

Ref: GA/AM/POT208/L0003

20th February 2020

***Sent by Email to:** localplan@greatercambridgeplanning.org*

South Cambridge District Council
Planning Policy Team
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge
CB23 6EA

Dear Sir/Madam

Representations to Greater Cambridge Local Plan – The First Conversation (Issues and Options 2020)

Land north of West Road/adjacent to Dennis Green, Gamlingay

We are writing on behalf of our client, the Stevens family, the landowners of land to the north of West Road, Gamlingay, Sandy, SG19 3LL as identified on the site location plan overleaf. We wish to make representations to the Greater Cambridge Local Plan Regulation 18: Issues and Options 2020 specifically in response to **Questions 31, 32, 33, 42 and 47** and remind you of our Call for Sites submission which was submitted on the 3rd of July 2019.

This representation firstly sets out the current strategic context of our client's site and Gamlingay more generally. It then seeks to respond to each of the questions set out above in turn before concluding on the availability, suitability and overall deliverability of our client's site for a residential development at the village.

Background

Gamlingay is classified in the South Cambridgeshire Adopted Local Plan 2018 as a Minor Rural Centre **Policy S/9**. The policy states that although minor rural centres have a lower level of services, facilities and employment than Rural Centres, they have a greater level than most other villages in South Cambridgeshire, and often perform a role in terms of providing services and facilities to smaller rural areas. Gamlingay is therefore considered to represent a sustainable location for future growth.

Gamlingay is located on the district boundary of South Cambridgeshire Central Bedfordshire. It is situated 16 miles from Cambridge. Gamlingay is sustainable in terms of its services it includes; a Co-Operative store, chemist, primary school, village college, library, doctor's surgery, public houses and a range of recreational facilities. It is situated approximately 5 miles from Sandy Train Station. Gamlingay is a popular rural centre due to its proximity

to several urban centres. Gamlingay certainly benefits from economic, social and environmental sustainability benefits which future developments would benefit from and contribute to.

There is a bus service which operates from Hitchin and stops at Biggleswade, Potton, Gamlingay and Sandy. This service operates Monday to Saturday with a number of services from 0730 to 1800. Our client’s site is situated within walking distance to this bus service. Sandy Train Station is on the Great Northern Rail line and benefits from being on line 10 (Peterborough and Arlesey to London). The journey time from Sandy to London St. Pancras is approximately 80 minutes. Therefore, sustainable modes of transport can be accessed from the site and Gamlingay and is in line with **Paragraph 108** of the NPPF which states that appropriate opportunities to promote sustainable transport modes can be taken up, given they type of development and its location.

Gamlingay Parish Council has produced a Village Design Guide 2020 to steer future developments. Within the document the Parish Council express its concerns regarding the affordability for the young, elderly and low-income families. It states that a mix of housing stock and provision for changing lives is desirable, albeit the current stock and mix is insufficient to meet community needs. Despite these concerns from the Parish Council in respect to housing need, there is no current intention to allocate additional sites in the Neighbourhood Plan. Hence, the need for the Greater Cambridge Local Plan to allocate additional housing sites for Gamlingay to ensure a sufficient and affordable supply.

In January 2020, the East West Rail (EWR) selected the preferred route option from Bedford to Cambridge. The new potential EWR station (St Neots/Sandy Area) will be situated around 5 miles to the south Gamlingay. Upon the implementation of this project, Gamlingay will become an extremely accessible village due to its close proximity to the new station which will provide access to frequent services to Cambridge and Bedford. As highlighted in **Figure 1**, Gamlingay will be ideally situated within proximity to the new EWR station and would establish a sustainable method of transport, connecting Gamlingay to Bedford and Cambridge. It is therefore imperative that the emerging Local Plan recognises that the sustainability of Gamlingay will only increase in time and therefore exploits the opportunity to deliver appropriate levels of growth at the village.

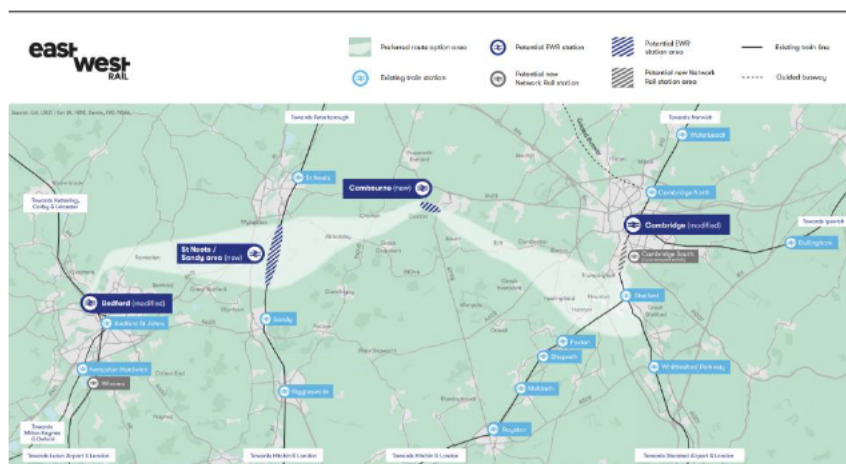


Figure 1: East West Rail Preferred Route Option

Question 31 – How should the Local Plan help to meet our needs for the amount and types of new homes?

The Local Plan should ensure it takes a positive and ambitious stance towards housing growth, as stated in **Paragraph 119** of the NPPF, local planning authorities should take a proactive role in identifying and helping

bring forward land that may be suitable for meeting development needs. There is a clear demand for additional housing in the Greater Cambridge area, especially with the forecasted increase in employment growth. The Local Plan must ensure there is a wide range and choice of residential dwellings available, including in rural and urban areas. Local Plan policy should be in line with **Paragraph 59** of the NPPF which states that policy should support the Government's objective of significantly boosting the supply of homes, ensuring that a sufficient amount and variety of land can come forward where it is needed.

The ageing population of South Cambridge is expected a growth forecast between 2001-2021 of 95% for the 60-74 age group and 108% for those over 75. The needs of the district are changing, and the new Local Plan must ensure it has catered for different sections of society. With an ageing population, there is a need for the deliverability of homes available for downsizing or 'lifetime' homes. As clarified in Paragraph 22 of the NPPF, strategic policies should look ahead over a minimum of a 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities, including preparing for demographic changes in the population and catering to its needs. The local plan must prepare for the future growth of the Greater Cambridge Area by providing and allocating a sufficient supply of homes which in turn will deter unsustainable and unsuitable developments.

The Greater Cambridge area has been affected by increasing house prices which coupled with growing demand for the past decade. By providing an ample supply of homes as well as the provision for affordable housing, it ensures residents do not have to leave their communities in search for more affordable accommodation. As part of the preparation for the Gamlingay Neighbourhood Plan, a Housing Needs Survey was published in 2017. The response for the survey was 22.4% which stated that Gamlingay should consider the housing demands of people moving to Gamlingay from the surrounding area and further afield in particular; older homeowners, families wanting to move to a village location to raise children and younger single persons households, or couples. Therefore, both in respect of the needs of the plan area and the localised needs of the village, it is important that an ambitious growth target is set for Gamlingay within the plan.

Question 32 – Do you think we should plan for a higher number of homes that the minimum required by government, to provide flexibility to support the growing economy?

Yes, strongly agree. As stated within section 4.6.3 the Government's 'standard method' calculation indicates a need for 1,800 homes per year or 40,900 within the plan period 2017-2040. However, CPIER (Cambridge and Peterborough Independent Economic Review) has highlighted that the recent job growth in Greater Cambridge is accelerating at a rate faster than expected. The popularity of the Cambridge sub-area to invest will be enhanced in no small part now that greater clarity has been provided on the nature and timescales of the infrastructure works proposed in response to the Government's proposals for the Oxford Cambridge Arc. As a result, CPIER provide a rough expectation that 2,900 homes will be built per year, equating to 66,700 for the plan period. Therefore, it is clear that there will be a residual requirement to deliver 30,000 additional homes to meet job related needs over the plan period.

Question 33 – What kind of housing do you think we should provide?

Section 4.6.3 reinforces the unaffordability of house prices within the Greater Cambridge area and thus reinforces the fact that the Local Plan must ensure appropriate and viable levels of affordable housing as well planning for a balance of tenure types, including affordable rent, shared ownership and community-led housing.

The demand for housing within the Greater Cambridge has expanded and this has exacerbated the 'affordability gap' in respect of house prices across the plan area. The Local Plan must therefore prioritise the delivery of adequate affordable housing available throughout the Greater Cambridge area, including rural areas and villages.

The Local Plan must also ensure that villages and rural areas in South Cambridgeshire remain sustainable and viable places to live. Although there has been an increase in the delivery of Rural Exception Sites to provide

affordable housing in South Cambridgeshire, the ad hoc nature of these sites means that they cannot be relied upon as a secure means of supply. The Local Plan must therefore allocate more housing within villages in the South Cambridgeshire to ensure sustainability and a sufficient level of growth.

South Cambridge now has an increased proportion of those over 65, with people living longer and less housing development in such areas, house prices are increasing. Local people are facing difficulties of affordability including buying or renting a home in their community. The Local Plan must act to counteract this and to do this it has two options: (i) increase residential developments in villages and rural areas, and (ii) introduce ageing homes which allow elderly people to remain in their community but be able to downsize to a more appropriate, accessible and affordable home.

As clarified in the NPPF, **paragraph 61** confirms that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, including for those who require affordable housing, families with children, older people, service families, people who rent their homes and people wishing to commission or build their own homes.

Question 42 – Where should we site new development?

Dispersal: Villages - **1**

Dispersal: New Settlements - **3**

Public Transport Corridors - **2**

Edge of Cambridge: Outside Green Belt - **4**

Edge of Cambridge: Green Belt - **5**

Densification of existing urban areas – **6**

Village growth is essential in the Greater Cambridge so that localised housing needs are met across the plan area and that the vitality and viability of villages, including local services can be secured. Importantly, villages, especially those which are situated away from the Green Belt are best placed to accommodate sites and that can be delivered quickly. As stated in **paragraph 68** of the NPPF, small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. Nonetheless, I would stress, however, that any growth at villages should most appropriately be of scale that can bring upgrades to services and community facilities, including schools and healthcare. Residential development at Gamlingay would secure housing at Villages and Transport Corridors.

Although new settlements can accommodate large residential growth, however as evidenced by development in Northstowe and Cambourne they can take a long time to deliver. It is important, therefore that growth in villages and public transport corridors should be implemented in a sustainable manner. In regard to residential development on the edge of Cambridge (outside Green Belt) and densification of existing urban areas, although these are sustainable areas, land is not readily available. This is especially with brownfield land as issues such as contamination could arise and delay development.

Question 47 – What do you think about growing our villages?

As mentioned throughout this consultation response, the Local Plan must promote growth and development within existing villages to ensure the sustainability and viability of the village. The Local Plan must recognise that promoting growth in villages should be prioritised over the development of new settlements. Major infrastructure and highway works would be required for the development of new settlements. However, by promoting appropriate development in existing villages, it results in being able to improve the existing infrastructure and services within the village. This would be in accordance with **paragraph 78** of the NPPF which states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities, it confirms that planning policies should identify opportunities for villages to grow and thrive, especially where it will support local services.

With a lack of 'lifetime homes' or downsizing homes available in villages, elderly people aren't willing to relocate and therefore there is no alternative housing available for the community especially for young families. Therefore, the Local Plan must promote the development of villages and ensure policies are progressive in accompanying this.

The case for Land north of West Road/adjacent to Dennis Green, Gamlingay

Set against our responses to the question above, and our clear identification that the emerging plan must distribute a challenging housing requirement across a wide range of Greater Cambridge's most sustainable settlements, we are pleased to reiterate the availability and suitability of our client's site for a well-proportioned residential development in Gamlingay. **Paragraph 78** of the NPPF is an important policy which promotes sustainable development in villages. Whilst there is an expectation that villages will need to grow, the greatest level of growth should be focussed on the most sustainable settlements, as mentioned above, Gamlingay will shortly be enhanced in this respect, especially with the EW rail line.

Gamlingay Parish Council is currently progressing its neighbourhood plan, towards which we have submitted our client's land to be considered for development. Within the draft plan, there are two housing allocations on the Key Policy Plan: an allocated Local Plan Site GAM1 and land south of West Road for Housing Policy GAM2.

However, an application for mixed use development including 90 homes has been approved (Application Ref. S/2068/15/OL) and an application for reserved matters is currently out for consultation for GAM1 site. Along with this, an application for 29 dwellings has been approved (Application Ref. S/2367/16/OL) for the site at GAM2. Consequently, the two sites allocated for housing already have permission prior to the neighbourhood plans adoption and will already be counted towards both the village and district's housing land supply. Despite these permissions a clear housing need at what is a sustainable and popular village continues to exist.

The Greater Cambridge Local Plan must therefore allocate additional appropriate sites for residential development in Gamlingay to ensure that opportunities are secured to situate development in sustainable locations across the plan area – this would include at Gamlingay.

As such, our client's land North of West Road/adjacent to Dennis Green, Gamlingay as identified on the map below represents an ideal opportunity for future residential development for approximately 10 dwellings.

Land North of West Road/Adjacent to Dennis Green



Figure 2: Site Location Plan

Importantly, the site directly to the north of our client’s land benefits from an extant permission for 9 dwellings (Planning Application **Ref. S/3170/17/OL**, permission secured following appeal)¹. On this basis this permission represents the first breach of the western edge of the settlement envelope of the village and with it establishes this fringe as the most obvious direction of growth. Delivery of our client’s land with a suitably scaled residential development would round off the development of the parcel of land defined by West Road, Heath Road and the western edge of the village.

Specifically, we are pleased to offer our client’s land on an entirely flexible basis – this includes the opportunity to allocate the land for additional self-build plots to directly complement the 9-dwelling scheme directly to the north. Importantly, South Cambridgeshire is a Right to Build Vanguard Authority with a statutory duty under Section 2a of The Self Build and Custom Housebuilding Act 2015 to “give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and customer housebuilding in the authority’s area”. We are aware from the case presented by the applicant in respect of the adjacent site that, as of the 30th of October 2018, there were 402 entries on the register. There clearly remains an overwhelming demand for plots of this type.

The site is not subject to any national designations, there are no TPO’s on the site or adjacent, there are no public rights of way and no key characteristics that seek to protect the site in its current form. Therefore, this site is available immediately without restrictions which would delay development.

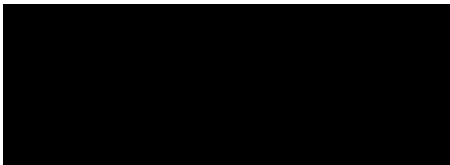
Importantly, when considered against the definition included in the Glossary of the NPPF we are pleased to confirm that our client’s site is entirely deliverable within a 5-year period in that it is:

¹ APP/W0530/W19/3230103

- **Available:** The site is being actively promoted by our clients, the Stevens family, who wish to use this submission as an opportunity to restate the availability of the land for allocation in the emerging Local Plan;
- **Suitable:** Primarily through an assessment of the sustainability of the site this submission clearly demonstrates that it is an entirely suitable location for an appropriate residential development within the popular village of Gamlingay; and
- **Deliverable:** The site is entirely devoid of any physical, legal or policy constraints and capable of contributing towards the housing and economic needs of Gamlingay and the Greater Cambridge area. The site is being promoted by a local landowner with the best interests of Gamlingay in mind.

We trust that these comments will be given due consideration and look forward to participating further as the Local Plan preparation progresses. Should you have any further queries or questions then please do not hesitate to contact either myself or my colleague Niamh McMenamin.

Yours sincerely



Geoff Armstrong **Director**
Armstrong Rigg Planning

