

Land off Barleyfields, Fulbourn, Cambridgeshire

Objection to South Cambridgeshire Local Plan
Proposed Submission – July 2013



October 2013

Cheffins

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"In all the years I have been reporting on people who want to build their own homes I've never seen so much interest, excitement and action as there is right now. A survey conducted earlier this year suggested that there are now six million people in Britain who would like to commission their own house - And all around the country more and more councils and landowners are now taking notice of this demand, and are recognising the passion and commitment there is out there among the public to have much more input into the design, specification and construction of their new homes."

Kevin McCloud (Grand Designs) Self Build Industry Champion – August 2013.

| Version | Description | Originated | Authorised | Date |
|-------------|----------------|------------|------------|----------|
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1. INTRODUCTION

- 1.1 This objection to the proposed submission version of the South Cambridgeshire Local Plan has been prepared by Cheffins Planning & Development on behalf of G C Lacey and Son Ltd. Cheffins have been instructed by the owners of the land off Barleyfields, in Fulbourn, to **object** to the Proposed Submission version of the Local Plan on the basis that the Plan is **unsound** because:
- **It has not been properly prepared** and is not based on a strategy that seeks to meet all objectively assessed housing development requirements;
 - **It is not justified** - because the plan is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **It will not be effective** - because the Council have demonstrated that they do not have a clear understanding of all the housing needs in their area; and,
 - **It is not consistent with national policy**, which requires that it should address the need for all types of housing, including the needs of different groups within the community.
- 1.2 The Submission Local Plan is currently in its final public consultation period before its submission to the Secretary of State.
- 1.3 Any queries or requests for further information should be addressed to the Cheffins Planning & Development Team on 01223 213975.



Aerial view of proposed site

2. NATIONAL PLANNING POLICY FRAMEWORK

- 2.1 The National Planning Policy Framework (NPPF), sets out the Government's planning policies for England and how these are expected to be applied. It was introduced in March 2012 and it replaced almost all previous national planning advice contained in Planning Policy Guidance Notes and Planning Policy Statements. The NPPF constitutes guidance for local planning authorities (LPAs) and decision-takers both in drawing up plans and as a material consideration in determining applications.
- 2.2 At the heart of the NPPF is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking¹. For plan-making, this means that LPAs should positively seek opportunities to meet the development needs of their area, and that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change².
- 2.3 Paragraphs 150 - 185 of the NPPF concern 'Plan Making', emphasising that Local Plans are seen as the key to delivering sustainable development that reflects the visions and aspirations of local communities³.
- 2.4 The Submission version of the South Cambridgeshire Local Plan contains a spatial strategy that would provide over 5,300 new homes for the period to 2031. The order of preference for the location of this development would be: on the edge of Cambridge; at new settlements; and in the rural area at designated 'Rural Centres' and 'Minor Rural Centres'.
- 2.5 Major site allocations from the earlier Local Development Framework (LDF) Development Plan Documents (DPDs) are carried forward, and in addition, three new strategic scale allocations are proposed for housing-led development to meet the majority of the additional development needs to 2031 and beyond – these are:
- A new town north of Waterbeach for 8,000 to 9,000 homes (with 1,400 by 2031);
 - A new village based on Bourn Airfield for 3,500 homes (with 1,700 by 2031);
 - A major expansion of Cambourne for a fourth linked village of 1,200 homes (all by 2031).
- 2.6 Policies SS/1 through to SS/8 deal in detail with the strategic allocations proposed in the plan, which taken together⁴ have the potential to provide around 25,000 new homes.
- 2.7 These policies (together with existing adopted policies in LDF documents) provide a significant amount of detail on how the allocations should be developed, including: masterplanning; landscaping; design codes; land uses; access; and sustainability. However, nowhere within these policies is there any mention of the provision of plots or areas for self-build housing, despite references to the need for a range of house types, sizes and mix.

¹ NPPF paragraph 14

² NPPF paragraph 14

³ NPPF paragraph 150

⁴ i.e. with the allocations carried forward in the adopted Area Action Plans

- 2.8 We believe that this is a serious omission which demonstrates that the Local Plan will not fully meet all its objectively assessed housing development requirements. While we are not challenging the overall spatial strategy, it is clear that the Local Plan is also not justified because the plan is not the most appropriate strategy, when considered against the reasonable alternatives – a principle alternative being one that includes specific policies that deal with the provision of sites for self-build dwellings.
- 2.9 We also believe that the plan will not be effective, because the Council have demonstrated that they do not have a clear understanding of **all** the housing needs in their area. The omission of any specific sites or areas of larger sites for self-build housing, or any mention of how such sites might be brought forward, illustrates that the Council have not fully addressed the need for all types of housing, and specifically those people wanting to build their own homes.
- 2.10 As a result, the Local Plan is not consistent with national policy, as contained in the NPPF, which requires that it should address the need for **all types of housing**, including the needs of different groups within the community.

3. EVIDENCE BASE DOCUMENTS

- 3.1 The NPPF requires LPAs to ensure that their Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of their area. In addition, the NPPF also requires LPAs to ensure that their assessment of, and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.⁵
- 3.2 In respect of housing, the NPPF stresses that LPAs should have a **clear understanding of housing needs in their area** and that they should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs.⁶ In addition, the NPPF makes it very clear that the SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
- Meets household and population projections, taking account of migration and demographic change;
 - Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community – such as families with children, older people, people with disabilities, service families **and people wishing to build their own homes**;
 - Caters for housing demand and the scale of housing supply necessary to meet this demand.⁷
- 3.3 In addition, the NPPF states that LPAs should also prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the viability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

⁵ NPPF paragraph 158

⁶ NPPF paragraph 159

⁷ NPPF paragraph 159

- 3.4 The SHMA that is included within the Council's evidence base documents was prepared by Cambridgeshire Horizons in 2012 and covered the Cambridge Sub-region, which includes seven Districts. This report is both thorough and extensive in its coverage of the housing market for this area.
- 3.5 Chapter 4 of the SHMA concerns the 'Dwelling Profile' of the existing housing stock in terms of type, tenure and the number of new homes delivered, which are split between 'all homes' and 'affordable homes'. Chapter 5 concerns 'Property Purchase' and identifies the difficulties faced by buyers and the fact that owner-occupation is the dominant tenure in the sub-region as a whole. Chapter 11 looks at 'Planning and Land Availability', but only examines overall housing numbers, planned delivery rates and land availability (based on the various SHLAAs). Chapter 12 examines 'Forecasts for Homes of all Tenures' based on objectively assessed need, and gives figures for market and affordable housing, noting that the majority of household change for the period 2011 – 2031 is accounted for by households aged over 65. The report notes that the greatest need over the next twenty years will be for small to medium sized dwellings.
- 3.6 Finally, chapter 15 of the SHMA looks at the 'Housing Requirements of Specific Groups' and includes household groups who have particular housing requirements, e.g. families, older people, those with physical or sensory impairments, adults with learning difficulties, ethnic groups, migrant workers, and gypsies and travellers.
- 3.7 **Nowhere within the SHMA is there any mention of the needs of those people who wish to build their own homes.** As a result, we believe that this key document of the Council's evidence base is flawed, because the SHMA does not fully identify the scale and mix of housing that the local population is likely to need over the plan period, and more specifically, does not address the need for all types of housing – such as people wishing to build their own homes.

4. SELF-BUILD⁸ HOUSING SCHEMES

- 4.1 The Self-build market in the UK now accounts for 10% of the UK's national housing output. A total of 12,000 new self-built/self commissioned homes were built in 2012. However, this is in fact the lowest level in Europe – in Austria, over 80% of new homes are self-build projects.
- 4.2 People are attracted to self-build projects because it gives them the opportunity to have the home they really want, normally with greatly reduced running costs. 'Self-builders' are usually in their 40's, 50's or early 60's and already own their property with a budget of around £250,000 – £350,000. However, there is currently a potential boom from people in their 20's, 30's and 40's, who are struggling to afford a new home – typically, their budget is around £100,000 – £200,00. One in four people in the UK are keen to be involved with a group self-build.⁹

⁸ Until recently the process of building your own home was almost universally referred to as 'self-build' and this had become well-recognised by both consumers and the development sector. In 2011 the Government's *Housing Strategy for England* introduced the term 'custom build housing' to more accurately reflect the variety of ways in which people can have their own homes built for them. The term 'self-build' is now used to describe homes which are largely self-organised or built as a DIY project.

⁹ National Self Build Association (NaSBA) presentation to Ecobuild 2013

- 4.3 A survey conducted earlier this year suggested that there are now six million people in Britain who would like to commission their own home.¹⁰ Across the country, more and more Council's and landowners are now taking notice of this demand, but at the present time only around 1 in 6 LPA's are actively involved in self-build projects. The stimulation for much of this activity has come from the NPPF, which requires all LPAs to measure the level of demand there is from people who want to build their own homes, and then to make provision for this level of demand. The National Self Build Association (NaSBA) firmly believe that the NPPF has been a real driver for change, and that as a result, the number of self-build and custom build housing sites has dramatically increased compared to previous years. For further information see the NaSBA Second Progress Report to Government: www.nasba.org.uk/images/documents/nasbadocs201308_progress_report_2_2013_08.pdf
- 4.4 Previous LDF documents produced by South Cambridgeshire District Council (most notably Area Action Plans for major mixed use allocations), have occasionally made a brief comment on the advantages of including self-build housing schemes within larger housing allocations. Paragraph D3.6 of the Northstowe AAP (concerning 'House Types and Quality') states:
- "In the interests of providing a range of housing at Northstowe, it would also be desirable for land to be available within the town for an element of self-build projects."*
- 4.5 However, this 'desire' is not contained within the specific policy (NS/7) on Northstowe Housing, which therefore severely limits the Council's ability to seek the provision of self-build housing schemes within the AAP area.
- 4.6 In addition, there is no mention whatsoever in the new Local Plan of the inclusion of self-build sites as a means of addressing the need for providing a range of housing. The only indirect reference to self-build schemes is on page 47, which makes reference (at paragraph 3.4) to the Cambridge K1 site at Orchard Park – an undeveloped parcel of land owned by Cambridge City Council. The site is likely to be developed for 36 'hybrid' self-build dwellings. However, this is not as a result of the site being allocated for that purpose, but because it is a cohousing community ownership scheme, with the individuals involved only having the opportunity to adapt the shell of their houses from a palette of materials.
- 4.7 The key policies in the emerging Local Plan in respect of the strategic site allocations, although comprehensive and addressing a variety of specific issues (including a strong desire for a mix of house types), make no reference to any part of the allocation being developed for self-build housing. Again we believe that this is a serious omission that goes to the heart of the soundness of the overall plan.
- 4.8 The NPPF also refers to housing strategies being "integrated", and that they should take full account of relevant market and economic signals. Perhaps the most significant 'signal' of the increasing importance attached to self-build housing projects and their ability to provide significant amounts of new housing is the Government's announcement (in April 2013) that it was minded to give relief from the Community Infrastructure Levy (CIL) to self builders; and in May 2013 the Government published its formal consultation on the proposed relief in the CIL Further Reforms.

¹⁰ NaSBA research for Progress Report on Action to Promote Self-Build Housing – August 2013

- 4.9 The Government are clearly committed to supporting individuals and communities that take the initiative to build their own homes. The self-build industry is important to the national economy - it is worth approximately £3.6 billion a year¹¹, safeguarding and creating new jobs, strengthening the construction supply chain and making a real contribution to local economies. Currently self-builders are building as many homes each year as each of our individual volume house-builders with around 13,800 self-build homes completed in the UK in 2010/11. Self-build housing also brings many other benefits, providing affordable bespoke-designed market housing, promoting design quality, environmental sustainability, driving innovation in building techniques and entrepreneurialism.
- 4.10 There are estimated to be over 100,000 people looking for building plots across the country and recent market research¹² has shown that one in two people would consider building their own home if they could. The Government recognises that by overcoming the challenges that are holding back the potential of this sector (lack of land, limited finance and mortgage products, restrictive regulation and a lack of impartial information for potential self-builders), self-build housing can make a stronger contribution to economic growth. By making it easier for ordinary people to build their own homes, there is the potential to deliver wider benefits of affordable, greener and innovatively designed homes and to make a significant contribution to the number of new homes built in this country.¹³

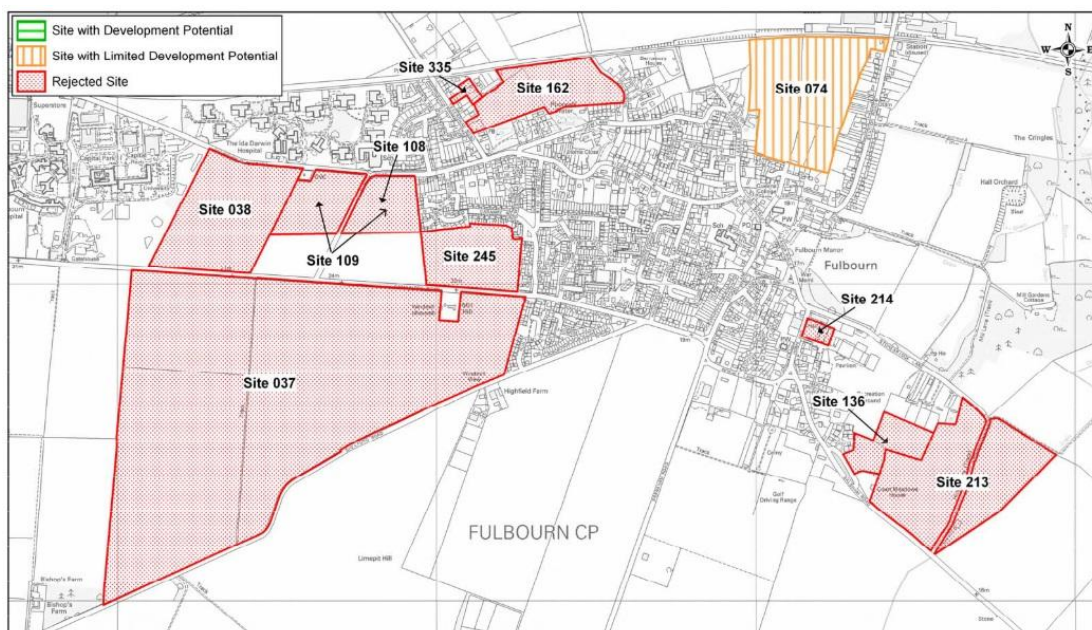
5. SITE SPECIFIC PROPOSALS

- 5.1 Our client is a philanthropic landowner whose family have lived in Fulbourn for many years. His land north of Barleyfields, in Fulbourn, has been promoted for housing at every stage of the preparation of the Council's new Local Plan in the belief that the site should be developed in a manner that benefits the village and will enhance it for future generations.
- 5.2 The site was identified in the Council's SHLAA (ref: 074) as being the only site with development potential out of all the sites put forward for development in Fulbourn. However, the size of the site (6.2ha), the downgrading of Fulbourn to a 'Minor Service Centre', impact on the Green Belt and limitations on access, were all reasons cited by the Council for not allocating the site for development in the draft Local Plan.
- 5.3 Despite this outcome, we believe that the site is the only one in Fulbourn where development could take place close to the heart of the village, enabling it to become an integral part of the existing community. Previous development in Fulbourn has resulted in housing development on the edge of the village, which results in these residents enduring long walks to reach the centre of the village, or more likely the use of their cars to make almost all journeys – including those to local facilities and services in the village.

¹¹ Self Build Housing Market UK 2009-2013 (AMA Research 2009)

¹² YouGov Survey - October 2011

¹³ Laying the Foundations - A Housing Strategy for England – HM Government November 2011



SHLAA Sites in Fulbourn

5.4 In response to the criticisms levelled at the scale and size of the original proposals for the site, and its potential impact on this part of the Green Belt, our client has now revised the proposed development as follows:

- The area of the site has been reduced (to approximately 3ha) and now only includes the southern part of the landholding, immediately adjacent to the village – this would reduce the visual impact on the Green Belt and reduce the amount of traffic using Church Lane/Barleyfields. It would also remove the need for any access from Station Road;
- The content of the housing proposed would be primarily individual plots and areas for self-build housing and small (1 and 2 bedroom) units for retired people and the elderly – in addition, significant planning gains would include a community orchard and public open space;
- Further work has also been commissioned to illustrate how the site could be developed (see overleaf) and this demonstrates how the key view of open countryside from the Conservation Area could be protected; how existing landscape features would be retained and enhanced; and the general low density of development that would be in-keeping with the character and identity of this part of the village.

5.5 Pedestrian, cycle and vehicular access to the site would be from Church Lane via Barleyfields and initial transport planning studies have demonstrated that access criteria relating to minimum road width and visibility splays can be achieved in full.



Proposed Concept Plan

- 5.6 The Local Plan proposes the downgrading of Fulbourn from a 'Rural Centre' to a 'Minor Rural Centre', largely because it has no village college, and no direct public transport link to Bottisham Village College which it is served by. However, the village does have good public transport to Cambridge provided by the Citi 1 bus service. The village also scores particularly well in terms of access to employment.
- 5.7 The spatial strategy for the 'rural area' contained in the Submission Local Plan seeks to direct new housing to the most sustainable locations, which are considered to be Rural Centres and Minor Rural Centres. In this respect, we believe that our clients' site is more sustainable, and in most cases would have less visual impact on the countryside, than those housing sites that have been selected at Comberton, Willingham and Melbourn.
- 5.8 Fulbourn is also the only Minor Rural Centre to the east of Cambridge, which also enjoys good public transport services directly into the City. No housing sites are proposed in Fulbourn for the Plan period (i.e. to 2031), despite its acknowledged sustainable location, and we believe that the allocation of our clients' site for housing would not significantly undermine the Council's spatial strategy for the rural area.
- 5.9 We firmly believe that all the issues identified by the Council as reasons to reject our clients land for housing, can be overcome through the preparation of a sensitive, low density scheme, and careful design, layout and landscaping. The concept plan above illustrates just how such a scheme could be achieved.

6. CONCLUSIONS AND RECOMMENDATIONS

- 6.1 This response to the Council's Submission Local Plan provides a detailed **objection** on the grounds that the Plan is unsound because:
- **It has not been properly prepared** and is not based on a strategy that seeks to meet all objectively assessed housing development requirements;
 - **It is not justified** - because the plan is not the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **It will not be effective** - because the Council have demonstrated that they do not have a clear understanding of **all** the housing needs in their area; and,
 - **It is not consistent with national policy**, which requires that it should address the need for all types of housing, including the needs of different groups within the community.
- 6.2 Specifically, we believe that the omission of any reference to the provision of self-build housing sites within the Local Plan is an important issue that must be addressed to make the Plan 'sound', and to meet the requirements of National Planning Policy as set out in the NPPF (paragraph 159).
- 6.3 **In order to make the Local Plan sound we recommend that detailed references should be made to the inclusion of specific sites for self-build housing within the spatial strategy**, but especially in the desirable and more sustainable villages, such as Fulbourn.
- 6.4 In respect of our clients' land at Fulbourn, we believe that we have justified the allocation of the site for housing since the revised proposals now put forward address the issues previously raised, *and* include a substantial element of self-build housing, as well as housing for older people and people with disabilities, and other significant planning gains. Such an allocation would recognise the importance of self-build housing as a significant element of national housing output and demonstrate the Council's commitment to understand and support the need for **all** types of housing within the District.