

# Luvli Homes

## Planning Statement

**Amended for "Proposal C" February 2021**

**Land at Clive Hall Drive  
Longstanton CB24 3DT**

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Longstanton CB24 3DT

Andrew R Taylor  
February 2021

\* Luvli Homes is a trade name of Resolute Estates Ltd.

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## Preface

**This preface has been provided at the start of each of the three reports mentioned below.**

- 1 This amended application is for a grant to develop 0.3ha of land (“the reduced site”) at the junction of Mills Lane and Clive Hall Drive, Longstanton CB24 3DT with 6 houses. We applied for a grant of permission to develop the whole 0.8 ha site (“the whole site”) with nine self-build plots under reference **S/2482/16/OL, dated 10 January 2016 (the “First Application”)**. That application was refused by notice dated 5 May 2017. It was also refused on appeal under reference: APP/W0530/W/17/3187357, on 4<sup>th</sup> May 2018.
- 2 The applicant believes that the application was refused as a result of unlawful activity by the Council, first around 2004 to 2007, and again from 2006 to 2018. The applicant’s evidence is set out fully in three reports attached as documents relating directly to this application. They are:
  - Longstanton Conservation Area – Full Reappraisal
  - Commentary on Inspectors Report of Northstowe AAP June 2007 (this report)
  - Northstowe and the Green Gap
- 3 Council members are broadly aware of the content of the reports. The Council has given no indication of acceptance or denial. Accordingly, the applicant has no evidence that the grounds for refusal would substantially change today on account of the facts of the detailed history uncovered by the applicant in the 30 months of research undertaken since May 2018 and set out in these reports. Consequently the applicant has no alternative than to set out the true position in sufficient detail to make clear that reasons for refusal given in 2017 and 2018 cannot apply today.

- 4 For the sake of good order, the applicant wishes to emphasise that it does not seek any comment or endorsement or approval or judgement of the facts set out in these three papers but puts them forward simply to provide irrefutable proof that there is no lawful reason why the Council should refuse this second application on account of matters pertaining to:
- the historic environment
  - the landscape
  - the green gap between the village and Northstowe.
- 5 We respectfully ask every decision maker who may assess this present application to take into account the facts stated in these three reports, not to be concerned with the illegality of the Council's past activity but purely to satisfy her/himself that the allegations of the Council with regard to the three items mentioned in paragraph 2, above, are a continuation of the misrepresentation and fraud set up 17 years ago and continue today, largely because the Council fears the public impact of an admission and possibly other legal consequences in third party claims.
- 6 As a result of the foregoing matters, we request that the decision maker should totally discount any suggestion by the Council that the decisions of inspectors over the last 20 years should be in any way relevant. We submit that the only relevant point about such decisions is that they were made on the basis of fraudulent misrepresentation – a situation which continues today.

# Introduction

“Bold” format has been added by the author

**The Council’s validation checklist provides as follows. We have interleaved our replies.**

## What is required?

7 The Council says: *A planning statement should provide information regarding:*

7.1 *“The context and background to the development.”*

We have provided a report “Concept, Context, Mission”. This provides the background. We have also provided an extensive design and access statement which also covers context and background

7.2 *“Details of and justification for the proposed use, including specific details of activities, intended numbers of staff and users of a site and details of the intensity of use.”*

We justify the proposed use on the basis that the Council is desperately short of houses, to the extent that by the Council’s own calculations, no person in the lowest quartile of income can afford a mortgage on even the most modest home.

In the context of residential development we have taken the intensity of use as being the density of housing on the Site.

7.3 *“An assessment of how the proposal has taken account of adopted national and local policy and any other material considerations.”*

This application is for a mere six dwellings. We suggest that a full assessment may be inappropriate. Very considerable detail has been provided in our Design and Access Statement.

7.4 *“Details of the assessment of alternative sites and why they have been found less sequentially preferable, where required by policy.”*

We have not considered alternative sites. We take the view that we are looking for sites suitable for residential development and our proposal will reflect whatever we believe is most appropriate for a site.

However, we have very carefully considered the three alternative proposals preferred by the Council, namely playing fields, allotments and cemeteries. As we have explained at greater length elsewhere, all of these require extensive car parking and preferably, larger sites.

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## Details of and justification for the proposed use

- 8 The Natural England Land Classification states that the site is “Other land, primarily in non-agricultural use”. It is not “green infrastructure” as defined in PPG Para 004 Ref ID: 8-004 of 21 July 2019. We note that the Council has told us specifically that the subject site was formerly the Orchard of the former Clive Hall, the last remains of which were removed to accommodate the present Clive Hall development. **Accordingly, our land is not technically “green field” but residential.**
- 9 The principal justification for using the land for this purpose is:
- 9.1 There is no other beneficial use. The area of the site proposed for development is a mere 0.3 ha. The remainder of the site (0.5 ha) has been specifically allocated as green space, in perpetuity. This provides powerful compliance for all time, with policy NH/1.
  - 9.2 South Cambridgeshire is in desperate need of housing;
  - 9.3 the proposed scheme is eminently suitable for a small number of houses to fill the gap in the settlement boundary.
  - 9.4 the proposed scheme improves the visual amenity of the immediate locality – particularly when contrasted with the likely development of Northstowe phase 3 to the South and possible subsequent development of the Northstowe land on the north side of Mills Lane.

## How the proposal has taken account of national and local policy

- 10 The proposal being for a mere six units, our approach to national and local policy has been simply to comply to the utmost extent. In particular, we have taken the Council’s draft “Planning Application Validation Requirements” document and complied with every item which affects our proposal.

# The national context – the NPPF

## The presumption in favour of sustainable development

11 Paragraph 11 of the NPPF reads:

*“Plans and decisions should apply a presumption in favour of sustainable development.*

*For plan-making this means that:*

*a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;”*

12 We respectfully suggest that this sort of rapid change which may well be included in this provision, would be the advent of Northstowe and the enormous impact it has made over development policy in and around Longstanton over the last 15 years. We refer in particular to the changed significance of the alleged historic value of the land added to the two tiny conservation areas in 2005.

13 The NPPF continues:

*“b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

*i. the application of policies in this Framework that protect **areas or assets of particular importance** provides a **strong reason** for restricting the overall scale, type or distribution of development in the plan area; or*

*ii. any **adverse impacts of doing so would significantly and demonstrably outweigh the benefits**, when assessed against **the policies in this Framework taken as a whole.**”*

To rephrase that, **the Council is expected to approve “sustainable development” unless its policies can jump ALL of the following hurdles:**

13.1 areas or assets to be protected must be of **particular importance**;

There are no areas or assets of particular importance which could be affected by the proposal

13.2 the reason for restricting development must be a **strong reason**;

There is no reason to restrict development, let alone a strong reason

13.3 any alleged adverse impact must **significantly and demonstrably outweigh the benefits of the proposal**;

There is no adverse impact. See Addendum 2 for the benefits of the proposal.

**Note: the yardstick for making the judgements above is not the opinion of the Council but an assessment of the benefits against the policies in the Framework.**

14 Continuing paragraph 11, the NPPF continues:

*“For decision-taking this means:*

*c) approving development proposals that accord with an up-to-date development plan without delay; or*

*d) where there are **no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:***

*i. the application of policies in this Framework that protect **areas or assets of particular importance** provides a clear reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would **significantly and demonstrably outweigh the benefits** when assessed **against the policies in this Framework taken as a whole.**”*

15 In view of the extreme housing market conditions in South Cambridgeshire we submit that the policies of the Council would fail to surmount a single one of these hurdles. The presumption in paragraph 11 should therefore apply.

## The NPPF states . . . .

16 **At paragraph 185:**

*“Plans should set out a positive strategy for the conservation and enjoyment of the historic environment . . . . This strategy should take into account:*

*. . . . **C) the desirability of new development making a positive contribution to local character and distinctiveness”.***

17 We note:

17.1 Our proposal does set out a very positive contribution to local character and distinctiveness and causes no harm to the historic environment. The proposal provides approximately 0.5 ha of new recreational, open land for local residents, separated from the built area by a 4 m wide bank of new planting for ecological habitat.

17.2 The Council has agreed to further destruction of the historic value of the open land in the Conservation Area by granting permission to the developers for an extensive cycle track, to County Highways standards, to run diagonally through Manor Field, long revered as the setting for the grade 1 listed All Saints Church.

17.3 Apart from the possibility of archaeological value, the open land which is part of the Longstanton Conservation Area will lose whatever residual historic value it ever had. Please refer to the learned report of Doctor Peter Wardle of the Historic Environment Consultancy.

18 In Guidance to the NPPF at section 21b, we note:

***“Determining a planning application***

*The National Planning Policy Framework represents up-to-date government planning policy and is a material consideration that must be taken into account where it is relevant to a planning application or appeal. This includes the presumption in favour of development found at paragraph 14 of the Framework. If decision takers choose not to follow the National Planning Policy Framework, where it is a material consideration, clear and convincing reasons for doing so are needed.”*

Paragraph: 006 Reference ID: 21b-006-20190315

Revision date: 15 03 2019 See previous version

19 We understand the importance of local democracy. **According to Guidance section 21b:**

*“A material planning consideration is one which is relevant to making the planning decision in question (e.g. whether to grant or refuse an application for planning permission).*

*The scope of what can constitute a material consideration is very wide and so the courts often do not indicate what cannot be a material consideration. However, in general they have taken the view that planning is concerned with land use in the public interest, so that the protection of purely private interests such as the impact of a development on the value of a neighbouring property or loss of private rights to light could not be material considerations.”*

Paragraph: 008 Reference ID: 21b-008-20140306

Revision date: 06 03 2014

Despite that clear exposition of the law, we have taken great care in this amended application to comply with the requirements, but dissipate the worries of local people – despite consultation responses containing a large number of “inaccurate” statements. Specifically, we have

- 19.1 reduced the number of houses from 20 to just six.
- 19.2 we have placed those six within the existing line of the settlement.
- 19.3 we have consolidated the proposition that the green space will remain green in perpetuity, as will the alleged “landscape” along Mills Lane and elsewhere.

20 **At paragraph 21b**

Can the local planning authorities take the planning history of a site into account when determining an application for planning permission?

*“The planning history of a site may be a relevant consideration in the determination of an application. In particular, when considering applications for major development involving the provision of housing, the National Planning Policy Framework indicates that local planning authorities should assess why an earlier grant of planning permission for similar development on the same site did not start. Relevant factors to take into consideration might include evidence as to the reasons why an earlier*

*permission was not implemented, the time that has elapsed since the previous permission expired and the number of similar applications made for the same site.*

*Paragraph: 010 Reference ID: 21b-010-20190315  
Revision date: 15 03 2019 See previous version”*

- 21 Our position is that the entire planning history of the site since the year 2000 has been based on fraudulent activity by the Council which is fully described in our reports:

*“Commentary on 2007 Inspectors report on draft Northstowe AAP”  
“Longstanton Conservation Area Re-Appraisal”  
“Northstowe and the Green Gap”*

We respectfully request the decision-maker to rely on the merits of our application today.

- 22 **The NPPF states at paragraph 68**

*“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*

*a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*

*c) support the development of windfall sites through their policies and decisions . . .”*

We are very happy that our proposal **complies precisely with this requirement**. The area is just under 1 ha, and the site is a windfall. Accordingly, we not only provide much-needed houses, but in doing so we contribute, in a small way, to qualification by the Council with regard to this 10% requirement.

## Government inspectors obliterate whatever historic value the Council might have alleged to subsist in the land added to the Conservation Area in 2005

- 23 The land added to the Longstanton Conservation Area in 2005 contained no significant historic value. In June 2007, Government inspectors, appointed under the Planning and Compulsory Purchase Act 2004, produced a report titled “Report to South Cambridgeshire District Council by Cliff Hughes BA(Hons) Dip TP MRTPI and Terry Kemmann-Lane JP DipTP FRTPI MCMI. They were dismissive about the proposition that the added land contained any building or artefact of significant historic value, presumably because none was apparent.

- 24 At one point, the Inspectors stated about this land: **“the characteristics of importance should be identified in the AAP so as to make it clear what needs to be protected, and as guidance for the masterplan.”** The Council never did identify anything of historic value in the Northstowe AAP and have not done so, since that date. That is

because the green space in the Conservation Area contains nothing of significant historic value. It seems likely that the reason for the Council's delinquency on this issue is that any report which confirmed that the green space contains no significant historic asset, would provide the basis of a legal claim for maladministration and misrepresentation, not only by ourselves but by others who have been misled to some extent over the last 15 years.

- 25 In a later section of their report, the Inspectors also expressed little interest in the Historic Environment. The report document consists in 17 "Main Matters". Some Main Matters are covered in as many as five pages each. However, "Main Matter 12" concerning archaeology and heritage, justifies only eight lines of text. That at least illustrates the extent of "significance" that the inspectors attributed to the historic value of the Conservation Area, as alleged by the Council at that time.
- 26 Moreover, even assuming that the subject land actually did or does contain any significant historic asset, its historic value must surely have been reduced by the advent of Northstowe, and in particular by the inclusion in 2016 of the "Manor Field" as part of Northstowe and the subsequent grant of permission for substantial earthworks and grading to create a footpath and cycle way to current highways standards, all as we set out in our document "Conservation Area – short assessment".

## House of Lords report – "Time for a strategy for the rural economy" – February 2019

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- 27 This report by the House of Lords was drawn as a result of discussions in the House and initially promoted largely by Liberal Democrat peers who were increasingly horrified by what they perceived as the deficiency of housing in rural areas – areas like South Cambridgeshire.
- 28 At paragraph 306 onwards, the report comments on the ridiculous level of house prices as a multiple of earnings. They point out that

*"people of working age are inevitably less likely to choose to live and work in rural areas . This creates a knock-on effect with regard to employment opportunities, skills shortages, business growth and the sustainability of rural services and amenities. It is clear, therefore, that **tackling the rural housing challenge is a key part of addressing the wider challenges of rural economies.**"*

Long before the appearance of Covid-19, we had considered the attraction of working from home. Now, it is commonly thought that up to 20% of workers will continue to work from home full or part-time. Working from home does not involve simply finding a corner of the sitting room which will accommodate a desktop computer, larger and more sophisticated printers, stationery and all those accumulated cables and devices. Home-working also requires comfortable space with a view to the outside world and plenty of electrical sockets for the devices you thought should work with Bluetooth, but maybe don't.

We provide such an environment as a matter of course. These were thoughts we already had in mind when we decided that every house we built should provide more space, more light and more storage than the average "red brick box" produced in thousands over the last 50 years.

29 And at paragraph 313, their Lordships continue:

*“We take the view that no one should be unreasonably disadvantaged by choosing to live or work in a rural area”.*

30 Reverting to the House of Lords report: at paragraph 317:

*“The Rural Housing Alliance also told us that the working age population in rural areas is projected to decline by 75,000 people between 2014 and 2038. It stated that “the key to ensuring viable, mixed communities in rural areas is building more affordable housing is quote but that “all too often, young people are forced to leave rural areas they grew up in because they cannot afford housing costs”.*

31 And at paragraph 389: one of their strongest recommendations:

*“The National Planning Policy Framework makes some welcome changes to support the rural economy . . . . It is also welcome that the document states that planning policies should identify opportunities for villages to grow and thrive, making clear that **housing in smaller villages, without local services is not necessarily “unsustainable”**. There may still be scope for stronger support for new housing in small settlements as a means of supporting rural economies, however.”*

32 We note:

32.1 although our contribution to the housing deficiency is tiny in proportion to the total requirement, it is extremely important that when taken in the balance between benefit and “harm”, the desperate needs of rural people to find houses must be of prime importance.

32.2 paragraph 389 points out that housing in villages is not necessarily unsustainable simply on account of some small deficiency in the “standard” list of sustainability requirements. For example, it is wholly unrealistic to expect every village resident to either have the time or the physical ability to walk 800 m to essential facilities. A large proportion of the adult population simply do not have the time or are too frail, or both.

33 Their Lordships also took account of evidence from The Rural Housing Association, who provided data as follows:

*“57% of local authorities identified local opposition as a barrier to delivery of rural affordable housing.*

*78% considered that their councillors supported rural affordable housing.*

***70% stated that schemes encounter local opposition, but proceed.”***

34 We note the Government’s own self critical response and **intention to identify opportunities to develop new homes in village locations:**

*“The government must make greater efforts to identify housing shortages in smaller rural villages and, where possible, work with local authorities and housebuilders to identify opportunities to develop new homes in village*

*locations. This will help ease the burden on larger settlements where large schemes are being proposed, **improve the sustainability of smaller villages, and ensure that development is more sensitive to local scale and context, minimising local community opposition.***

## House of Commons briefing paper 8981 of 12<sup>th</sup> of January 2021

### Planning for the Future: planning policy changes in England in 2020 and future reforms

35 at page 32, paragraph 1.13, the above paper provides:

*“One of the white paper’s aims is to support SME builders and developers, who will (the Government says) be key players in economic recovery following the pandemic. The press release accompanying the white paper argued that its proposals could provide a “major boost” to SME builders:*

*The changes will be a major boost to SME builders currently cut off by the planning process. They will be key players in getting the country building on the scale needed to drive our economic recovery, while leading housebuilding that is beautiful and builds on local heritage and character.*

(...)

*Recent studies show smaller firms feel the complexities of the planning process and its associated risks, delays and costs are the key challenges they face in homebuilding.*

*Planning for the Future makes several references to the role and needs of the SME sector. It suggests (for example) that the new Infrastructure Levy would reduce cashflow difficulties for SME developers:*

*4.11. As a value-based charge across all use classes, we believe it would be both more effective at capturing increases in value and would be more sensitive to economic downturns. It would reduce risk for developers, and would reduce cashflow difficulties, particularly for SME developers.”*

**Resolute Estates is such a developer whom the Government specifically wishes to support.**

# Addendum 1 - the benefits of our proposal

- 36 This application was submitted in October 2020. Despite the failure by the Council to acknowledge our communications, let alone discuss them, “leaves on the wind” indicated that we should consider other alternatives in order to obtain a grant. After a few days of consideration, we put forward alternative proposals, as set down below.
- 37 We copied the proposals to the Leader and others. She told us she would not be able to look at our proposals on account of COVID. In the meantime, time was passing. If we did not want a refusal to the proposal submitted, we should submit our amended version fast. This present document is now therefore submitted in support of our amended application.
- 38 In order to be able to build more homes, we need our projects to move forward fast. We have therefore abandoned 70% of our site – conceding it to “green separation” simply in order to make progress. Technically however the 0.3 ha we propose to develop with six houses is still subject to whatever objections the Council may raise. For that reason, these amended documents remain required in order to contest those objections.
- 39 Accordingly, the value of each of these proposals to the Council must be set against the value placed by the Council on the non-existent historic assets they allege will be harmed by the proposal and/or the value they place on this small paddock in order to distance the village from the perceived horrors of Northstowe – which for no apparent reason, affect only this short section of the boundary.

## Proposals sent to the Council in these precise terms

If you are a local resident, you will probably be surprised to read about these proposals being turned down by your council. As you consider each one, we suggest you have a picture in your mind of the councillor you best know personally and ask yourself why that person turned down these offers and continues to turn them down today.

The following text is taken almost word for word from our correspondence and is therefore somewhat less formal than the text you would otherwise expect in this report.

### **Proposal number one**

We will build 20 houses, of which only 8 will be for market sale. **The remaining 12 (60%) but will be “affordable”** in the wide definition used by the Government today. The affordables could be more in number and configured to the precise requirements of the Council.

Of course we will mix the market units with affordables. I strongly favour avoiding a ghetto attitude. It is absolutely wrong that any section of society should be identified as being inferior by pushing them into a separate section of an estate.

However, it is possible that housing associations may be constrained by budgets to buy only less attractive houses. I see that Government has recently announced an increase in cash available to them but housing associations will discuss only firm proposals, preferably when planning permission has been obtained. I therefore need your decision first.

I mentioned 12 houses but of course, what really matters is the number of people

accommodated. If you want 30 neat, one-bedroom flats, in blocks no more than two storeys high, we should be as happy to accommodate you as if you wanted 6 x 4-bedroom houses. **However, subject to our finding a housing association willing to pay for these things, I can assure you that we will on no account reduce the quality of our product – low u-values, great natural light, loads of storage, under-floor heating, part triple glazing.**

This is not a completely idiotic proposal from our viewpoint because there is also a considerable value to us in achieving our first development by Luvli Homes which we shall then use for publicity purposes in promoting our eco-homes and the sheer attraction of a small scheme at the edge of a village.

#### **Proposal number two**

As above – 8 x market plus 12 x affordables, except that we will sell the 12 affordable homes as “Starter Homes” at a discount of **30% below market price** under whatever terms the Minister might approve or as the Council may otherwise decide. To satisfy other requirements of this scheme, we would be aiming to build houses with a market value of around £300,000, giving a discounted price of around £210,000. **On 12 houses, local residents will save around £1,000,000. This wipes out the entire uplift in value for the whole site, from obtaining planning permission,** leaving us only with a small builder’s profit.

#### **Proposal number three**

We will build only 12 units – all for market sale. That low density will allow us plenty of space to intensify the planting both around the perimeter and within the site. For that grant, we would be prepared to make a section 106 **payment of £1,000,000 to the Council,** payable simply as £83,400 out of proceeds of sale as each sale is completed. Simple to set up, simple to administer.

#### **Proposal number four**

Still working on 8 x market plus 12 x affordable, another alternative would be to treat the site as a “rural exception”. **The site satisfies the conditions perfectly.** Furthermore, after 6 years of encouragement from the Government, the District has **only five rural exception sites.** The law does provide for a certain number of market homes, sufficient to make the proposal viable. Forgive my reminding you that the Council’s publication “What is an exception site” includes the following text:

*“Average house prices in South Cambridgeshire September 2018 £441,539.  
A property is assumed to be unaffordable if the monthly cost is greater than 1/3 of monthly gross income, or greater than 45% of net income.”*

We have set down a reminder of the text as to what qualifies as a rural exception site in the addendum following this letter.

#### **Proposal number five**

Yet another alternative would be for us to build only eight houses on that **half of the land** nearest to Clive Hall Drive, leaving **almost an acre of green space.** We would gift that to an appropriate ecology-based organisation after planting and landscape work, at our cost, to their design. That would create an acre of semi-wild area of solid greenery, providing substantial additional habitat for animals and birds. It would become a precious educational feature for groups of children and older students and maybe open to the public (no dogs!) for quiet enjoyment.

The Council has consistently made much noise about green separation, the Conservation Area and local landscape. This option is specifically intended to enable the Council to accept a mere eight houses to complete the approximate existing line of the settlement boundary in exchange

for an acre of special nature reserve.

### **Proposal number six**

This proposal is the formal amended proposal we are putting forward today. Specifically, we have cut the size of the site right back so that the boundary links up the extent of the built edge of the village that both sides and accordingly does not protrude even 1 m into the area referred to by the Council as “green separation”. This amended application is for a mere six units.

### **In summary, a refusal of permission is a refusal of:**

- 1 12 (60%) affordable homes with only eight for market sale; alternatively
- 2 a Starter Homes scheme heavily promoted by the Government which could place as much as **£1 million in the hands of lucky local residents**; (error – the correct designation is “First Homes”), alternatively
- 3 only 12 detached houses for market sale, with greatly enhanced green coverage plus a payment of **£1,000,000 cash to the Council**, payable proportionately as each unit is sold.
- 4 the opportunity to demonstrate the Council’s willingness to identify and promote “rural exception” sites for the benefit of Cambridge Acre or other organisations providing similar services.
- 5 eight houses on half the site and a **gift of 1 acre of land** to an approved (preferably local) ecological organisation, our having paid for the landscape work as that organisation will have specified.
- 6 six homes each on a plot of approximately 400 m<sup>2</sup> with zero disturbance to the alleged green separation, zero disturbance to landscape in or around the site, 40% increase in ecological value.
- 7 we are still happy to negotiate. Your parish council tells us a barn owl has been seen in the area, so of course there is a good argument that we should not disturb it.

in most of the above cases, the opportunity to demonstrate the Council’s determination to defeat the problems set out in the following statement which appears in the 2018 Local Plan at 7.44:

*“There is a high level of housing need in the district with 3,378 households on the Council housing register as of March 2013. The Strategic Housing Market Assessment records that identifies that 11,838 affordable homes will be required to meet current and arising need in the period to 2031, a considerable proportion of all the homes to be built to 2031, however the delivery of such housing will be constrained by development viability, the availability of land, and the need to create sustainable, inclusive and mixed communities.”*

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## **Addendum 2 – Summary of benefits of this amended application**

- 40 **Note: many of the items on this list are actually ideas or conditions taken from: <https://www.gov.uk/guidance/apply-for-affordable-housing-funding> .**

## Some are actual conditions, demonstrating their importance

### 40.1 Super-eco:

Low u-value through massive use of insulation and careful “passive” design.  
Timber - so a carbon store  
Sustainable timber - EU certified  
Used water heat recycled

40.2 No square red boxes

40.3 Modern but eternal rural style that fits the environment - far from urban.

40.4 Optimum viable use.

40.5 The NPPF states at paragraph 196:

*"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."*

We absolutely maintain that the site cannot harm any significant historic asset nor its setting for the many reasons set out in other accompanying documents. Nonetheless, if the Council continues to believe otherwise than we say, in the alternative, that the benefits listed in this section by far outweigh any harm which could be attributed to the development, all as provided in paragraph 196, above

40.6 Boundary planting will be increased. Total additional planting will exceed the extent of the present hedges by at least 40%.

40.7 Each of our proposals complies with Gov preference for:  
modern methods of construction  
Government requirement for 10% of assessed housing need to be provided by sites smaller than 1 ha  
support for small builders  
proactive search by LPAs for windfall sites

40.8 The offer of £1 million specifically to local people on terms drawn by the Council.

## The benefit as an alternative to Northstowe

41 It has been suggested that the sheer size of the Northstowe development will provide more than enough houses for local need. We submit however, that the entire process of development of the Northstowe concept through to today's level of construction has been based on Northstowe as a “town”. This understanding is based on the following points:

41.1 every housebuilder at Northstowe has marketed its houses as a location suitable for commuting to Cambridge.

41.2 it has been estimated that the population of Northstowe after completion in a few years time will exceed 25,000 people. By contrast, there are no specific

figures available for the expectation of the number of new jobs or other indicators of new employment in the Longstanton area. This appears to confirm that Homes England and the Council regard Northstowe as a dormitory town to Cambridge City.

- 41.3 Northstowe has been designed so that the guided bus provides an obvious energy-saving and extremely convenient route southwards.
- 41.4 the car park for the Longstanton guided bus is gigantic. Furthermore, as far as we can identify, there are no plans for the introduction of an industrial or business sector within Northstowe. This is further confirmation that the Council intends that all of the residents of Northstowe will be employed in Cambridge City.
- 42 Against that suburban background, we have no doubt that our small development at the southern end of the village will serve the market **for those people who specifically do not wish to live in the urban development at Northstowe**. The occupiers of our mere six houses will immediately join established residents at the south end of Longstanton village with its strong sense of its own community and place.
- 43 The homes we shall build will be specifically designed to fit the village environment and the people who occupy them (so far as they are owner occupied) will be people who specifically choose **not** to live at Northstowe. Indeed, we note that Councillor Aidan van de Weyer is on record as saying:

*"People growing up here need somewhere to live and by building more homes we will help deliver a range of properties that, when you add up all your living costs, are affordable for people to live in. **I am a parent and want my children to be able to get on the housing ladder near where they grew up, as will thousands of other parents in the area.***

*It is never possible to put forward a plan that has complete consensus but if we had been in power at the Council when this process began, the plan put forward would have been different. However, we need to put the best interests of the area as a whole first and **our job now is to ensure that we put existing communities, especially those living nearest to where new homes will be built, at the heart of our development plans.***"

That is exactly what we hope the good councillor will allow us to do.

**End**