkeynes@dlpconsultants.co.uk

RUGBY

Planning
rugby.enquiries@dlpconsultants.co.uk

SHEFFIELD

Planning/ SDD / SPRU
sheffield@dlpconsultants.co.uk

