

Written Statement

South Cambridgeshire Local Plan Examination

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

Client: KG Moss Will Trust

Sites: Land off Home End, Fulbourn and Land at East Court Meadows House, Balsham Road, Fulbourn

Rep ID No.: 59843 & 62132

Introduction

This Written Statement has been prepared on behalf of the KG Moss Will Trust, who owns two sites in Fulbourn; land off Home End, and land at East Court Meadows House, Balsham Road. This Statement is focussed on the omission of these sites from the South Cambridgeshire Local Plan (SCLP). The sites are located outside, but immediately adjacent to, the development framework boundary of Fulbourn. The sites are 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 Fulbourn, 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 such as Fulbourn.

1.3C Fulbourn

i. Omission sites

Is the plan unsound without the allocation of the following sites for housing development or other uses as specified below, and if so why?:

a. Land at Court Meadows House, off Balsham Road and land off Home End

Introduction

1. In summary, the submitted South Cambridgeshire Local Plan (SCLP) is unsound without the allocation of land off Home End and land at Court Meadow House in Fulbourn. 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 correctly applying a 20% buffer because of persistent under-delivery and the Sedgefield approach to meet the current housing shortfall - 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 Minor 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, identify an indicative maximum scheme size of 30 dwellings, within the Development Framework boundary of Minor Rural Centres – see Policy S/9. There has been no assessment undertaken to determine what capacity exists within Minor Rural Centres such as Fulbourn to accommodate schemes of up to the maximum site size threshold. Fulbourn is constrained 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 Fulbourn, 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 current Group Villages such as Bassingbourn, which is due to be upgraded to a Minor Rural Centres. 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 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 Group Villages 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 other developments in Group Villages, including our client's site, if allocated for development in SCLP.
7. Paragraph 48 of the Over appeal decisions is also relevant and supports the point made above, that Group Villages 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 Fulbourn, have been ignored in order to protect the Green Belt.

Conclusions on Soundness

9. The overall development strategy and the failure to consider Fulbourn 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 Fulbourn have not been properly factored in to the development strategy. The sustainability credentials of sites on the edge of Fulbourn have been ignored in order to protect the Green Belt.
11. Policy E/7 (Fulbourn and Ida Darwin Hospitals) in SCLP identifies a site for residential development, in conjunction with the removal of all buildings and the creation of an area of open countryside to increase the openness of the Green Belt. Policy E/7 carries forward Policy SP/9 of the Site Specific Policies DPD 2010. Therefore, no additional sites have been identified in Fulbourn through SCLP.
12. 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 at Home End and land at East Court Meadows House off Balsham Road, in Fulbourn.

Fulbourn

13. Fulbourn is a Rural Centre in the current settlement hierarchy, which puts it in the top-tier of the rural settlement hierarchy and one of the preferred locations for development. It is due to be reclassified as a Minor Rural Centre in SCLP. Fulbourn contains a good range of services and facilities, reflecting its current Rural Centre status. It has a primary school, doctor's surgery, pharmacy, library, post office, supermarket and other small convenience stores, village hall, and outdoor recreation and play facilities. In addition, there are regular bus services to Cambridge, Haverhill and Newmarket from Fulbourn, and there is a cycle route between Fulbourn and Cambridge. Therefore, Fulbourn is a sustainable location and a suitable location for additional development.
14. The main constraints to additional development in Fulbourn is the Green Belt designation. 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.

Land off Home End Fulbourn – Site Assessment

15. The land off Home End was assessed in the SHLAA (SHLAA Ref. 214). The site is an undeveloped parcel of land, comprising a grass field enclosed by a hedge and fence. It is currently used as a paddock. It is surrounded by buildings on three sides. To the east of the site is the recreation ground, including sports pitches, tennis courts, a bowling green and a pavilion. The site is located adjacent to the development framework boundary, and it is within the Green Belt and the Conservation Area.
16. The SAA Report assesses land off Home End in Fulbourn (Ref. SC214 – see pg. 193 to 199 of Annex 1 (Part 6) Minor Rural Centres pt.1) against the sustainability criteria. We commented on the development potential of our client's site in our representations to Policy H1: Village Housing Allocations of Draft SCLP. The assessment of the site in the SAA Report identifies impacts on landscape, townscape, Green Belt, and heritage assets as the main constraints to development. We disagree with that assessment. The adjacent recreation area limits the contribution that the site makes to the wider landscape character. The Conservation Area means that the impact of development on the heritage assets will be a key consideration, and development is expected to sustain and enhance those heritage assets. The draft Fulbourn Conservation Area Appraisal does not identify the site as having any historic significance which was worthy of mention in the document; the 'positive open space' definition of the site in the Townscape Appraisal Map is not defined. It will be possible for a development with a high quality design which respects the character of the conservation area to be brought forward on the site. The site makes a limited contribution to the purposes for including land within the Green Belt, and we disagree with the score as 'Red' in the assessment process. The site is part of the urban area for Fulbourn, and is surrounded by buildings on three sites and a recreation area on the other. The development of the site would not lead to the merging of neighbouring towns. The site is undeveloped but could not be described as countryside because of the surrounding uses. The site does not form a key part of the setting of Fulbourn. There are limited previously developed sites in Fulbourn, and as such development of the site

would not affect regeneration elsewhere within the village. The site is not open in character, and as such it does not contribute to the openness of the Green Belt in this location.

Land at East Court Meadows House off Balsham Road, in Fulbourn - Site Assessment

17. The land at Court Meadows House off Balsham Road was assessed in the SHLAA (SHLAA Ref. 213). The site is on the eastern edge of Fulbourn. The site comprises two fields divided by a track that links Balsham Road to Stonebridge Lane. The site is currently separated from the urban area. However, we are aware that there is active interest from adjoining landowners to bring forward that land for a rural exception housing scheme, and as such it is likely that in the short term built development will extend to the edge of the site. As set out above, there are exceptional circumstances to justify the release of land from the Green Belt, and suitable sites should be considered for development when considered against long term development needs and the effect on the purposes for including land within the Green Belt.
18. The SAA Report assesses land at East Court Meadows House off Balsham Road in Fulbourn (Ref. SC213 – see pg. 185 to 192 of Annex 1 (Part 6) Minor Rural Centres pt.1) against the sustainability criteria. We commented on the development potential of our client's site in our representations to Policy H1: Village Housing Allocations of Draft SCLP. The assessment of the site in the SAA Report identifies impacts on landscape, Green Belt, and heritage assets as the main constraints to development. We disagree with that assessment. It will be possible for a development with a high quality design which respects the character of the surrounding landscape and the setting of the Conservation Area to be brought forward on the site. It will be possible for built development to be directed to less sensitive areas, in conjunction with strategic landscaping, biodiversity enhancement, and additional open space and recreation areas.

Requested Change

19. We request that land off Home End and land at Court Meadows House off Balsham Road in Fulbourn are allocated for residential development in Policy H/1, and are included within the housing trajectory contained in Table 3. Fulbourn is a Minor Rural Centre and is a suitable village for additional development, and sites should be identified within and adjacent to the development framework boundary including land designated as Green Belt to meet the housing and affordable housing need within the village.