



Matter SC1

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16420**

**Representation Numbers
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61910 and 61913**

SOUTH CAMBRIDGESHIRE LOCAL PLAN EXAMINATION IN PUBLIC

MATTER SC1 HEARING STATEMENT

DEVELOPMENT FRAMEWORKS, STRATEGY FOR THE RURAL AREA, AND THE OMISSION SITES

ON BEHALF OF BLOOR HOMES (EASTERN)

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004**

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Pegasus Group

Suite 4 | Pioneer House | Vision Park | Histon | Cambridgeshire | CB24 9NL

T 01223 202100 | **W** www.pegasuspg.co.uk

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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1. Introduction

1.1 This Hearing Statement is prepared on behalf of Bloor Homes (Eastern) which has land interests at land south of Fen Drayton Road, Swavesey. It also has land interests at Mill Road, Over where planning permission was recently granted on appeal¹ for residential development.

1.2 An outline planning application (reference S/1027/16/OL) was submitted for up to 99 dwellings in 2016. This received an officer's recommendation of approval but was refused by South Cambridgeshire District Council's planning committee contrary to this recommendation and is subject of an ongoing appeal.

2. Question 1.1A i: Is paragraph 2 of the policy too restrictive? Should it enable redevelopment of redundant sites outside of a village framework where it is demonstrated that there are clear benefits in planning terms?

2.1 Yes – this paragraph is too restrictive. Bloor Homes (Eastern) has successfully demonstrated at appeal¹ that there are instances where land outside of the village framework can be appropriate for development other than those already listed in the policy. The policy should acknowledge this and should allow for such circumstances in the future.

3. Question 1.1A ii: Would the growth in housing numbers as enabled by the policy, place additional burdens on the existing school infrastructure provision which could not be accommodated with the current level of educational facilities? Should the development of key community infrastructure be allowed outside the development frameworks?

3.1 Policy S/7 does not specify a housing growth figure so part one of this question is unclear. The first paragraph of the policy makes it clear that the necessary infrastructure must be available for proposals within the village framework. The same should also be true for those outside of the framework.

3.2 Bloor Homes (Eastern) is a housebuilder but can see merit in allowing key community infrastructure outside of the development frameworks. Such infrastructure should be defined in any policy and should acknowledge the potential for the need for associated development to help fund such provision.

¹ PINS reference APP/W0530/W/16/3148949

4. Question 1.1C i: Is there a sound justification for the maximum scheme size threshold in paragraph 2 of the policy? How was the figure derived? Should the villages be assessed on an individual basis in this regard?

4.1 Bloor Homes (Eastern) considers there is no sound justification for the blanket imposition of a maximum threshold. As such, the Local Plan is **not effective** and **not justified**. The figure appears to have been an historical limit that has been rolled forward from previous development plan documents, which is not considered to be an appropriate way to draft policy.

4.2 For the reasons set out in our Matter 2 statement, the Plan is based on the flawed premise of directing a substantial proportion of planned growth to large-scale sites which can struggle to deliver housing in line with forecast expectations. This approach perpetuates that of the 2006 Core Strategy which demonstrably failed to deliver the housing needed to meet requirements.

4.3 For example, at the time of the submission of the Local Plan in 2013, it was envisaged that by the end of 2016/17, 455 dwellings would have been completed at Northstowe². This has not been the case in practice and in the most recent Annual Monitoring Report³ (AMR), only one unit was forecast to be completed by the end of 2016/17. We note that Bloor Homes (Eastern) has been building out this first parcel at Northstowe and can now confirm that only one home was completed by the end of 2016/17.

4.4 Furthermore, it is worthy of note that the most recent Annual Monitoring Report (RD/AD/480) demonstrates that the housing land supply has worsened over the last year from a predicted 4.1 year supply to an actual 3.7 year supply⁴. This is also lower than the last stated actual supply figure in the previous AMR (RD/AD/460), which was reported as 3.9 years.

4.5 The adjusted trajectory in the AMR demonstrates that the decline in the predicted housing supply is due to significant slippages in the delivery of housing at large strategic sites (see Table SC1a and compare with Table SC1a of RD/AD/480).

4.6 Meanwhile, the supply of housing from unallocated sites with planning permission has increased (see windfall section of Tables SC1a in RD/AD/460 and

² See trajectory within Proposed Submission Local Plan (RD/Sub/SC/010)

³ See trajectory within 2015-16 Annual Monitoring Report (RD/AD/480)

⁴ Based on Sedgefield and a 20% buffer, both of which the Council has agreed to in recent appeals (see the Over case for example).

RD/AD/480). However, this increase has not been sufficient to offset the decline in supply from other sources of supply. This is confirmed in paragraph 2.49 of RD/AD/480.

- 4.7 The latest AMR also confirms that even with the joint trajectory taken into account the Council can only show a 4.7 year supply⁵ based on the agreed methodology compared with 5.2 years in the previous AMR⁶.
- 4.8 All of this is clear evidence that the Council must allow for more development in other locations in order to ensure an appropriate supply of housing during the plan period. It highlights the failings of the current development plan approach, which is being repeated by the emerging development plan – and all without sound justification for the limit being suggested for these settlements.
- 4.9 Bloor Homes (Eastern) considers that this additional source of housing should be met by smaller, more readily deliverable sites that can come forward in sustainable locations – as is currently being demonstrated across the District. Some villages will naturally be better-served than others and may be able to reasonably accommodate more than thirty units at a single site. Additional allocations of smaller sites in smaller settlements will provide a range of readily deliverable sites to help in meeting the current shortfall in housing and to provide additional flexibility. Applying a blanket 30-unit threshold set out in policy S/9 will restrict suitable sites from coming forward in sustainable locations.
- 4.10 Consequently, the plan will not be flexible enough to respond to any shortfall in housing (as is presently the case). As such, the Plan is **not effective** without modifications to enable this.
- 4.11 The 30-unit threshold itself appears to be derived from historic plans, having featured in the 2007 Core Strategy and the 2004 Local Plan. Circumstances have changed dramatically since then and the District now faces a chronic and persistent housing shortfall. It is therefore surprising that the principle of the threshold has not been meaningfully reviewed. As such the Local Plan is **not justified**.
- 4.12 For the reasons outlined in the following section, we consider Swavesey to be a sustainable location which can accommodate additional housing growth, since the

⁵ See paragraph 2.47 of RD/AD/480

⁶ See Paragraph 2.45 of RD/AD/460

village benefits from a wide range of local services and excellent public transport links.

4.13 As such, to ensure the Plan is effective and justified it is considered that villages should be assessed on an individual basis and planned growth should be apportioned in line. This can be achieved through the allocation of additional sites where appropriate.

5. Question 1.1C ii: Should the policy be amended to allow local Parish Councils to agree to development going ahead, provided adequate services, facilities and infrastructure are available?

5.1 Bloor Homes (Eastern) does not consider that the approval of development should be subject to the agreement of a local Parish Council. Parish Councils should retain the role of consultees but should not effectively be responsible for the approval of such development. Parish Councils are run on a voluntary basis with limited financial resources and without access to expert opinion such as is at the disposal of the Local Planning Authority.

6. Question 1.1D i: Is there a sound justification for the maximum scheme size threshold in paragraph 2 of the policy? How was the figure derived? ii: Should the villages be assessed on an individual basis in this regard?

6.1 To avoid repetition, Bloor Homes (Eastern) request that you refer to the answer to question 1.1Ci above for these questions. In this case the relevant threshold is 8 units but the issues referred to under 1.1Ci are equally relevant.

7. Question 1.3I i b: Is the plan unsound without the allocation of land abutting Fen Drayton Road for housing development and if so, why?

7.1 As demonstrated in the response to question 1.1Ci, Bloor Homes (Eastern) considers the South Cambridgeshire is over-reliant on large, strategic sites to meet its housing need. This strategy has failed to deliver sufficient housing in the last plan period and is continuing to fail to deliver housing at the pace predicted.

7.2 The evidence included in the answer to question 1.1Ci demonstrates that the Council continues to rely on smaller housing sites to contribute towards its housing needs and that even with an increase in provision from this source it has still failed to account for the slippage in the larger sites. The Council should prepare a plan that allows for this eventuality to be taken into account and provides a more sustainable pattern of growth across a range of settlements.

- 7.3 The existing and ongoing failure to deliver sufficient housing can be addressed now by allocating more, smaller, sites and it is for this reason that Bloor Homes (Eastern) consider that the absence of this site allocation makes the plan unsound.
- 7.4 Swavesey is a sustainable location for development. It benefits from a range of local services including shops, a post office, public houses, a primary school, and a secondary school. This is reflected in the proposed upgrade of Swavesey to the Minor Rural Centre tier and has been acknowledged by the Council in recent Officers' Reports within the village.
- 7.5 In the Officers' Report to the Council's Planning Committee into an outline planning application for land south of Fen Drayton Road (dated 11 January 2017), the Council's Principal Planning Officer states *"Officers are of the view that sites on the edges of these locations [Minor Rural Centres] generally and Swavesey specifically, can, in principle, accommodate more than the indicative maximum of 30 units and still achieve the definition of sustainable development due to the level of services and facilities provided in these villages."*
- 7.6 Swavesey is served by the Cambridgeshire Guided Busway (approximately 1.3km from land at Fen Drayton Road) which provides a frequent high quality service to Cambridge, St Ives and Huntingdon. The service has proven popular and two additional routes are to be introduced on 21 May 2017 to meet demand and to provide connections with the new Cambridge North railway station.
- 7.7 The CGB was considered at a recent planning appeal in the nearby village of Over⁷ (the appeal site lying 2.4km from the CGB stop). Inspector Stone considered that *"From the evidence before me I am satisfied that the CGB is an extremely well-used public transport facility that has very good connectivity to the close by major centres of Cambridge and St Ives, amongst others"*. He continued: *"When this accessibility to the CGB is added to the comparable, if not lower, overall cost of the commute (when undertaken by private car) and the similar or better journey times, I am satisfied, on the basis of the evidence before me, that significant weight can be given to the proximity to the CGB and the likely reliance on it as a mode of transport for future residents of the development wishing to make journeys to the major centres"*

⁷ Reference RD/CAR/040

- 7.8 The appeal decision clearly indicates the value of the CGB as a credible alternative to the private car, even for a site that lies some 1.1 km further distant from the stop than land at Fen Drayton Road. Swavesey is arguably even better placed to access the Busway since it can be reached on foot (unlike at Over).
- 7.9 Taking into account the recent findings of the Council's officers and appeal Inspectors, it is eminently clear that Swavesey is a suitable location for additional housing growth beyond the thirty-dwelling threshold. These findings have been reached through the detailed and careful consideration afforded by the development management process and in the case of the Over decision, at a public inquiry.
- 7.10 Turning to site-specific matters, the development management process (through application S/1027/16/O) has demonstrated that 'technical' matters relating to the site can be successfully addressed and capable of mitigation where necessary. The Principal Planning Officer concluded the proposals were acceptable in respect of landscape, arboriculture, ecology, highways⁸, residential amenity, surface water drainage, foul water drainage, archaeology and heritage, and environmental health aspects.
- 7.11 The development management process has also shown that there is capacity to accommodate the infrastructure requirements of the proposed development (including school and doctors' surgery places) subject to the payment of appropriate financial contributions. None of the Council's consultees has objected in this regard.
- 7.12 It is fair to report that Members disagreed with the officer's opinion on this scheme and refused the application on pedestrian safety grounds and cumulative impact on infrastructure. This is now being considered at appeal and a revised application has been submitted to address these points. This revised application is yet to be determined.
- 7.13 Bloor Homes (Eastern) consider that the feedback on the original application at this site make it clear it is a suitable site in a sustainable location. The absence of

⁸ The Local Highway Authority objected to the proposed pedestrian access and work is continuing through the appeal process to resolve this. In any event the Principal Planning Officer notes in their report that "*it is the role of the Local Planning Authority to weigh this objection against all of the other material considerations*" and considered in the round that this was insufficient to weigh against the benefits of the scheme.

sufficient sites to meet the identified housing need and the anticipated shortfall even under a joint trajectory justify the need for additional site allocations. This site is an evidently suitable candidate and its absence as an allocation means that the Council will continue to struggle to meet its housing land supply requirement.

7.14 By not allocating land at Fen Drayton Road the Plan is **not effective** as the Council's overreliance on large sites will simply be perpetuated.

7.15 Allocation of land at Fen Drayton Road will enable these soundness concerns to be remedied.