

**GREATER CAMBRIDGE LOCAL PLAN PREFERRED OPTIONS
REG.18 CONSULTATION – NOVEMBER TO DECEMBER 2021
ENDURANCE ESTATES – LAND OFF OLD HOUSE ROAD BALSHAM
FINAL REPRESENTATIONS**

INTRODUCTION

The consultation on Preferred Options for the Greater Cambridge Local Plan closed on 13th December 2021. This document sets out final representations to the consultation. The final version of the representations were uploaded to the Councils online consultation system.

REPRESENTATIONS TO PREFERRED OPTIONS GCLP

Policy S/JH: Level of Jobs and Housing

OBJECT

The Greater Cambridge City Deal recognised the relationship between housing and economic growth, and that the shortage of available and affordable housing within Greater Cambridge has an impact on house prices, commuting patterns, and recruitment and retention of employees. The Cambridgeshire and Peterborough Devolution Deal committed to delivering substantial economic growth and to double economic output during the next 25 years. The 2018 Cambridgeshire and Peterborough Independent Economic Review (CPIER) identified that recent employment growth has been faster than anticipated, and the aim of doubling economic output in the area by 2040 was realistic. It was suggested in CPIER that economic growth could be achieved by attracting knowledge-intensive businesses that would not locate elsewhere in the UK, by delivering new housing, and by prioritising infrastructure projects. The National Infrastructure Commission, the Cambridge and Peterborough Combined Authority and the Greater Cambridge Greater Peterborough Enterprise Partnership acknowledge and support the economic growth potential of the Greater Cambridge area, and consider that there is a need to substantially increase housing delivery in order to support that economic growth and address the significant housing affordability issues that exist. At present there is an imbalance between rates of economic growth and housing delivery in Greater Cambridge. As set out below, the employment land evidence and emerging GCLP does not plan for sufficient economic growth.

All these factors support a significantly higher number of homes than are proposed in the preferred 'medium plus' growth option of Policy S/JH. It is considered that the 'medium plus' growth option makes insufficient upward adjustments to the housing requirement (from Section Id.2a of the Planning Practice Guidance) to take into account growth strategies, strategic infrastructure improvements and housing affordability in Greater Cambridgeshire. The 'medium plus' growth option also does not reflect the anticipated growth aspirations of the Oxford to Cambridge Arc Spatial Framework, or that the economic success of Greater Cambridge is of national significance.

Barton Willmore, on behalf of Endurance Estates, have assessed the preferred jobs and housing targets in Policy S/JH. Policy S/JH takes forward the 'Central' growth scenario, based on employment growth of 58,500 jobs 2020-2041, at an average annual growth rate of 1.1%. However, the CPIER report identified that Cambridge and South Cambridgeshire Districts experienced average annual employment growth of 2.4% and 2.3% respectively according to Office for National Statistics data,

between 2010 and 2016. This approach by CPIER results in an annual employment growth rate for Cambridge which is the same as the ONS rate (2.4%), but a significantly higher rate (4.2%) is calculated for South Cambridgeshire. Barton Willmore conclude that the Councils current objectively assessed need is far below the potential growth scenarios for the area and, therefore, will need to be revised up and supported by further site allocations in the development strategy.

Therefore, the emerging GCLP should have selected a higher growth level option to support economic growth, address housing affordability, and reduce in-commuting. The higher growth level option will require infrastructure funding, but there are existing transport improvements already planned for Greater Cambridge and further investment in infrastructure (e.g. water and electricity) will need to be secured as part of the Oxford to Cambridge Arc.

Requested Change

It is requested that the housing and jobs requirements in Policy S/JH are based on delivering a higher growth level option.

Policy S/DS: Development Strategy

OBJECT

Endurance Estates is promoting land off Old House Road in Balsham for residential development, and in representations has requested that the site is allocated in emerging GCLP. These representations to Policy S/DS are focussed on the preferred development strategy for the rest of the rural area, and specifically the decision to allocate a very limited amount of development to the more sustainable villages.

The overall development strategy is very reliant on the delivery of an extension to an existing new settlement (Cambourne West + an additional 1,950 dwellings at Cambourne), planned new settlements (Northstowe, Waterbeach and Bourn Airfield) and new communities on the edge of Cambridge (North East Cambridge and Cambridge East). It is acknowledged that the principle of development at most of these strategic sites is already established through adopted development plan documents; the additional dwellings at Cambourne is proposed through emerging GCLP and associated with East West Rail. However, it is considered that there are a number of risks associated with the preferred development strategy, which relate to housing delivery rates and whether these can be increased at some new settlements, the relocation of existing uses from some sites, and the delivery of affordable housing.

There is monitoring data, evidence from other examinations, and national research (see Start to Finish Report and updates by Lichfields for example) that provides information on housing delivery rates. The most recent housing trajectory for Greater Cambridge (published April 2021) already predict high average annual housing delivery rates for the new settlements; Northstowe and Waterbeach are predicted to deliver 250 dwellings per annum, and Cambourne West and Bourn Airfield are predicted to deliver a combined total of 300 dwellings per annum. According to monitoring data Cambourne has historically delivered approximately 230 dwellings per annum. Hampton (in Peterborough) has historically delivered 259 dwellings per annum. Cranbrook (in East Devon) which has the highest annual delivery rate of current new settlements is delivering at approx. 295 dwellings per annum. The Inspector for the Huntingdonshire Local Plan recommended that the combined housing delivery rates Alconbury Weald (the former Alconbury Airfield and

Grange Farm) should be no higher than 300 dwellings per annum, and for St Neots East (Loves Farm and Wintringham Park) should be no higher than 200 dwellings per annum. The predicted average housing delivery rates at Northstowe, Waterbeach and Cambourne West/Bourn Airfield already appear to be at levels comparable to or higher than other new settlements elsewhere. Based on the evidence and examples set out above, it is clear that current predicted delivery rates are already optimistic, but there is no credible evidence that faster housing delivery rates can be achieved at Northstowe or Waterbeach (i.e. what site-specific circumstances are present on these sites that mean they will deliver an above-average number of dwellings a year, consistently over a prolonged period of time. It is noted that Cambourne, Hampton and Cranbrook all had multiple housebuilders on site at the same time and delivered affordable and market housing in conjunction with one another. It is requested that predicted housing delivery rates for the new settlements take into account the above comments, and the assumption that faster housing delivery rates can be achieved at Northstowe and Waterbeach should be deleted from the development strategy.

North East Cambridge and Cambridge East are allocated in both Local Plans as strategic sites. It is acknowledged that these sites involve the re-use of previously developed land. However, the redevelopment of these sites is complex and involves the relocation of the existing uses; the relocation of a sewage treatment works and existing businesses in the case of North East Cambridge, and the relocation of airport related uses and businesses in the case of Cambridge East. It is considered that the delivery of development at these sites will need to be realistic, taking into account all of the challenges that need to be overcome prior to the commencement of development. It is requested that realistic assumptions about delivery are applied for North East Cambridge and Cambridge East.

It is noted that most of the new settlements will deliver less affordable housing than the statutory policy requirement of 40%, mainly because of the need for these developments to also deliver significant levels of new transport and community infrastructure in initial phases. The affordable housing contributions that have come forward on major strategic sites to date are as follows: 20% at Northstowe (Phases 1 & 2), 30% at Waterbeach, 30% at Cambridge East (Wing), 30% at Cambourne West and 40% at Bourn Airfield, although all are subject to a review mechanism that could result in adjustments to the level of affordable housing. The proportion of affordable housing that will be provided from the developments at North East Cambridge and Cambridge East are unknown at this stage, but because of the costs associated with the relocation of existing uses and the delivery of new transport infrastructure it is very unlikely that 40% affordable housing will be provided at least in the initial phases. It is clear that the existing and planned new settlements and new communities in the edge of Cambridge are not and will not provide enough affordable housing, which should be a concern in an area such as Greater Cambridge which has significant housing affordability issues. It is requested that, in order to address the under-delivery of affordable housing from Northstowe, Waterbeach, Cambourne West, North East Cambridge and Cambridge East, the development strategy should allocate additional sites that are capable of providing policy compliant levels of affordable housing including small and medium sites in the villages.

The preferred development strategy for the rest of the rural area is based on the assumption that the villages in this area are unsustainable because existing and future residents would need to travel by car to access services and facilities and employment opportunities. It should be noted that the three objectives of sustainable development – environmental, economic, and social – are interdependent and one objective is not more important than the others. It is considered that the assumption about unsustainable travel is incorrect for some villages, including Bassingbourn which contain a range of services and facilities, are in close proximity to other centres and employment opportunities, and are accessible by sustainable modes of transport and the bus services are due to

be improved. In addition, the preferred development strategy for the rest of the rural area provides no support for existing services and facilities in villages and provides no strategy to meet current identified affordable housing needs of villages. Endurance Estates are not advocating a dispersed development strategy whereby most development is directed to the villages, but is requesting that a sufficient amount of land is allocated at the more sustainable villages to support services and opportunities are identified to make villages more sustainable through the delivery of housing development and services/ facilities alongside, to ensure that identified affordable housing needs are met.

There are three paragraphs in the NPPF that suggest a different approach is required in the development strategy for the rest of the rural area. Paragraph 105 seeks to ensure that development is located where the need to travel will be minimised and the use of sustainable transport modes can be maximised, but acknowledges that the opportunities will be different in urban and rural areas. Paragraph 79 seeks to promote sustainable development in rural areas by locating housing where it will enhance or maintain the vitality of rural communities and enable villages to grow and thrive. Paragraph 62 expects the size, type, and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need, students, renters, and self-builders.

Balsham contains a good range of services and facilities, including a primary school, village shop, post office, and public houses. The promoted development by Endurance Estates at land off Old House Road would support the existing services and facilities in the village, which are all within walking distance of the site – see attached Services & Facilities Plan including walking distances. Balsham is also on a bus route, with regular services to Haverhill and Linton and a limited daily service to Cambridge. There is a school bus service from Balsham to the secondary school at Linton Village College. It noted that the Greater Cambridge Partnership's Making Connections project proposes a more frequent rural bus service including for Balsham, providing alternatives to car travel for some journeys. Balsham will have a direct link to the 'A11 Travel Hub' significantly increasing the opportunities for use of sustainable modes.

South Cambridgeshire District Council's 'Housing Statistical Information Leaflet' (December 2019) identified a need for 21 affordable dwellings in Balsham for those with a local connection to the village – see <https://www.scambs.gov.uk/media/18316/affordable-housing-housing-statistical-information-leaflet-december-2019.pdf>. This identified need would not be met without allocations in Balsham. It is noted that there is no neighbourhood plan being prepared for the village, no community land trust, and rural housing exception schemes are typically very small and are reliant on a landowner willing to offer land up at existing use value. The promoted development by Endurance Estates at land off Old House Road in Balsham would include housing and affordable housing to meet local needs of the village.

For all these reasons, small scale housing allocations should be made in the more sustainable villages within the rest of the rural area, because those villages are accessible by sustainable modes of transport, there is a need to support the existing services and facilities within those villages, and there is an identified need for affordable housing in those villages which would not be met via other means.

Requested Change

The following changes are requested to Policy S/DS: Development Strategy:

It is requested that predicted housing delivery rates for the new settlements take into account the evidence from similar development elsewhere.

It is requested that the assumptions about faster housing delivery rates for Northstowe and Waterbeach are deleted from the development strategy.

It is requested that realistic assumptions about delivery, including for affordable housing, are applied for North East Cambridge and Cambridge East.

It is requested that additional sites that are capable of providing policy compliant levels of affordable housing are identified in the development strategy, including small and medium sites in the villages, in order to address the under-delivery of affordable housing from Northstowe, Waterbeach, Cambourne West, North East Cambridge and Cambridge East.

It is requested that small scale housing allocations should be made in the more sustainable villages within the rest of the rural area, including Balsham, because those villages are accessible by sustainable modes of transport, there is a need to support the existing services and facilities within those villages, and there is an identified need for affordable housing in those villages.

As requested in the Endurance Estates representations to Section 2.6: Rest of Rural Area, the land off Old House Road in Balsham should be allocated in emerging GCLP for residential development.

Policy S/SH: Settlement Hierarchy

OBJECT

Endurance Estates is promoting land off Old House Road in Balsham for residential development, and in representations has requested that the site is allocated in emerging GCLP. Balsham is defined as a Group Village in the settlement hierarchy for South Cambridgeshire, and Endurance Estates agree with the status of the village.

As set out in the representations to Policy S/SB: Settlement Boundaries, it is considered that there is limited capacity within the settlement boundaries of most villages. There are few outstanding development opportunities for up to 8 dwellings (or 15 dwellings on previously developed sites) within existing settlement boundaries in Group Villages, and Balsham is an example where there are no opportunities within the boundary for sites of 8 dwellings or more. It is likely that in most cases only small sites for one or two dwellings would be available. It is considered that the site size thresholds for each category of village are largely irrelevant and ineffective because very few sites are actually available, and those that are available would fall below the threshold where affordable housing is required e.g. less than 10 dwellings.

Requested Change

It is requested that a capacity assessment is undertaken of all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041, and the number of dwellings that might be delivered from each of those sites.

It is requested that the site size limits for each category of village are deleted and replaced with a general policy that supports development within existing settlement boundaries, in conjunction with

a revised development strategy that allocates suitable sites on the edge of existing sustainable villages including at Balsham.

Policy S/SB: Settlement Boundaries

OBJECT

Endurance Estates does not object to the principle of settlement boundaries being defined around villages. However, the existing defined settlement boundaries for most villages in South Cambridgeshire have remained largely unchanged since the Local Plan 2004. The settlement boundaries were adjusted in some cases to take into account allocations at some villages through the Site Specific Allocations DPD 2010 and the South Cambridgeshire Local Plan 2018. It is very likely that most of the development opportunities within existing village boundaries would have been taken up by now. It is also likely that heritage assets within some villages, such as conservation areas and listed buildings, will constrain development opportunities.

The Councils have not undertaken an assessment of capacity within the existing settlement boundaries of villages to accommodate additional development. It is likely that such an assessment would demonstrate that the capacity is limited.

It is considered that the emerging GCLP should seek to allocate suitable sites on the edge of existing sustainable villages and to adjust the settlement boundary to accommodate those allocations. The site promoted by Endurance Estates at land off Old House Road in Balsham is suitable and available for housing, and should be allocated for development. There is a need for additional housing sites in the more sustainable villages to support existing services and facilities and to meet identified affordable housing needs in those villages.

Requested Change

It is requested that a capacity assessment is undertaken of all villages in South Cambridgeshire to determine which potential housing sites might be deliverable or developable during the plan period to 2041 and the number of dwellings that might be delivered from each of those sites.

If the capacity assessment identifies no suitable sites to meet identified affordable housing needs it is requested that additional allocations are made on the edge of those villages to deliver sufficient housing to meet those affordable housing needs.

Section 2.6: Rest of Rural Area / Policy S/RRA: Allocations in the Rest of the Rural Area

OBJECT

It is considered that the growth of the more sustainable villages must be part of the development strategy for emerging GCLP, and particularly those villages that contain a good range of services and facilities, are accessible by a range of modes of transport, and where there is an identified need for affordable housing for those with a local connection to the village.

Paragraph 79 of the NPPF seeks to promote sustainable development in rural areas and acknowledges that housing can enhance or maintain the vitality of rural communities and support

local services. The promoted development by Endurance Estates at land off Old House Road in Balsham would support the existing services and facilities in the village, including the village shop, post office, public houses, and existing and future bus services.

Paragraph 69 acknowledges the role that small and medium sized sites can make towards meeting the housing requirements, and that such sites are often built-out relatively quickly. Small and medium sized sites typically only require limited new physical infrastructure and amendments to the access arrangements. The housing monitoring data from Cambridge and South Cambridgeshire confirms that small and medium sites are delivered quickly i.e. within two to three years. It is considered that small and medium sized sites make a significant contribution towards the short term housing land supply and the five year housing land supply position in Greater Cambridgeshire. It is requested that small/medium sized sites such as land off Old House Road in Balsham are allocated to meet the requirement for a mix of sites including those that are easily deliverable.

Paragraph 104 of the NPPF expects transport issues to be considered at the earliest stages of plan-making. Those issues include opportunities created by existing or proposed transport infrastructure in terms of the scale, location and density of development, and opportunities to promote walking, cycling and public transport use. Paragraph 105 expects significant development to be focused on locations which are or can be made sustainable. The services and facilities within Balsham are all accessible by walking and cycling. Balsham is on a bus route, with regular services to Haverhill and Linton and a limited daily service to Cambridge. There is a school bus service from Balsham to the secondary school at Linton Village College. The Greater Cambridge Partnership's Making Connections project proposes a more frequent rural bus service for Balsham. Balsham will have a direct link to the 'A11 Travel Hub'. As such, there will be realistic alternatives to the car for travel to and from Balsham once the Making Connections project has been delivered. Balsham is well related to Linton and to employment opportunities at Babraham Research Campus and Granta Park.

Paragraph 62 of the NPPF expects the size, type, and tenure of housing needs of the community to be assessed and reflected in planning policies, including for example those with an affordable housing need, students, renters, and self-builders. South Cambridgeshire District Council's 'Housing Statistical Information Leaflet' (December 2019) identified a need for 21 affordable dwellings in Balsham for those with a local connection to the village. This identified need would not be met without allocations in the village. The promoted development by Endurance Estates at land off Old House Road in Balsham would include housing and affordable housing to meet local needs of the village.

For all these reasons, small scale housing allocations should be made in the more sustainable villages within the rest of the rural area, including Balsham, because those villages are accessible by sustainable modes of transport, there is a need to support the existing services and facilities within those villages, and there is an identified need for affordable housing in those villages which would not be met via other means.

The Endurance Estates representations to the assessment of the land off Old House Road in Balsham site in the HELAA (Site Ref. 40438) comment on the potential constraints identified with the promoted development and explain how those constraints would be addressed. In summary, there would be negligible impact on landscape character, the hedgerows and trees at the site would be retained and enhanced, and ecological enhancements would be provided as part of the promoted development. As set out above, there is a range of services and facilities available in Balsham, there are additional facilities available in Linton, employment opportunities available nearby, and proposed improvements to the bus services.

As set out in the call for site submission and the supporting technical work for the site, there are no significant constraints to development at land south of Old House Road in Balsham. For example, the site is not in the Green Belt and is not affected by any heritage assets. The site is located in Flood Zone 1 which means it has a low probability of flood risk. The trees and hedgerows would be retained at the site and additional planting would be provided at the site boundary, and as a result there should not be a significant adverse effect on the landscape setting of the village. There is an existing access to the site, which will need to be upgraded to provide footways and junction arrangements for the promoted development and mitigation measures to protect residential amenity. The promoted development would include biodiversity enhancement measures, including additional landscaping with native planting and bird and bat boxes.

For all these reasons it is requested that land south of Old House Road in Balsham is allocated for residential development in emerging GCLP. The Proposed Block Plan and Development Brief (prepared by Saunders Boston Architects) submitted with the call for sites response explained the design and layout of the promoted development, and could be used as a basis for a site allocation.

Requested Change

It is requested that the development strategy for the rest of the rural area includes an additional allocation in Balsham at land off Old House Road.

It is requested that land off Old House Road is allocated with the following policy requirements:

- Site Area of 1.17 Ha
- Capacity for approx. 23 dwellings, including affordable housing
- Delivery of open space and green infrastructure
- Development should address the following constraints:
 - Landscaping at eastern and southern boundary
 - Upgraded access arrangements from Old House Road

HELAA Site Assessment – Land off Old House Road, Balsham (Site Ref. 40438)

A Proposed Block Plan and Development Brief (prepared by Saunders Boston Architects) was submitted with the call for sites response to explain the design and layout of the promoted development. The key points to note are as follows:

- The promoted development is formed around a shared surface with a central square reflecting the layouts of local farmsteads.
- The promoted development represents a low density scheme within a high quality landscape setting.
- All of the plots have deep gardens to create a buffer between the promoted development and the mature hedgerows and trees at the site boundary and allows for the existing landscape features to be retained.
- The promoted development includes additional tree and hedgerow planting to enhance the landscape setting of the eastern edge of Balsham and provide a transition to the surrounding countryside.
- The promoted development includes two areas of open space, both of which will enable views to the east through the existing hedgerows to the adjacent fields and countryside. treatment.

A number of technical reports have been prepared for the promoted development. The findings are as follows:

- **Flooding & Drainage:** The site is located within Flood Zone 1 which means it has a low probability of flood risk. The promoted development would include an appropriate drainage strategy to manage surface water drainage.
- **Ecology:** A Preliminary Ecological Appraisal (prepared by Applied Ecology Ltd) has been undertaken for the site. The site is not covered by any statutory or non-statutory wildlife designations, and there are no protected sites in the vicinity. The site mostly contains semi-improved neutral grassland, with small areas of dense scrub. There are hedgerows at the site boundary; it is only those hedgerows on the eastern boundary that are identified as species rich. The following ecological recommendations are made: the existing boundary hedgerows should be retained, protected, enhanced, and kept free of artificial lighting after dark; additional landscaping with native plants should be provided within peripheral areas of the site to enhance biodiversity; and bat and/or bird boxes are incorporated into new buildings.
- **Trees:** There are some protected trees in the south west corner of the site, and there are other mature trees and hedgerows at the site boundary. A tree survey and arboricultural impact assessment will need to be undertaken, but it is anticipated that the existing trees and hedgerows would be retained and any that are removed will be replaced.
- **Landscape:** An assessment of the landscape character of the site and surroundings has been completed. A detailed landscape and visual impact assessment will need to be undertaken. It is likely that if the trees and hedgerows are retained at the site, and additional planting is provided at the site boundary and within the proposed development, then there should not be a significant adverse effect on the landscape setting of Balsham.
- **Heritage:** The site is not affected by any heritage assets. An archaeological assessment will be undertaken to determine whether there are any archaeological remains at the site.
- **Residential Amenity:** There is an existing vehicular access to the site between two existing dwellings. The impact of vehicles passing between the existing dwellings will be assessed and appropriate mitigation measures on the access road will be introduced to protect the amenity of the existing residents.

Endurance Estates' comments and suggested amendment for the site assessment in the HELAA are as follows:

- **Landscape and Townscape:** The finding of the assessment that development at the site would have a "negligible impact on landscape character" is agreed. The trees and hedgerows at the site would be retained and enhanced. The promoted development would include additional landscape screening at the eastern and southern boundaries.
- **Biodiversity and Geodiversity:** The existing hedgerows at the site boundary would be retained and enhanced. The additional landscaping would comprise native plants to enhance biodiversity. Bat and/or bird boxes would be incorporated into new buildings.
- **Accessibility to Services and Facilities:** Balsham contains a good range of services and facilities, including a primary school, village shop, post office, and public houses. The

attached Services and Facilities Plan identifies those facilities in the village and the walking distances to them from the site. All facilities are within 800m of the site. Balsham is on a bus route, with regular services to Haverhill and Linton and a limited daily service to Cambridge. There is a school bus service from Balsham to the secondary school at Linton Village College. The Greater Cambridge Partnership's Making Connections project proposes a more frequent rural bus service for Balsham. Balsham will have a direct link to the 'A11 Travel Hub'. Balsham is well related to Linton and to employment opportunities at Babraham Research Campus and Granta Park. It is requested that the score for accessibility to services and facilities is amended to reflect these comments, including improvements to bus services in the future.

Sustainability Appraisal

A key aim of the Sustainability Appraisal process is to make a plan more sustainable. It tests the social, economic, and environmental impacts of various plan options, to help choose the most sustainable options. It also seeks to determine the extent to which the principles of sustainable development are integrated into the plan and its policies.

It is considered by Endurance Estates that the Sustainability Appraisal has not sought to make emerging GCLP more sustainable, and in respect of villages it appears that the assessment against sustainability objectives is not robust because it does not critically review the evidence provided by the Councils. For example, some villages have good access by sustainable modes of transport and contain a good range of services and facilities, there is an identified need for affordable housing in most villages which is ignored in the assessment process, and there is limited capacity within existing settlement boundaries for villages to accommodate additional development.

The sustainability objectives that are relevant to Endurance Estates' representations are: SA1 Housing; and SA2 Access to Services and Facilities.

The Endurance Estates representations and requested amendment to the assessment of policy options in the Sustainability Appraisal are as follows:

- Table 5.4: Policy S/DS: Development Strategy: A 'significant positive effect/uncertain' score is identified in the assessment for the housing sustainability objective (SA1). However, as set out in the Endurance Estates representations to Policy S/DS, there are no housing allocations made in most villages, including Balsham, and as such the identified needs for affordable housing in the villages would not be met by the preferred development strategy. South Cambridgeshire District Council's 'Housing Statistical Information Leaflet' (December 2019) identified affordable housing needs for those with a local connection in all villages – see <https://www.scamb.gov.uk/media/18316/affordable-housing-housing-statistical-information-leaflet-december-2019.pdf>. That information is not reflected in the assessment contained in Table 5.4. The identified need for 21 affordable dwellings in Balsham will not be met by the preferred development strategy, which must be a negative outcome for the housing related sustainability objective. Endurance Estates has requested that land off Old House Road in Balsham is allocated for housing and affordable housing to deliver positive housing related sustainability outcomes.
- Table 5.6: Policy S/SB: Settlement Boundaries. A 'mixed significant positive and minor negative effect' score is identified for the housing sustainability objective (SA1). As set out in Endurance

Estates' representations to Policy S/SB and S/SH (Settlement Hierarchy) the settlement boundaries at most villages have remained largely unchanged since 2004 and there has been no assessment of capacity within settlement boundaries to accommodate additional development. The assessment in Table 5.6 does not consider whether any capacity exists within the settlement boundaries to accommodate the identified needs for affordable housing. Balsham is an example where there are no opportunities within the boundary to accommodate major developments that would require affordable housing i.e. 10 or more dwellings. As set out above there is an identified need for 21 affordable dwellings in Balsham. It must be a negative outcome for the housing related sustainability objective if affordable housing needs of villages, including Balsham, will not be met by the currently defined settlement boundaries.

- Table 5.22: Policy S/RRA: Allocations in the Rest of the Rural Area: A 'mixed significant positive and minor negative effect' score is identified for the housing sustainability objective (SA1). A 'mixed significant negative and minor positive effect' score is identified for access to services and facilities objective (SA2). As set out above there is an identified need for 21 affordable dwellings in Balsham, and it must be a negative outcome for the housing related sustainability objective if affordable housing needs of villages, including Balsham, will not be met by the development strategy or the strategy for rural areas. Balsham contains a primary school, village shop, post office, public houses, and a bus service which is due to be improved. The accessibility to services and facilities and employment opportunities is good for Balsham, but this is not reflected in the assessment for this sustainability related objective, and additional development in this village would improve the sustainability outcomes and support the existing services and facilities.

It is requested that land off Old House Road in Balsham is allocated in emerging GCLP to deliver better and more positive sustainability outcomes compared with the preferred development strategy.

Carter Jonas – 10th December 2021