

13<sup>th</sup> December 2021

Greater Cambridge Shared Planning  
Planning Policy Team  
Cambridge City Council  
PO Box 700  
Cambridge  
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Submitted by email to: [localplan@greatercambridgeplanning.org](mailto:localplan@greatercambridgeplanning.org)

Dear Sirs,

**GREATER CAMBRIDGE LOCAL PLAN – THE FIRST PROPOSALS**  
**REGULATION 18: PREFERRED OPTIONS 2021**

Please find set out below representations on behalf of Beechwood Homes Contracting Ltd (hereafter “Beechwood Homes”) in relation to the Regulation 18 consultation, and in addition to submit further site-specific information in relation to land south of Chestnut Lane, Kneesworth.

This response has been formatted as per the published guidance, and includes representations to the following proposed policies / parts of the draft Plan:

- Policy S/JH: New Jobs and Homes, in respect to ‘Housing Needs’
- Policy S/DS: Development Strategy, in respect to ‘Housing Supply’ (and in particular in respect to ‘The Buffer’, ‘The 5-Year Housing Land Supply’ and ‘The Role of Small Sites’), and ‘Development Strategy / Spatial Distribution’
- Policy S/SH: Settlement Hierarchy, in respect to ‘Settlement Hierarchy’
- Section 2.6: Rest of the Rural Area

In addition, we are submitting further commentary in relation to ‘Land to the South of Chestnut Lane, Kneesworth, which was assessed in the HELAA under site ref. 40073.

Please note that these representations have been submitted by email only as we have been unable to utilise the online portal. We have provided a summary in relation to each policy / part of the Plan.

**VISION AND DEVELOPMENT STRATEGY (SECTION 2.1)**

**Housing Needs (Policy S/JH: New Jobs and Homes)**

The Housing Requirement

Under proposed **Policy S/JH: New Jobs and Homes** (commencing page 24), and the sub-heading of ‘Proposed Policy Direction’ (also commencing page 24) the draft Plan states (again page 24) (our emphasis):

*“We propose that the new Local Plan will meet the following objectively assessed needs for development in the period 2020-2041:*

- *58,500 jobs*
- *44,400 homes, reflecting an annual objectively assessed need of 2,111 homes per year, which is rounded for the plan.”*

The 'Development Strategy Topic Paper' explains (page 23):

*"The Greater Cambridge Housing and Employment Relationships Report identified that the medium level jobs would generate a need for 44,400 homes (reflecting an annual objectively assessed need of 2,111 homes per year, which is rounded for the plan period), assuming all the additional homes to support the additional jobs (being those above the jobs supported by the standard method homes) are located in Greater Cambridge. This would have the effect of providing opportunities for workers in those additional jobs to live close to where they work. The total homes associated with the medium jobs are considered to represent the objectively assessed need for homes in Greater Cambridge."*

The Topic Paper goes on to say (also page 23):

*"The Report also demonstrated that if existing commuting patterns were carried forward, the homes that would be provided in Greater Cambridge would be 41,900. However, this approach is not consistent with the local plan theme of net zero carbon and there is no certainty that neighbouring authorities would plan for the additional homes in their local plans in order to support the economy in Greater Cambridge."*

It then notes (page 24):

*"... the Employment Land Review stated that the higher employment scenario places greater weight on fast jobs growth [as] seen in the recent past, particularly in key sectors. By implication from the wording included in the Employment Land Review regarding the central scenario, this outcome is considered possible but not the most likely."*

By this the Topic Paper is explicitly acknowledging that the Employment Land Review (2020) identified that the rate of jobs growth in Greater Cambridge as seen 'in the recent past' would result in a demand for housing in excess of either 41,900 or 44,400 homes. The Topic Paper also notes (page 20) that this relationship is addressed in the 'Housing and Employment Relationships Report', dated November 2020.

The table on page 21 of the Topic Paper provides a helpful summary, making it clear that if recent jobs growth were to continue then the comparable housing need would be between 53,500 and 56,500 homes.

The 'Greater Cambridge Employment Land and Economic Development Evidence Study', dated November 2020, explains (para. 5.17) that the two employment growth scenarios are:

- The 'central' growth scenario: considered the most likely outcome taking into account long term (2001 to 2017) patterns of employment growth; and
- The 'higher growth scenario: a higher outcome placing greater weight on fast growth in the recent past.

Notably, the Study states that the methodology adopted is such that the 'higher' growth scenario figure is still lower than the year-on-year 'fast growth' seen during the period 2010 to 2017.

Whilst the 'higher' growth scenario might not be the most likely, it is the pattern of growth that has been experienced over recent years (noting that it is lower than the year-on-year 'fast growth'

experienced between 2010 and 2017) and thus should not simply be dismissed in favour of what is considered to be the ‘most likely’ of just two scenarios.

Were a 2:1 weighting to be applied to the two (‘central’ and ‘higher’) scenarios, in favour of the ‘most likely’, but not dismissing the potential continuation of the most trends, one would arrive at a projected jobs growth of c. 65,200 and a consequential need for between c. 45,800 and 48,300 homes. Adopting the same approach that leads to the proposed housing requirement of 44,400 homes would result in a requirement for 48,300 homes – approximately 9% more than is proposed.

Instead, the Topic Paper dismisses the higher growth scenario and simply states (page 24):

*“... As such, the maximum level of homes, associated with the higher employment scenario, is not considered to represent the objectively assessed need for homes in Greater Cambridge.  
...”*

### *Summary*

It is thus evident that:

- The draft Plan, knowingly, focusses only on the ‘most likely’ of just two employment growth scenarios, with no weighting given to the scenario that is based on the most recent trends.
- Were weighting to be given to the scenario that is based on the most recent trends, it is likely that the associated housing requirement would increase by c. 9% to 48,300 homes.

### **Housing Supply (Policy S/DS: Development Strategy)**

#### The Buffer

Many of the problems with the delivery of housing stem from the fixing of a housing requirement at plan-making stage that is too low and does not allow sufficient flexibility. Doing so means that:

- a) there is insufficient flexibility should allocated sites in the plan do not come forward as anticipated;
- b) the sites allocated in the plan have a monopoly position and the LPA is under great pressure to grant planning permission even where concerns exist around one or more aspects of the proposal; and
- c) if housing delivery does not keep pace with needs, the immediately available recourse is to increase housing land supply through speculative planning applications predicated upon the presumption in favour of sustainable development – the plan-making system being too slow to respond quickly enough when a shortfall is identified.

The NPPF states (para. 74):

*“The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:*

- a) 5% to ensure choice and competition in the market for land; or*
- b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during that year; or*
- c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply<sup>41</sup>.”*

PPG states (ID: 68-022-20190722):

*“To ensure that there is a realistic prospect of achieving the planned level of housing supply, the local planning authority should always add an appropriate buffer, applied to the requirement in the first 5 years (including any shortfall), bringing forward additional sites from later in the plan period. This will result in a requirement over and above the level indicated by the strategic policy requirement or the local housing need figure. Buffers are not cumulative, meaning that an authority should add one of the following, depending on circumstances:*

- *5% - the minimum buffer for all authorities, necessary to ensure choice and competition in the market, where they are not seeking to demonstrate a 5 year housing land supply;*
- *10% - the buffer for authorities seeking to ‘confirm’ 5 year housing land supply for a year, through a recently adopted plan or subsequent annual position statement (as set out in paragraph 74 of the Framework), unless they have to apply a 20% buffer (as below); and*
- *20% - the buffer for authorities where delivery of housing taken as a whole over the previous 3 years, has fallen below 85% of the requirement, as set out in the last published Housing Delivery Test results.”*

Under proposed **Policy S/DS: Development Strategy** (commencing page 27), and the sub-heading of ‘Proposed Policy Direction’ (commencing page 29) the draft Plan states (page 31) (our emphasis):

*“In order to provide greater confidence that the identified housing needs in Policy S/JH New Jobs and Homes can be met, and that a continuing supply of housing can be demonstrated, we are proposing to allocate enough sites to provide approximately a 10% buffer so we have the flexibility to deal with unforeseen circumstances. ...”*

A 10% buffer is generally considered the minimum possible if an authority is seeking to be able to demonstrate, on a rolling basis, a 10% buffer within its 5YHLS.

However, the ‘Greater Cambridge Housing Trajectory and Five Year Housing Land Supply’, published 1<sup>st</sup> April 2021, explains that the Councils consider it appropriate to apply ‘lapse rates’, of between 6% and 10% to some projected delivery to take into account that some sites never come forward. So far as we can tell the Councils have not included reference to lapse rates, or made any provision for sites not coming forward, within the draft Plan.

Many Local Plans have been adopted with a 10% buffer built into the projected housing supply, which has proven to be insufficient, resulting in the consequences outlined above. The solution is relatively straightforward – include a larger buffer in the form of additional allocations. The former of these is generally preferable as, again as noted above, the plan-making system being too slow to respond quickly enough when a shortfall is identified.

Inclusion of a larger buffer would have a number of benefits for all parties and provide greater certainty over the delivery of housing. It would:

- 1) provide greater democratic oversight of housing supply, putting LPAs in control and able to respond proactively to housing delivery should a shortfall occur;
- 2) reduce uncertainty for local communities and the propensity for ‘speculative’ planning applications where a shortfall in housing is encountered;

- 3) remove the monopoly of land supply caused by the current plan-making system and increase the likelihood of the Councils being in a position to secure a policy compliant proposals;
- 4) provide a source of housing land which the Councils can draw upon to maintain deliver if the plan-making process takes longer than anticipated; and
- 5) reduce the number of planning appeals, thereby making cost savings for both the Councils and the Planning Inspectorate.

### Summary

It is thus evident that:

- The 10% buffer proposed is not sufficient and additional sites should be allocated across the Greater Cambridge area to provide sufficient flexibility. Further work will be required to identify the size of an increased buffer but we would suggest that this be at least 15% (equivalent to 6,660 homes on a housing requirement of 44,400 homes, or 7,245 homes on a housing requirement of 48,300 homes – see above).

### The 5-Year Housing Land Supply

The NPPF states (para. 74):

*“... Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing ...”*

It is usual practice for assessments of housing need and supply to be calculated over periods commencing on 1<sup>st</sup> April.

PPG states (ID: 68-003-20190722):

*“The purpose of the 5 year housing land supply is to provide an indication of whether there are sufficient sites available to meet the housing requirement set out in adopted strategic policies for the next 5 years. ...”*

The draft Plan does not explicitly address this need to demonstrate a 5YHLS.

The ‘Greater Cambridge Housing Trajectory and Five Year Housing Land Supply’, published 1<sup>st</sup> April 2021, concludes that, applying a 5% buffer to the calculation, across the Greater Cambridge area, the Councils can, as of 1<sup>st</sup> April 2021, demonstrate a 5YHLS of 6.1 years.

The ‘Housing Delivery Study for Greater Cambridge’, October 2021 projects the 5YHLS for an assumed adoption date of the emerging Local Plan of 1<sup>st</sup> April 2025. However, in doing so it makes a numbers of errors and a number of assumptions are adopted that are flawed. We discuss just two of these below

Firstly, it calculates the baseline requirement as being 2,111 dws x 5 years = 10,555 dws. Based on the emerging Local Plan including an overall housing requirement of 44,400 homes, the correct baseline requirement would be 2,114.3 dws x 5 years = 10,571 dws.

Secondly, the revised trajectory promulgated in the Delivery Study adds 516 dws to the delivery projected identified in the April 2021 Trajectory for the period 2020/21 to 2025/26, and a further 1,641 dws to the delivery projected for the period 2025/26 to 2029/30. This additional delivery has not been properly tested against the requirements for inclusion in a 5YHLS with a base date of 1<sup>st</sup> April 2021 and the Study ‘assumes’ that it will be able to be included.

If this 516 and 1,641 dws were removed from the supply and the figures in the April 2021 Trajectory relied upon, there would be a shortfall over this period of 414 dws.

Taking into account just these two corrections results in the following:

Calculation Stage	Draft Plan)	Beechwood Homes
Baseline average annual requirement	2,111	2,114.3
Five-year baseline requirement	10,555	10,571
Requirement to date (20/21 to 25/26)	10,555	10,571
Supply to date (20/21 to 25/26)	11,132	10,616
Shortfall from base date	0	0
Baseline plus shortfall	10,555	10,571
Buffer (10%)	1,056	1,058
Baseline plus shortfall plus buffer (i.e. Requirement)	11,611	11,629
Supply	11,970	10,329
<b>5YHLS</b>	<b>5.15 years</b>	<b>4.44 years</b>

### Summary

It is thus evident that:

- Whilst the Councils have been nominally able to show that they will be able to demonstrate a 5YHLS on adoption of the Plan, this projection is prone to challenge and is not robust, such that there is a high potential that the Councils will fail the 5YHLS test soon after adoption of the new Plan.

### The Role of Small Sites

Under proposed Policy S/DS: Development Strategy (commencing page 29), and the sub-heading of ‘Spatial Strategy’ (commencing page 36) the draft Plan states (page 40) (our emphasis):

*“National planning policy says at least 10% of our housing requirement should be accommodated on sites no larger than 1 hectare, unless it can be shown that there are strong reasons why this cannot be achieved. ...”*

This is not completely correct.

The NPPF states (para. 69):

*“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*

- a) *identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved ...”*

There is a subtle but important difference between 10% of a housing requirement being accommodated on sites no larger than 1 hectare and 10% of a housing requirement being accommodated on identified sites of no larger than 1 hectare. The need to identify this land is critical to ensuring that sufficient small and medium sized sites do make an important contribution towards the meeting of the housing requirement, as required by national policy. Failure to identify sufficient sites jeopardises this objective.

The need to ‘identify’ sites is noted in the ‘PAS Local Plan Route Mapper Toolkit Part 2: Local Plan Form & Content Checklist’, last published in October 2021.

On this point, the draft Plan simply states (page 40):

*“... The site commitments we have and new proposals suggested in this consultation, together with windfall sites expected to come forward would mean we exceed this requirement by some margin. ...”*

This statement falls far short of the explicitly clear requirement in national policy to identify sufficient sites to deliver 10% of the housing requirement.

Section 6.6 of the Development Strategy Topic Paper discuss the requirement set out in paragraph 69 of the NPPF. It states (page 44):

*“The housing supply anticipated to deliver the First Proposals housing requirement includes existing housing commitments (adopted allocations and sites with planning permission), existing commitments for communal accommodation for students and older people (adopted allocations and sites with planning permission, converted to dwelling equivalents as set out in Appendix 2B), proposed new allocations, and a windfall allowance. All of these elements of housing supply include sites no larger than one hectare.”*

The Topic Paper highlights on page 45 that only small sites sufficient to provide 2,077 homes are ‘identified’ (we do not concur with the inclusion in this allowance of C2 communal accommodation as including such runs counter to the intent of paragraph 69). This figures equates to less than half the 4,400 dwelling requirement that would result from paragraph 69 were the proposed housing requirement of 44,400 to be adopted. In addition, most of these ‘identified’ sites are within Cambridge, with very few within South Cambridgeshire.

The remainder of the provision to meet the small sites requirement comprises the ‘windfall allowance’. Windfall sites are defined in the NPPF as:

*“Sites not specifically identified in the development plan.”*

and in the draft Plan as:

*“Sites which have not been specifically identified as available for development in the Local Plan. They normally comprise previously developed sites that have unexpectedly become available.”*

As such, windfall sites cannot, by definition, be ‘identified’. The Council’s proposal to utilise the windfall allowance to meet the requirements of paragraph 69 runs counter to the intent of paragraph 69 – to ensure that Local Plans ‘identified’ small sites that could then be brought forward by small and medium-sized housebuilders to assist with housing delivery.

The draft Plan continues (page 40):

*“... However, if we were to allocate specific sites it would need us to develop large numbers of sites in the rural area. ...”*

Here the draft Plan is almost accepting that it is not doing what national policy requires; by use of ‘however’ it is almost as though the draft Plan recognises the requirements of national policy but it has decided that this requirement should be set aside.

The draft Plan continues (page 40):

*“... This would compromise our development strategy, by directing a significant portion of growth to less sustainable locations, impacting on our response to the challenges of net zero carbon, and likely requiring large numbers of Green Belt releases.”*

By this statement, the draft Plan explicitly sets out that it is contrary to national policy – the requirement set out in paragraph 69 of the NPPF has been set aside in favour of the proposed ‘development strategy’.

Paragraph 69 of the NPPF is explicit: the 10% requirement applies (our emphasis):

*“... unless it can be shown that there are strong reasons why this cannot be achieved ...”.*

Neither the draft Plan, nor any of the supporting evidence base sets out a reason why the requirement ‘cannot be achieved’. Instead, the draft Plan simply concludes that it cannot as it would ‘compromise the development strategy’ – a strategy that was seemingly arrived at first.

Indeed, the number of potential development sites submitted through the call-for-sites process makes it very evident the requirement can be met; it is simply that a decision has been taken that the draft Plan should not do so.

The case for allocating sufficient sites to accommodate 10% of the housing requirement on sites no larger than 1 hectare is very strong and widely recognised. As stated in Appendix 9 to the ‘Housing Delivery Study for Greater Cambridge’, dated October 2021, with regard to ‘meeting the small sites requirement’ (our emphasis):



*“Concentrating development at sites within Cambridge urban area and also allocating sites at villages is likely to yield a number of sites that would meet the NPPF Paragraph [69] definition of “small sites”, assisting with meeting the small sites requirement.”*

### Summary

It is thus evident that:

- The draft Plan, knowingly, does not accord with national policy in paragraph 69 of the NPPF.
- The draft Plan does not provide any reason as to why it ‘cannot’ comply with the requirements of paragraph 69 of the NPPF.
- The draft Plan should be made compliant with the requirements of paragraph 69 of the NPPF by adapting it to include additional small sites no larger than 1 hectare, predominantly within South Cambridgeshire.

### Development Strategy / Spatial Distribution (Policy S/DS: Development Strategy)

(NB See also our discussion above in relation to: ‘Development Strategy / Spatial Distribution’. This is repeated (in part) here due to the manner in which we will need to submit the representations / the way in which they will be considered separately to each other.)

Under proposed **Policy S/DS: Development Strategy** (commencing page 29), and the sub-heading of ‘Proposed Policy Direction’ (commencing page 29) the draft Plan states (page 31) (our emphasis):

*“In the rest of the rural area, we propose a very limited amount of development:*

- *Small new sites for housing and employment at villages that have very good public transport access, to help our rural communities thrive;*
- *New employment sites in the countryside meeting specific business needs; and*
- *Windfall development - an allowance for homes on unallocated land, which would need to be consistent with policy requirements in the Plan, including Policy SS/SH: Settlement Hierarchy, which sets out scales of development in different categories of village.”*

It is considered that this is akin to the abandoning of the rest of the rural area; whilst those villages identified as having ‘very good public transport access’ will be allowed to ‘thrive’, essentially no provision is being made, over the course of the next generation, to enable any other communities to grow. In short, other than a limited number of villages the Development Strategy will lead to the stagnation and decay of the rural area.

As we discuss below in relation to the ‘rest of the rural area’, the rural area accommodates 5 Rural Centres, 13 Minor Rural Centres and 33 Group Villages, not to mention 55 Infill Villages. The draft Plan proposes the allocation of only 6 new sites / 384 new homes, to this area – a ‘paltry attempt to meet local needs. As evidenced by the table on page 32 of the draft plan, this figure equates to just 3.3% of the new housing allocations proposed.

This is directly contrary to national policy in the NPPF, which includes (para. 79):

*“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.”*

In addition (para. 84):

*“Planning policies ... should enable:*

*...*

- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”*

The draft Plan completely fails to recognise that by not allowing rural communities to grow, irrespective of whether they have a full range of services and facilities and ‘very good’ public transport links, it will run counter to the guidance in paragraphs 79 and 84 and almost certainly lead to the loss of services and facilities and a reduction in rural sustainability.

This national policy is a far more nuanced and sustainable approach than the blunt tool being proposed in the draft Plan.

Two easy options for a solution to this are to either:

- i) increase the housing requirement as discussed above and accommodate the addition 1,900<sup>1</sup> to 4,700<sup>2</sup> homes on sustainable sites in sustainable locations (the HELAA process makes it clear that these do exist) within the rural area; and/or
- ii) not include the ‘additional’ / ‘faster’ delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements, thereby providing increased flexibility and relieving the pressure to continue the high rate of delivery experienced in recent year, and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.

With regard to the latter option, the Development Strategy Topic Paper notes (page 74) (our emphasis):

*“... Our Housing Delivery Evidence suggests that our assumptions on housing delivery at Northstowe and Waterbeach **can** be faster than we previously estimated, such that they **could** contribute additional homes towards our housing need to 2041. ...”*

The ‘evidence’ included in the ‘Housing Delivery Study for Greater Cambridge’, dated October 2021, is scant and apparently based solely, and entirely, on the expectation that Modern Methods of Construction (MMC) will facilitate faster delivery than previously expected. However, virtually no evidence to support this contention, which also fails to take into account whether the higher rate of delivery can be sustained in all other respects (e.g. highway and other infrastructure improvements not capable of adopting MMC), or whether the demand will persist for the higher rate.

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<sup>1</sup> 48,300 – 44,400 = 1,900

<sup>2</sup> 1,900 (as above) plus increased buffer: 7,245 – 4,400 = 2,845; total = 4,745

The suggestion in the draft Plan is notable for its use of ‘can’ and ‘could’ – in particular the expected delivery of an additional 1,500 new homes at Northstowe and Waterbeach is readily accepted as being something that ‘could’ happen – whether it is ‘likely’ to happen is not addressed.

This conflicts with the approach taken to the expected level of employment growth as discussed above in relation to ‘Housing Needs’ / ‘The Housing Requirement’, where the Councils have entirely set aside the higher level of employment growth that their own evidence identifies ‘could’ happen in favour of what they consider is ‘most likely’ to happen. Noting this, in regard to the Development Strategy and distribution of development, it would appear that the draft Plan is seeking to have its cake and eat it, or to put it another way, adopting one approach in one regard, and a contrasting one in another. At best this suggests a lack of consistency in the Plan.

### *Summary*

It is thus evident that:

- The quantum of housing allocated to the rural area is ‘paltry’ and insufficient to enable existing communities to ‘thrive’ and/or ‘grow’.
- The approach taken to the distribution of development, especially the ‘additional’ / ‘extra’ on the edge of Cambridge / at Northstowe and Waterbeach, is not supported by robust evidence, and is an approach that conflicts with that taken to employment growth.
- Two options for a solution would be to either:
  - increase the housing requirement by 1,900 to 4,700 homes as discussed; and/or
  - not include the ‘additional’ / ‘faster’ delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements,and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.

### **Settlement Hierarchy (Policy S/SH: Settlement Hierarchy)**

Under proposed **Policy S/SH: Settlement Hierarchy** (commencing page 47), and the sub-heading of ‘Proposed Policy Direction’ (also commencing page 47) and based on the maps provided on pages 12 and 13, the draft Plan explains that Kneesworth will remain an Infill Village.

The draft Plan goes on to explain (also page 47):

*“Windfall proposals for residential development coming through planning applications within these settlements ... will be subject to the following:*

*...*

- *Infill Village: indicative maximum scheme size of 2 dwellings, and exceptionally consist of up to about 8 dwellings where this would lead to the sustainable reuse of a brownfield site bringing positive overall benefit to the village.”*

There appears to be little, if any, justification for this proposed limitation on the scale of development. The draft Plan explains (page 48):

*“This is a delicate balance between supporting housing development and the reuse of brownfield land, whilst avoiding unsustainable scales of development in areas where there is more limited access to services, facilities, and employment. Whilst there is a desire to provide*

*flexibility to help meet housing needs, that has to be balanced with the evidence coming through our Net Zero Carbon Study (2021) that growth in smaller villages tends to generate higher levels of carbon than urban development.”*

However, to set an indicative maximum size for any development fails to recognise that the full potential of a site in such a location might be higher, and that there might be benefits of a larger proposal in ensuring existing services and facilities remain sustainable in the longer-term. A more appropriate approach would be to reflect paragraphs 124 and 125 of the NPPF, which advocate the need to make the most effective use of land, subject to number of criteria that need to be considered. Such an approach would provide the necessary flexibility to maximise delivery whilst also taking into account wider considerations regarding the sustainability of such a site.

### Summary

It is thus evident that:

- There is little, if any, justification for the proposed limitation on the scale of development.
- The policy should instead advocate an approach reflective of paragraphs 124 and 125 of the NPPF (to which at present it is contrary).

### REST OF THE RURAL AREA (SECTION 2.6)

(NB See also our discussion above in relation to: ‘Development Strategy / Spatial Distribution’. This is repeated (in part) here due to the manner in which we will need to submit the representations / the way in which they will be considered separately to each other.)

Section 2.6 of the draft Plan opens by stating (page 122):

*“We want our rural villages to continue to thrive and sustain their local services, but we don’t want to encourage lots of new homes in places where car travel is the easiest or only way to get around. We therefore propose some development in and around villages that have good transport links and services, while in smaller villages, we propose that only small-scale infill development and affordable housing would be permitted. ...”*

This sounds reasonable, but in reality, only 13 allocations are proposed across the entirety of the rural area. Of these only four new sites are proposed that include housing, totalling 224 new homes – equivalent to just 10 new homes for every year of the plan period. And this notwithstanding that some of these homes are on sites already granted planning permission and that some of the homes have already been completed.

Taking into account that the rural area accommodates 5 Rural Centres, 13 Minor Rural Centres and 33 Group Villages, not to mention 55 Infill Villages, the proposed allocation of only 6 new sites / 384 new homes are figures that can only be described as ‘paltry’ and completely inadequate and incapable of facilitating the achievement the objective set out above. As evidenced by the table on page 32 of the draft plan, this figure equates to just 3.3% of the new housing allocations proposed.

This is directly contrary to national policy in the NPPF, which includes (para. 79):

*“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.”*

In addition (para. 84):

*“Planning policies ... should enable:*

*...*

- a) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”*

This national policy is a far more nuanced and sustainable approach than the blunt tool being proposed in the draft Plan.

The draft Plan completely fails to recognise that by not allowing rural communities to grow, irrespective of whether they have a full range of services and facilities and ‘very good’ public transport links, it will almost certainly lead to the loss of services and facilities and a reduction in rural sustainability, and thus be contrary to national policy in paragraphs 79 and 84 of the NPPF.

It is considered that the approach taken in the draft Plan to the distribution of development, and the determination of what constitutes a sustainable (broad) location for development and a sustainable site should be reviewed in the context of needing to ensure that rural communities are allowed to “thrive and sustain their local services” as stated.

As identified above in our representations to Section 2.1, two options for a solution to this would be to either:

- increase the housing requirement by 1,900 to 4,700 homes as discussed; and/or
- not include the ‘additional’ / ‘faster’ delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements,

and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.

### *Summary*

It is thus evident that:

- The quantum of housing allocated to the rural area is ‘paltry’ and insufficient to enable existing communities to ‘thrive’ and/or ‘grow’.
- National policy advocates a far more nuanced and sustainable approach than the blunt tool being proposed in the draft Plan.
- By failing to recognise that by not allowing rural communities to grow, the draft Plan will lead to the loss of services and facilities and a reduction in rural sustainability, and thus be contrary to national policy in paragraphs 79 and 84 of the NPPF.
- Two options for a solution would be to either:
  - increase the housing requirement by 1,900 to 4,700 homes as discussed; and/or
  - not include the ‘additional’ / ‘faster’ delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements,

and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.

#### Land to the South of Chestnut Lane, Kneesworth

The land to the south of Chestnut Lane, Kneesworth, was assessed in the HELAA under site ref. 40073. This assessment concluded, in summary, that the site should be scored as follows:

Criteria	Outcome
Suitable	Amber
Available	Green
Achievable	Green

Against the various sub-criteria assessed under 'suitability', the site was scored 'green' on five, and 'amber' on eight. It is not clear from the HELAA methodology how the Councils have used these individual scores to arrive at the overall 'suitability' score.

Many of these 'scores' were awarded with a degree of subjective commentary.

With regard to two of the sub-criteria on which the site was score 'amber':

- **Transport and Roads**  
Development of the site would not have a detrimental impact on the functioning of trunk roads and/or local roads, thus it is considered that the site should be scored 'green'. The suggestion in the HELAA proforma that the site is 'potentially part of a cluster and, therefore, may require a cumulative assessment' is unexplained and unfounded.
- **Noise, Vibration, Odour and Light Pollution**  
There is no reason why the site should be considered anything other than at 'low risk', or that any particularly 'careful' design or mitigation is required, thus it is considered that the site should be scored 'green'.

Subject to these changes, the site would be scored 'green' on seven, and 'amber' on six, and it is considered should thus be afforded an overall score of 'green', and hence a conclusion, in summary of:

Criteria	Outcome
Suitable	Green
Available	Green
Achievable	Green

#### Summary

It is thus evident that:

- The site (HELAA ref. 40073) to the south of Chestnut Lane, Kneesworth is a sustainable site in a sustainable location and is suitable, available and achievable.

## SUMMARY

These representations are submitted by Beechwood Homes in relation to the Regulation 18 consultation, and in addition to submit further site-specific information in relation to land south of Chestnut Lane, Kneesworth.

In summary, it is considered that:

### Policy S/JH: New Jobs and Homes, in respect to 'Housing Needs'

- With regard to the Housing Requirement (Section 2.1 of the draft Plan):
  - The draft Plan, knowingly, focusses only on the 'most likely' of just two employment growth scenarios, with no weighting given to the scenario that is based on the most recent trends.
  - Were weighting to be given to the scenario that is based on the most recent trends, it is likely that the associated housing requirement would increase by c. 9% to 48,300 homes.

### Policy S/DS: Development Strategy, in respect to 'Housing Supply' (and in particular in respect to 'The Buffer', 'The 5-Year Housing Land Supply' and 'The Role of Small Sites'), and 'Development Strategy / Spatial Distribution'

- With regard to Housing Supply (Section 2.1 of the draft Plan):
  - The 10% buffer proposed is not sufficient and additional sites should be allocated across the Greater Cambridge area to provide sufficient flexibility. Further work will be required to identify the size of an increased buffer but we would suggest that this be at least 15% (equivalent to 6,660 homes on a housing requirement of 44,400 homes, or 7,245 homes on a housing requirement of 48,300 homes – see above).
  - Whilst the Councils have been nominally able to show that they will be able to demonstrate a 5YHLS on adoption of the Plan, this projection is prone to challenge and is not robust, such that there is a high potential that the Councils will fail the 5YHLS test soon after adoption of the new Plan.
  - With regard to the role of 'small sites', the draft Plan, knowingly, does not accord with national policy in paragraph 69 of the NPPF, does not provide any reason as to why it 'cannot' comply with the requirements of paragraph 69 of the NPPF, and should be made compliant with the requirements of paragraph 69 of the NPPF by adaptation to include additional small sites no larger than 1 hectare, predominantly within South Cambridgeshire.
- With regard to the Development Strategy / Spatial Distribution (Section 2.1 of the draft Plan):
  - The quantum of housing allocated to the rural area is 'paltry' and insufficient to enable existing communities to 'thrive' and/or 'grow'.

- The approach taken to the distribution of development, especially the ‘additional’ / ‘extra’ on the edge of Cambridge / at Northstowe and Waterbeach, is not supported by robust evidence, and is an approach that conflicts with that taken to employment growth.
- Two options for a solution would be to either:
  - increase the housing requirement by 1,900 to 4,700 homes as discussed; and/or
  - not include the ‘additional’ / ‘faster’ delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements, and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.

Policy S/SH: Settlement Hierarchy, in respect to ‘Settlement Hierarchy’.

- With regard to the Settlement Hierarchy (Section 2.1 of the draft Plan):
  - There is little, if any, justification for the proposed limitation on the scale of development, and the policy should instead advocate an approach reflective of paragraphs 124 and 125 of the NPPF (to which at present it is contrary).

Rest of the Rural Area (Section 2.6)

- With regard to the Rest of the Rural Area (Section 2.6 of the draft Plan):
  - The quantum of housing allocated to the rural area is ‘paltry’ and insufficient to enable existing communities to ‘thrive’ and/or ‘grow’.
  - National policy advocates a far more nuanced and sustainable approach than the blunt tool being proposed in the draft Plan.
  - By failing to recognise that by not allowing rural communities to grow, the draft Plan will lead to the loss of services and facilities and a reduction in rural sustainability, and thus be contrary to national policy in paragraphs 79 and 84 of the NPPF.
  - Two options for a solution would be to either:
    - increase the housing requirement by 1,900 to 4,700 homes as discussed; and/or
    - not include the ‘additional’ / ‘faster’ delivery of between 1,500 and 2,500 new homes on the edge of Cambridge / at new settlements, and to instead accommodate these homes on sustainable sites in sustainable locations within the rural area.
- The site (HELAA ref. 40073) to the south of Chestnut Lane, Kneesworth is a sustainable site in a sustainable location and is suitable, available and achievable.



## CONCLUSION

It is clearly evident that the overall housing requirement should be increased to properly reflect the potential for employment growth. It is also evident that the proposed housing supply is overly reliant on large sites, prone to challenge and not robust, such that there is a high potential that the Councils will fail the 5YHLS test soon after adoption of the new Plan. The quantum of development allocated to the rural area is 'paltry' and will not allow existing communities to thrive and grow as required. The solution is to increase the overall housing requirement, including the buffer, and identify additional sites for housing development in the rural area. The site (HELAA ref. 40073) to the south of Chestnut Lane, Kneesworth is a sustainable site in a sustainable location and is suitable, available and achievable.

We trust that you find the above of assistance; should you have any queries, please do not hesitate to contact us.

Yours faithfully,

**Lucy Blake MRICS**  
Development Director  
Beechwood Homes Contracting Ltd

[REDACTED]