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Friday, 19 November 2021

BY email to:
neighbourhood.planning@greatercambridgeplanning.org

Dear Sir/Madam,

GAMLINGAY NEIGHBOURHOOD PLAN SUBMISSION – AUGUST 2021

On behalf of our client [REDACTED] we provide our comments below on the submission version of the Gamlingay Neighbourhood Plan.

Vision and Objectives

Objective 1: We will meet the needs of the local community by supporting new housing that is of appropriate size, affordable and adaptable. All new buildings will be built to high environmental standards.

We support this objective. As set out later in the plan, there is a clear need for sustainable affordable homes, in particular 1-2-bedroom dwellings and bungalows.

A further Housing Needs Survey was carried out in September and October 2021. Snapshot data from the survey and housing register is turned into an annual flow of households in affordable using the Government's Basic Needs Assessment Model. The main findings of the model are that:

- every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years;
- 55% will seek affordable rented housing and 45% will seek affordable home ownership; and
- a mixture of 1, 2 and 3 bedroom bungalows semi detached and terraced houses are needed.

Objective 2: In order to maintain the integrity of Gamlingay as a radial village with satellite hamlets and smallholdings, we will protect the open countryside and landscape setting. We will protect our built heritage. Alterations to existing buildings and new buildings will reflect and contribute to the strong character of the built heritage expressed in the Village Design Guide.

This objective should include support for rural exception sites to meet an affordable housing need, as long as they are well-designed. Rural exception sites are supported in the South Cambridgeshire

Local Plan (2018) at Policy H/11 permits rural exception sites on small sites at locations within or adjacent to existing settlements.

Objective 4: We will protect valued local amenities and seek developer contributions to ensure that local facilities adapt to meet the needs of our growing community.

We support this objective. The NPPF (2021) at para. 79 states that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

Objective 5: We will develop a network of paths to promote walking, cycling and riding for everyday journeys and recreation. We will reduce congestion by encouraging more parking provision.

We support the promotion of walking, cycling and riding. However with regard to car parking, the policy should be in line with South Cambridgeshire Local Plan Policy TI/3: Parking Provision which states that:

“Car parking provision will take into consideration the site location, type and mix of uses, car ownership levels, availability of local services, facilities and public transport, and highway and user safety issues, as well as ensuring appropriate parking for people with impaired mobility.”

The objective therefore should not be to encourage more parking provision, but rather to provide levels of parking appropriate to the site and circumstances.

Paragraph 4.23

This paragraph states that housing sites must fall within the development framework.

We object to this because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the text should be amended to reflect this.

Policy GAM1 – New houses and employment buildings

We support this draft policy, specifically the requirement for housing development to “provide a mix of homes, in particular one- or two-bedroom dwellings and bungalows.”

Housing surveys have shown a clear need for 1-2 bedroom properties and bungalows and affordable bungalows according to Table 3 of the Plan have not been delivered.

As stated in paras. 4.12 and 4.13 of the Plan, the Housing Needs Survey (2018) indicates a particular demand for smaller 1-2-bedroom homes and bungalows in order to meet the needs of single people requiring accommodation on their own, as well as older people seeking to downsize. Market conditions showed a glut of larger 4- and 5-bedroom houses for sale in the parish, with only one 2-bedroom property available in December 2017.

A further Housing Needs Survey was carried out in September and October 2021. Snapshot data from the survey and housing register is turned into an annual flow of households in affordable using the Government's Basic Needs Assessment Model. The main findings of the model are that:

- every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years;
- 55% will seek affordable rented housing and 45% will seek affordable home ownership; and
- a mixture of 1, 2 and 3 bedroom bungalows semi detached and terraced houses are needed.

Further information on this survey is provided under the heading 'Proposed site allocation' below.

Page 43

The text box on page 43 states that the right place for new homes is within the boundary of the village.

We object to this because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the text should be amended to reflect this.

Paragraph 4.31

This paragraph states that new homes should be within the boundary of the village.

We object to this because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the text should be amended to reflect this.

Policy GAM3 – Local character

The draft policy states that:

“Housing will be located within the boundary of Gamlingay village (its development framework) to prevent the village, the hamlets and smallholdings from joining up, to preserve the visual quality of the landscape and retain the separate identities of the settlements.”

We object to this policy because there is no reference to rural exception sites. These are permitted according to South Cambridgeshire Local Plan Policy H/11, so the policy should be amended to reflect this.

Policy GAM6 – Community amenities and facilities

We support the protection of community amenities and facilities.

Policy GAM9 – Transport provision on developments

The draft policy states that “Situating within the village framework, new housing will be located within convenient walking or cycling distance to village facilities”.

We object to this policy – the policy should be amended to refer to rural exception sites and should also refer to locations within easy reach of a bus stop.

Proposed site allocation

We propose the site Land at Potton Road, Mill Hill, Gamlingay as a further housing allocation (for sustainable affordable homes). A map is included at Appendix 1.

A Housing Needs Survey was carried out in September and October 2021. All households in the parish were invited to respond to the questionnaire. 1,676 questionnaires were dispatched and 204 responses were received. Survey data was processed to find out how many households were in affordable housing need and planned to move home to find more suitable housing that they could afford in the parish. The number of new households likely to form and be in affordable need over the next 5-years was also estimated from information provided by respondents. Information was collected about number of bedrooms needed and household preferences for affordable rented or affordable home ownership (e.g. shared ownership).

The Government's good practice guidance for housing needs surveys states that more than one source of data should be used to estimate levels of affordable housing need. This is because parish housing surveys cannot collect information from households with a local connection that do not live in the parish and not all households respond to the survey. Housing registers underestimate need as registration is voluntary, only records need for affordable rented housing and does not take account of future need from newly forming households. Therefore both methods tend to undercount local need for affordable housing.

Snapshot data from the survey and housing register is turned into an annual flow of households in affordable using the Government's Basic Needs Assessment Model. The main findings of the model are that:

- every year for the next 5-years a minimum of 27 households will be in affordable housing need, 135 households over 5-years;
- 55% will seek affordable rented housing and 45% will seek affordable home ownership; and
- a mixture of 1, 2 and 3 bedroom bungalows semi detached and terraced houses are needed.

Supply from vacancies and new build affordable homes must be taken into account over this 5-year period. We note that 34 affordable homes including 10 shared ownership homes will be built in the parish on the former Green End industrial estate over the next few years.

Our overall finding is that even taking supply into account there will still be a need for 15 affordable rented and 49 affordable home ownership dwellings over the 5-year period.

This level of need is mostly due to the level of local house prices. The HNS demonstrates that although prices are lower than for South Cambridgeshire as a whole, they are still not affordable to many households needing to move to more suitable housing.

We also had responses from home owners seeking more suitable housing at market prices. Many are seeking to upsize to 4-bedroom homes. We note that Gamlingay has a smaller proportion of 4-bedroom homes than South Cambridgeshire as a whole.

The proposed site at Land at Potton Road falls outside the Gamlingay settlement boundary, however as it is previously developed land (a former scrap yard) it is sequentially preferable to many alternative greenfield locations. In addition, the site has an extant consent for B class employment uses. If this was implemented, the site could be in commercial use and there would be workers commuting to and from the site, and at lunchtimes (as there are no facilities currently on the site).

The NPPF (paragraphs 122 and 130) encourages the effective use of land by reusing land that has been previously developed provided that it is not of high environmental value. The site is not considered to be of high environmental value (as it is not within the Green Belt, nor are there any other protected designations) and therefore the re-development of the site would be in line with this key aim.

The Council's leaflet on rural exception sites states that these can only be brought forward if there is a proven unmet local need for affordable housing. The Housing Needs Survey results demonstrate that there is a proven unmet local need for affordable housing. The Neighbourhood Plan Submission does not include any affordable housing sites.

A sustainable affordable housing development on this site would support local shops and services in Gamlingay, and also in nearby Potton, in accordance with the NPPF paragraph 79 which states that housing should be located where it will enhance or maintain the vitality of rural communities, as well as the Neighbourhood Plan Draft Objective 4 which seeks to support local facilities. There is a farm shop and café opposite the site and therefore the site is in close proximity to local facilities. Furthermore, on-site facilities could be included in any development.

Transport options for the site include an eco-friendly shuttle bus between the site and the village, a contribution towards local bus services or a car rental scheme, a bike hire scheme and electric vehicle charging points.

Summary

Please take these representations into account. Should you have any queries then please do contact me on tel. [REDACTED] or [REDACTED], alternatively my colleague Simran Kang will be happy to assist [REDACTED] or [REDACTED].

Yours faithfully,

Gemma Jenkinson

BSc (Hons) MSc MRTPI
Director of the Midlands, Planning

APPENDIX 1

