 Site to be considered

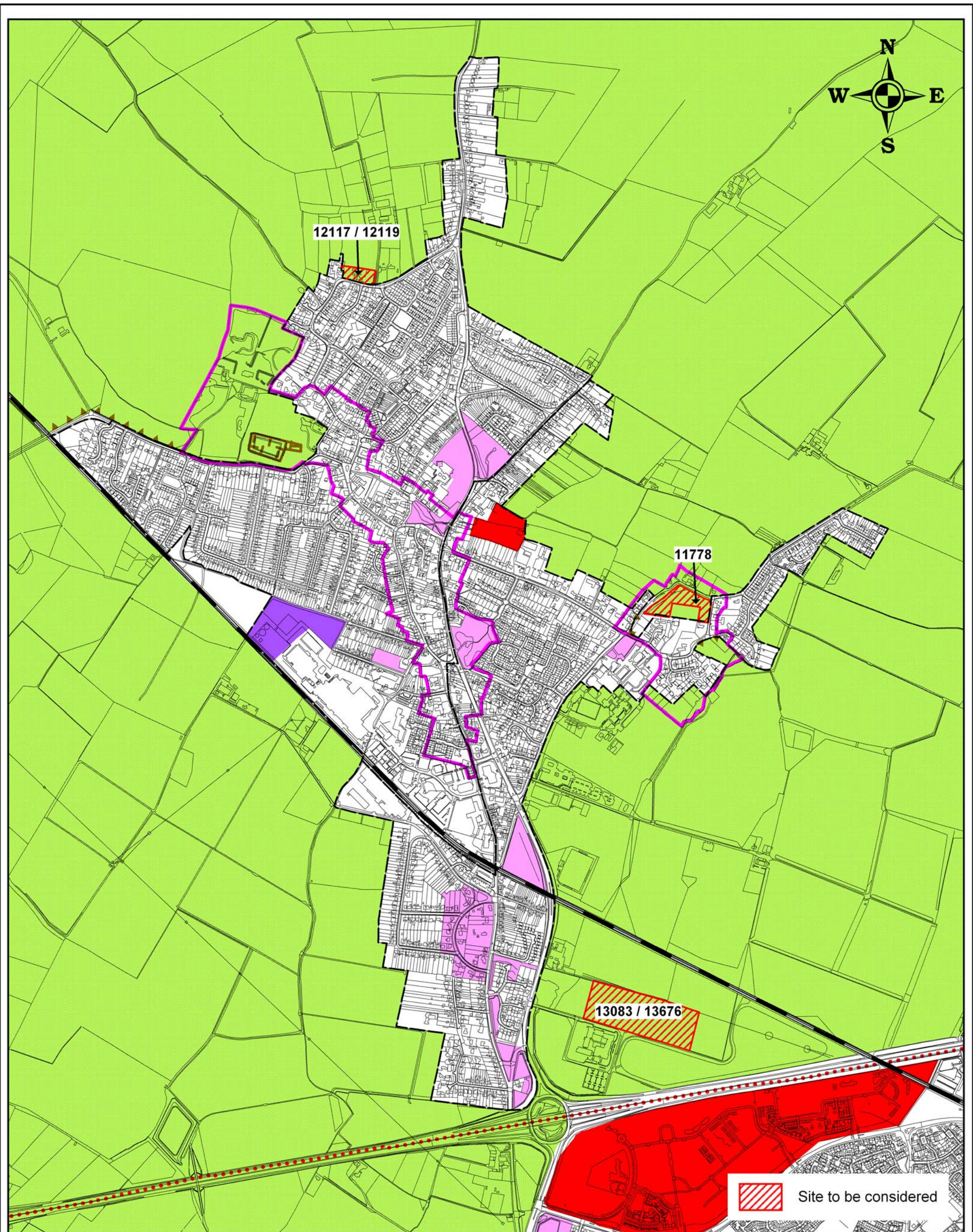


South  
Cambridgeshire  
District Council

# Great Shelford and Stapleford

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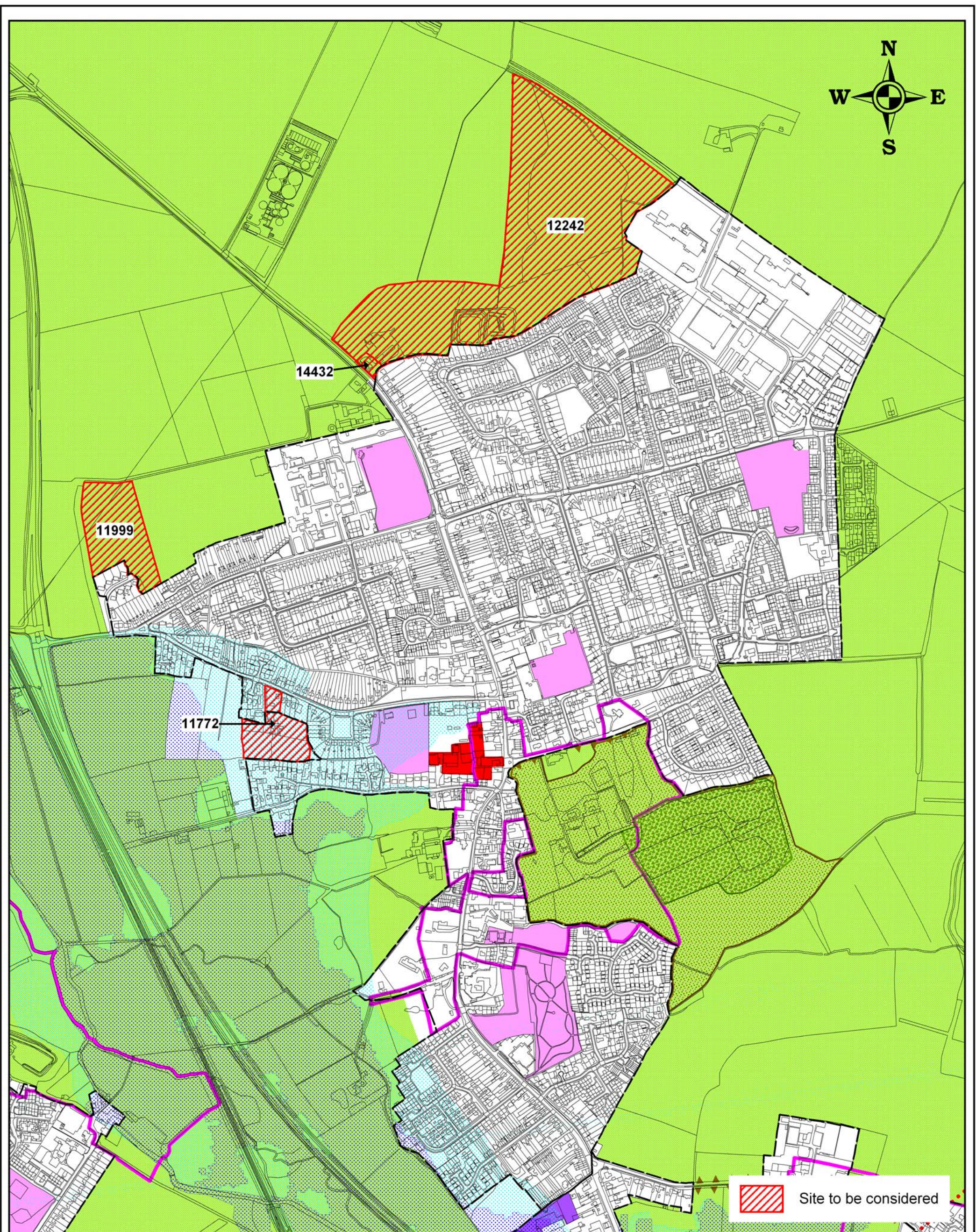


South  
Cambridgeshire  
District Council

## Histon & Impington

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# Sawston

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Scale:	1:8,000 @ A3

# INDEPENDENT EXAMINATIONS LOCAL DEVELOPMENT FRAMEWORK SOUTH CAMBRIDGESHIRE

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Our Ref: GA/Insp/HsgShortfall  
Your Ref:

25<sup>th</sup> April 2008

Mr K Miles  
Planning Policy Manager  
South Cambridgeshire District Council

Dear Keith

## **SITE SPECIFIC POLICIES DPD PROGRESSING THE EXAMINATION – HOUSING SHORTFALL**

I have been asked to refer to the letter from Mr Miles dated 22 April 2008 concerning the Site Specific Policies DPD and the comparative assessment to respond to the housing shortfall. This response from the Council is very welcome to the Inspectors, who are grateful for the further assistance to be provided by the Council. They are satisfied with the outline of the process which is given, and the indication of the timescale for the completion of the exercise.

On the second page of the letter a number of questions are set out regarding the Inspectors' initial conclusions which have led them to the view that there is a shortfall of 1,600 dwellings in the district within the plan period. The Inspectors would wish to be as helpful as possible in providing guidance for the exercise to be undertaken, and therefore annexed to this letter is an extract from their draft report setting out their conclusions on housing supply as at early March 2008.

It should be noted that it was at this point that the Inspectors determined that the request which has now been made should be put to the Council, and that it was at this point that they realised that the inevitable extension of time for the completion of the report of the examination of the SSPDPD made it possible to coordinate this examination with that of the NWCAAP. Therefore, the draft report at that point is based upon the earlier conclusion that any housing supply arising from NWCAAP could not be foreseen and taken into account. As a result, the shortfall of 1,600 dwellings can potentially be addressed in part from any housing supply which, when adopted, the NWCAAP provides for.

This draft also makes clear the Inspectors' conclusions about windfalls, and that they should not be taken into account as part of the housing supply, which should arise from allocated sites.

This brings the Inspectors to make a comment about the list of sites which the Council intends to examine as part of the comparative assessment. In making this comment, the Inspectors wish to emphasise that, as plan making authority, they consider that it is for the Council to determine which sites should be assessed, and to put forward its conclusions for the Inspectors' consideration in due course. Having said that, they are concerned that the exercise should be as focused as possible and should use the Council's resources to the greatest effect. At first glance, the list of sites is long, and includes some quite small sites and some that are within the Green Belt in areas well removed from those where Structure Plan policy P9/2c indicates that land for development should be considered for release from the Green Belt.

Finally, the Inspectors have concluded that none of the sites allocated for housing development by the SSPDPD should be deleted.

Yours sincerely

Gloria Alexander  
Programme Officer

## ANNEX

### HOUSING SUPPLY

#### INSPECTORS' DRAFT CONCLUSIONS as at early March 2008

Does the Housing Provision comply with the Core Strategy?

1.1. The adopted CSDPD (RD/Adop/10) at Policy ST/2 makes provision for 20,000 new homes in locations in the following order of preference:

1. On the edge of Cambridge;
2. At the new town of Northstowe;
3. In the rural area in Rural Centres and other villages.

1.2. The reasoned justification to this policy at paragraph 2.8 noted that land so far identified has a capacity of approximately 19,000 dwellings during the plan period, with about 4,180 dwellings likely to come from urban extensions to Cambridge, 4,800 from Northstowe, and 10,050 from the rural area. The shortfall between the land so far identified and the housing requirement would be made up by sites to be identified in Area Action Plans and the SSPDPD. Figure 1: Housing Land Supply in the Rural Area is set out in paragraph 2.14 showing how the 10,050 is arrived at. It will be seen that, since the CS was not able to identify fully where the housing requirement in the plan period would be met, it provides flexibility to ensure that the DPDs still to be adopted would be able to make up the shortfall.

1.3. The CSDPD was submitted in January 2006 along with 5 other DPDs. Save for the SSPDPD, these have now all been adopted: CSDPD in January 2007, NAAP and DCP in July 2007, the CE and CSF in February 2008. The outcome of the examination of the other DPDs, together with the passage of time, allows us to examine progress made in providing for the housing needs of the district since the CS was examined. At the Pre-hearings Meeting for the SSPDPD we asked the Council to provide an update of the Housing Supply situation, and progress with the Northstowe development. This has been provided (see RD/H/14 and RD/SSPEXAM/50): here we show only the 'Total up to 2016':

<b>Completions</b>	Actual completions	6016
<b>Edge of Cambridge</b>	Cambridge East	2050
	Cambridge Southern Fringe	630
	Cambridge Northern Fringe East	600
	North West Cambridge	400

<b>Northstowe</b>	Northstowe	4150
<b>Rural Development</b>	Cambourne Extra Density	950
	Rural Allocations in villages without Planning permission	100
	Rural Brownfield Allocation: Bayer CropScience	380
	Rural Brownfield Allocation: Papworth West-Central	87
<b>Existing Permissions</b>	Cambourne	1011
	Cambridge Northern Fringe West (Arbury Park)	800
	Rural Allocations in villages with Planning permission	959
	Other Estate-level sites	603
	Small Sites Already Under Construction	156
	Small Sites Already Not Construction	312
<b>Windfalls</b>	Windfalls	852
<b>Total Forecast to be built – all sources</b>		20056

1.4. It will be seen that the progress at Northstowe has not been what was expected: in place of the figure in the CS of 4,800, there is now a maximum number of completions expected in the plan period of 4,150. Set against that loss, there have been a number of planning applications where the number of dwellings has exceeded what was anticipated in the allocation. These include an extra 250 at Camborne as a result of higher density (SSP Policy SP/3), 55 at Papworth Everard 3c (SSP Policy SP/6 site d), and an extra 130 at the Bayer CropScience site at Hauxton (SSP Policy SP/7). However, there are entries in this table which we consider must be revisited: North West Cambridge, Northstowe, and Windfalls.

#### North West Cambridge Area Action Plan

1.5. The submitted CS mentioned NWC in the section under the heading "Urban Extensions to Cambridge", stating that a joint AAP was to be prepared but did not give any figure of housing numbers to be expected. It stated, "*land at north-west Cambridge is only being released from the Green Belt to provide for the long-term development needs of Cambridge University... The structure plan makes clear it will only be brought forward for development when the university can show a clear need for the land to be released. The Council considers that in the interests of careful husbandry of this area where land is*

*being released from the green belt on an exceptional basis in view of the particular needs of the university, this includes the test that there is no other suitable university or college land or building available elsewhere in the city."* This gives no hint that there is an expectation of a substantial housing supply arising from the University land. In the adopted CS, policy ST/2 provides for the first preference as *"on the edge of Cambridge"*, and in the reasoned justification states that *"about 4180 dwellings are likely to come from urban extensions to Cambridge ..."*. This is the figure for housing development arising from the CE and CSF AAPs, together with other sites on the edge of Cambridge: again no figure being allowed for development arising from the NWC.

1.6. The latest LDS (RD/LDS/30) proposes the NWCAAP (joint DPD with Cambridge City) being submitted to the Secretary of State in June 2008 and adopted in July 2009. Thus the public consultation on the submitted draft will take place after the submission of this report, with the report recommendations leading to adoption coming over a year later.

1.7. We made it clear at the Pre-hearing Meeting that we considered that it would be wrong to take any account of development arising from the NWC, but we provided an opportunity for the Council and other parties to comment on this statement. At that meeting, we set out our reasons for this as:

- 1) The Area Action Plan will not have been tested for soundness.
- 2) No representations regarding the Area Action Plan would have been heard/examined; and
- 3) The Inspectors cannot see what procedure could be adopted to 'examine' or otherwise assess the Area Action Plan Preferred Option as part of the Site Specific Policies DPD examination.

Having considered the various submissions put to us we remain of the view that we cannot take account of what might come forward in the NWCAAP as it is still too early to say. This would be pre-judging the legitimate examination of that document before it has even been submitted and the consultation responses have been considered. The weightiest considerations leading to our decision are 1 and 2 above. Their effect is to make it very difficult to give any weight to any dwelling production figure. Also, potentially that figure could be zero. The procedural problem adds some further weight in arriving at the conclusion.

Northstowe

1.8. There was much controversy at the examination of the CSDPD as to the annual rate of dwelling completion that could be achieved once the development of the new town had got into its stride. Whilst the discussion at the CS hearings centred around whether 650 dpa could be achieved, the housing trajectory in the NAAP showed 750 dpa for each of the penultimate years and 850 dpa for the final year of the plan period. The reason for this higher annual production rate is that it was necessary to achieve the CS delivery of 4800 dwellings in the plan period when, by the time the NAAP was adopted, just over a year later, the anticipated start date was one year later with a slower build rate than we anticipated in the first two years.

1.9. We took a somewhat optimistic view of what could be achieved, when making our recommendations, when dealing with the CS and the NAAP, for two reasons. Firstly, in order to achieve a step change in the delivery of housing in



the Cambridge sub region as a whole, all the major sites must produce dwellings at a greater rate than achieved in South Cambridgeshire in the past. It therefore seemed to us to be appropriate to set a challenging target to expect the developers and the Council to live up to. We remain of the view that such pressure should be maintained. Secondly, there would be the opportunity to review progress in the examination of the SSPDPD.

1.10. Since the SSPDPD is the final chance in this round of submitted LDF documents to provide allocations to meet the housing target, for current purposes it is better to take a less optimistic view of progress at Northstowe. For this reason, we use 650 dpa as the maximum number of dwellings that will be completed in any one year at Northstowe. This does not provide any limit to the amount of development which takes place at Northstowe in the plan period, but is a safeguard in relation to overall housing delivery. This means that the figure for Northstowe in the housing trajectory for the plan period should be 3750, 400 less than the 4150 shown in the table above.

#### Windfalls

1.11. The intention of the LDF system of plan making is to provide as much certainty as possible in seeking to deliver the number of homes required. Recent government pronouncements have emphasised the need to increase the housing supply, and South Cambridge is within a Growth Area wherein there is a need to achieve a 'step change' in the numbers of houses actually being completed. PPS3 is a recent example of government thinking and policy on this topic. Whilst PPS3 was published in November 2006, shortly before the adoption of the CS, it was too late for it to have any part in our consideration of that document. Whilst a draft had been published and was before the Examination, as a draft, little weight could be attached to it. But it would be wrong, now, not to place considerable weight on the published version – the more so when the flexibility of the CS allows for some reassessment of the position.

1.12. PPS3 makes it clear that windfalls are not to be taken into account in determining the first 10 years housing land supply, unless there are genuine local circumstances that prevent specific sites being identified. The Council has advanced an argument for including a windfall allowance in the district – see RD/SSPEXam/72. The essence of this argument is that in this rural district there are about 100 villages in which sites might be identified. There is a history of such sites coming forward, which policy allows for, and therefore there is confidence that this will continue. Furthermore, in a district which is part of a growth area, with a significant number of major sites, it is considered that a more sensible use of resources was to bring the CS, DCP and AAPs forward to adoption as quickly as possible and to put in place staff and systems to deal with the planning applications, master plans, etc needed to achieve development on the ground. An alternative, which remains available, would be to put resources into identifying up to 80 sites in the villages for allocation.

1.13. We do not accept that this amounts to genuine local circumstances which prevented sites being allocated. Furthermore, it is far more satisfactory in terms of the sequential approach and securing sustainable, low carbon development to identify a very small number of large sites, rather than spread planned development throughout the rural area.

1.14. The result of these considerations is that there is a shortfall of 1600 homes. We therefore conclude that this DPD, as submitted, provides insufficient

certainty in housing land supply through allocations to be in conformity with the CSDPD requirement to provide 20,000 dwellings in the plan period, and thus does not satisfy Test 6 on this issue. Thus there is a compelling need to allocate additional housing sites at this stage.



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Cambridge  
CB23 6EA

Our ref:  
Your ref:  
22<sup>nd</sup> May 2008

Planning Services  
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Direct dial: 01954 713181  
Direct email: [keith.miles@scambs.gov.uk](mailto:keith.miles@scambs.gov.uk)

Dear Mr Hughes

### **Housing Shortfall**

You and your colleague Mr Kemmen-Lane have asked to be kept informed of changes in circumstances which might have a bearing on your report on the Site Specific Policies Development Plan Document.

During the last 6 months, consultants have been working for Cambridgeshire Horizons and its partners (including South Cambridgeshire) to test the viability of relocating the Cambridge Waste Water Treatment Works to make way for a housing-led mixed-use redevelopment of the Waste Water Treatment site and Chesterton Sidings. The Consultants report has now been received and advises that the relocation of the Waste Water Treatment Works will not be viable. More importantly for the Council, during the course of this study and since the Chesterton Sidings examination session, Network Rail has announced its intention to retain a large part of Chesterton Sidings for train stabling.

As a consequence of this work and in particular the recent decision by Network Rail, it is looking increasingly likely that the Site Specific Policies Development Plan Document proposals for Chesterton Sidings in their current form will not come to fruition.

A new planning framework for the potential redevelopment land at Cambridge Northern Fringe East will be explored through the preparation of Cambridge City Council's Core Strategy, the review of South Cambridgeshire's Core Strategy and subsequently the preparation of a new Development Plan Document or Supplementary Planning Document by the new Section 29 Committee which will have future responsibility for the Cambridge Northern Fringe East. It remains a possibility that residential development could take place on a smaller site area adjoining a new railway station at Chesterton Sidings and this is likely to be investigated through

these new plans for Cambridge Northern Fringe East. Other options will include a wholly employment redevelopment.

The Council is therefore looking to you and your colleague inspector whether the potential for non-delivery of housing development at Chesterton Sidings is a matter which would have a bearing on the housing shortfall work that the Council has been requested to undertake. Part of the reason for this request is that the City Council finds itself in the same situation in respect of its Local Plan but there is no question that it will not explore a new planning framework for that part of the Cambridge Northern Fringe East within the City through its and the Section 29 Committee's plan-making powers.

Yours sincerely



**Keith Miles**  
Planning Policy Manager

# INDEPENDENT EXAMINATIONS LOCAL DEVELOPMENT FRAMEWORK SOUTH CAMBRIDGESHIRE

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Our Ref: GA/Insp/HsgShortfall2  
Your Ref:

2<sup>nd</sup> June 2008

Mr K Miles  
Planning Policy Manager  
South Cambridgeshire District Council

Dear Keith

### **South Cambridgeshire District Local Development Framework Site Specific Policies DPD – Housing Shortfall**

I have been asked to respond to your letter of 22<sup>nd</sup> May 2008 regarding Chesterton Sidings and the housing shortfall. The Inspectors are grateful for the information provided, and consider that this does indeed have a bearing on the housing shortfall work which you have been requested to undertake, and means that the shortfall rises by 600 dwellings.

In addition, the SSPDPD will need amendment with regard to Policies SP2 and SP18: please could the Council suggest the necessary amendments. It is assumed that there will no longer be a conflict, which had been seen, between SP2 and SP19 (with regard to the inclusion of Chesterton Sidings in the latter): please can this be confirmed.

I should be grateful for a response by Friday 27<sup>th</sup> June 2008.

Yours sincerely,



Gloria Alexander  
Programme Officer