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14th March 2008

Mrs Gloria Alexander
Programme Officer
Public Examination Office
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
CB23 6EA

Dear Gloria

Re: South Cambridgeshire District Council - Site Specific Policies DPD Public Examination: Representations on behalf of Harcourt Developments Ltd (1735) and Martin Grant Homes Ltd (1736)

Preamble

We appeared at the Site Specific Policies DPD Examination Sessions in December 2007 and in response to issues raised by the Inspector at the Cambourne session, relating to the submission of Sustainability Assessments/ Appraisals, we have now had an opportunity to consider matters and set out our response below. Please pass a copy of this correspondence to the Inspector.

LDF Process

The following outlines the key stages in preparation of the LDF:

- Consultation with Statutory Bodies (April – May 2004)
- Preferred Options Public Participation (Oct – Nov 2004)
- Pre-Submission Public Participation (June – July 2005)
- Submission to Secretary of State (Jan – Feb 2006)
- Advertise Objectors' Sites (March – April & June – July 2006)
- Objector Sites 2: Further Public Consultation (June 2007)

We commented upon each stage in detail as appropriate.

The Preferred Options Consultation was the first opportunity to promote the subject site at North Cambourne for development. Detailed submissions were made at that time, including an appraisal of the merits of the site as a housing allocation.

The level of detail included with our representations enabled the LPA to include the site within their Strategic Environmental/ Sustainability Assessment (SEA)

Strategic Environmental Assessment (SEA)/ Sustainability Assessment

The Final Environmental/ Sustainability report was published by Scott Wilson in January 2006.

The SEA approach to Cambourne Policy SP/3 is set out on p.166. This states that as the findings of the housing capacity study indicate that land in rural centres is not required, the potential for alternative approaches to is limited

Page 99 further notes that taking account of the results of the urban capacity study and the result of applying District wide density policies to Cambourne, no further peripheral development is currently required at the Rural Centres.

The SEA notes that alternative approaches were not applicable as the issue was not included in the Preferred Options Report.

We objected to each round of consultation, including the omission of the North Cambourne as a housing allocation in the Preferred Options Consultation Paper.

Early Involvement

PPS12 sets out the approach to Sustainability Appraisal and Strategic Environmental Assessment (pages 22-25). This places an onus on the LPA to undertake a SA.

PPS12 sets out a requirement for early involvement in preparation of LDDs.

Para 4.1 states:

“Key to the success of the new system is the early identification of all issues in the preparation of a development plan document. It is essential that anyone who has an interest in the planning of an area actively seeks to assist the local planning authority to shape the future of that area from the earliest stage, both at the core strategy level as well as at the detailed area action level. Those interested, including national organisations, government agencies, regional organisations, developers, local organisations, local community groups and the community, must not wait for the authority to finalise their development plan document before getting involved. To do so would be contrary to the aim of the new system to produce plans which deliver sustainable communities and have been prepared taking all interests into account.”

(Our emphasis)

Para 4.2 states:

“Local planning authorities should front load the preparation of development plan documents by facilitating early involvement and securing inputs from the community and all stakeholders. The preparation process should include consideration of all the alternative options derived from the

development of the evidence base, the authority's awareness of local issues, the views of stakeholders and community involvement. Key decisions on the spatial strategy should be taken at the earliest possible stage to allow for full community involvement and sustainability appraisal."

(My emphasis)

Para 4.3 states:

"Front loading is particularly important when the development plan document is dealing with site allocations. All those who wish land to be allocated for development should ensure that their sites are brought forward early in the process so that they can be considered by the local planning authority and subjected to sustainability appraisal. Local planning authorities should consult with the bodies set out in the statement of community involvement or the minimum requirements set out in Regulations. This will ensure that the community and stakeholders have a real say in the evolution of development plan documents, and on the suitability of any sites put forward, before the local planning authority prepares the development plan document for submission. Furthermore, sustainability appraisal requires that decisions on preferred options should be taken early so that the consequences can be assessed. Where community involvement or sustainability appraisal cannot be demonstrated, for example on a site submitted late in the process of preparation, the inspector, in the binding report, would not be able to recommend its inclusion in a development plan document."

(My emphasis)

Detailed information relating to the suitability of the omission site for development as part of the emerging CS and Site Allocations DPD was submitted at the earliest opportunity in the plan making process (Nov 2004).

Our approach to promotion of the omission site for development is entirely in accordance with the requirements set out in PPS12.

Creating Local Development Frameworks, A Companion Guide to PPS12 sets out further advice for LPAs in preparing their LDFs.

Section 8.4 (page 91 onwards) refers to the preparation of the Sustainability Appraisal.

Page 92 states:

"Authorities are required to formally consult on the preferred options document at this key milestone stage as required by Regulation 26. Formal consultation must also be undertaken on the sustainability appraisal report as required by the SEA Directive. Details regarding the publication process are set out in PPS12. This public participation should reflect the standards set out in the statement of community involvement (if adopted) or the minimum requirements as explained in

table 7.2. The document should be presented as an opportunity for communities and stakeholders to respond to the options proposed and bring forward alternative proposals, providing they meet the development plan documents' objectives and are compatible with its spatial vision and spatial objectives.

Front-loading requires authorities to actively encourage communities, stakeholders and commercial interests to come forward at this stage with their future plans and proposals in respect to development (see Section 2.7 for further details). Identifying all known proposals likely to come forward, or required to meet identified needs, at this stage will give authorities time to resolve emerging issues prior to the submission of the development plan document to independent examination. Failure to do so may result in an unsound plan and time-consuming discussions at examination on issues that should have been addressed prior to submission of the document."

We submitted details of the suitability of the omission site at Cambourne North for development at the early stage in the process in order to meet the objectives set out above.

The onus is clearly on the LPA to demonstrate that all options for development have been considered and assessed as part of the LDF process.

Our representations were submitted against the need to ensure front loading in the preparatory process and to enable the LPA sufficient time to resolve emerging issues prior to formal submission of the DPD.

Housing Land Supply

At the outset, our submissions demonstrated a shortfall in housing land supply, identifying a need to identify land at North Cambourne for development. Detailed evidence is set out in our housing land supply paper to the Examination, as considered at the housing land supply hearing session last month.

Pursuant to the above, a note was circulated on behalf of the Inspector setting out a number of concerns in relation to HLS. There is a demonstrable need to identify additional housing allocation to help deliver the strategic housing requirement during the plan period.

It remains our view that the Site Allocations DPD is unsound without additional housing allocations.

North Cambourne: Sustainability Appraisal

If the Inspector is not satisfied that the North Cambourne site has been subject to appropriate sustainability testing then the Site Specific Policies DPD should be found to be unsound as detailed information relating to the merits of the site for development was submitted to the LPA at the earliest possible stage of the LDF process in order to allow testing of the suitability of the site through the SA.

The failure of the SEA to consider alternative approaches to providing for the strategic housing requirement was based upon the Council's assessment that the identified sources of housing land supply would deliver the required housing numbers during the plan period. It has since been demonstrated that this is not the case and that additional housing allocations are required.

As demonstrated at the Cambourne Examination Session, our clients' omission site at Cambourne, North of the A428, can provide for a sustainable urban extension. A Sustainability Appraisal has been prepared and is submitted in support of the allocation of the site for housing and associated uses.

We enclose 2 x copies of the Sustainability Appraisal and accompanying material (Illustrative Masterplan and Explanatory Note) for addition to the Examination Library and onward transmission to the Inspector.

The Sustainability Appraisal and accompanying material has also been sent to those organisations identified on the attached consultation schedule for comment. Copies have been deposited at Cambourne Library and South Cambridgeshire District Council and are available for public inspection.

Consultation upon the Sustainability Appraisal will commence on 17th March 2008 for a period of 6 weeks until 28th April 2008. Following the consultation period, a summary report will be produced and supplied to the Inspector.

I trust the above is clear. No doubt you will contact me to discuss matters as necessary.

Yours sincerely

Jeremy C. Woolf MA DipTP MRTPI

Enc.