

## **LOCAL PLAN EXAMINATIONS CAMBRIDGE CITY AND SOUTH CAMBRIDGESHIRE: MATTER 11 JOINT OMISSION SITES – 11.5 LAND AT FEN DITTON**

**Hearing Statement on behalf of The Quy Estate 2918/18308  
MAY 2017**

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## **Introduction**

1. The Quy Estate ('TQE') owns a considerable amount of land on both sides of the A14 in the north-east quadrant of Cambridge, situated between Fen Ditton and Horningsea. However, it is only the land within the A14 that forms part of TQE's present site promotion for development ('the Site') (Appendix A).
2. Whilst the Site falls entirely within the administrative area of South Cambridgeshire, its location on the edge of Cambridge means that the opportunities and implications for both jurisdictions should be assessed. Furthermore, as with all sites under consideration for development on the Edge of Cambridge ('EoC'), the Site is currently located within the Green Belt.
3. Written representations supporting the release of two housing parcels from the Green Belt, in order to facilitate residential development (for approximately 500 homes), have been presented at all stages of the Draft South Cambridgeshire Local Plan 2014 and Draft Cambridge Local Plan 2014 processes, including a 'call for sites' process (where it was assessed by South Cambridgeshire District Council ('SCDC') as part of its Strategic Housing Land Availability Appraisal ('SHLAA') – references SC159 and SC160), the Issues & Options and Proposed Submission consultations, verbal contributions to the Examination process in November 2015, and consultation on Modifications in January 2016.

## Issues for Joint Hearing Sessions

### **I. IS THE PLAN UNSOUND WITHOUT THE ALLOCATION OF LAND AT FEN DITTON FOR DEVELOPMENT, AS PROPOSED IN THE RELEVANT REPRESENTATIONS, AND IF SO WHY?**

4. As explained in previous representations, and summarised in relevant sections of this Statement, the draft Cambridge Local Plan 2014 and draft South Cambridgeshire Local Plan (collectively referred to as 'the Plan', using the above Inspectors' terminology) is considered to be unsound without the allocation of Land at Fen Ditton for a number of reasons.

### **PROPOSED LEVELS OF HOUSING GROWTH**

5. The housing requirement remains at the lower end of possible options (19,500 for South Cambridgeshire; 14,000 for Cambridge City), and will not address the housing crises and chronic shortage of affordable housing in Cambridge and South Cambridgeshire.
6. **Soundness Response: It is considered that housing growth in South Cambridgeshire should be increased to at least 21,500. Allocation of Land at Fen Ditton for approximately 500 new homes, including up to 200 affordable homes (40%), could assist in addressing the resultant housing shortfall (i.e. at least 2,000 homes). Land at Fen Ditton is in single ownership, is available now, offers a suitable location for development now, and is achievable with a realistic prospect that a smaller element (c.70 homes in years 4/5) of the housing could be deliverable within five years, with the residual total (c.430 homes) completing in years 6-10. It is considered that development of the Site for approximately 500 homes would be viable.**

### **LOCATION OF PROPOSED GROWTH**

7. The Councils acknowledge that the need for housing, affordable housing and employment does represent exceptional circumstances that justify the release of land from the Green Belt. The Inner Green Belt Review 2015 fails to consider the relationship between the Green Belt and sustainable development. It is apparent that the Green Belt is the over-arching principle guiding the development strategy of the Local Plans, with the delivery of sustainable development having only a secondary role which is an approach that is contrary to National Policy (National Planning Policy Framework 'NPPF') – and therefore unsound.
8. We disagree with the limited scale and extent of Green Belt release that has been proposed within the Plan. There is a clear and compelling case that sites on the EoC offer greater opportunities for delivering sustainable development than in New Settlements or in existing villages. Alternative development scenarios on the EoC have not been adequately tested, in terms of calculating the

**net sustainability benefit** of major development on the EoC vs. the anticipated benefits arising from New Settlements:

- Delivery of housing in urban extensions on the EoC (i.e. for 500 homes at Land at Fen Ditton) can be achieved earlier than in New Settlements - as evidenced in the housing delivery rates of Cambourne and Northstowe;
  - New homes in urban extensions on the EoC (i.e. Land at Fen Ditton) would have access to existing education, health and social infrastructure, jobs, and high quality public transport offered by Cambridge, enabling residents to cycle, walk or travel by bus or train. New Settlements will lead to the majority of residents out-commuting to areas such as Cambridge, with many by car, adding to the severe congestion problems around the City;
  - The Councils acknowledge that EoC sites will have higher sales revenues than comparable properties in New Settlements, resulting in higher contributions for s.106/CIL, and an increased quantum of affordable housing in residential schemes (as EoC sites are more viable than New Settlements and will be able to generate a greater percentage of affordable housing within schemes). Additionally, the use of CityDeal funding should be re-considered as part of the alternative scenario testing of sites on the EoC, in preference to creating new infrastructure and service provision for one or more New Settlements.
9. Alternative scenario testing for sites on the EoC should challenge how potential environmental impacts of development could be mitigated, and modelling should be carried out to measure the potential effects upon the Cambridge Green Belt (including, *inter alia*, potential impact upon the City's compactness, its dynamism, townscape and landscape setting, and the importance of its historic core), using the range of growth scenarios on the EoC.
10. Accordingly, the Plan is unsound as it is not Positively Prepared, Justified or Consistent with National Policy.
11. **Soundness Response: we have undertaken (and previously submitted), analysis on the Councils' Sustainability Appraisal objectives and the scoring applied by the Councils in respect of EoC and New Settlements. When scoring for each area is totalled up, it immediately demonstrates that the EoC is where sustainable development can be best achieved (EoC score: 11; New Settlements score: 6). Furthermore, in the two objectives of 'Landscape and Townscape Character' and 'Housing' we have sought to challenge how the scoring has been applied, which if accepted, would add a further two + points to EoC, and result in the deduction of a + point in New Settlements (EoC score: 13; New Settlements score: 5).**

- 12. We also believe the Councils have mis-applied the scoring in its assessment of Strategic Development Alternatives. We have previously submitted analysis that presents the case for 2-3 urban extensions on EoC consisting of up to 4,000 homes, in addition to a Village Focus. This Option outscored two separate Options focusing on Waterbeach and Bourn/or Village Focus by 29 points compared to 18 and 19 respectively. This was despite Green Belt being included in the scoring assessment, resulting in negative points being accrued in EoC locations.**

### **SAFEGUARDED LAND**

13. Bullet Point 3 of Paragraph 85 of the NPPF states: *“When defining boundaries, local planning authorities should: ...where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;...”*. A proper assessment of safeguarded land has not been undertaken for the Plan, and none of the Green Belt studies including the Inner Green Belt Review 2015 have considered this matter. Land at Cambridge East has been identified as safeguarded land without any assessment as to whether it will be available for development after 2031. Furthermore, no additional or alternative land has been considered or assessed as potential safeguarded land for housing or employment. It is clear that if sufficient land has not been identified to meet development needs, and in the absence of available safeguarded land, that the proposed Green Belt boundaries will need to be altered again at the end of the plan period. In effect the Green Belt boundary has no permanence and will not endure beyond the plan period.
14. Consideration should also be given to identifying land as safeguarded land either to meet long term development needs or to ensure a flexible approach to development strategy is taken in the event that sites identified for early delivery are delayed. SCDC cannot demonstrate a consistent, long-term, track record of delivering housing in accordance with its medium-long term development strategy, most notably in terms of New Settlements. We have previously demonstrated this for the two recent New Settlement proposals at Cambourne and Northstowe.
- 15. Soundness Response: it is considered that the Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development, and in particular meeting full objectively assessed housing and employment needs and whether safeguarded land needs to be identified. We request that Land at Fen Ditton should be released from the Green Belt, and allocated for development or identified as safeguarded land to meet long term development needs. The issue of safeguarded land has not been properly considered in the Plan or the supporting evidence.**

## LAND AT FEN DITTON – SUSTAINABILITY

16. The Councils have relied on a Site Assessment Proforma to assess the suitability of Land at Fen Ditton. We have previously provided analysis to challenge how the scoring has been applied, and have requested that adjustments be made in respect of AQMA, Contamination, Biodiversity, Landscape, Townscape, Green Belt, Heritage, Distance to District or Local Centres, Distance to GPs, Distance to Key Local Facilities, Integration with Existing Communities, Employment Accessibility, Distance to Secondary School and Distance to Railway Station.
17. **Soundness Response: The Councils should review our analysis and apply this to a new Site Assessment for Land at Fen Ditton. We have challenged 14 of the 46 assessment criterion used (30.4%) and our analysis would affect the scoring as follows (shown in detail in Appendix 2):**

Scoring	How Land at Fen Ditton <u>should</u> have been scored	How Land at Fen Ditton was scored by Councils
	0	1
	3	11
	16	15
	24	16
	3	3

## LAND AT FEN DITTON – GREEN BELT AND LANDSCAPE

18. We have previously submitted analysis by Liz Lake Associates to challenge how Land at Fen Ditton was assessed in the Inner Green Belt Assessment 2012 and Cambridge Inner Green Belt Boundary Study 2015 (LDA Design). We believe that the conclusions reached in the assessment of Land at Fen Ditton have been incorrectly applied, leading to the dismissal of Land at Fen Ditton for allocation.
19. The case for Land at Fen Ditton (parcels 18.2 and 19.1 in the Inner Green Belt Assessment 2015) is intriguing given the Green Belt Assessment undertaken by LDA Design applying the CEG methodology. Consequently, using this method it is shown to make a Low Contribution to Green Belt Purposes when evaluated with the CEG methodology. LDA Design have used this to demonstrate the flaws in the CEG methodology. However, this highlights the differences and inconsistencies of assessing Green Belt value, and the Inspectors will ultimately determine which of the approaches used is most appropriate. Should the Inspectors accept the CEG methodology, the Councils will have then, in effect, accepted that Land at Fen Ditton should also be released, by virtue of it making a Low Contribution to the Green Belt.

20. Notwithstanding the CEG methodology point, Liz Lake Associates would note that, in the case of Land at Fen Ditton, there are clearly differences between how they and LDA Design have defined land parcels and subsequently assessed potential impact. The land parcels being promoted here are smaller than the sectors in which they lie (within the LDA Design report) with the consequence of lower effects on the land.
21. There are also a number of other contributing factors which support the removal of land from the Green Belt at Fen Ditton and a potential allocation, now the LDA Design Review has been published; this is enhanced since the Sectors study is an assessment based on landscape assessment/appraisal and has not assessed the land using a methodology in line with the National Green Belt purposes. The summary reasons are rather selective, appearing to be based on landscape appraisal factors rather than strict Green Belt planning reasoning; consequently they allow a limited way of quantifying or comparing the effects on Green Belt Purposes. Clearly the absence of an aligned approach means that a number of opportunities are missed. That said, whoever's methodology is used, there would be an effect on the Green Belt Purposes through development of the land. However, there are a number of opportunities.
22. The opportunities for Sub Area 18.2 are:
- Built edge of newer housing in Fen Ditton is described a 'stark' and could be enhanced.
  - The land is flat and arable with few hedgerow features (which could be enhanced).
  - The land contains no designations.
  - Edges of the land are generally well vegetated – the A14 and disused railway providing containment.
  - The A14 is a detractor to the north.
  - The A14 provides a well-defined defensible edge, allowing the natural expansion of the City to be contained, with the further addition of new buffer planting.
  - The land at Sub area 18.2 does not contribute to a physical merging of communities into one another (using the methodology as written), as it does not lie in between the existing built edge of Cambridge and the built edge of Fen Ditton. It would only result in the expansion of the village itself in a generally north-east direction away from Cambridge itself.
  - The sub area does not lie within any green corridor or serve to provide connection between green corridors.
  - The sub area is contained by the A14, which is elevated and well vegetated; accordingly views from the wider landscape would be rather more limited than stated by LDA Design. Views however, would be mostly limited to the adjacent sub areas to the west and south.
  - The land does not extend the perceived urban gateway, which is beyond Fen Ditton.
  - The land does enable views to or from the historic core, nor does it form the backdrop to skyline views.

- The land abuts Fen Ditton on two sides to the south and west, and is contained by the A14 and a disused railway line to the north and east.

23. The opportunities for Sub Area 19.1 are:

- The Sub area is bordered on three (3) sides by the built edges of Fen Ditton. However this includes the village's historic core, which would need careful treatment of the built edge to preserve the village character.
- The A14 is a detractor to the north.
- The rural field boundary is well defined with a strong hedgerow.
- The land at Sub area 19.1 does not contribute to a physical merging of communities into one another (using the methodology as written), as it is contained on three (3) sides by the built edge of Fen Ditton; in addition it does not lie in between the existing built edge of Cambridge and the built edge of Fen Ditton. It would result in the infill expansion of the village itself in a generally north direction away from Cambridge itself.
- The sub area does not lie within any green corridor or serve to provide connection between green corridors; however, the position of the land provides an excellent opportunity to extend and reinforce the River Cam green corridor further north, as part of future development proposals, enhancing strategic green infrastructure.
- The sub area is contained by the A14, which is elevated and well vegetated, accordingly views from the wider landscape would be rather more limited than stated by LDA Design. Views however, would be mostly limited to the adjacent sub areas east.
- The land does not extend the perceived urban gateway, which is beyond Fen Ditton.
- The land does not enable views to or from the historic core, nor does it form the backdrop to skyline views.
- The reduced topography of the land means that development would not interrupt elevated views identified.
- The land abuts Fen Ditton on three sides to the south, east and west, and is contained by the A14 and B1047 to the north and east.

24. Land at Fen Ditton provides an opportunity to develop areas of land in 18.2 and 19.1, however there would be some harm to Green Belt as identified in all studies.

#### **PROPOSED POLICY AND ALLOCATION – LAND AT FEN DITTON**

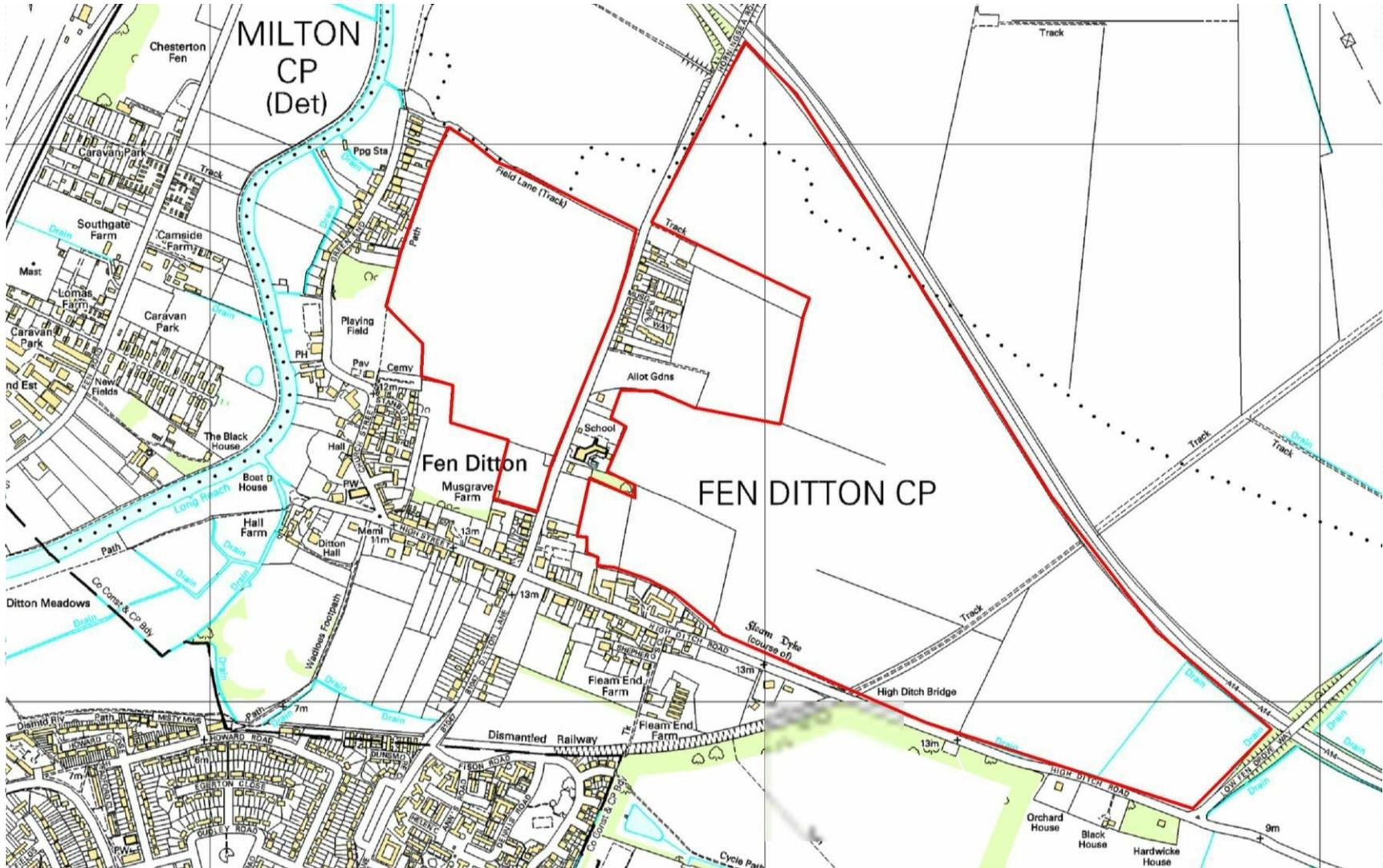
25. To assist in making the Plan sound, we proposed a new policy and allocation for Land at Fen Ditton, comprising the following uses:

- Land at Fen Ditton is allocated as a sustainable housing-led urban extension to Cambridge for approximately 500 dwellings including affordable housing. The development will also provide

land for the provision of a relocated and expanded primary school (subject to further detailed discussions with the Local Education Authority) and new publicly accessible open space.

- Revision of the Green Belt boundary to accommodate the new development.
- A Masterplan-led approach which considers:
  - Vehicular access from Horningsea Road
  - Opportunities to achieve pedestrian and cycle links from Fen Ditton towards Cambridge Science Park Train Station Interchange (via new bridge)
  - Land for a relocated and expanded primary school (if required)
  - Protection of views and setting of the Church and nearby listed buildings
  - A Landscape Strategy, providing new site green infrastructure, including public open space/play areas, boundary landscaping
  - opportunities to enhance site biodiversity
  - a Surface Water Drainage Strategy to manage surface water run-off and flood risk
  - a Phasing Plan
  - a Noise Impact Assessment will be prepared for the site to mitigate noise impacts from the A14.
  - an Air Quality Assessment will be prepared for the site to mitigate air quality impacts from the A14.
  - A Construction Strategy will be required for all phases of development at the site.

## APPENDIX A – SITE PLAN



**APPENDIX B – SITE ASSESSMENT PROFORMA ADJUSTMENTS**

<b>Development Sequence</b>	<b>Site Number</b>	Non-Car Facilities		
		Access		
		Distance: Railway Station		
		Distance for cycling to City Centre		
		Public Transport Journey Time		
		Frequency of Public Transport		
		Distance: Bus Stop		
		Sustainable Transport Score		
		HQPT		
		Cycle Routes		
		Distance: Secondary School		
		Distance: Primary School		
		Education		
		Utilities		
		Employment Land		
		Employment Accessibility		
		Shopping hierarchy		
		Deprived Areas of Cambridge		
		Integration with existing communities		
		Community Facilities		
Key Local Facilities				
Distance: Health Centre or GP services				
Distance: Edge of City Centre				
Distance: District or Local Centres				
Gypsy and Traveller Provision				
Distance: Play Space				
Distance: Outdoor Sports Facilities				
Open Spaces				
Flood Risk				
Renewable Energy				
Heritage				
Green Belt				
Townscape				
Landscape				
Green Infrastructure				
TPO				
Biodiversity, Habitats and Species				
Designated Wildlife Sites				
Water Quality				
Contamination				
Pollution				
AQMA				
Air Quality				
Mineral Reserves				
Agricultural Land				
PDL				
<b>Scoring Responsibility</b>	<b>Edge of Cambridge</b>	Sustainability Appraisal (Council)		
		Objector (TQE)		