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Dear Sir or Madam

**Greater Cambridge Local Plan: The First Conversation  
Regulation 18: Issues & Options Submission: Land to the South of The Causeway, Kneesworth, SG8 5JD**

I write on behalf of my client, M Scott Properties Ltd in relation to their site at land to the south of The Causeway, Kneesworth, SG8 5JD. This submission follows my client's submission in March 2019 as part of the Greater Cambridge Local Plan 'Call for Sites and Broad Locations' exercise.

My client welcomes the opportunity to comment on the Greater Cambridge Local Plan: The First Conversation, which explores a series of big themes that will underpin the decisions about where homes, jobs, and infrastructure should be located, and consequently what spatial development strategy the Greater Cambridge Shared Planning Service should adopt.

This submission comprises completed forms, which respond to the following questions:

- Q4: Do you agree that planning to 2040 is an appropriate date in the future to plan for? If not, what would be a more appropriate date and why?
- Q6: Do you agree with the potential big themes for the Local Plan?
- Q7: How do you think we should prioritise these big themes?
- Q31: How should the Local Plan help to meet our needs for the amount and types of new homes?
- Q32: Do you think we should plan for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?
- Q33: What kind of housing do you think we should provide?
- Q37: How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?
- Q40: How flexible should the Local Plan be towards development of both jobs and homes on the edge of villages?
- Q42: Where should we site new development?
- Q47: What do you think about growing our villages?
- Q49: Do you have any views on any specific policies in the two adopted 2018 Local Plans? If so, what are they?

Of particular significance is the level of housing that will be required, which should be set at a level that seeks to meet the demand created by the concentration of jobs in the Greater Cambridge area. The spatial strategy, should be a blended strategy but one that focuses on sustainable locations that are well-connected or have the potential to be connected to high quality public transport, while recognising that a range of sites is required to aid deliverability and to ensure that all villages can grow in a sustainable manner appropriate to their size and scale.

The housing market area for Greater Cambridge is a very challenging one. Affordable housing delivery is a significant problem with high levels of demand for affordable and key worker housing. The ageing population will also add significantly to the demand for specialist housing. Consequently, the new Plan needs to be very ambitious in terms housing delivery to ensure that there is a significant supply and mix of deliverable housing sites across the plan area, in excess of the levels of identified need, to boost delivery and help maintain competition in market and drive affordability.

The joint Inspectors' Report on the Examination of the South Cambridgeshire Local Plan (August 2018) noted at para. 21:

*"The Plan proposes that development needs will be met at two new settlements at Waterbeach and Bourn Airfield. We have some concerns regarding the challenges of delivering new development at Waterbeach and Bourn..."*

Because these development sites were not required to deliver housing in the early part of the Plan period, the Inspectors concluded that due to the commitment to an early review there would be an opportunity to review progress as part of the preparation of the new Joint Local Plan.

We consider the Inspectors' concerns to be justified and that the new Plan should include a range of allocations and essentially more small and medium size sites throughout the area to ensure that rural settlements have the opportunity to grow and thrive in line with National Planning Policy advice.

It is important to note that the Inspector for the Uttlesford Local Plan Examination wrote to the Council on the 10<sup>th</sup> January 2020 raising significant concerns in relation to the soundness of its Plan. In particular, in respect of the overall spatial strategy which relies on the development of three Garden Communities.

At para 31. of their letter they stated:

*"...the scale of the need for housing for the next plan period is currently unknown and uncertain. We are concerned that the Council's chosen strategy (reliance on three Garden Communities) would mean that other sites in the district would not be developed or permitted for a significant period of time in the future. This would be likely to adversely affect the vitality and viability of services in existing towns and villages and result in a lack of housing choice in the market. It would also be difficult to accommodate changes in demand for certain types of development/services required over the very long period being committed to within the current strategy."*

The Inspectors went on to state that the reliance on Garden Communities carried significant risks and a lack of flexibility. Furthermore, it would result in a worsening of affordability problem as it would delay delivery of housing to meet an identified need for a number of years. They concluded (Para. 114) that:

*"In order to arrive at a sound strategy, we consider that as a primary consideration, the Council would need to allocate more small and medium sized sites that could deliver homes in the short to medium term and help to bolster the 5-year HLS, until the Garden Communities begin to deliver housing. This would have the benefit of providing flexibility and choice in the market and the earlier provision of more affordable housing..."*

This reinforces the essential need for the new Greater Cambridge Local Plan to be based on a blended strategy which builds on the existing urban extensions already allocated around Cambridge and the strategic growth proposed at Cambourne, Northstowe, Waterbeach and Bourn Airfield through the allocation of small and medium sized sites across the Plan area. This is imperative to not only maintain supply and flexibility but to ensure that the rural areas can prosper and thrive and are not left behind.

## **Lack of Specialist Accommodation within Villages**

At present, the retirement housing market is dominated by a handful of providers who typically produce flatted developments within town centres for those approaching the later years of their lives (predominantly 75+ years of age). This results in a lack of choice and highly inflated prices for those aged 75+, who are looking to move to a property more suited to their current or future needs but also wish to remain close to friends and family. Needless to say, the couples and individuals who are of the 60-75 age bracket are left with no alternative housing option, other than making costly adaptations to their existing property.

Extensive research has shown a number of benefits arising from the provision of suitable specialist accommodation for the older population. The lack of suitable alternative and attractive accommodation acts as a significant barrier to down-sizing for the over 55s. Providing such accommodation will facilitate the release of under-occupied housing through downsizing. This will free up more housing in the locality for families, thus reducing the pressures on the local authority to make provisions for additional housing and costly adaptations to their existing housing stock.

## **The Specialist Housing Proposal**

The site extends to an area of 1.66 Ha in total. The scheme currently proposed comprises single storey dwellings suitable for those aged 55 and over as well as those with or supporting someone with a disability, with associated site infrastructure and public open space. It could deliver an indicative mix of 6 x 1 bed properties, 8 x 2 bed properties, 9 x 3 bed properties and 2 x 4 bed properties. As detailed in the Experian Demographic Report attached, there is a significant ageing population in Kneesworth and the immediate area, with 64% of the population growth in the local area in the next 5 years being in the 55 and over age category. The provision of specialist accommodation for older people allows people to downsize while remaining in the local area and close to friends and family. New family housing also comes to the market as a result, reducing the pressure to provide additional family housing sites in the local area. This in turn allows new families to move to the area helping to redress the demographic imbalance and increase support for the continuance of demand for existing services and facilities.

The proposed development could also make a significant contribution towards specialist affordable housing provision in a relatively expensive area with a high housing need.

## **Working with The Wildlife Trust and Developing with Nature Forum**

Public open space will be provided for the enjoyment of both new and existing residents, and it will be possible to deliver net biodiversity gains compared to the current intensive agricultural use through the provision of green infrastructure, wildlife corridors and a dedicated ecology area. On this subject my client has been working closely with The Wildlife Trust and is a member of the Developing with Nature Forum, a group set up to assist with the application of the Developing with Nature Toolkit on small and medium-sized sites. The development proposals are targeting the highest level of accreditation within the Toolkit, with this being one of the first projects to be tested.

The site is available immediately and is currently being promoted through the emerging Bassingbourn-cum-Kneesworth Neighbourhood Plan. Technical reports have been completed in the areas of Highways, Flood Risk, Landscape and Ecology, and a detailed planning application could be submitted within 3 months of allocation.

The site is considered to be highly attractive. Scott Residential is the sister company of M Scott Properties Ltd and is a housebuilder specialising in the delivery of specialist housing for older people in the form of their bespoke product 'LifeLong Homes'. Scott Residential is very keen to develop the site and enquiries have been received from potential purchasers, following the public consultation work carried out to date. We consider that this is an ideal site to be allocated in the new Local Plan.

## **An Appropriate Location for Specialist Accommodation**

The site is located centrally within the Parish of Bassingbourn-cum-Kneesworth. It is situated on the southern side of The Causeway which connects Kneesworth to the east with Bassingbourn to the west. Essentially, the villages operate as one larger settlement and share a good range of services and facilities. Furthermore, the town of Royston lies just 1.5 miles to the south of Kneesworth and contains a full range of services, retail offers, employment opportunities and leisure and recreational facilities. It also has a mainline railway station providing regular services to London and Cambridge. In settlement hierarchy terms Royston is a Market Town, a higher tier in sustainability terms than any of the settlements in South Cambridgeshire, which is a factor which should not be overlooked. Accordingly, we consider that the site is in a highly sustainable rural location.

## **Planning Policy**

Bassingbourn is identified in the current South Cambridgeshire Local Plan as a Minor Rural Centre (Policy S/9). This is the second tier in the settlement hierarchy below Rural Centres (Policy S/8). Minor Rural Centres are described as *'having a lower level of services, facilities, and employment than Rural Centres, but a greater level than most other villages in South Cambridgeshire, and often perform a role in terms of providing services and facilities for a small rural hinterland'*. Bassingbourn is not in the Green Belt unlike many of the Rural Centres and is very close to Royston. The current policy (Policy S/9) permits *'Residential development and redevelopment up to an indicative maximum scheme size of 30 dwellings ... within the development frameworks of Minor Rural Centres'*. While the Rural Centres are more appropriately unlimited, our client's site would be below the 30 dwelling threshold, although currently outside the development framework. Kneesworth, is however currently classified in its own right as an Infill Village (Policy S/11) where schemes are generally restricted to not more than two dwellings. This policy approach is considered to be unduly restrictive and the new Local Plan should allow for a greater level of development in sustainable locations. However, if the new Local Plan does retain a similar settlement hierarchy, then Bassingbourn-cum-Kneesworth should be reclassified as one settlement in a similar way to Great Shelford & Stapleford and Histon & Impington.

The *"presumption in favour of sustainable development"* is at the heart of the National Planning Policy Framework 2019 (NPPF). The Planning and Compulsory Purchase Act 2004 (Section 39(2)) establishes a legal requirement for Plans to be prepared with the objective of contributing to the achievement of sustainable development.

Paragraph 16 of the NPPF requires plans to be prepared positively in a way that is aspirational but deliverable. Paragraph 59 reminds Local Planning Authorities that the Government's objective is to significantly boost the supply of homes and that it is therefore important that a sufficient amount and verity of land comes forward where it is needed.

Planning Policies are required to identify a supply of specific, deliverable sites for the first 5 years of the plan period and specific, developable sites (or locations for growth) for the next 5 to 10 years. Paragraph 68 recognises the important contribution that small and medium sized sites can make to meeting the housing requirement of an area as they can be built out relatively quickly. It specifically requires local planning authorities to identify at least 10% of their housing requirement on sites no larger than 1 hectare. Neighbourhood Planning groups are encouraged to allocate small and medium sized sites, suitable for housing, in their area. It is considered that our client's site at Kneesworth would fulfil all these National Planning policy objectives. Although it extends to more than one hectare, the physical characteristics of the site (the whole site is not developable) and the lower density use proposed mean that it still aligns with the intention of the policy by offering a development of less than 30 dwellings.

Furthermore, in order to ensure that Local Authorities have specific deliverable sites they are required to maintain a 5 Year Housing Land Supply with an appropriate buffer. In addition, to ensure supply is maintained, they are also required to monitor the progress in building out sites, to comply with the housing delivery test. Currently, the supply of housing in South Cambridgeshire is only marginally above the 5-year requirement (5.05 years – Appeal Reference APP/W0530/W/19/3220761) and the Government's recently published housing delivery figures for 2019 indicate delivery to be at 95% which while not significantly below the target, still falls short.



In developing the new Local Plan, it will be important that an adequate mix of sites is promoted including a proportion of smaller sites as well as sites to meet specific housing needs (including housing for older people) to meet the needs of the Local Plan Housing Area. It is submitted that our client's site at Land to the South of The Causeway, Kneesworth could make a meaningful and positive contribution towards meeting these goals.

This letter should be read in conjunction with the completed forms, Site Location Plan, Illustrative Masterplan and Experian report that accompany this submission. I trust that the information submitted is sufficient for your purposes but should you require any additional information, please do not hesitate to contact me.

Yours faithfully

**Adam Davies**  
**Associate Director**  
**Cambridge Planning**

Enc: Completed forms  
Site Location Plan  
Illustrative Masterplan  
Indicative Elevation  
Context Plan  
Experian report