

CAMBOURNE TOWN COUNCIL

District of South Cambridgeshire

Planning Committee 22nd October 2019

Statutory Consultees Greater Cambridge Housing Trajectory and Five Year Housing Land Supply Consultation

Following the Planning meeting held on the 1st October 2019 the following response was submitted to South Cambs District Council prior to the deadline for the end of the consultation.



Greater Cambridge Housing Trajectory and Five Year Housing Land Supply Consultation

Response Form

This form has two parts to complete (please use black ink):

Part A – Your Details

Part B – Your Response

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or ldf@scambs.gov.uk.

All comments must be received by 5pm on Monday 14 October 2019.

Data Protection

We will treat your data in accordance with our [Privacy Notices](#). Information will be used by South Cambridgeshire District Council and Cambridge City Council solely in relation to the Greater Cambridge Housing Trajectory and Five Year Housing Land Supply. Please note that all responses will be available for public inspection and cannot be treated as confidential. Comments, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.

Do you wish to be kept informed on the Greater Cambridge Housing Trajectory and Five Year Housing Land Supply?

Please tick: Yes No

Part A – Your Details

Please note that we cannot register your comments without your details.

Name:	John Vickery	Agent's name:
Name of organisation: (if applicable)	Cambourne Town Council	Name of Agent's organisation: (if applicable)
Address:	The Hub High Street Cambourne Cambridge	Agent's Address:
Postcode:	CB23 6GW	Postcode:
Email:	clerk@cambourneparishcouncil.gov.uk	Email:
Tel:	01954 714403	Tel:

Signature:	Date:
If you are submitting the form electronically, no signature is required.	

For office use only

Agent number:

Representor number:

Representation number:

Part B – Your Response

Document details and nature of response:

Which document are you commenting on? (please tick)	Greater Cambridge Housing Trajectory and Five Year Housing Land Supply: <input checked="" type="checkbox"/> Main Document <input checked="" type="checkbox"/> Annex
Section / Paragraph / Figure (Please state)	
Do you Support, Object or have Comments? (Please tick)	<input type="checkbox"/> Support <input type="checkbox"/> Object <input checked="" type="checkbox"/> Comment

Reason for support, object or comment:

Please give details to explain why you support, object or have comments on the Greater Cambridge Housing Trajectory and Five Year Housing Land Supply – Main Document or Annex (continue on separate A4 sheets(s) if necessary).

Please use a separate response form for each section you are commenting on.

Cambourne Town Council (CTC) support South Cambs and Cambridge City Councils in their identification of a 5 year housing land supply, but have significant concerns regarding the marginal level of supply identified at just 5.3 years. CTC commend the Councils in the production of a robust and broadly reasonable assessment of forecast supply, but wish to highlight a few of points of concern:

- **Lead-in times:** CTC are concerned by the Councils' approach to developing lead-in times based on type of planning application rather than size of site. The report recognises that larger sites have longer lead-in times and yet it would appear that there is no recognition of this in the assumptions made. This approach is clearly at risk of challenge as it will underestimate the time it takes for delivery to start on larger sites. We are also concerned regarding the forecast date of first completions at Bourn Airfield of 2021/22. This would require a start on site in mid-2020 which is clearly over-optimistic considering that outline planning permission is still pending;
- **Built-out rates:** CTC are generally supportive of the forecast build-out rates at West Cambourne and Bourn Airfield. The forecast peak delivery on these sites of 150 dwellings per year is broadly reasonable and the combined figure of 300 dpa across both sites (which is lower than would be assumed for separate developments located further apart) importantly recognises likely issues with market absorption that were highlight in Sir Oliver Letwin's Independent Review of Build Out – Final Report (October 2018). This figure should, however, clearly be kept under review to ensure it is accurate;
- **Inclusion of Resolutions to Grant:** There is reference in the document to developments on unallocated sites with a resolution to grant planning permission being included in the supply. This is contrary to several recent appeal decisions on the matter (e.g. Bures Hamlet - ref: 3207509; and Woolpit - ref: 3194926) that make clear permissions issued after the base date should not be counted (including sites subject to a resolution to grant at the base date). There does not appear to be any reliance in the forecast supply on such sites and it is unclear why this reference is included as it simply serves to open up the Council's methodology to criticism;

- Reliance on Strategic Level Sites: CTC are struck by the reliance on delivery from just 4 strategic level developments in years 5-10 of the housing trajectory (i.e. Bourn Airfield, Northstowe, Waterbeach and West Cambourne). These sites are expected to deliver 800 dpa (approximately half the total requirement) which raises significant concern regarding the impact of any delays in the delivery of these sites on future 5 year supply calculations.

In the context of the above concerns, while CTC support the Councils' position that it can demonstrate a 5 year housing land supply, we urge the authorities to press on with the production of their new Joint Local Plan in a timely manner and to consider the need for a broader range of smaller housing sites in years 5-10 of the current trajectory where there is an overreliance on strategic scale developments.

Summary of Comments:

If your comments are longer than 100 words, please summarise the main issues raised.

Support the 5YHLS position, but concerns at marginal level of 5.3 years and aspects of methodology. Progression of Joint Local Plan is critical.

Completed response forms must be received by 5pm on Monday 14 October 2019.

Email: ldf@scambs.gov.uk, or post it to:

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c/o South Cambridgeshire District Council
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Cambridge
CB23 6EA