

## **Policy S/DE: Defined Development Extents**

**Do you consider the Local Plan is:**

- **Legally Compliant – YES**
- **Sound – NO**
- **Complies with Duty to Cooperate – YES**

We are writing on behalf of our client, Rosconn Group, with regard to Site: 115179 (HELAA Site: 40256) known as Land North of Pampisford Road, Great Abington. Our client wishes to **OBJECT** to Policy S/DE for the following reasons:

Objection is raised to this policy in conjunction with our client's objection to policy S/JH. As the policy does not facilitate development outside of a Defined Development Extent unless it is allocated within a Neighbourhood Plan or meets a very narrow range of exceptions.

As we stated in our objections to policy S/JH, we would contend that the plan should not rely upon Neighbourhood Plans coming forward as this limits growth to those areas that have been designated and are bringing forward or are reviewing an existing Neighbourhood Plan. This limits the geographical location and range of sites that can be delivered through this approach. We would argue the plan fails to tackle this issue directly by leading through example and would recommend that the plan directly allocate more smaller and medium sized sites, especially where there is no Neighbourhood Plan. Furthermore, the Planning Practice Guidance makes clear that housing requirements for designated neighbourhood areas cannot be binding, as Neighbourhood Plans are not required to plan for housing.

Development Extents are usually very tightly drawn around existing settlements, leaving very little room for growth within the settlement itself, so when coupled with the limitations of growth within the Settlement Hierarchy under Policy S/SH, the policy leaves little scope for development on suitable small and medium sized sites on the edge of existing settlements. This constraint undermines the positive contribution such sites can make to the proportional growth of villages, which will help to maintain the viability of existing services.

Mindful of the changing landscape of national policy, we would argue that this policy is not consistent with emerging Policy S5 (Principle of Development Outside Settlements) that is proposed in the revised National Planning policy Framework. The revised text has a much more holistic set of criteria for facilitating development outside of defined development frameworks, particularly where there is a shortfall in supply. We would encourage the LPA to

adopt this approach and amend Policy S/DE so that it is in line with emerging Policy S5 rather than simply relying on the NPPF as being a material consideration.

In particular, the LPA should consider adopting the criteria of Policy S5 paragraph j which relates to addressing evidenced unmet need (including where an LPA cannot demonstrate a five year supply of deliverable housing sites) by supporting development which would be well related to an existing settlement and of an appropriate scale. This would be a more proactive approach which would enable the Development Plan to be more responsive in addressing unmet need, which is something the current Local Plan is failing to achieve.

In conclusion, Policy S/DE is not **justified**, as it is not the appropriate strategy taking into account the alternatives, and will not be **effective**, failing to deliver the minimum level of growth over the plan period. The plan is therefore not sound, contrary to para 36 of the NPPF.

What changes do you think need to be made to the plan? Please try to be clear and concise as to what you would like this part of the plan to say:

The Council is encouraged to revisit the assessment of Development Extents and to consider adjustment to facilitate growth, or preferably to allocate additional development. As we have highlighted this policy is designed to constrain growth, contrary to the objectives of the Settlement Hierarchy policies which infer growth is possible.

We would recommend that the Council amend the policy to accord with the emerging NPPF policy S5, as set out above. Or provide an independent policy structure that allows for sustainable growth beyond the Development Extents, where a site adjoins the settlement.

Please also see our comments on policy S/SH.