

**Gladman Developments Ltd**

**Cambridge and South Cambridgeshire Local Plan Examinations**

**Matter 2**

**Overall Spatial Vision and General Issues**



**October 2014**

# 1 MATTER 2 – OVERALL SPATIAL VISION AND GENERAL ISSUES

## **Matter 2a. Is the overarching development strategy, expressed as the preferred sequential approach for new development, soundly based and will it deliver sustainable development in accordance with the policies of the National Planning Policy Framework?**

- 1.1 Policy S/6 of the South Cambridgeshire Local Plan sets out the overall strategy and sequential approach for accommodating future sustainable development in the district. It outlines that as far as possible and having regard to the purposes of the Green Belt, in the first instance development will be located on the edge of Cambridge, ahead of new settlements at Waterbeach, Bourn Airfield and Cambourne, and development in the district's Rural Centres and Minor Rural Centres.
- 1.2 The Local Plan retains the development sequence from the previous plan and claims that this balances *"the sustainability merits of land on the edge of Cambridge in terms of accessibility to services and facilities and reducing emissions with the sustainability merits of land in the Green Belt on the edge of Cambridge in terms of protecting the special characteristics of Cambridge as a compact historic city."* (paragraph 2.42, proposed submission South Cambridgeshire Local Plan).
- 1.3 This Plan has been prepared under an entirely different policy framework than the previous plan and one which now seeks to deliver sustainable development without delay and significantly boost the supply of housing. It is inappropriate to follow a previous plan strategy where this does not fit with the provisions of the Framework.
- 1.4 Part 2 of Policy S/6 sets out how major site allocations from the South Cambridge Local development Framework 2007-2010 together with Area Action Plans for a number of sites are carried forwards within this plan. Paragraph 2.43 refers to *"A significant proportion of the overall housing requirement is made up of allocations carried forward from the previous plan..."* Several old allocations may not have been delivered because of the presence of significant constraints or the requirements for new infrastructure that makes a site unviable. Often old allocations do not deliver the level of housing that was envisaged when they were originally allocated as through the process of preparing applications for these sites issues come to light which may affect developable areas, constraints, housing mix and density, infrastructure requirements etc.

- 1.5 Gladman are concerned that these previous allocations have not come forward throughout the lifetime of the existing Local Plan which covered both times of economic boom and economic downturn. The Council therefore need to have clear evidence to demonstrate that these sites will be delivered during this plan period and at the quantum suggested by the Local Plan. Without the ability to demonstrate that these sites are likely to come forward there is uncertainty regarding whether the plan will be delivered and be effective. It would therefore not meet the tests of soundness outlined in paragraph 182 of the Framework.
- 1.6 Part 3 of Policy S/6 sets out three new strategic scale allocations are proposed for housing led development to meet the majority of the additional development needs and Part 4 of Policy S/6 concludes that development in the rural area will be limited, with allocations for jobs and housing focused on Rural Centres and Minor Rural Centres.
- 1.7 Gladman are concerned by the significant over reliance being placed on strategic sites and new settlements at the expense of development in other sustainable locations. Whilst recognising that these types of developments have an important role to play and do offer sustainability benefits, these large schemes are likely to require significant infrastructure investment, and planning prior to delivery and consequently have longer lead in times.
- 1.8 Gladman commissioned consultants Hourigan Connolly to undertake a report looking into the factors associated with bringing forward major urban extensions (sites greater than 500 dwellings), the timescales for their delivery and the rates of delivery once development gets underway. The study emphasises that the delivery of urban extensions can be problematic and the timescales associated with the delivery of houses on such sites are significant. Using a number of schemes as case studies it finds that an eight-year period should be allowed for from the preparation of an outline/in principle planning application to the delivery of homes.
- 1.9 In light of the above, South Cambridgeshire should be allocating a range of sites both small and large to allow for flexibility of delivery and to ensure that the housing needs of the various communities across the district are met. The local authority should be seeking to provide a portfolio of sites that would deliver a mix in house types and sizes to meet demand. Over reliance on large scale sites may prevent development from being delivered in the short to medium term leading the Council to encounter issues with maintaining a rolling five year housing land supply.
- 1.10 As noted within earlier submissions to the Local Plan, South Cambridgeshire is a particularly extensive authority. The various areas will have their own local need for housing and this should be reflected in the spatial distribution for housing in the Local Plan. Gladman believe

that growth should be located within and adjacent to the principle and sustainable settlements with established facilities and services including those listed in Policy S/8, S/9 and S/10. The Council should not restrict growth to SUE's and new settlements around Cambridge, but should also allow for growth in the more sustainable villages where development would facilitate economic and social development.

- 1.11 Gladman recommend that the Council should be proposing further growth through small/medium sized sites in sustainable locations to provide sufficient flexibility and meet the Districts housing needs. In some instances it may be necessary to plan for the release of additional housing sites, and earlier in the Plan period to meet the District's housing needs in accordance with the Presumption in Favour of Sustainable Development.
- 1.12 England's rural areas, towns and villages are popular and attractive places to live for people of all ages and backgrounds. They provide a high quality of life with ready access to open space and clean air. Consequently there is a ready market for new housing. Greenfield sites well related to existing towns and villages are easy and relatively cost effective locations for housing development. This makes them attractive to house builders. This combination of circumstances provides a positive context for efficient, effective, and timely housing delivery.
- 1.13 In the majority of local authority territories the rural area provides a range of viable opportunities for housing delivery. Identifying sites for housing development in rural areas and creating spatial strategies which enable housing sites to come forward in rural areas will make a substantial contribution towards the deliverability of any plan.
- 1.14 Housing sites in rural areas offer a strong measure of certainty (around delivery) that is very rarely associated with brownfield sites, larger allocations or urban extensions. Land ownership is usually fairly straightforward. Competing pressures on land use are fewer, the need for off-site works or infrastructure improvements far less likely and easier to deliver. Risks associated with urban regeneration, around community management, wider structural investment and local governance are not likely to be an issue.
- 1.15 The benefits associated with housing development in rural areas are widespread. They include the ability for new families and people of all kinds to play a part in and contribute towards the vitality of local communities and economies. Private housing developments provide much needed affordable housing and directly and immediately widen the choice and availability of high quality housing.

- 1.16 New residents bring increased spending and demand for local services, especially those designed for children and young people and new skills energy and enthusiasm to contribute to local clubs and activities. They often include business owners, home based workers and those that are likely to start new businesses.
- 1.17 The development of new housing at proportionate scale will breathe new life into to settlements of all shapes and sizes as well as meeting current and future housing needs, both in the immediate local area and across the local authority area more widely. The considered allocation of housing across a range of settlements will mean that the benefits of new housing, and any burdens associated with it, will be shared more widely across the population.
- 1.18 The sequential approach that is set out under Policy S/6 (1) seems to suggest that development in the rural area at Rural Centres and Minor Rural Centres will only come forward once development has been delivered firstly on the edge of Cambridge and secondly at the new settlements. This sequential approach effectively relegates any new development in the rural centres identified in the plan until late in the Plan period or, given the lengthy delivery periods associated with the new settlements, potentially not at all. This sequential policy is entirely at odds with the provisions of the Framework and the need to boost significantly the supply of housing. As set out above, development in the rural area is essential to address the needs of the rural communities, ensure that the vitality and vibrancy of villages are maintained and to rebalance aging rural populations. This order of preference part of Policy S/6 should therefore be deleted as it is not consistent with national policy.

**Matter 2b. Is it clear what other strategic options were considered and why they were dismissed?**

- 1.19 It is entirely unclear as to how the South Cambridgeshire Local Plan arrived at the strategy that forms the basis of plan through to 2031. The Plan should of looked at a variety of ways in which the development needs of the district could be delivered to ascertain which was the most appropriate approach having regard to all three strands of sustainability, economic, social and environmental. This should of been undertaken in a systematic, thorough and robust way through the Sustainability Appraisal and other evidence based documents.
- 1.20 The Cambridge and South Cambridge Sustainable Development Strategy document (November 2012) sets out the Council approach to the assessment of delivery options. This

document is brief and far from comprehensive and seems to confuse sustainability with accessibility. It does not consider sustainability under the three strands set out in the Framework in a balanced manner. Even the Council's own work set out in this document shows (on the table on page 16) that development in the market towns scores better in sustainability terms than the pursuit of growth in one or more new settlements. In addition, there is no commentary associated with that table to explain why certain factors have scored how they do e.g. why the provision of housing in the larger villages scores a +/-

- 1.21 It is therefore considered that the Plan as set out does not justify the strategy upon which it was based and does not adequately set out the reasoning why other strategic approaches were rejected. The Plan is therefore considered unsound on this basis as it fails to meet the 'is the plan Justified' criteria set out in para 182 of the Framework.

**Matter 2c. Are the Plans founded on a robust and credible evidence base?**

- 1.22 Gladman reiterate previous concerns regarding the evidence base for the approach to the Green Belt. The Council should be undertaking a comprehensive Green Belt review as opposed to focussing on the inner Green Belt area around Cambridge. This would have assisted the Council in determining the most appropriate sites to be released from the Green Belt to achieve sustainable development. A comprehensive review would have ensured that all potential development options were thoroughly investigated and will ensure that a coherent a focused policy approach is adopted through the Plan. As it stands, the evidence base in this respect is only partial.