

Written Statement

South Cambridgeshire Local Plan Examination

Matter SC1: Development Frameworks, Strategy for Rural Area, and Omission Sites

Client: Shelford Investments

Site: Land south of Shelford Caravan and Camping Club, off Cabbage Moor, Great Shelford

Rep ID No.: 58793

Introduction

This Written Statement has been prepared on behalf of Shelford Investments, who owns land south of Shelford Caravan and Camping Club, off Cabbage Moor, Great Shelford. This Statement is focussed on the omission of the site from the South Cambridgeshire Local Plan (SCLP). The site is currently occupied by a dwelling and garden, and is used to store caravans. The site is adjacent to the Great Shelford Caravan and Camping Club site. It is currently located outside, but immediately adjacent to, the development framework boundary of Great Shelford. The site is located within the Green Belt.

The representations submitted to the draft Local Plan in October 2013 and to the Local Plan Modifications in January 2016 remain valid, and are relevant to other questions in Matter SC1. In particular the Rural Centres, including Great Shelford, are one of the most sustainable locations for development. Most of the Rural Centres are affected by the Green Belt. As acknowledged at Paragraph 2.32 of SCLP the level of need for homes and jobs represent the exceptional circumstances to justify the release of land from the Green Belt, and yet few sites have been released from the Rural Centres. The potential for small and medium sized sites to be released from the Green Belt to meet housing needs, without affecting its purpose and openness, has not been properly considered. In addition, there have been material changes since SCLP was submitted for examination, including that it has been confirmed that the Council cannot demonstrate a five year housing land supply and a number of appeals have been allowed and applications approved in Group Villages (and Group Villages which are due to be reclassified as Minor Rural Centres). The sustainability of villages has been reassessed through the appeals process, and edge of village locations have been accepted as suitable for residential development. The outcome of those appeals is equally relevant to the higher order and more sustainable Rural Centres.

1.2 RURAL CENTRES

1.2C Great Shelford and Stapleford

i. Development framework boundary and omission sites

Is the plan unsound without the amendment of the development framework boundary to include the following sites, and/or the allocation of the sites for housing or other development (where specified), and if so, why?:

g. Land South of Shelford Caravan and Camping Club

Introduction

1. In summary, the submitted South Cambridgeshire Local Plan (SCLP) is unsound without the allocation of land south of Shelford Caravan and Camping Club, off Cabbage Moor, in Great Shelford. The Council acknowledge that it cannot demonstrate a five year housing land supply, and the land supply position has deteriorated since SCLP was submitted for examination. The outcome of recent appeal decisions and decisions on planning applications demonstrate that residential development on the edge of villages are sustainable; the SCLP adopts a different approach and makes only a limited number of residential allocations in the villages despite these being identified at appeal and in decisions on planning applications as sustainable locations. If, as determined at appeal, Group Villages (and Group Villages due to be upgraded to Minor Rural Centres) are sustainable locations for additional development then land in higher order Rural Centres which are more sustainable villages should be considered as allocations in SCLP. There are exceptional circumstances related to housing and affordable housing need to justify the release of land from the Green Belt, and the potential exists for small and medium sized sites to be released from the Green Belt to those housing needs. It is clear that the Green Belt is the over-arching constraint guiding the development strategy of the Local Plans, with the delivery of sustainable development having only a secondary role which is an approach that is contrary to Paragraphs 7 and 85 of the National Planning Policy Framework (NPPF). The sustainability credentials of sites on the edge of the Rural Centres have been ignored in order to protect the Green Belt. The failure to allocate sufficient sites for residential development in the villages, and the Rural Centres in particular, would not support the rural economy and the existing services and facilities within villages, and would not meet rural housing and affordable housing needs. A range of sites are needed to meet the housing land supply, including small and medium sized housing sites in the sustainable villages which are typically less complex and can be delivered quickly and as such would make an early contribution to the housing land supply shortfall.

Housing Land Supply Position

2. The Council acknowledge that it cannot demonstrate a five year housing land supply. The calculated supply is 3.7 years when a 20% buffer because of persistent under-delivery and the Sedgefield approach to meet the current housing shortfall is applied - see table on pg.62 and table in Appendix 3 pg.200 in the Annual Monitoring Report 2016 [Doc Ref. RD/AD/480]. The 20% buffer and Sedgefield approach were accepted as the appropriate method for calculating the housing land supply for South Cambridgeshire in the two Waterbeach appeals in 2014 [Doc Refs. RD/Strat/330 and RD/Strat/340] and there has been no change in circumstances since to suggest a different approach. The table in Appendix 3 pg.200 in the Annual Monitoring Report 2016 [Doc Ref. RD/AD/480] shows that the Council does not expect to be in a position to demonstrate a five year housing land supply until the period 2020-2025. The housing land supply position has deteriorated since SCLP was submitted for examination. The housing land supply has been boosted by appeal decisions in the last three years, but these are insufficient to address the shortfall. Paragraph 47 of the NPPF seeks to boost significantly the supply of housing, and expects local planning authorities to identify deliverable sites to maintain a five year housing land supply; the Council is clearly not meeting this requirement. The fact that a

significant number of residential developments in Minor Rural Centres and Group Villages have been allowed on appeal in the last three years demonstrate that the Council has adopted a negative approach towards developments which have been found acceptable in terms of constraints, potential impacts and sustainability. The Council's inability to demonstrate a five year housing land supply is unsound because it demonstrates that SCLP is not consistent with national policy and is not positively prepared. Additional sites in the more sustainable villages, and in particular small and medium sites which can be delivered quickly and easily, need to be identified in SCLP to address the current housing land supply shortfall.

3. We are aware that there are a number of matters which have not yet been confirmed as sound which could affect the housing land supply position, including the following: the preferred housing target (including modifications) in Policy S/5: Provision of New Jobs and Homes; and, the proposed strategy for the new settlements, including infrastructure requirements and delivery assumptions, at Waterbeach (Policy SS/5: Waterbeach New Town) and Bourn Airfield (Policy SS/6: New Village at Bourn Airfield). A higher housing target would make the housing land supply position worse than it currently is. Any amendments to the delivery assumptions, and delays in particular, at the new settlements (if accepted as sound) would have a significant detrimental effect on the housing land supply position; the delivery of new settlements is complex and it typically takes much longer for development to commence than first predicted e.g. Northstowe.

Development Strategy for Rural Centres

4. In summary, the development strategy for the Rural Centres is based on the following: a defined Development Framework boundary for the villages to distinguish the urban area from the countryside – see Policy S/7; and, support for developments in Rural Centres on sites within the Development Framework boundary. Most of the Rural Centres are affected by the Green Belt. There has been no assessment of the potential for small and medium sized sites to be released from the Green Belt to meet housing needs, without affecting the purposes for including land within the Green Belt and the openness of the Green Belt. The Green Belt is the main factor that has informed the development strategy, at the expense of sustainability considerations, and as a result small and medium sized sites on the edge of the Rural Centres have not been fairly assessed. In most cases the Development Framework boundaries around the Rural Centres, including Great Shelford, are unchanged from the 2004 Local Plan. The previously developed sites and the easily deliverable sites within the Development Framework boundaries would already have come forward since 2004. It is not clear whether many sites within the villages and Rural Centres are still available to meet future housing needs, and if so how many sites and how many dwellings could be provided. The development strategy for the villages provides no or limited support for existing services and facilities in villages including schools and would not deliver additional affordable housing.

Sustainability of Villages – Outcome of Recent Appeals & Applications

5. There have been four recent appeal decisions in South Cambridgeshire which are relevant to sustainable development in Group Villages. The outcome of those appeals are equally relevant

to Rural Centres which are more sustainable locations for development. The details of the appeals are as follows: Land at 18 Boxworth End, Swavesey (Appeal Ref: APP/W0530/W/15/3139078) for 30 dwellings [Doc Ref. RD/CAR/010]; Land at Land at Linton Road, Balsham (Appeal Ref: APP/W0530/W/16/3162747) for up to 29 dwellings [Doc Ref. RD/CAR/020]; Land at 8 Greenacres, Duxford (Appeal Ref: APP/W0530/W/15/3138791) for 35 dwellings [Doc Ref. RD/CAR/030]; and, Land to the west of Mill Road, Over (Appeal Ref: APP/W0530/W/16/3148949) for 55 dwellings [Doc Ref. RD/CAR/040]. In all cases the appeals were allowed, and are relevant to SCLP because of how the Inspectors assessed sustainable development in these Group Villages. The Inspectors in all four cases were not concerned with the status of the villages as Group Villages in reaching their decision, and assessed sustainable development in its widest context against all three strands; see Paragraphs 52 and 53 of the Swavesey appeal decision [Doc Ref. RD/CAR/010], Paragraphs 25 to 28 of the Duxford appeal decision [Doc Ref. RD/CAR/030], Paragraphs 18 to 23 of the Balsham appeal decision [Doc Ref. RD/CAR/020], and Paragraph 54 to 58 of the Over appeal decision [Doc Ref. RD/CAR/040].

6. The Over appeal decision, as the most recent decision, is particularly relevant to the allocation of housing sites in and on the edge of Rural Centres in SCLP. In that case the indicative layout demonstrated that a suitable development could be delivered, which included commitments to retain and enhance landscape and biodiversity features and provide planning obligations to address impacts on infrastructure. A similar outcome could be achieved for developments in Rural Centres if allocated for development in SCLP, with an additional requirement for the impact on openness to be addressed for land to be released from the Green Belt.
7. Paragraph 48 of the Over appeal decisions is also relevant and supports the point made above, that Rural Centres are suitable locations for additional development, sites in these villages are needed to meet the current housing land supply shortfall, and further developments above and beyond those allowed on appeal (and at Planning Committee) are needed to address the five year housing land supply position. Paragraph 48 states:

“48. The Council cannot provide a five year housing land supply. That has been the case persistently and there is no evidence to demonstrate that there is a realistic prospect that that position will be changed in the short term. Even with the Council seeking to apply a more flexible approach, as it has put it, there is still a significant shortfall and there is no indication of when that would be addressed. The Council accept that it will need to approve housing schemes in Group village locations, Ms Ballantyne-Way cross examination, and indeed Ms Ballantyne-Way’s new appendix 5 shows they are approving such. However, the level of approvals are not at such a scale or rate that they are making significant in-roads into the shortfall. Therefore in this context it is likely that further approvals will need to come forward in Group Village locations to meet the Council’s housing needs. I have no reason to suppose, on the evidence before me, that other sites likely to come forward under the flexible approach the Council is adopting would have better access to services. A concern that the location of this development would lead to journeys for shopping trips is therefore something that is potentially to be repeated at other such locations and therefore does not make this site significantly less sustainable than any other sites in terms of travel and transport issues.”

8. It is clear from the Over appeal decision that despite appeals involving residential development being allowed, and the Council granting planning permission for residential development elsewhere, the housing land supply shortfall is still not being resolved. In these circumstances additional land needs to be allocated in SCLP, including small and medium sized sites on the edge of Rural Centres which is defined as Green Belt because exceptional circumstances exist to release such land. The sustainability credentials of sites on the edge of the Rural Centres, including Great Shelford, have been ignored in order to protect the Green Belt.

Conclusions on Soundness

9. The overall development strategy and the failure to consider Great Shelford for small and medium sized development is unsound because:
- it fails to consider all three dimensions of sustainable development jointly and simultaneously (NPPF Paras. 7 and 8);
 - it is contrary to the core planning principles (NPPF Para.17);
 - it does not support the economy of the rural area (NPPF Para. 28);
 - it will not address the housing supply and demand in South Cambridgeshire, and significant affordability pressures (NPPF Para. 47);
 - it will not promote sustainable development in rural areas that meets local housing needs and that maintains and enhances the vitality of rural communities (NPPF Para. 55); and,
 - the Green Belt boundaries do not seek to promote sustainable patterns of development and be consistent with the delivery of sustainable development (NPPF Paras. 84 and 85).
10. The positive benefits of meeting housing and affordable housing needs including local needs in villages such as Great Shelford have not been properly factored in to the development strategy. The sustainability credentials of sites on the edge of Great Shelford have been ignored in order to protect the Green Belt.
11. Policy H/1: Village Housing Allocations is not sound because it is not positively prepared, not justified, not effective, and not consistent with national policy. Policy H/1 can only be made sound by allocating more land for development in the villages and releasing small and medium sized sites from the Green Belt, including land south of Shelford Caravan and Camping Club, off Cabbage Moor in Great Shelford.

Land south of Shelford Caravan and Camping Club, Great Shelford - Site Assessment

12. The site is currently occupied by a dwelling and garden, and is used to store caravans. The site is adjacent to the Great Shelford Caravan and Camping Club site. It is currently located outside, but immediately adjacent to, the Development Framework of Great Shelford. The site is located within the Green Belt. Great Shelford is a Rural Centre.
13. The site was assessed through the SHLAA and Sustainability Appraisal (SA) processes. The SHLAA reference is Ref. 188. The site is 1.80 hectares in size and could accommodate approximately 60-70 dwellings, with open space. The site has an existing access to the

highway network, which will need to be upgraded to accommodate residential development on the site.

14. The main constraints to the site are the Green Belt designation, and that the site is within an area identified for landscape improvements. As set out above, the need for housing and affordable housing are acknowledged in SCLP to represent the very special circumstances that justify the release of land from the Green Belt. The Green Belt is treated as an absolute constraint in SCLP, rather than a planning policy tool which can be varied to meet development needs.
15. The development of the site would have no adverse impact on the compactness or setting of Cambridge, and would not lead to the merging of villages. The SAA Report assessed the site (Ref. SC188 – see pg. 158 to 164 of Annex 1 (Part 4)) against the sustainability criteria. The site makes a limited contribution to the purposes for including land within the Green Belt, and is scored as 'Amber' in the assessment process. As such, the site makes a limited contribution to the purposes for including land within the Green Belt purposes. In any event, landscape improvements could be undertaken in conjunction with development, which would protect the factors that define the special character of Cambridge and its setting. The adjacent land is used as a caravan park and camp site, and the site is not part of the wider landscape but is related to the urban area. A more detailed landscape study would be required to inform development proposals at the site.
16. The SHLAA and the SA identify no other constraints to development that cannot be resolved through mitigation. Further technical studies, particularly on transport, archaeology, noise, and ecology, would be required. We note that the development of backland sites is the typical form of development for Great Shelford, so this type of development at Cabbage Moor would not be out of character.
17. The site is accessible to the services and facilities provided in Great Shelford, but it is possibly better related to those that exist to the north in Trumpington.

Requested Change

18. We request that land south of south of Shelford Caravan and Camping Club, off Cabbage Moor in Great Shelford is allocated for residential development in Policy H/1, and is included within the housing trajectory contained in Table 3. Great Shelford is defined as a Rural Centre making it a suitable village for additional development, and sites should be identified within and adjacent to the Development Framework boundary to meet the current housing and affordable housing need within the village. The site makes a limited contribution to the purposes for including land within the Green Belt, and there are no other constraints to development identified in assessments.