

SOUTH CAMBRIDGESHIRE LOCAL PLAN

RESPONSE TO INSPECTOR'S QUESTIONS FOR

MATTER 2- OVERALL SPATIAL VISION AND

GENERAL ISSUES

ON BEHALF OF HARROW ESTATES- 3111

IN RESPECT OF REPRESENTATION 60518

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1. INTRODUCTION

- 1.1 This Statement has been prepared on behalf of Harrow Estates (my client) in response to the Main Matters and Issues for the joint examination of the draft Local Plan for South Cambridgeshire District Council and Cambridge City.
- 1.2 This response reiterates and references the representations made in October 2011 in relation to the Issues & Options draft and expands upon concerns submitted in September 2012 to the Proposed Submission of the South Cambridgeshire Local Plan.
- 1.3 For the avoidance of doubt, the interest of Harrow Estates is focused on the former Hauxton Waste Water Treatment Works within the rural area of South Cambridgeshire District. Unless otherwise stated, references to the "local plan" and its policies relate to the South Cambridgeshire Local Plan.

2. Response to Matter 2: Overall Spatial Vision and General Issues

(a.) 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?

- 2.2 No- as previously highlighted in our submission to the Issues and Options and latterly the Proposed Submission we object to the overall development strategy as it plans to limit development in the rural area, without any robust justification for doing so.
- 2.3 As set out within our previous submissions, the strict criteria set out in Policy S/2 (e) fails to properly take into account that development in rural areas is often needed in locations that are co-dependent on other settlements. By excluding these areas, the strategy will lead to over-development within those settlements deemed to have the full range of services and infrastructure, whilst leading to a managed decline of those settlements that are deemed not to have the full range of services. This objection is best explained by paragraph 55 of The Framework which acknowledges the potential for co-dependency on services.
- 2.4 The policy is supported by the Village Classification report (RD/Strat/240) which looks at villages in isolation and fails to properly assess potential for co-dependency.
- As such, the strategy is not consistent with National Policy (Para 55); not justified as the evidence does not consider co-dependency and not effective as it will lead to the decline of villages perceived to be less sustainable.
- 2.5 The proposed development strategy (S/8) represents a continuation of that already in place. This strategy has persistently failed to deliver the required number of homes over the plan period AMR (RD/AD/270). The development strategy continues to place an over-reliance on large strategic allocations which have historically failed to deliver either due to market conditions or infrastructure constraints. Whilst the council asserts that the market is returning to normal and infrastructure barriers will be overcome through the signing of the City Growth Deal which links government funding to delivery targets.

- 2.6 Despite the City Deal, Harrow Estates highlight that there is still uncertainty in respect of the speed of delivery from large sites and if sufficient infrastructure will be available. This is in part due to the requirement of housing delivery (1000 affordable rural units) to release further tranches of funding for infrastructure.
- 2.7 As noted the strategy relies upon the delivery of large, strategic sites. For each of the new settlements, the transport plan states that "*Development will be subject to sufficient highway capacity being available at all stages of the development, including on the adjacent strategic road network.*" (H-9). This implies that, should highway capacity not be available, then development will be prevented in coming forward (RD/T/092).
- 2.8 Sites within sustainable rural locations have the capacity to deliver housing in a timely manner without significant infrastructure burdens, overcoming the issues associated with the new settlements. Furthermore, rural sites will contribute to the overall infrastructure funding mechanisms through the Council's CiL, which when taken together with the Cambridge City Growth Deal, will enable the funding of infrastructure to release the larger sites as part of the strategy.
- 2.9 There is a belief within the plan that resisting development in the rural area will lead to more sustainable travel patterns. We disagree. The Transport Strategy (RD/T/120) highlights that, whilst the proportion of those using a private car to travel to work has fallen, congestion has worsened. This suggests that those working in and around South Cambridgeshire have moved further afield, a matter also supported by the 2011 census data that commutes within Cambridgeshire are 20% longer than the national average (See: RD/T/110). Rather than delivering sustainable development, the strategy has forced households to move beyond the district boundaries and commute back to the district for work purposes.
- 2.10 This is further supported by evidence which shows that the cost of housing within the district has increased by 13.2%, the greatest increase within the Housing Market Area, compared to just 8% in the wider region (RD/Strat/090). Cambridge and South Cambridgeshire were the two most expensive areas, with the average house price more than double that of Forest Heath and Fenland (SHMA 2013- RD/Strat/090).

2.11 The Council present no evidence to suggest that a continuation of the present strategy will counteract the current 'ripple' effect of households being forced to move out of the district and commute to locations in and around the City and across South Cambridgeshire.

- Policy S/8 is ineffective as it will not deliver the required number of homes in a timely manner. This will have wider implications for the delivery of infrastructure required to support new settlements.

(b.) Is it clear what other strategic options were considered and why they were dismissed?

2.12 No- It is understood that three options for meeting need were assessed through the sustainability appraisal process:

- focus on providing more development on the edge of Cambridge, in part to replace development previously planned on Cambridge airport which is no longer available in the plan period, through a further review of the Green Belt.
- Focus on providing more development through one or more new settlements, of sufficient size to provide sustainable development, including provision of a secondary school, and with good public transport links to Cambridge.
- Focus on providing development at the more sustainable villages that have the best levels of services and facilities and accessibility by public transport and cycle to Cambridge or, to a lesser extent, a market town.

2.13 The SA concludes that the most sustainable option is the focus on the edge of Cambridge, principally due to a reduced need to travel. In our view, and as set out in our answer to question (a) selecting this option fails to properly consider the impact of a continuation of the existing planning strategy which has failed to meet the needs of South Cambridgeshire and deliver the required levels of housing growth over the last plan period and has not lead to more sustainable travel patterns for the wider area.

2.14 The options have not properly considered an alternative split of development across the three options, with additional rural development being brought forward in the rural areas to meet the current needs and the undersupply which has been accumulated between 2011-2014.

(c.) Are the Plans founded on a robust and credible evidence base?

2.15 In our answer to questions (a) and (b) we have highlighted a number of issues with the evidence base, which has led to the option to continue the existing strategy. Principally, this includes:

- the failure to properly assess the functional and co-dependent role of villages in the classification report;
- the justification for not identifying additional rural sites to meet the housing needs; and
- the absence of a strategy to deliver 1000 affordable homes on rural exception sites.

2.16 In the absence of evidence, it would appear that the sentiments expressed at paragraph 2.6 of the plan that there is "*a degree of nervousness amongst residents of the district believing that continuing high levels of growth would put the environment and living standards at risk*" has over-ridden the need to justify, through robust evidence, the continuation of the previous strategy.

2.17 The development strategy is therefore not justified.

Summary Matter 2:

The Development Strategy is unsound for the following reasons:

2.18 Policy S/2 is not positively prepared or consistent with National Policy. This policy fails to take into account that development in rural areas is often needed in locations that are co-dependent on other settlements. In order to make this policy sound, the criteria of the policy must be amended to allow for the unique circumstances of the rural settlements to be taken into account for the determination of development. In particular criterion c and e must be revised.

2.19 Policy S/8 is unsound as it is not justified, effective or positively prepared. The distribution strategy is a continuation of the existing distribution, which has failed to deliver sustainable development. The Local Plan must allocate additional sites within the rural area to meet the objectively assessed needs and ensure flexibility, particularly over the next five years.