



# Report to South Cambridgeshire District Council

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## **PLANNING & COMPULSORY PURCHASE ACT 2004 (SECTION 20)**

## **REPORT OF THE EXAMINATION INTO THE SOUTH CAMBRIDGESHIRE CORE STRATEGY DEVELOPMENT PLAN DOCUMENT**

Document submitted for Examination on 6 January 2006  
Examination hearings held on 11-27 July 2006

## **Introduction**

1. The requirements of s20(5)(a) of the 2004 Act fall into two parts:-
  - a. whether the DPD satisfies the requirements of s19 and s24(1) of the 2004 Act;
  - b. whether the DPD satisfies the requirements of regulations under s17(7) and s36 relating to the preparation of the document.
2. This report contains our assessment of the Core Strategy in terms of the above matters, along with our recommendations and the reasons for them, as required by section 20(7) of the 2004 Act.
3. Our role is to consider the soundness of the submitted Core Strategy DPD. This introduction is followed by consideration of soundness in accordance with the procedural tests. The report then covers the Main Matters raised during the examination on a topic-by-topic basis, reaching conclusions on soundness in relation to each matter. Our overall conclusion is that the Core Strategy is sound provided it is changed in the ways we specify. A schedule and appendices are included at the end of this report. These show the changes necessary to ensure that the plan meets all the tests of soundness

## **PROCEDURAL TESTS OF SOUNDNESS**

### ***Test 1 - Consistency with Local Development Scheme***

1.1 The production of the Core Strategy is identified in the Local Development Scheme (LDS) and the document has been prepared in accordance with the milestones in the LDS. The submitted Core Strategy contains a spatial vision, objectives, strategic policies, and rural settlement policies, in accordance with the role described in the LDS.

1.2 The LDS description of the Core Strategy refers to the Key Diagram setting out broad locations for development. Our recommendation to delete most of the major development sites from the Key Diagram follows on from our conclusion concerning the Sustainability Appraisal (see i)3.32 below). However the broad locations for development are identified in general terms in Policy ST/1, and in our view this is sufficient detail to accord with the LDS.

1.3 Since the preparation of the Core Strategy is generally in accordance with the LDS, we are satisfied that this soundness test has been met.

### ***Test 2 - Compliance with Statement of Community Involvement and associated Regulations***

1.4 The Council has yet to produce a Statement of Community Involvement. In these circumstances, the Council must comply with the minimum requirements as set out in the Regulations and ensure that the community is able and encouraged to participate in the preparation process. We conclude that the Core Strategy has met this soundness test.

1.6. We are satisfied all parties were given the chance to comment.

1.7. Some changes to the Core Strategy have been suggested by the Council as a result of representations at the submission stage and during the examination. These are taken into account in our consideration of the issues and soundness in terms of the other tests.

### **Test 3 - Sustainability Appraisal (SA)**

1.8. The Council undertook an extensive SA exercise which is described in the Self Assessment of Soundness. The SA should be seen in the light of the Structure Plan, which was the result of thorough investigation of alternative development locations. SA is required to do no more than assess reasonable options. In the circumstances the fact that the Council did not seek to test other options for the broad location of housing was justified.

## **TESTS OF CONFORMITY, COHERENCE, CONSISTENCY, AND EFFECTIVENESS**

### **Main Matter 1: The Strategy**

2.1 This Main Matter is concerned with the first 2 sections of Chapter 2 of the Core Strategy, namely the strategic vision for the District, and objectives.

#### *Coverage, the Sequential Approach, and draft Regional Spatial Strategy*

2.2 In general terms the vision encompasses those strategic elements of spatial planning which should be included in such an overall expression of the way in which the District should be developed (and important features be conserved) over the plan period. These elements include the satisfaction of needs, the District's heritage and character, the setting of Cambridge, the Green Belt, the City's rural hinterland, and economic factors. The vision contains references to social fabric and to sustainable and balanced communities. The fact that it also reflects the sequential approach of regional and Structure Plan strategies is a further indication of its concern with sustainability. We consider that there are no major omissions in the vision, or inconsistencies with other Council plans, and no conflict with test vi. We see no need for specific reference to military establishments at the level of the strategic vision. On the other hand, a severely truncated vision would omit matters of importance such as the function of the Cambridge Green Belt.

2.3 The vision for the Cambridge sub-region contained in the Structure Plan is specific in requiring that the needs of the sub-region, rather than pressures generated elsewhere, should be met. The Structure Plan, following RPG6, adopts a sequential approach to housing development. This starts with the built-up area of Cambridge, and goes on to include sites on the edge of Cambridge, then a new settlement at Longstanton/Oakington (now referred to as Northstowe), and finally to market towns (of which there are none in South Cambridgeshire), Previously Established New Settlements (PENS - i.e. Cambourne), rural centres, and development already committed elsewhere in the sub-region. Draft regional guidance has a similar sequential approach, and RPG6 has a similar policy for employment generating development.

2.4 Consistent with this strategic background, the Core Strategy vision is to focus development into urban extensions to the built-up area of Cambridge and in a small new town north-west of the City (i.e. Northstowe). There is therefore a clear emphasis on urban extensions. The potential for development on smaller sites on the edge of Cambridge does not require mention in the vision as such sites are non-strategic and not automatically ruled out of consideration by the vision as written. The sequential approach is based on considerations of sustainability and is clear from the vision. There is no need for reference to transport modes, which are in any case dealt with in the objectives.

2.5 As for other development locations, the Core Strategy is not the place for specific sites to be identified. For reasons given in the next section of this report, there is no justification at the present time for the Core Strategy to identify Waterbeach as a location for a second new settlement, nor to include a more general reference to an additional settlement.

2.6 Generally, we find that the vision and objectives, in dealing with the sequential approach and especially the treatment of development in the levels of the sequence above rural centres, accords with the soundness tests. In particular, there is conformity with regional and Structure Plan policy and the strategy is the most appropriate in all the circumstances (tests iv and vii).

2.7 The draft regional guidance has reached only the stage where the report of the EIP Panel has been published. The vision and objectives do not have to refer to it in order to make the Core Strategy accord with soundness test iv or other tests. There is reference to the draft East of England Plan elsewhere in the Core Strategy, but the DPD fails to explain that the Core Strategy will need to be reviewed when the new regional guidance has been approved. This omission should be put right to meet the test of conformity with national planning policy.

#### *Villages and the Rural Area*

2.8 The vision and objectives make appropriate provision for limited development in the villages in the District, with most of that development being focussed into rural centres. Objective ST/e is to ensure, *inter alia*, that the scale of development in each village is in keeping with its size, character and function. These statements allow for development which would help to meet local needs, result in affordable housing, and enable previously developed land to be used. PPG3 sees rural exception housing as a good way of meeting local needs.

2.9 National policy (PPG3 and PPS7) promotes more sustainable development patterns, focussing most additional housing in rural areas on existing towns and service centres. It will also be necessary to provide for some new housing to meet identified local need in other villages, but the vision is not incompatible with these policies. Moreover regional and Structure Plan policy apply national policy to the circumstances of this area. In general terms, the villages of the District are not remote from service centres. The Structure Plan's sequential approach is given above, and regional policy does not suggest that villages should be the recipients of significant amounts of development. In fact, the regional and Structure Plan approach, discussed at the Core Strategy DPD hearings, plainly limits development in rural areas. Recently published reports concerning rural housing are not part of the national or local policy approach.

2.10 Very substantial development would be required to sustain village services. Villages in South Cambridgeshire received significant amounts of development under the previous planning strategy of dispersal, but this scale of past development does not appear to have led to the maintenance of services and facilities in the rural areas of the District as a whole. A similar point is made in the draft regional guidance. There have been demographic and lifestyle changes in urban and rural areas which have a great influence on the sustainability and vitality of villages.

2.11 The plan would be unsound if it allowed for large amounts of housing through extra flexibility in the approach to villages generally. The population increases sought by some objectors could see perhaps 30 additional dwellings in many villages. This would add up to big increases in the amount of housing produced in the lowest level of the hierarchy of the sequential approach. The rural area of the District is already on course to provide more houses than any other level - in fact approximately half the District's total, although largely

because of existing commitments. Development in villages should be limited in order to minimise commuting for employment purposes and unsustainable car journeys to larger centres for shopping and services.

2.12 Against the above background, the sections of the vision and objectives which are supportive of the rural areas should not be used to justify increased building in villages.

2.13 We conclude that the rural settlement element of the vision and objectives complies with the soundness tests. With regard to test iv, the sequential approach of the regional guidance and the Structure Plan is a strong element in determining the approach the Core Strategy should take to rural settlement. There is reasonable flexibility, to use the words of test ix, because there is provision for some development (see Main Matters 5-8 below) but this has to be tempered by the need for conformity with regional and Structure Plan policy.

#### *Other Points*

2.14 As for matters covered by other individual objectives, there are several elements, in a number of objectives, which encompass water resources. Objectives ST/b and ST/e (the reference to the function of villages) enable account to be taken of the effects of the CGB in rural areas. Objective ST/k is a correct expression of the plan's approach to previously developed land. The percentages of housing on such land and on greenfield land can be judged from reading Policy ST/2 and its supporting text.

2.15 On the other hand the complex expression used in objective ST/b gives the impression that either the second part of the objective is superfluous or that this part of the objective is intended to weaken the commitment to locating development where there are sustainable travel opportunities. This would be contrary to national policy in PPG13 and in this respect the Core Strategy fails test iv. Even in villages the aim should be to locate development where there are opportunities for non-car travel modes to services and facilities. The alternative wording we recommend has greater clarity and complies with test iv.

2.16 Similarly objective ST/i appears to require all developments to provide opportunities for increased access to the countryside and enjoyment of biodiversity. This would be onerous and in conflict with national policy in Circular 11/95. Consequently there is a failure to comply with test iv. The Council suggests a form of wording to make the plan sound in this respect.

2.17 Other objections to the wording of objectives in our opinion raise issues of minor importance which do not render the Core Strategy DPD unsound.

#### **2.18 The following changes are required for the document to be sound:**

- i) Delete objective ST/b and replace with "To locate development where access to day-to-day needs for employment, shopping, education, recreation, and other services is available by public transport, walking and cycling thus reducing the need to travel, particularly by private car".**
- ii) In objective ST/i, delete "requirements" from the last line and replace with "aspects".**

### **Main Matters 2 and 3: Housing Provision and its Distribution**

3.1. This Main Matter is concerned with the provision of sufficient housing to meet requirements, and with the overall distribution of that provision to reflect the locational preferences of national, regional and Structure Plan guidance. The relevant parts of the Core Strategy are paragraphs 2.1 – 2.22, Policies ST/1 – ST/3, Figure 1, and the Key Diagram. This matter is also relevant to some elements of the rural settlement part of the DPD, especially Figure 3. First, however, we consider the question of the Green Belt.

#### *Green Belt*

3.2. Locations where land is to be removed from the Green Belt are named in the Structure Plan. The detailed site boundaries are for other DPDs to draw. However there is no policy to maintain the Green Belt, or which provides the context for establishing detailed boundaries in accordance with the Green Belt review set up by RPG6 and intended in Structure Plan Policy P9/2b. The Core Strategy should not rely on the Structure Plan for such an important matter, but should be capable of standing alone. Soundness test iv in particular would be failed if there is no over-arching Green Belt policy. Furthermore the shortage of housing land and the emphasis on development in and near Cambridge mean that the Core Strategy should encompass the possibility of identifying in other DPDs sites for release from the Green Belt.

3.3. A straightforward Green Belt policy, with supporting text, has been canvassed during the examination, and its final form takes account of representations made. It would allow for the completion of the Green Belt review and the delineation of boundaries, and would provide a link between regional Green Belt policy and the policies in AAPs and other DPDs in South Cambridgeshire. The Structure Plan does not limit consideration to strategic sites alone. The principal function of the Green Belt is included in the Policy because of the important role of the Green Belt: the purposes are included in the supporting text. The specific purpose of the review is also dealt with in this text.

#### *The Housing Requirement and the Plan Period*

3.4. In accordance with RPG6, the Structure Plan indicates that provision should be made in South Cambridgeshire for 20,000 additional homes between 1999 and 2016. There is no requirement in the strategic context guiding the Core Strategy DPD for the provision of 'at least' 20,000 dwellings, or similar forms of wording. Such wording would be imprecise and includes no ceiling. The use in the submitted DPD Policy ST/1 of the term "approximately" to qualify the figure of 20,000 is also imprecise, and does not provide the clarity sought by national policy. Nor does it reflect the wording of Structure Plan Policy P5/1. It therefore fails soundness test iv, and should be deleted.

3.5. The Core Strategy adopts the Structure Plan period. Draft regional guidance has a plan period for housing provision which extends to 2021, further in the future than the RPG6 and Structure Plan period. However the final housing requirement for the draft regional guidance is not known, and will not be known when the Core Strategy is adopted. There are as yet no proposed modifications to the draft East of England Plan, and the draft has not reached the stage where it can be given considerable weight (PPS12 paragraph 4.19). The draft regional guidance is not sufficiently advanced, and the evidence base is not sufficiently clear, to allow for a Core Strategy which extends to 2021. Were the Core Strategy period to be so extended, it would fail both the test of compliance and test vii.

3.6. When the new regional guidance is adopted it will effectively require a further 5 years worth of housing land, whatever that might mean in terms of a precise figure for housing provision. Furthermore the Core Strategy DPD, when adopted, will cover (formally) a period of a little under 10 years. However, the submitted Core Strategy contains a sequential approach to development. It indicates in Figure 1 and in relation to Northstowe that there are locations where implementation of housing schemes is expected to commence, or continue, after 2016. The locations in question are substantial. Therefore the DPD plans for large numbers of houses to be built after 2016. The Core Strategy is reasonably flexible in the light of the stage reached in drawing up the regional strategy. In the circumstances, the submitted Core Strategy is the most appropriate, bearing in mind our conclusion and recommendation to refer to a review of the Core Strategy.

3.7. There is no Core Strategy policy under which affordable housing, including key worker housing, will be sought. Securing this type of housing is an important consideration as part of the overall housing provision, and should be the province of Policy ST/1.

#### *Meeting the Housing Requirement*

3.8. Core Strategy Policy ST/1 is to provide 20,000 dwellings in the District for the period 1999-2016. Questions arise as to whether the plan provision is realistic and enables the requirement to be met over the plan period.

3.9. The Council makes allowance for commitments which are unlikely to come forward. Further discounts from the land supply are not necessary given the close working relationship between the Council and the development industry, and the knowledge gained concerning the land which makes up the planned provision. Arguments for discounting the figure for Cambridge East are also countered by the possibility that development might start at Cambridge Airport before the end of the plan period.

3.10. On the other hand the Council includes a figure for greenfield windfalls, which is contrary to national policy in PPG3. A reduction of 173 dwellings should be made in the land supply relied upon by the Core Strategy. This figure allows for a continuation of past rates of windfalls on previously developed land outside village envelopes. It remains to be seen whether stricter controls on development in rural settlements will decrease the number of windfalls.

3.11. General locations for housing and mixed use development are identified in the submitted Core Strategy, and provide a large part of the housing supply relied upon in the document. The transport implications of these developments were considered in the preparation of the Structure Plan. The locations are in many cases reliant upon the provision of infra-structure: this together with their size makes the achievement of the housing requirement a challenging prospect. However the effort has the backing of many parties working jointly and in the knowledge of the urgent nature of their task. This has not prevented delays in the past, but those involved will have gained experience and familiarity with the sites, constraints, and actions needed to implement the required development. Even so, delays in the commencement of development at Northstowe will reduce the number of dwellings which can be completed during the plan period from that expected in the DPD (see Main Matter 4 below).

3.12. Past completion rates are not a guide to future potential rates, as they were necessarily based on rural sites alone. Nevertheless the completions figure for 2005/6 is 888, and annual rates can be expected to rise substantially in future years as urban extensions come forward. The evidence regarding the construction rates achievable where large areas of land are released suggests that high levels

of annual completions are achievable where large areas of land are developable in separate sections.

3.13. There is good evidence regarding the developability of individual locations and sites relied upon by the Core Strategy to meet the dwelling requirement. In Cambridge East development is partly dependent on construction of the Bar Hill to Fen Ditton section of improvements to the A14. The best estimate for that construction is 2013/2014, but some development can go ahead before the completion of improvements, and between that date and 2016. Furthermore, the 2 relevant areas, north of Newmarket Road and north of Cherry Hinton, are well separated from each other and would not operate as a single site. Substantial rates of development could be achieved at both. The relocation of Marshall's North Works is being pursued, with a planning application expected before the end of 2006.

3.14. Housing densities at Cambridge East are to be at least 50 dwellings per hectare (dph) across the site as a whole, but with an aim to achieve 75 dph: the latter figure is not the figure relied upon across the whole site. The background to densities relied upon in the Core Strategy is the national drive for higher densities.

3.15. The remaining plan period gives a considerable amount of time to address problems like the relocation of uses which constrain housing development. This applies not only to Marshall's but also to the Northern Fringe East.

3.16. Overall, the production of dwellings from land on the edge of Cambridge, given in the Core Strategy, is founded on a robust and credible evidence base, and in this respect the strategy is the most appropriate in all the circumstances. As for land availability lower down the sequence of sites, much of this is made up of completions and commitments. However the Core Strategy should not identify the Bayer Crop Science site, or similar sites such as Ida Darwin East, in the light of advice in PPS12 that core strategies should set out broad locations for development but not identify individual sites. Additionally, the sustainability and suitability for development in other respects of such sites needs to be tested. With regard to the Bayer Crop Science site, there is not the necessary evidence base to justify its inclusion in the Core Strategy DPD.

3.17. Northstowe is likely to produce about 4800 dwellings during the plan period (see Main Matter 4 below).

3.18. The areas for which dwelling figures are given in this part of the Core Strategy will not produce 20,000 dwellings in the plan period. In round figures the likely product of development in the areas identified is 19,000 dwellings. The Core Strategy would be internally inconsistent if left unaltered, and would also fail to meet tests iv and vii. However, changes to the DPD would render it sound, and possible changes are discussed in the following paragraphs.

3.19. A number of possible changes to make the DPD sound, or other actions, have been canvassed in evidence to the examination. Some of the shortfall will be made up by development on the Cambridge University land in North-West Cambridge, but it is too early to say how much of this housing land should be located in the District. For example, there are Green Belt considerations to be taken into account. Relying on a review of the Core Strategy would not make the document sound and would be unlikely to produce a reviewed Strategy for at least 2 years, on the Council's evidence. Identifying reserve sites for housing development would be inadequate as action is needed now in order to ensure dwelling completions during the plan period, and the shortfall can be foreseen without further monitoring.

3.20. Nevertheless, our knowledge of the potential additional housing sites, principally those put forward by objectors, satisfies us that the housing requirement will be met through the agency of the other submitted DPDs which are to be examined in the near future, together with the AAP for North-West Cambridge. Wording to indicate this should be added to the supporting text.

3.21. The change to Policy ST/1 put forward on behalf of Countryside Properties would render the DPD sound. This change would delete the figures from the Policy, with the exception of the overall requirement of 20,000, and leave it for the Area Action Plan (AAP) and Site Specific Policies DPDs to identify sites which would make up the shortfall. More details are given below, following discussion of the location of development.

#### *Location of Development*

3.22. Policy ST/1 divides the housing provision between the categories of location set out, for the sub-region, in the Structure Plan. Thus 4,400 homes would be provided on the edge of Cambridge, 6,000 at the new town of Northstowe, and 9,600 in the rural area in rural centres and other villages.

3.23. On the face of it this appears to reverse the sequence set out in RPG6 and Structure Plan Policy P1/1, which in effect place development in and on the edges of Cambridge at the top, followed by Northstowe and then the rural area. However the Structure Plan Policy specific to the sub-region, Policy P9/1, has exactly the distribution adopted in the Core Strategy. The draft East of England Plan also includes a similar hierarchy of types of location: whether this is removed from the final version remains to be seen.

3.24. The distribution reflects reality. As at March 2006, completions within the plan period totalled 5088 and commitments over 3000, almost all of which were in the form of planning permissions. Even if strong restrictions were placed on development in villages, there would continue to be some windfalls in rural settlements, to add to the above figures. The windfall figure adopted by the plan, modified as suggested in paragraph 3.10 above, is about 1000.

3.25. The great majority of these dwellings are/will be located in the rural areas and largely result from past decisions which cannot be reversed. The operation of Green Belt policies on the edge of Cambridge in the past has prevented the extension of the urban area. However the balance of distribution between urban and rural areas will change as development gets under way in the former. In the meantime completions and commitments in the rural area will be needed so that this District can contribute some housing towards meeting the needs of the sub-region.

3.26. Bearing in mind past decisions, and the sequential approach, the distribution reflected in the Core Strategy DPD is the most appropriate in all the circumstances, and does not conflict with other relevant plans, policies and strategies relating to the area. However, in view of the shortfall in likely dwelling provision in Northstowe, that part of the distribution detailed in Policy ST/1 is inaccurate. Furthermore, in order to make up the shortfall in meeting the overall housing requirement identified above, the possibility of additional allocations on the edge of Cambridge would need to be investigated. This would lead to the figure of 4,000 in the Policy being exceeded. The figure for the rural area will also be exceeded. The distribution element of the Policy does not reflect the evidence, and is inflexible as written, bearing in mind the need for another 1,000 dwellings.

3.27. The DPD as submitted would be unsound for these reasons as well as those set out in paragraph 3.18.

3.28. The action suggested in 3.21 above would make the DPD sound by removing the figures specific to each type of development location. The hierarchy of development locations should be retained in the Policy: it is a very strong element in the strategic background. The possibilities of development in Cambourne, over and above that allowed for in the Core Strategy, and of stronger restrictions on development in villages elsewhere, are discussed below, under Main Matters 6 and 5.

3.29. The change to Policy ST/1 would require a consequential change, the deletion of paragraph 2.8.

3.30. It is not appropriate to identify Waterbeach in the Core Strategy as the site of a possible new town. This location is not put forward to meet the shortfall in housing numbers but as a longer term development for which planning should start now. However the form which long term development will take in the sub-region is not known, nor is the level of need post-2021. Draft regional guidance does not identify Waterbeach to meet needs up to 2021, and the EIP Panel Report merely refers to a number of possibilities for the location of development beyond 2021. Locations to meet the housing requirement in South Cambridgeshire beyond 2016 can be identified in the first review of the Core Strategy.

#### *Sustainability Appraisal (SA)*

3.31. The distribution of housing growth in the Core Strategy has been strongly guided by the detail concerning the location of development in the adopted Structure Plan, particularly with respect to Policies P9/1 and P9/2c. The Structure Plan went through a relatively exhaustive assessment of the suitability of alternative locations for development and as a result has produced some fairly prescriptive guidance on how new development should be distributed in the District, in terms of broad location. The general thrust of this guidance is also replicated in the Draft East of England Plan. In order for the Core Strategy to comply with this guidance, the introduction of new locations for housing development into the Core Strategy would not be acceptable unless there was an overriding change in local circumstances since the adoption of the Structure Plan. We have seen no overwhelming evidence to suggest that circumstances have changed justifying setting aside the broad thrust of the Structure Plan. Furthermore Article 5 Paragraph 1 of the European Directive concerned with the Sustainability Appraisal of Plans (2001/42/EC) refers to the testing of "reasonable alternatives". Given the Structure Plan lead the fact that the Council did not seek to test other options for the broad location of housing as part of its SA was therefore justified.

3.32. However it is equally clear that should the Core Strategy begin to allocate specific sites within these locations SA regulations would require assessment of alternative sites. As this assessment has not occurred the Core Strategy would not be sound if it identified particular sites as being suitable for development, as it would not have fully complied with SA requirements. Whilst the general thrust of the Core Strategy refers only to broad locations, Policy ST/3, Figure 1 and paragraphs 2.9-2.22 effectively identify specific sites. These should therefore be removed from the Core Strategy in order for it to be sound and we have recommended accordingly below. There are consequential changes to the Key Diagram.

3.33. Nevertheless, as discussed in paragraphs 3.9-3.16 above, there is adequate reliable evidence available to indicate the quantity of development likely to be achieved in the locations at the top 2 levels in the development hierarchy.

Their contribution to housing supply is important information which should be included in the Core Strategy supporting text.

*Policy ST/2 (Previously developed land)*

3.34. Almost half the housing development identified in the Core Strategy between 1999-2016 either already has planning permission or has already been built. Planning permission for these developments was largely granted under a very different planning regime, before the most recent revision of PPG3, and largely relates to greenfield sites. The proposed urban extensions to Cambridge will also involve greenfield release and the rural nature of the district does not present many significant opportunities for the development of previously developed land in sustainable locations.

3.35. A target of 37% for previously developed land (PDL) appears low, but the Core Strategy is robust in its approach to PDL in sustainable locations, both in terms of its reliance on Northstowe and the commitments given in objectives ST/d and ST/k. In following the Structure Plan target of 37% of new dwellings being developed on PDL the Core Strategy is only reflecting reality. This approach is supported by the Council's Urban Capacity Study. Given this, we can see no need for the Core Strategy to adopt a Brownfield Strategy. The use of Brownfield Strategies is proposed in draft PPS3, but as this is not a requirement of extant planning guidance there is no necessity for its inclusion in the Core Strategy. Policy wording to encourage the development of PDL would not necessarily be effective in actually securing more such development, and other sustainability factors need to be weighed in the balance in assessing the suitability of land for development.

*Action Needed to Achieve Soundness*

**3.36. The following changes are required to make the document sound:**

- i) Insert new Policy ST/1 and supporting text immediately after Objective ST/k, and renumber all subsequent policies and paragraphs. The wording of the new Policy and text is given in Appendix A at the end of this report.**
- ii) Replace Policy ST/1 as submitted with "The District Council will make provision for 20,000 new homes in South Cambridgeshire during the period 1999 to 2016 in locations in the following order of preference:**
  - i) on the edge of Cambridge**
  - ii) at the new town of Northstowe**
  - iii) in the rural area in Rural Centres and other villages.**

**The provision of affordable housing, including housing for key workers, will be sought as part of overall housing provision."**
- iii) Add to paragraph 2.3 "Land so far identified has a capacity of approximately 19,000 dwellings during the plan period. Of this, about 4180 dwellings are likely to come from urban extensions to Cambridge, 4800 from Northstowe, and 10050 from the rural area. The shortfall between land so far identified and the housing requirement will be made up by**

**sites to be identified in Area Action Plans and the Site Specific DPD."**

- iv) Delete Policy ST/3, Figure 1 and paragraphs 2.5-2.22.**
- v) Delete all major development sites from the Key Diagram, with the exception of Northstowe. Delete the legend "Major Development Site" from the Key and replace with "New Settlement".**

#### **Main Matter 4: Northstowe**

4.1. An important element in the housing provision set out in the strategy is the new town of Northstowe. This will have a developing life beyond the plan period, but is expected to produce 6,000 homes by 2016. As well as the housing provision, it will include a town centre and be a strategic employment location. It is an element of the Strategy that is identified in the Structure Plan. It will be developed adjoining the new rapid transit route and use the previously developed land at Oakington Airfield. The expectation was that the first new homes would be produced in 2006, and simple mathematics reveals that an average build rate of 600 homes per year is needed to hit the target of 6,000 by 2016.

4.2. There are criticisms of the strategy that it is optimistic about the date when any substantial development will begin and that it is far too unrealistic about the speed of development of Northstowe up to 2016. These are based on the need for essential infrastructure provision, and the need for planning permission and master plan approval. There is also great scepticism that an annual rate of anywhere near 600 dwellings per annum can be achieved up to 2016. The Council relies on examples of high build rates elsewhere, particularly in Swindon and the Bristol area, but concedes, in its housing trajectory for Northstowe, that only 5,300 dwellings will have been completed or be under construction by 2016.

4.3. It is important that a 'step change' is achieved in the housing provision in South Cambridgeshire compared with past completion rates. From the evidence presented it appears to us that it will not be until 2008 that any sizable housing completions will be achieved at Northstowe, bearing in mind infrastructure provision, particularly the Cambridge Guided Bus Route, and the need for a detailed permission on the early parts of the town to be in place following outline planning permission and the approval of a master plan. After that, we are optimistic that there can be a build up to high numbers of completions rather quickly, but our judgement is that the total number of dwellings likely to be completed by 2016 is not likely to exceed 4800, on the basis of a slow start but fast build up to 600+ per annum. This is the sort of level that must be aimed for, and we would not set a lower target. This does not mean that the development should be stopped if it reaches 4800 before 2016, but is the maximum figure that should be used in the Strategy as a contribution to the 20,000 new dwellings to be provided between 1999 and 2016.

4.4. As to the final size of Northstowe, pending any different figure being specified when the new regional guidance is approved, we consider that the ultimate size should arise from a detailed consideration of the local circumstances in the examination of the Northstowe AAP. But since the Structure Plan refers to a capacity of 8,000 to 10,000, we consider it appropriate to put the upper figure as the guide figure in the Core Strategy. This provides the greatest scope for detailed work to produce the most appropriate solution, and ensures that the longer term is not too constrained in meeting future housing demands. As for the

point about the description "small" new town, this is not an adjective with very precise meaning, but it seems to us that as towns go, Northstowe will remain small for the foreseeable future.

4.5. As the necessary figures are included in paragraph 2.23 Figure 2 is otiose.

**4.6. The following changes are required to make the document sound:**

- i) Paragraph 2.23, third line, replace "8,000 homes" with "up to 10,000 homes" and "6,000 homes" with "4,800 homes".**
- ii) Delete Figure 2.**

### **Main Matters 5-8: Rural Settlement Hierarchy and Policies ST/4-ST/7**

5.1. This section of the report deals with the principle and general form of the Core Strategy's rural settlement hierarchy, and with some matters common to all, or most, of the rural settlement Policies.

#### *The Rural Settlement Hierarchy*

5.2. The Core Strategy DPD contains a rural settlement hierarchy to control windfall development in villages. There are 4 levels in the hierarchy: rural centres, minor rural centres, group villages, and infill villages. On the face of it, this is a complex hierarchy, but it is a reasonable response to local characteristics. There are no traditional market towns in the District. There are, however, many smaller rural settlements varying in size from small villages and hamlets up to large villages with populations of several thousands. Some of these larger villages have substantial facilities, serving their own residents and in some cases those of surrounding smaller settlements. These large villages function as rural centres in the absence of market towns.

5.3. Regional guidance and the Structure Plan refer to larger villages and rural centres in their sequential approaches to locating development. The Structure Plan in particular assists with the identification of rural centres by setting out criteria which should generally be met. Rural centres are thus separated from other villages, where development is to be much more restricted. It should also be borne in mind that Northstowe will function as a centre with a hinterland in the north of the District.

5.4. The DPD is justified in identifying centres from amongst the many villages in the District by the policy context and local character described above. National policy also supports the location of development, outside urban areas, by the utilisation of the most sustainable option. Concentration of rural development in the larger villages with most services is the most sustainable option. Thus the 4 largest villages (taking the planned population of Cambourne into account) are identified by Policy ST/4 as rural centres within which development is not limited provided there is the infra-structure to support it.

5.5. This appears to leave much of the rural area without service centres, as the chosen centres are mostly close, or fairly close, to Cambridge. However there are several villages with populations above the Structure Plan guideline of 3000, and possessing sufficiently good facilities and communications to function as centres for small hinterlands. These are identified as minor rural centres in Policy ST/5, and the Council has assessed all the larger villages in deciding which should be centres and which minor centres. Thus the rural areas are served by a network of centres.

5.6. The classification of all the villages with, say, a population above 3000 as rural centres, with unlimited development within these village frameworks, would lead to a continuation of the dispersed pattern of development which the regional and Structure Plan guidance aims to reverse. Furthermore this guidance contains further criteria for the identification of centres/larger villages, and these criteria need to be applied in addition to the population guideline (see below). The DPD contains a mechanism, which relies on a number of criteria derived from those of the Structure Plan, for deciding how the split between rural centres and minor rural centres should occur. The decisions on which villages are in each category have not been made on an arbitrary basis, but are based on robust evidence regarding the services and functions of villages. These decisions also need to take account of the role of Northstowe, and of the strategy to concentrate development, with its corollary, to avoid dispersed development.

5.7. Below the level of centres are the remainder of the villages. There are many of these and they vary in nature from those with no facilities to those with a primary school and some other services. Given the number and variety of villages the division of these for policy purposes into group villages and infill villages is justified by the character of the area. In the latter category infilling only would be permitted, by Policy ST/7, and in the former larger developments would be allowed by Policy ST/6 (but less development than in the villages higher up the hierarchy).

5.8. We conclude that the rural settlement hierarchy is the most appropriate in all the circumstances, bearing in mind the nature of the District and the strategic background. It reflects local distinctiveness and also accords with national and regional policies. The hierarchy is not in our view confusing. It is set out in the DPD with all the relevant villages identified under each policy, and clear indications of the amounts of development permissible in the villages at each level in the hierarchy. The approach is familiar from the existing South Cambridgeshire Local Plan, which contains a similar hierarchy.

#### *Rural Settlement Policy Considerations*

5.9. The rural settlement Policies follow a common pattern in that they each give an exact figure for the maximum number of dwellings which would be allowed in any scheme. This is inflexible and runs the risk that previously developed land within village frameworks would not be reused, or would be developed at low densities which would not accord with national and regional policy. The figure is derived from earlier plans, but its use as a precise limit does not allow local circumstances to be taken into account. To meet soundness test ix, the Policy and supporting text should be reworded to treat the upper dwelling limit as a guideline. Also in the interests of greater flexibility the guideline for Policy ST/5 should be increased to 30 dwellings, a figure which the Council sees as consistent with this type of village.

5.10. Section 2 above, and paragraph 6.1 below, indicate why it is necessary to include indicative ceilings for housing development in most villages. There are mechanisms for providing affordable housing in rural areas.

5.11. The rural settlement Policies are intended to control housing development. Housing is a use which gives rise to significant numbers of windfall proposals which need to be provided within a controlling framework. This is less the case with employment. In regional policy rural centres and villages do not feature in the sequential approach to locating such uses. In the Structure Plan rural centres are not identified as strategic employment locations, but employment can be located in rural centres, where there is a need for new allocations. There is not a need in South Cambridgeshire.

5.12. There is no particular justification for including wording in the rural settlement Policies to allow for additional general employment uses, and the Council is addressing the question of rural employment in the Development Control Policies DPD (see paragraph 9.8.v)10.7 below).

5.13. Cluster development is subject to different considerations from general employment uses, and is encouraged to expand. The identification of clusters is a site specific matter, and not for the rural settlement policies.

**Main Matter 5: Rural Settlement Policy: Paragraphs 2.25-2.32, Figure 3**

6.1. For various reasons given in section 2 above it would not be appropriate to increase the amount of development proposed for villages in general, to allocate more land in villages, or, in principle, to expand village frameworks in order to allow for more development. Nor should there be an increase in the proposed dwelling contribution in Cambourne, in the light of the sequential approach to the allocation of housing land. There are sites on the edge of Cambridge which might be suitable for allocation in one or other of the submitted DPDs. However in the light of the size of the rural contribution to housing land supply (about half the total requirement) in a policy context of limiting rural development, it is pertinent to examine the case for reducing rural land supply.

6.2. Figure 3 in the Core Strategy sets out the housing land supply in the rural area. As noted above, the great majority of this supply consists of completed or committed dwellings. The single remaining undeveloped allocation surviving from the present Local Plan is the subject of a resolution to grant planning permission subject to the conclusion of a S106 agreement, which is being pursued. The Council has reviewed this element of land supply but there is little scope for reducing the supply from such sources.

6.3. There is in Figure 3 a substantial allowance of an additional 700 dwellings at Cambourne, over and above the permitted level of development. As this is an allowance for the application of higher densities within the permitted area, and not a new allocation, it is sensible to include it. This inclusion reflects national policy on housing density. On the other hand, we conclude above that the uncommitted Bayer Crop Science site should not be included in the land supply. As a result paragraph 2.31 should be deleted.

6.4. The windfall allowance for the rural area, excluding greenfield windfalls, is 984. This figure is based on the results of an Urban Capacity Study, adapted for use in a rural area, and reflects the contents of rural settlement policies in the Core Strategy. It is therefore possible to reduce the potential windfall contribution by altering Policies ST/4-7 in order to reduce the amount of housing development in the rural area.

6.5. Given the policy background and local characteristics already discussed in Sections 2 and 5 above, it would be unrealistic to expect too great a decrease in windfalls within villages, over a period of nearly 10 years. The rural area is the only area which can contribute to housing provision until development gets under way in the large sites. Too great a restriction on development in villages would lead to rural decline. As it is, the DPD has decreased the number of villages categorised as centres, compared with the numbers of growth settlements listed in the existing Local Plan. In our view the Core Strategy has the balance about right, and in this respect meets tests iv and vii. Greater constraints on development within villages would run the risk of leaving previously developed land undeveloped or under-developed.

6.6. There need to be changes to some parts of the rural settlement policy section of the DPD as a consequence of our changes to Policy ST/1. As the distribution of housing supply given in the document does not reflect the evidence, and has been deleted from Policy ST/1, the references to the dwelling requirement in the rural area (paragraphs 2.25 and 2.29) should be deleted. The introduction to paragraph 2.26 would also need amendment to make sense.

6.7. An updated Figure 3 (now Fig 1) was provided to the DPD examination at the Inspectors' request. The updated figures were provisional but final figures have now been provided. The updated Figure should be used in the DPD with the exception of those for completions before and after 2001, which have not been seen by the parties. The references to guidelines, requirements, surpluses and similar matters should be omitted as a result of the changes we propose to Policy ST/1. In accordance with our conclusion concerning greenfield windfalls, the Figure 3 total for windfalls should be changed to 984.

**6.8. The following changes are required to make the document sound:**

- a. Delete paragraphs 2.25, 2.29 and 2.31.**
- b. Delete the first line of paragraph 2.26 and replace with "A substantial contribution to the dwelling requirement has already been made by the rural area,".**
- c. Replace Figure 3 as submitted with the updated Figure 3 forming Appendix 2 to Reference Document CSMM2-SCDC-3, but deleting the lines dealing with Structure Plan guideline, outstanding requirement, housing land supply to be identified, Bayer Crop Science site, and surplus, and deleting the material in brackets in the completions row. Also delete the sub-headings "Components of supply" and renumber the rows as necessary. In the totals column, replace 1157 with 984 and 1092 with 10050.**

**Main Matter 6: Rural Centres: Policy ST/4**

7.1. In the Cambridge sub-region, the Structure Plan does not distinguish separate figures for new housing to be provided in market towns, PENS (i.e. Cambourne) and rural centres in Policy P9/1. There are no market towns identified in the Structure Plan in this District. However Cambourne has some differences from the rural centres which are older, more traditional, settlements.

7.2. Cambourne was planned as 3 villages with a common village centre. It is being developed to a Master Plan, and 2000 dwellings have been completed of the 4000 which the Core Strategy proposes, taking into account higher densities on land as yet undeveloped. It includes a substantial employment area and a superstore, although there are other rural settlements in the District with superstores.

7.3. Cambourne is clearly towards the upper end of the hierarchy of settlements in South Cambridgeshire, but is not comparable with the market towns in the sub-region. Its population with 4000 dwellings is likely to be between 9500 and 10000. This is not very different from the 8350 population of the next largest rural centre in the District, Histon with Impington. It is well below the populations of market towns located in the ring of such settlements around Cambridge, and below the planned population of Northstowe. It falls a little short of the population for market towns given in the Structure Plan

Glossary, but well short of that of the market towns selected for growth in that Plan.

7.4. Even when Cambourne is completed it is also likely to lack the range and choice of facilities available in market towns, and may have a poorer range and choice than other rural centres. There is no secondary school. To provide one would require perhaps as many as 2000 additional dwellings, and the shortfall in housing supply in the District is not of this magnitude.

7.5. The Structure Plan suggests that there may be some scope for additional growth at Cambourne which could improve the sustainability of the village. The 700 dwellings to be produced by higher densities would assist. This increase in the scale of development would not be sufficient to sustain High Quality Public Transport (HQPT) to Cambridge. The lack of HQPT is a further argument against identifying Cambourne as a market town.

7.6. At Cambourne there has been substantial investment in the provision of infra-structure for a new settlement and there is some justification for arguing that further development should be permitted in order to capitalise on that and to achieve greater sustainability. However the level of provision is not such as to warrant the classification of Cambourne as a market town or some other form of settlement above the level of other rural centres in the District. The possibility of meeting the shortfall in housing supply on the edge of Cambridge outweighs the sustainability case for further substantial development at Cambourne.

7.7. The sequential approach to releasing housing land also weighs against altering Policy ST/4 to make up the shortfall in other villages.

7.8. Histon and Impington can be considered as one settlement for the purposes of this part of the Core Strategy. There is a good level of service provision compared with other villages, and the CGB will serve the settlement. The identification of Histon and Impington as a rural centre is justified. The Policy requires adequate infra-structure to be available for development to take place.

7.9. The larger existing and proposed settlements on the CGB route, Histon with Impington and Northstowe, are identified as centres for development, along with Cambridge itself. This takes advantage of the sustainability credentials of the CGB.

7.10. We conclude that the Core Strategy DPD is sound as far as Policy ST/4 and its supporting text are concerned. However there are necessary changes consequent, firstly, upon the changes to Policy ST/1, which require the deletion of text concerning the housing requirement, and secondly upon a change to Policy ST/5 concerning Fulbourn (see 8.4 below).

**7.11. The following changes are required to make the document sound:**

- i) Delete the first sentence of paragraph 2.34.**
- ii) Add Fulbourn to the list of rural centres in Policy ST/4, and on the Key Diagram change the notation of Fulbourn from Minor Rural Centre to Rural Centre.**

**Main Matter 7: Minor Rural Centres: Policy ST/5**

8.1. Policy ST/5 identifies 8 minor rural centres. In terms of population size these all meet the Structure Plan criterion of 3000 residents, and the question arises as to whether some of them should be categorised as 'full' rural centres

under the terms of Policy ST/4. This question should be considered against the background of a Cambridge-centred strategy and the substantial amount of rural land already available for housing development. This establishes a context in which caution should be exercised in choosing rural centres, so as to avoid allocating too many and increasing the dispersal of development into less sustainable locations where there would be greater reliance upon car journeys.

8.2. There is a group of villages of significant size in the north of the District, one of which, Cottenham, has a population of similar size to that of the smallest of the Policy ST/4 centres. However the role of rural centre in this part of the District will be performed by Northstowe, and there will be no need for a further such centre in this area. Waterbeach is well to the east of the site of Northstowe but has a limited hinterland itself. Although Waterbeach has a station, public transport accessibility to Cambridge does not meet the Council's criteria, and Waterbeach looks to Cottenham for some services.

8.3. The Council's test requiring retail facilities sufficient to provide for weekly shopping needs is harsh in the light of the Structure Plan criterion of meeting day to day needs. Nevertheless, other facilities besides retailing should also be considered, and the minor rural centres generally have restricted services, public transport, and/or employment compared with the Policy ST/4 centres and the criteria for rural centres derived from the Structure Plan. With specific regard to Melbourn, there are gaps in the provision of public transport services from Melbourn to Cambridge, and these are greater if bus services only are taken into account. Bearing in mind also the nature of the footpath connections from Meldreth station to Melbourn, and the distances involved, Melbourn fails to meet the criterion of good public transport accessibility.

8.4. However, at the hearing concerning Fulbourn the Council's evidence did not support its opposition to the designation of the village as a rural centre, and this village has excellent transport links with Cambridge. The Council's written evidence identifies a role for Fulbourn in helping to serve the area east of Cambridge. The identification of Fulbourn as a rural centre does not necessarily mean that expansion beyond its boundaries will be permitted.

8.5. Our overall conclusion is that the choice of minor rural centres is generally appropriate and in accordance with wider policies, with a robust evidence base, and is therefore sound. The exception is the identification of Fulbourn as a minor rural centre. Fulbourn should be added to the list of rural centres identified by Policy ST/4, and, for reasons given in the next section, Papworth Everard should replace Fulbourn in Policy ST/5.

8.6. Changes to the Policy wording and supporting text are needed as a result of our conclusions in paragraph 5.9 above.

**8.7. The following changes are required to make the document sound:**

- i) Delete Fulbourn from the list of villages under Policy ST/5, and add Papworth Everard to that list and to the Key Diagram with the notation Minor Rural Centre.**
- ii) Delete "a maximum" from sub-paragraph 2 of Policy ST/5 and replace with "an indicative maximum".**
- iii) Amend the figure of 25 to a figure of 30, in the Policy and supporting text.**
- iv) Delete the last 2 lines of paragraph 2.36 and replace with "a guideline figure to indicate the upper limit of housing development likely to be suitable."**

**Main Matter 8: Group Villages: Policy ST/6**

**Infill Villages: Policy ST/7**

9.1. Group villages have a restricted range of services but sufficient facilities to support new development up to the scale of small groups of dwellings. The villages selected for this category meet this description.

9.2. The villages at the larger and better-served end of the scale in this category might be considered for designation as minor rural centres, but have too few facilities, sometimes scattered within a discontinuous or straggling linear built form, and do not operate as the centres for particular rural hinterlands. Bassingbourn cum Kneesworth is an example where settlement form combines with limitations on the range of services, and in this case proximity to a market town outside the District, to militate against designation as a minor rural centre. Meldreth too is located close to Melbourn, which fulfils the role of minor rural centre in the south-west of the District.

9.3. Comberton and Swavesey have secondary schools, which, as is generally the case in this District, provide community facilities. However, in other respects the villages do not provide foci for other settlements, bearing in mind the proximity of Cambourne to Comberton, and the location of employment well outside Swavesey. The village of Over is much smaller than the rural centres and has fewer services. The nearest CGB stop will be at the northern end of Swavesey, about 1.5km from the centre of Over, and relatively inconvenient for the latter settlement. In the case of Swavesey the CGB is likely to be used to take people out of the village to use services elsewhere rather than to bring them in to use services in the village, with the exception of the village college.

9.4. Other villages like Oakington have too few services to act as minor rural centres. Villages in this area will also look to Northstowe for services when the new settlement's development is sufficiently advanced. The need to reuse previously developed land has to be balanced against other factors, including the sustainability of the site and location. Girton does not function as a minor rural centre and there are more sustainable development locations. Nor is there convincing evidence that Duxford functions as a minor rural centre, whereas it is close to the rural centre of Sawston.

9.5. As is the case with Policy ST/5, there is one exception to the conclusion given in paragraph 9.1 above, and that is Papworth Everard. The range of facilities in this village, and its location between other villages and Cambourne, are such that it would be appropriate on the evidence to designate it as a minor rural centre. We also note that significant development in the village is taking place under the terms of the existing Local Plan.

9.6. The remaining villages in South Cambridgeshire are small and have few services. It is appropriate that they should be listed in Policy ST/7 and restricted to infill development on a limited scale.

9.7. Changes to Policy wording and supporting text are needed as a result of our conclusions in paragraph 5.9 above.

**9.8. The following changes are required to make the document sound:**

- i) Delete Papworth Everard from the list of villages in sub-paragraph 1 of Policy ST/6.**

- ii) **Delete the words "a maximum" from sub-paragraph 2 in Policy ST/6, and replace with "an indicative maximum".**
- iii) **Insert the word "about" before "15 dwellings" in sub-paragraph 3 of Policy ST/6.**
- iv) **Insert the phrase "(indicative size)" after the words "2 dwellings" in sub-paragraph 2 of Policy ST/7.**
- v) **Insert the word "about" before "8 dwellings" in sub-paragraph 3 of Policy ST/7.**

### **Main Matter 9: Employment Provision**

10.1. The Structure Plan forecasts a total supply of employment land of around 196 ha for 2002-2016, based on an annual take up rate of 14 ha per annum. It is not a requirement of the Structure Plan for this figure to be met as due to varying economic conditions take up rates may change but we consider it to be a useful indicative figure of the likely need for employment land in the District. Rather than have a specific employment policy the Core Strategy relies on Figure 4 to set out the committed supply of employment land. The way that this information is presented in Figure 4 is confusing – it does not show an additional 50ha of employment land that is identified in the Structure Plan as coming from Urban Extensions to Cambridge and Northstowe, and makes no allowance for windfall – which remains a small but important component of supply, approximately 11 ha for the period 2006-2016. However it does include information on the take up rate between 1999-2002 which, whilst providing useful background information, is not relevant in showing how the Core Strategy aims to meet the Structure Plan target – the Council have included this figure in its total supply. Similarly the reasoned justification is confusing in places and does not reflect the current economic environment or explain the relationship between the provisions of the Structure Plan and the Core Strategy clearly.

10.2. To address these concerns the Core Strategy should contain a policy setting out the District's commitment to providing sufficient land, both in terms of range and quantity to meet its employment needs. The Council have suggested wording for this policy which we find to be acceptable. Figure 4 should be amended to take strategic employment locations and rural windfall into account, and delete the 1999-2002 supply, which provides approximately 192 ha to 2016. Paragraphs 8-12 of document CSMM9 provide a considerably better explanation of the current economic climate than the paragraphs of the Core Strategy Text and should be inserted into the Core Strategy.

10.3. We accept that the level of supply from the urban extensions to Cambridge may not be necessarily as large as suggested in the Structure Plan as less land may provide the level of employment opportunities envisaged, due to changing employment practices. However, at present it is unclear if this will significantly affect the amount of land necessary to provide a range of employment sites, including clusters, to serve the District's employment needs and 50 ha still seems to be a reasonable target to aim for from this source provided employment land uptake is carefully monitored.

10.4. Although this figure of 192 ha is slightly below the Structure Plan projection, recent evidence provided by the Council suggests that there has been a reduction in the uptake of employment land in the District, due to a slow down in the economy of the sub-region, and there is some evidence of surplus floorspace. Furthermore the Council also suggests that changes to employment

patterns may have reduced the need to provide relatively "land hungry" employment development such as campus type facilities. We find that both of these assertions suggest an element of uncertainty in the level of land that is necessary to meet the District's employment needs. Given this we consider that, provided the suggested amendments are made to the Core Strategy, the land supply shown there is sufficiently close to the Structure Plan target for it to be considered sound in this respect.

10.5. Given that there is only a very limited shortfall in employment land to 2011, and according to the Council there remains 7.1 ha to be developed at the Cambourne Business Park, there is no justification for providing additional employment land at Cambourne.

10.6. We have already concluded that employment provisions from strategic locations should be included in employment land supply and the Council accept that the 20 ha at Northstowe could be added. However we consider that although the density of employment provision is likely to be higher in these locations, the density of employment provision is really a matter that should be addressed under the relevant AAPs. Therefore references to the possible density of such provision should be deleted from the Core Strategy.

10.7. Locating some small scale employment development in rural settlements may well benefit the sustainability of such settlements, and the broader economy. It must be remembered that the benefits of such development also need to be balanced with other policy requirements, particularly those concerned with the protection of the countryside as set out in PPS7. The Council is addressing the issue of rural employment in its Development Control DPD, where the detailed scale of employment provision for rural settlements and the reuse of buildings for employment use are addressed through its criteria based policies. It would be premature for us to comment on these policies in this report, as we consider that the Development Control DPD is the most appropriate place to address these concerns. However we note that the Council considers that a range of sites are available in village locations, including some with existing planning permission.

**10.8. The following changes are required to make the document sound:**

- i) Delete the final sentence of paragraph 2.41, paragraphs 2.42 to 2.45, and Figure 4, and replace with a new Policy ST/8 and supporting text as set out in Appendix B.**

**Main Matter 10: Retail Hierarchy**

11.1. Policy ST/8 sets out a hierarchy of preferred centres in South Cambridgeshire that will be taken into account in considering proposals for retail development. The Policy also seeks to ensure that proposals for new retail provision in these centres will be of a scale appropriate to their identified position in the hierarchy. The retail hierarchy in Policy ST/8 generally accords with Policy E9 of the Draft Regional Spatial Strategy and the Cambridgeshire and Peterborough Structure Plan 2003.

11.2. Under Main Matter 6 we give some reasons why Cambourne should not be classified as a market town.

11.3. As the Structure Plan suggests that there may be some scope for additional growth at Cambourne which could improve the sustainability of the village, we have considered whether additional retail should be planned for at

Cambourne, with a commensurate move up the retail hierarchy. However, Cambourne is not a sustainable location for retail facilities that attract significant numbers of trips. In comparison with Cambridge, the market towns or Northstowe (in future), public transport access is relatively limited and therefore a significant number of any retail trips generated would likely to be by private car. It also unlikely that any further retail growth would be sufficient to sustain HQPT to Cambridge.

11.4. There is some justification for arguing that further development at Cambourne should be permitted in order to capitalise on the substantial investment that has already taken place. However, the level of provision is not such as to warrant the classification of Cambourne as a market town or some other form of settlement above the level of other rural centres in the District. We find no justification to re-categorise Cambourne as a market town in Policy ST/8. The role of Cambourne in serving a rural catchment is suitably acknowledged by its status as a Rural Centre. This is supported by Annex A of PPS6, which states that in rural areas, large villages may perform the role of a local centre. Any changes to retail provision at Cambourne could be addressed through revisions to the master plan.

11.5. In view of this, it would not be appropriate to designate a primary retail area based on the extent of commercial uses in Cambourne. There is no need for defined boundaries in rural service centres. Policy ST/8 states that proposals for new retail development should be in scale with the position of the centre in the retail hierarchy. This guidance is sufficient to ensure that any future development is of a size and type that is appropriate to the role of the particular centre. The Policy should also be read in conjunction with PPS6, RPG6, Policy E9 of the draft Regional Spatial Strategy, and the Structure Plan, to ensure that inappropriate development does not take place.

11.6. On the other hand, we consider that Northstowe is correctly designated as a town centre in the retail hierarchy due to the nature of the development and the role and function it will perform. The delivery of Northstowe is addressed by the AAP, and should development not be implemented as planned appropriate actions could be addressed through plan, monitor and manage. We do not consider that a fallback position is necessary. In the event of Northstowe not coming forward as planned, the promotion of other less sustainable centres would not be appropriate without evidence of an overriding need.

11.7. Because of the proximity of Cambridge East to Cambridge City Centre, we consider that the retail centre for Cambridge East should not be designated as a town centre. The relationship between Cambridge East and Cambridge City Centre is acknowledged in the Structure Plan and is identified in the forthcoming AAP. It is crucial that the allocation of Cambridge East for the provision of a range of services does not conflict with the Structure Plan's promotion of Cambridge City Centre as the most appropriate location for retail and service uses within the greater Cambridge area.

11.8. The issue of retail floor space was addressed in detail by the Cambridgeshire Structure Plan review. We note the role of the Retail Study prepared in July 2001 by Hillier Parker on behalf of Cambridgeshire County Council, Cambridge City Council and Peterborough City Council, in informing strategic retail planning in the Structure Plan area. The study identified no need for additional comparison and convenience retail up to 2011 beyond that already planned and did not indicate any need up to 2016. Policy P9/10 of the Cambridgeshire Structure Plan 2003 makes it clear that there is no further need for major sub-regional shopping provision in the Structure Plan period. In addition, the Council has confirmed that further studies are required by the AAPs,

to explore the type of retail and floorspace required in the major new developments. In the absence of any convincing evidence to the contrary, we conclude that the Council's argument is sound in this respect. The purpose of the Core Strategy is to set out the hierarchy of centres within South Cambridgeshire and their commensurate role and function. There is no need for a new retail need assessment to be undertaken.

11.9. However, we consider that it would be more meaningful to transfer the section of the Policy from Point 3 (starting from the reference to Cambridge being the relevant City Centre in the local hierarchy) to Point 6 to the reasoned justification. The text here is descriptive and should not form part of the Policy *per se*.

11.10. Our overall conclusion is that the retail hierarchy with respect to Policy ST/8 is appropriate and in accordance with wider policies, and is therefore sound. However, changes to the Policy wording and supporting text are needed as a result of our conclusions above.

**11.11. The following changes are required to make the document sound:**

- i) **Move the text from the second sentence of Point 3 of Policy ST/8 to Point 6 to create a new paragraph 2.46 of the reasoned justification as follows: "2.46 Cambridge is the relevant city centre in the local hierarchy while the ring of market towns just outside the district represent town centres. The Centre at Northstowe will also be considered a town centre in the hierarchy. The centre at Cambridge East will perform a function equivalent to that of a large district centre. Village Centres at Rural Centres fulfil the role of local centres but are not appropriate locations for shopping development which serve urban centres and which are subject to the sequential test set out in Policy SF/2. Rural Centres are the appropriate location for shopping to serve their local catchment area only. The same principle applies to Minor Rural Centres, Group Villages and Infill Villages, which serve even smaller catchment areas than Rural Centres and cater for very localised shopping needs."**

**Main Matter 11: Phasing**

12.1. The primary purpose of PMM in this DPD is to secure the delivery of housing, in view of the importance of the Cambridge Sub-Region as a Sustainable Communities Growth Area.

12.2. A more usual purpose of phasing in development plans, to hold back the development of greenfield sites and other environmentally significant land until more sustainable land has been developed, has been fulfilled by the strategy set out in regional and Structure Plan policies, carried forward in the LDF for South Cambridgeshire. Very broad locations for development have been identified. Sites within the locations are allocated in other DPDs, and building needs to commence as soon as possible, where relevant following the adoption of DPDs.

12.3. The existing phasing Policy, Policy ST/9, as submitted, does not carry the message of urgency carried by strategic policy, nor does it express what the Council in reality intends to do. The same applies to paragraph 3.5 supporting the

Policy. There was, however, general agreement, at the phasing hearing during the examination, on policy wording which would better reflect intentions and strategic aims. Such wording would meet the soundness tests of conformity and effectiveness, including flexibility, and would also help to provide clear mechanisms for implementation and monitoring.

12.4. The changed Policy would provide the policy context for the phasing of urban extensions to Cambridge, where constraints such as noise from activities awaiting relocation, and considerations of need, in some cases require the phasing of land release. There are no such strategic considerations in the case of Northstowe and smaller sites.

12.5. A mechanism is needed to allow possible obstacles to development to be foreseen early and overcome, or to enable other sites within development locations to be brought forward (rephased) to take the place of any site which is unavoidably delayed. This requires a mechanism which can consider all broad locations for development, District-wide, and take decisions, following public consultation. Supplementary planning documents offer a flexible tool to fulfil the purpose, taking into account that some locations straddle the boundary with Cambridge and others are not the subject of AAPs. Relying on reviews of DPDs to rephase sites would be cumbersome and time consuming.

12.6. A potential shortfall in housing delivery can be foreseen now, and the way to deal with this is to identify a site, or sites, through the other DPDs, not to have a reserve of sites. Following the adoption of the current DPDs Policy ST/9 and other elements of PMM would be in place to monitor and manage delivery. Only if under-delivery appeared likely to occur, and the problem could not be overcome by action to provide specific infra-structure, for example, would it be necessary to use a supplementary planning document.

12.7. More detailed documents, including AAPs, master plans, planning permissions and S106 obligations, will define the 'triggers' for infra-structure requirements, and the means by which the requirements are met and harm from premature development is avoided.

12.8. The change we are making to Policy ST/9 carries with it a need to alter some of the supporting text. This includes the deletion of paragraph 3.5, but the important part of the message of that paragraph, concerning the role of major sites, can be incorporated in paragraph 3.4. There is also a minor change to paragraph 3.6 to recognise that supplementary planning documents would be prepared only if necessary.

12.9. There should be no reference to Cambourne in this Policy as Cambourne is not identified in the Core Strategy as a broad location for strategic development.

**12.10. The following changes are required to make the document sound:**

- i) Delete Policy ST/9 and replace it with the following Policy ST/9: - "As the aim is to achieve a continuous high level of dwelling production throughout the Plan period, urban extensions to Cambridge will be phased only where required because of environmental or other constraints. The new settlement of Northstowe and other sites will not be phased. Where applicable, phasing policies will be set out in AAPs. Should the required rates of housing delivery not be achieved, supplementary planning documents may be produced in order to bring forward housing construction on specific sites."**

- ii) **Add a new second sentence to paragraph 3.4, as follows: -  
"The major strategic sites are the key to the delivery of the housing requirement."**
- iii) **Delete paragraph 3.5.**
- iv) **Replace the first word of paragraph 3.6 with the word "Any".**

### **Main Matter 12: Delivery**

13.1. The housing trajectories contained in this section of the DPD are inaccurate and out of date, particularly bearing in mind our conclusion above regarding likely dwelling construction at Northstowe. Furthermore, the overall shortfall in housing land supply will be made up by sites to be identified in the several DPDs yet to be examined. In the circumstances that apply in South Cambridgeshire the housing trajectories in the Core Strategy are particularly prone to becoming further out of date. There was a general consensus at the hearing that the trajectories should be deleted.

13.2. Core Strategies do not contain housing allocations but should contain sufficient detail to indicate that the quantum of housing development which is being planned for can be provided within the requisite period. However in this particular case, for the reasons given, the inclusion of the submitted housing trajectories would render the document less than robust. Nevertheless, we are satisfied that the housing requirement for South Cambridgeshire will be provided through the completions, commitments and locations identified in the evidence, which has been subject to examination, together with land which will come forward via the examination of other DPDs (see paragraphs 3.9-3.20 above). The evidence enables the source of the majority of the required housing supply to be identified in general terms (paragraph 3.36 above).

13.3. The trajectories should be deleted, along with parts of their explanatory text. Paragraphs 3.7 and 3.9, and the first sentence of paragraph 3.10, explain the trajectories and their preparation. There would need to be consequential changes to the second sentence of paragraph 3.10. Most of the material following the heading "Delivering the Development Strategy" would thus be deleted, and this suggests that the heading itself should also be deleted. The remaining text, augmented and amended as recommended below, would continue to act as a link between the phasing and monitoring sections. Delivery is already covered in the first part of Chapter 3 of the DPD, and in paragraph 4.2. Changes to paragraph 4.7 of the DPD are also necessitated by deletion of the housing trajectories.

13.4. Housing trajectories do form parts of submitted AAPs, and are an important part of annual monitoring reports (AMRs). A reference to AMRs should be included in the Core Strategy, as suggested by the Council at the hearing.

13.5. Paragraph 3.8 refers to the relationship between the Core Strategy and the regional guidance which is being prepared. Those parts of the paragraph which deal with the draft East of England Plan have been written without the knowledge of the final form and content of that Plan. In order to meet the test of flexibility they should be deleted.

### **13.6. The following changes are required to make the document sound:**

- i) **Delete pages 36-38 inclusive.**

- ii) **Delete the heading "Delivering the Development Strategy", and paragraphs 3.7 and 3.9, together with the final 3 sentences of paragraph 3.8.**
- iii) **Delete the first sentence of paragraph 3.10 and replace with "An annual monitoring report will be produced and this will contain housing trajectories".**
- iv) **Delete the first 4 words of the second sentence of paragraph 3.10 and replace with "Many of the factors influencing the delivery of housing -----".**
- v) **Delete paragraph 4.7 with the exception of the final sentence, delete the word "separate" from that sentence, and make the sentence the first sentence of paragraph 4.8.**

### **Main Matter 13: Monitoring**

14.1. Monitoring and management of the delivery of housing in particular are necessary. This is the case even though there is a shortfall in housing supply, and will remain so after additional land has been allocated to make up the shortfall.

14.2. Policy ST/10 specifies the actions which would be taken in the event that monitoring finds that the DPD is not achieving its objectives. These actions will be especially relevant to the delivery of housing, but are also applicable to other policy areas.

14.3. The Policy sets out actions which are both necessary and potentially effective.

14.4. As the Core Strategy covers a period a little short of 10 years, it needs to be sufficiently robust to address unforeseen circumstances. The Cambridge Sub-Region has been included in one of the growth areas identified in the Sustainable Communities Plan. The government has deliberately set up a delivery vehicle, Cambridgeshire Horizons, to deliver growth. Many agencies with various powers are working in partnership to secure development.

14.5. Should a shortage of housing, or a gap or delay in provision, be identified by monitoring, then action under clause 1(a) of Policy ST/10 would aid understanding of the cause of the problem and possible solutions. If there are no direct solutions to the specific problem, action under clauses 1(b)-(d) would be taken. This would investigate whether any part of an allocated area could be brought forward to replace the land affected by the problem. If the shortfall or gap could be made up by bringing forward replacement land, the delayed site would come forward later in the plan period. This is one example of how the Policy would operate: many other possible actions under clauses 1(b)-(d) were mooted at the examination hearing.

14.6. A list of possible actions would be lengthy, and would appear to be definitive while in reality incomplete. Such a list should not be included in the Policy or supporting text.

14.7. In general terms Policy ST/10 is therefore robust, flexible, and the most appropriate in the circumstances of South Cambridgeshire. At this strategic level it fulfils the requirements of test viii.

14.8. Paragraph 4.11 deals with review of the strategy for the Sub-Region and refers to the sequential approach to allocation. It is appropriate to identify villages as being at the bottom of the sequence in circumstances where potential exists for meeting deficiencies higher up the sequence.

14.9. Sub-paragraph 2 of the Policy is also necessary. Although we have found there to be a shortfall in housing supply, this will be made up in the near future by way of examinations of other DPDs. The possibility of an over-supply of land in the future is not prevented by the shortfall in supply at present. An over-supply could lead to the development of housing for commuters to London, rather than for local needs, and to the development of less sustainable sites.

14.10. However the wording of sub-paragraph 2 should be changed to exclude Northstowe and urban extensions to Cambridge. The threat of refusal of planning permission should be removed from these locations. They have been chosen as sustainable locations for major development requiring massive investment. This level of investment requires certainty over the long term. Test iv would be satisfied by specific wording excluding these major allocations.

14.11. The core and local output indicators set out in tabular form in the pages following Chapter 4 of the Core Strategy DPD are important aids in monitoring. Both types of indicator are relevant in showing whether the document's strategic objectives are being achieved. However the material in the Table which is relevant only to other DPDs should not be included in the Core Strategy DPD, where it is not appropriate. There will need to be consequential changes to the supporting text to explain the Table, and to correct an inaccuracy, all as agreed at the hearing.

**14.12. The following changes are required to make the document sound:**

- i) Add to sub-paragraph 2 of Policy ST/10, after the word "applications", the phrase "outside the urban extensions to the built up area of Cambridge and outside Northstowe".**
- ii) Delete from the Tables on Pages 44-51 all the non-Core Strategy references in columns 4-6. The resultant Tables are set out in Appendix C at the end of this report.**
- iii) On Page 43 replace "ST/d and ST/e" with "ST/d and ST/c" and add the following sentences at the end of the existing text: "All the indicators are relevant to the strategic objectives, and targets are included where they are relevant to the Core Strategy. Where targets are not identified in this Table, they will be identified in other DPDs."**

**Other Matters**

15.1. The Council accepts that paragraphs 1.24-1.50 of the Introduction to the Core Strategy will be out of date on adoption of the Core Strategy but suggests a short summary of the Core Strategy preparation process could be inserted in place of these paragraphs. As this part of the Introduction is clearly out of date, it should be deleted and the Council's suggested insertion utilised. Otherwise the document would be insufficiently flexible to meet test ix of the tests of soundness. We have made some small adjustments to the insertion for reasons of accuracy.

15.2. As regards the rest of the Introduction, the Council also highlights a number of paragraphs where some amendment is necessary to bring the text up to date, in terms of new regional guidance. Paragraphs 1.3 and 1.4 do need amendment as they contain out of date information but there is no necessity to amend paragraphs 1.10 and 1.12 as they remain extant. Paragraph 1.13 contains material we recommend elsewhere in this report for deletion. This is also a suitable place to refer to the need to review the Core Strategy when the new regional guidance has been approved (see paragraph 2.7 above).

15.3. Our main concern with the remaining text of the Introduction is that it is unnecessarily long and repeats information that is found either in national planning policy, the Local Development Scheme or Community Strategy. PPS12 paragraph 2.31 states that the reasoned justification for plans should be "clear, succinct and necessary". The introduction as written would therefore fail test iv of the tests of soundness as it would conflict with national planning policy.

15.4. Specifically paragraphs 1.5 to 1.8 contain information that is largely available in the Council's LDS and in national guidance on the preparation of LDFs. These paragraphs should be deleted, although a small part of the text can be incorporated in a revised paragraph 1.3. Whilst paragraphs 1.14 to 1.18 contain helpful information on the relationship between the Community Strategy and the LDF they are unnecessarily long and repeat information that can be found in the Community Strategy. We have therefore also recommended the deletion of parts of this text.

**15.5. The following changes are required to make the document sound:**

- i) Paragraph 1.3: Reword to read**  
**"The Local Development Framework forms part of the Development Plan for South Cambridgeshire. The Development Plan is made up of those plans which have been statutorily adopted and which cover the District. The composition of the current development plan is set out in the Council's Local Development Scheme. This document sets out how the Council will move from the previous to the current development plans system, and lists which local development documents are to be produced and when."**
- ii) Paragraph 1.4: Delete the phrase "(expected to be mid 2006)".**
- iii) Paragraph 1.5 to 1.8: Delete these paragraphs.**
- iv) Paragraph 1.13: Delete lines 7-9, and add a new final sentence "The Core Strategy DPD will be reviewed when the new East of England Plan has been approved."**
- v) Paragraph 1.14: Delete the final sentence of the paragraph and the subsequent bullet points.**
- vi) Paragraph 1.15: Delete this paragraph**
- vii) Paragraph 1.17: Delete this paragraph**
- viii) Paragraph 1.24 to 1.50: Delete and replace with the following text, to be numbered as paragraphs 1.24 and 1.25:-**

**"The Core Strategy has been prepared following a programme of consultation and public participation. Consultation with the community on the future planning of South Cambridgeshire began at the end of 2001 with the publication of an Issues Report. In April 2004 the Council carried out an initial consultation with statutory bodies, as required under the new system of plan making, to ensure that it was aware at an early stage of any programmes and plans that would affect the LDF. This was followed in October 2004 by consultation on issues and options, which gave people the opportunity to comment on how the local planning authority should approach the preparation of a particular development plan document. A Preferred Option Report (Pre Submission Draft) of the DPD was published in June 2005 and was subject to a six-week long public participation period, allowing people to make representations to be considered by the Council.**

**The DPD was then submitted to the Secretary of State in January 2006, and made available for a further six-week consultation period. Representations received were considered at an independent Examination, conducted by Inspectors appointed by the Secretary of State to consider the soundness of the plan. The independent Inspectors subsequently produced a report, which was binding on the Council. Further information on the plan preparation process can be found on the Council's website: [www.scambs.gov.uk](http://www.scambs.gov.uk)".**

### **Overall conclusions**

16.1. We therefore conclude that, with the amendments which we recommend, the Core Strategy satisfies the requirements of s20(5)(a) of the 2004 Act and the associated Regulations, and is sound in the context of s20(5)b of the 2004 Act.

*Cliff Hughes*  
*Terry Kemman-Lane*

Inspectors

**SCHEDULE A: CHANGES REQUIRED TO THE CORE STRATEGY**

| Section           | Page | Change  | Report ref |
|-------------------|------|---|------------|
| Introduction      | 1    | Reword paragraph 1.3 to read <i>"The Local Development Framework forms part of the Development Plan for South Cambridgeshire. The Development Plan is made up of those plans which have been statutorily adopted and which cover the District. The composition of the current development plan is set out in the Council's Local Development Scheme. This document sets out how the Council will move from the previous to the current development plans system, and lists which local development documents are to be produced and when."</i>  | 15.5       |
| Introduction      | 1    | Paragraph 1.4: Delete the phrase <i>"(expected to be mid 2006)"</i> .   | 15.5       |
| Introduction      | 2    | Deleted paragraphs 1.5-1.8  | 15.5       |
| Introduction      | 4    | Paragraph 1.13: Delete lines 7-9, and add a new final sentence <i>"The Core Strategy DPD will be reviewed when the new East of England Plan has been approved."</i>   | 15.5       |
| Introduction      | 4    | Paragraph 1.14: Delete the final sentence of the paragraph and the subsequent bullet points.  | 15.5       |
| Introduction      | 5    | Delete paragraphs 1.15 and 1.17   | 15.5       |
| Introduction      | 7-12 | Paragraph 1.24 to 1.50: Delete and replace with the following text, to be numbered as paragraphs 1.24 and 1.25:- <i>"The Core Strategy has been prepared following a programme of consultation and public participation. Consultation with the community on the future planning of South Cambridgeshire began at the end of 2001 with the publication of an Issues Report. In April 2004 the Council carried out an initial consultation with statutory bodies, as required under the new system of plan making, to ensure that it was aware at an early stage of any programmes and plans that would affect the LDF. This was followed in October 2004 by consultation on issues and options, which gave people the opportunity to comment on how the local planning authority should approach the preparation of a particular development plan document. The issues and options reports focused on key issues for the DPDs and issues where there were choices to be made on the policy direction. A Preferred Option Report (Pre Submission Draft) of the DPD was published in June 2005 and was subject to a six-week long public participation period, allowing people to make representations to be considered by the Council. The DPD was then submitted to the Secretary of State in January 2006, and made available for a further six-week consultation period. Representations received were considered at an independent Examination, conducted by Inspectors appointed by the Secretary of State to consider the soundness of the plan. The independent Inspectors subsequently produced a report, which was binding on the Council. Further information on the plan preparation process can be found on the Council's website: <a href="http://www.scambs.gov.uk">www.scambs.gov.uk</a>".</i> | 15.5       |
| Strategy          | 14   | Delete objective ST/b and replace with <i>"To locate development where access to day-to-day needs for employment, shopping, education, recreation, and other services is available by public transport, walking and cycling thus reducing the need to travel, particularly by private car"</i> .  | 2.18       |
| Strategy          | 14   | In objective ST/i, delete <i>"requirements"</i> from the last line and replace with <i>"aspects"</i> .  | 2.18       |
| New Section       | 15   | See Appendix A.   | 3.35       |
| Housing Provision | 15   | Replace Policy ST/1 as submitted with <i>"The District Council will make provision for 20,000 new homes in South Cambridgeshire during the period 1999 to 2016 in locations in the following order of preference:i)on the edge of Cambridge ii)at the new town of Northstowe iii)in the rural area in Rural Centres and other villages. The provision of affordable housing, including housing for key workers, will be sought as part of overall housing provision."</i>   | 3.35       |
| Housing Provision | 15   | Add to paragraph 2.3 <i>"Land so far identified has a capacity of approximately 19,000 dwellings during the plan period. Of this, about 4180 dwellings are likely to come from urban extensions to Cambridge, 4800 from Northstowe, and 10050 from the rural area. The shortfall between land so far identified and the housing requirement will be made up by sites to be identified in Area Action Plans and the Site Specific DPD."</i>  | 3.35       |

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|                                     |       |  |       |
|-------------------------------------|-------|--|-------|
| Housing Provision                   | 17-22 | Delete Policy ST/3, Figure 1 and paragraphs 2.5-2.22.  | 3.35  |
| Key Diagram                         |       | Delete all major development sites from the Key Diagram, with the exception of Northstowe. Delete the legend "Major Development Site" from the Key and replace with "New Settlement".  | 3.35  |
| Northstowe                          | 22    | Paragraph 2.23, third line, replace "8,000 homes" with "up to 10,000 homes" and "6,000 homes" with "4,800 homes".  | 4.6   |
| Northstowe                          | 22    | Delete Figure 2.   | 4.6   |
| Rural Settlement Policy             | 23/4  | Delete paragraphs 2.25, 2.29, and 2.31.  | 6.8   |
| Rural Settlement Policy             | 23    | Delete the first line of paragraph 2.26 and replace with "A substantial contribution to the dwelling requirement has already been made by the rural area,".  | 6.8   |
| Rural Settlement Policy             | 23    | Replace Figure 3 as submitted with the updated Figure 3 forming Appendix 2 to Reference Document CSMM2-SCDC-3, but deleting the lines dealing with Structure Plan guideline, outstanding requirement, housing land supply to be identified, Bayer Crop Science site, and surplus, and deleting the material in brackets in the completions row. Also delete the sub-headings "Components of supply" and renumber the rows as necessary. In the totals column, replace 1157 with 984 and 1092 with 10050.   | 6.8   |
| Rural Centres                       | 25    | Delete the first sentence of paragraph 2.34.   | 7.11  |
| Rural Centres and Key Diagram       | 25    | Add Fulbourn to the list of rural centres in Policy ST/4, and on the Key Diagram change the notation of Fulbourn from Minor Rural Centre to Rural Centre.  | 7.11  |
| Minor Rural Centres and Key Diagram | 26    | Delete Fulbourn from the list of villages under Policy ST/5, and add Papworth Everard to that list and to the Key Diagram with the notation Minor Rural Centre.  | 8.7   |
| Minor Rural Centres                 | 26    | Delete "a maximum" from sub-paragraph 2 of Policy ST/5 and replace with "an indicative maximum".   | 8.7   |
| Minor Rural Centres                 | 26    | Amend the figure of 25 to a figure of 30, in the Policy and supporting text.   | 8.7   |
| Minor Rural Centres                 | 26    | Delete the last 2 lines of paragraph 2.36 and replace with "a guideline figure to indicate the upper limit of housing development likely to be suitable."  | 8.7   |
| Group Villages                      | 27    | Delete Papworth Everard from the list of villages in sub-paragraph 1 of Policy ST/6.   | 9.8   |
| Group Villages                      | 27    | Delete the words "a maximum" from sub-paragraph 2 in Policy ST/6, and replace with "an indicative maximum".  | 9.8   |
| Group Villages                      | 27    | Insert the word "about" before "15 dwellings" in sub-paragraph 3 of Policy ST/6.   | 9.8   |
| Infill Villages                     | 28    | Insert the phrase "(indicative size)" after the words "2 dwellings" in sub-paragraph 2 of Policy ST/7.   | 9.8   |
| Infill Villages                     | 28    | Insert the word "about" before "8 dwellings" in sub-paragraph 3 of Policy ST/7.  | 9.8   |
| Employment Provision                | 29/30 | See Appendix B.  | 10.8  |
| Retail                              | 31    | Move the text from the second sentence of Point 3 of Policy ST/8 to Point 6 to create a new paragraph 2.46 of the reasoned justification as follows: "2.46 Cambridge is the relevant city centre in the local hierarchy while the ring of market towns just outside the district represent town centres. The Centre at Northstowe will also be considered a town centre in the hierarchy. The centre at Cambridge East will perform a function equivalent to that of a large district centre. Village Centres at Rural Centres fulfil the role of local centres but are not appropriate locations for shopping development which serve urban centres and which are subject to the sequential test set out in Policy SF/2. Rural Centres are the appropriate location for shopping to serve their local catchment area only. The same principle applies to Minor Rural Centres, Group Villages and Infill Villages, which serve even smaller catchment areas than Rural Centres and cater for very localised shopping needs." | 11.11 |
| Phasing                             | 34    | Delete Policy ST/9 and replace it with the following Policy ST/9: - "As the aim is to achieve a continuous high level of dwelling production throughout the Plan period, urban extensions to Cambridge will be phased only where required because of environmental or other constraints. The new settlement of Northstowe and other sites will not be phased. Where applicable, phasing policies will be set out in AAPs. Should the required rates of housing delivery not be achieved, supplementary planning documents may be produced in order   | 12.10 |

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|            |       |   |       |
|------------|-------|---|-------|
|            |       | <i>to bring forward housing construction on specific sites."</i>  |       |
| Phasing    | 34    | Add a new second sentence to paragraph 3.4, as follows: -<br><i>"The major strategic sites are the key to the delivery of the housing requirement."</i>   | 12.10 |
| Phasing    | 34    | Delete paragraph 3.5 and replace the first word of paragraph 3.6 with the word "Any".   | 12.10 |
| Delivery   | 34/35 | Delete the heading " <i>Delivering the Development Strategy</i> ", and paragraphs 3.7 and 3.9, together with the final 3 sentences of paragraph 3.8.  | 13.6  |
| Delivery   | 35    | Delete the first sentence of paragraph 3.10 and replace with " <i>An annual monitoring report will be produced and this will contain housing trajectories</i> ".  | 13.6  |
| Delivery   | 35    | Delete the first 4 words of the second sentence of paragraph 3.10 and replace with " <i>Many of the factors influencing the delivery of housing -----</i> ".  | 13.6  |
| Delivery   | 36-38 | Delete these 3 pages.   | 13.6  |
| Monitoring | 39    | Add to sub-paragraph 2 of Policy ST/10, after the word " <i>applications</i> ", the phrase " <i>outside the urban extensions to the built up area of Cambridge and outside Northstowe</i> ".  | 14.12 |
| Monitoring | 41    | Delete paragraph 4.7 with the exception of the final sentence, delete the word " <i>separate</i> " from that sentence, and make the sentence the first sentence of paragraph 4.8.   | 13.6  |
| Monitoring | 43    | Replace " <i>ST/d and ST/e</i> " with " <i>ST/d and ST/c</i> " and add the following sentences at the end of the existing text: " <i>All the indicators are relevant to the strategic objectives, and targets are included where they are relevant to the Core Strategy. Where targets are not identified in this Table, they will be identified in other DPDs.</i> " | 14.12 |
| Monitoring | 44-51 | See Appendix C.   | 14.12 |

## **APPENDIX A: NEW POLICY ST/1 GREEN BELT AND SUPPORTING TEXT**

### **GREEN BELT**

#### **POLICY ST/1 Green Belt**

**A Green Belt will be maintained around Cambridge which will define the extent of the urban area. The detailed boundaries of the Green Belt will be established in Development Plan Documents.**

xx The Cambridge Green Belt serves a number of purposes which are derived from government guidance (PPG2) and the Cambridgeshire and Peterborough Structure Plan. The Green Belt keeps land open and free from development over a long period, which extends beyond the plan period, in order to give assurance that its boundaries will endure.

xx The Cambridge Green Belt is relatively small in extent. Its purposes are defined as:

- To preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
- To maintain and enhance the quality of its setting;
- To prevent communities in the environs of Cambridge from merging into one another and with the city.

xx In defining the Green Belt and the policies which should be applied to it, regard will be given to the special character of Cambridge and its setting, which include:

- Key views of Cambridge from the surrounding countryside;
- A soft green edge to the City;
- A distinctive urban edge;
- Green corridors penetrating into the City;
- Designated sites and other features contributing positively to the character of the landscape setting;

- The distribution, physical separation, setting, scale and character of Green Belt villages;
- A landscape which retains a strong rural character.

xx The Cambridge Green Belt was established in the 1965 Development Plan. A review of the Green Belt was undertaken in the 1980s resulting in the Cambridge Green Belt Local Plan 1992. A further review was undertaken in the South Cambridgeshire Local Plan 2004.

xx The Green Belt boundaries are now being reviewed to serve the long-term development needs of Cambridge, taking into account Regional Planning Guidance for East Anglia (now RPG6), the Cambridgeshire and Peterborough Structure Plan 2003, and PPG2. The Structure Plan identifies the broad locations where major growth will take place on the edge of Cambridge as urban extensions and at the new town of Northstowe. These are indicated in very general terms in Policy ST/2 below. Revised Green Belt boundaries are required to enable the necessary development to take place. The outer boundary of the Green Belt is being reviewed to take account of the creation of the new town of Northstowe to ensure the continued separation of settlements.

## **APPENDIX B: NEW POLICY ST/8 EMPLOYMENT PROVISION AND SUPPORTING TEXT**

### **Policy ST/8**

**Policies in Local Development Documents will ensure sufficient employment land is available to enable further development of the high technology clusters and meet local needs. Additional land will be brought forward for employment development at the Strategic Employment Locations of Northstowe, Cambridge East and Northwest Cambridge.**

Figure 4 Projected Supply

| Components of Supply                          | Area (ha)     |
|---|---------------|
| Completions 2002-2005                         | 21.23         |
| Sites with Planning Permission end March 2005 | 103.32        |
| Cambridge Northern Fringe                     | 5.63          |
| Village Employment Land                       | 1.35          |
| Strategic Employment Locations                | 50            |
| Windfalls                                     | 11            |
| <b>Total</b>                                  | <b>192.53</b> |

Notwithstanding the forecast take up rates in the 2003 Structure Plan, there has been a slow down in the economy of the Cambridge Sub-Region in the early years of this decade. This has led to a supply surplus both in terms of empty floorspace and uncompleted commitments. Once the market picks up again, it is likely this surplus will be utilised, and new provision will be sought, including through windfall development.

The take up of employment land has been as follows since 2002:

| Year         | Total Net Gain in Employment Land - Completions (hectares) |
|--------------|--|
| 2002/3       | 11.21  |
| 2003/4       | 8.27   |
| 2004/5       | 1.65   |
| <b>Total</b> | <b>21.13</b>   |

The relatively low net gains in employment land in the early years of the period indicate why the estimated take up rates may not be met. It must be emphasised that the figures in table 2.2 of the Structure Plan is an estimate of annual take up which it assumed will continue into the future. Because of the selective management of growth policy it is not a target that has to be met if the local economy does not grow at the anticipated rate by relaxing the policy to attract footloose industries. If as shown, take up has not been as strong in the early years of the post 2002 period, the total

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estimated take up might not be accurate. This means that the planned supply of employment land would be likely to last longer rather than a requirement to allocate additional employment land.

The existing land commitments provide a wide range variety of types and locations for employment development. Existing commitments for research and development include sites at Granta Park, Babraham Hall, Cambridge Research Park, Hinxton Hall, and Cambridge Science Park. Other commitments include land at Cambourne Business Park, Buckingham Way Business Park, Papworth Business park, Longstanton Business Park, Dales Manor Business Park Sawston and Norman Way Over. There are also a wide variety of smaller sites, including in rural areas which take advantage of the stock of rural buildings available.

The only new land allocations for employment in the LDF are the Strategic Employment Locations identified by policy P2/3 of the Cambridgeshire Structure Plan. This land will be allocated through the area action plans. These are the sites chosen for their ability to play a major role in the employment strategy for the Cambridge Sub-Region. It is sound that these areas should be the focus of new employment in the district.

### APPENDIX C: CHANGES REQUIRED TO PAGES 44-51

| <b>ST/a: To provide an adequate and continuous supply of land for housing and employment, to meet strategic requirements, in sustainable locations.</b> |   |                          |                                       |   |
|---|---|--------------------------|---------------------------------------|---|
| <b>Indicator number</b>   | <b>Indicator</b>  | <b>Type of Indicator</b> | <b>Related Core Strategy Policies</b> | <b>Targets</b>  |
| CO1a  | Amount of land developed for employment by type:<br><br>(i) B1<br>(ii) B2<br>(iii) B8   | Core                     |                                       |   |
| CO1b  | Amount of land developed for employment, by type, which is in development areas defined in the LDF (Northstowe, Cambridge Southern Fringe and Cambridge East):<br><br>(i) B1<br>(ii) B2<br>(iii) B8 | Core                     |                                       | <i>See indicators relating to Strategic Objectives ST/c and ST/d, which address development in each of the major development areas at Northstowe, Cambridge East and Cambridge Southern Fringe.</i> |
| CO1c  | Percentage of CO1a, by type, which is on previously developed land  | Core                     |                                       |   |
| CO1d  | Employment Land Supply by type with full planning permission and with outline planning permission   | Core                     |                                       |   |
| CO1f  | Amount of Employment land lost to residential development:<br><br>(i) in the district as a whole<br><br>(ii) Within Village Frameworks  | Core                     |                                       |   |

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|--|--|-------------------|--------------------------------|--|
| CO2a   | Housing Trajectory -<br><br><i>For further details on the data requirements for the housing trajectory, see the housing trajectory section of the Monitoring Strategy.</i>   | Core              | ST1                            | a) The annualised level of housing completions approximates as closely as possible to the Strategic requirement.<br><br>b) The cumulative level of completions approximates as closely as possible to the Strategic requirement of 20,000 dwellings over the LDF period. |
| CO2d   | Affordable Housing Completions   | Core              |                                |  |
| LOA2   | Mix of Affordable Housing  | Local             |                                |  |
| LOA3   | Number of Rural Exceptions sites for affordable housing coming forward for affordable housing and number of dwellings on those sites   | Local             |                                |  |
| CO4a Office Development  | Amount of completed <b>office (B1)</b> , retail and leisure development. <i>Core Indicator CO4a is split into three separate indicators for office, retail and leisure development respectively. The retail and leisure elements of the indicator are considered to relate more closely to Strategic Objective ST/b, and are therefore included in the table for that strategic objective.</i> | Core              |                                |  |
| LOA4   | Number of gypsies and travelling showpeople living on sites without planning permission  | Local             |                                |  |
| CO2b   | Percentage of new and converted dwellings on PDL   | Core              | ST2                            | At least 37% of all dwellings (new and converted) on Previously Developed Land.  |
| LOA1   | Market housing mix   | Local             |                                |  |
| <b>ST/b: To locate development where it will provide the opportunity for people to satisfy their day-to-day needs for employment, shopping, education, recreation, and other services locally or in locations which minimise the need to travel and where there are modes of transport available (or the provision of new services can be guaranteed through the planning process) in addition to the motor car.</b> |  |                   |                                |  |
| Indicator number   | Indicator  | Type of Indicator | Related Core Strategy Policies | Targets  |

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|---|--|--------------------------|---------------------------------------|----------------|
| CO2c  | Percentage of new dwellings completed at:<br><br>(1) less than 30 dph;<br><br>(2) 30 dph or greater and less than 50 dph,<br>and<br><br>(3) 50 dph or greater  | Core                     |                                       |                |
| CO3a  | Percentage of non-residential development complying with car-parking standards set out in LDF  | Core                     |                                       |                |
| CO3b  | Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre.   | Core                     |                                       |                |
| CO4a Retail   | Amount of completed office (B1), <b>retail</b> and leisure development.<br><br>(i) Amount of retail floorspace built in A1,A2 and A3 use classes<br><br>(ii) Amount of retail floorspace committed in A1, A2 and A3 use classes. | Core                     |                                       |                |
| CO4a Leisure  | Amount of completed office (B1), retail and <b>leisure</b> development. Type and size of new leisure facilities in D2 Use Class built in the District.   | Core                     |                                       |                |
| LOB1  | (a)Gains or losses of open space/outdoor recreation land resulting from new developments<br><br>(b)Percentage of planning permissions meeting standards set out in SF13  | Local                    |                                       |                |
| <b>ST/c: To create new and distinctive sustainable communities on the edge of Cambridge connected to the rest of the City by high quality public transport and other non-car modes of transport which will enhance the special character of the City and its setting.</b>                           |  |                          |                                       |                |
| <b>Indicator number</b>   | <b>Indicator</b>   | <b>Type of Indicator</b> | <b>Related Core Strategy Policies</b> | <b>Targets</b> |
| <b>SEE TABLES IN THE MONITORING CHAPTERS OF THE CAMBRIDGE EAST AREA ACTION PLAN AND THE CAMBRIDGE SOUTHERN FRINGE AREA ACTION PLAN.</b>   |  |                          |                                       |                |
| <b>ST/d To create a sustainable small new town close to but separate from the villages of Longstanton and Oakington connected to Cambridge by a high quality rapid transit system along the route of the disused St Ives railway. The new town will make best use of previously developed land.</b> |  |                          |                                       |                |
| <b>Indicator number</b>   | <b>Indicator</b>   | <b>Type of Indicator</b> | <b>Related Core Strategy Policies</b> | <b>Targets</b> |
| <b>SEE TABLES IN THE MONITORING CHAPTER OF THE NORTHSTOWE AREA ACTION PLAN.</b>   |  |                          |                                       |                |

**ST/e To protect the varied character of the villages of South Cambridgeshire by ensuring that the scale and location of development in each village is in keeping with its size and character and that the buildings and open spaces which create their character are maintained and where possible enhanced.**

| Indicator number | Indicator   | Type of Indicator | Related Core Strategy Policies | Targets   |
|------------------|---|-------------------|--------------------------------|---|
| LOE1             | (a) Average size of housing developments in Rural Centres, Minor Rural Centres, Group Villages and Infill Villages<br><br>(b) largest development coming forward in Rural Centres, Minor Rural Centres, Group Villages and Infill Villages<br><br>(c) Total dwellings built by village category | Local             | ST4, ST5, ST6, ST7             | Rural Centres: None;<br><br>Minor Rural Centres: Maximum development size of 30 dwellings;<br><br>Group Villages: maximum development size of 8 dwellings (or exceptionally up to 15 dwellings);<br><br>Infill Villages: Maximum development size of 2 dwellings (or exceptionally up to 8 dwellings) |
| LOE2             | Amount of land designated as<br><br>a) Protected Village Amenity Areas and<br><br>b) adjacent to an Important Countryside Frontage<br><br>lost to development each year   | Local             |                                |   |

**ST/f To provide and enable provision of enhanced infrastructure to meet the needs of the expanded population.**

| Indicator number | Indicator  | Type of Indicator | Related Core Strategy Policies | Targets |
|------------------|--|-------------------|--------------------------------|---------|
| LOF1             | Investment secured for infrastructure and community facilities through developer contributions | Local             |                                |         |

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**ST/g To ensure development addresses sustainability issues, including climate change mitigation and adaptation issues, maximising recycling and reuse of resources, and reduce waste and pollution.**

| Indicator number | Indicator  | Type of Indicator | Related Draft LDF Policies | Targets |
|------------------|--|-------------------|----------------------------|---------|
| LOG1             | Amount of new development completed: - on previously-undeveloped functional flood-plain land, and - in flood risk areas, without agreed flood defence measures                                 | Local             |                            |         |
| CO9              | Renewable Energy Capacity installed by type  | Core              |                            |         |
| LOG2             | Proportion of development proposals greater than 1000 metres <sup>2</sup> or 10 dwellings including renewable energy technology providing at least 10% of their predicted energy requirements. | Local             |                            |         |

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**ST/h To support the Cambridge Area's position as a world leader in research and technology based industries, higher education and research, particularly through the development and expansion of clusters.**

| Indicator number | Indicator  | Type of Indicator | Related Draft LDF Policies | Targets |
|------------------|--|-------------------|----------------------------|---------|
| LOH1             | Amount of land committed for "employment cluster" development in the District in the following sectors:<br>1) Biotechnology and biomedical<br>2) Computer services<br>3) Electronic engineering<br>4) Information technology / telecommunications<br>5) Medicine<br>6) Research and Development<br>7) Other locally-driven high-technology clusters as they emerge | Local             |                            |         |

**ST/i To ensure that any new development results in appropriate provision for the protection and enhancement of native biodiversity in order to contribute towards biodiversity gain, whilst having regard to the site's current biodiversity value. Opportunities for increased access to the countryside and enjoyment of biodiversity should be viewed as integral requirements of new development.**

| Indicator number | Indicator  | Type of Indicator | Related Draft LDF Policies | Targets |
|------------------|--|-------------------|----------------------------|---------|
| CO8              | Change in areas and populations of biodiversity importance, including:<br><br>(i) change in priority habitats and species (by type); and<br><br>(ii) change in areas designated for the intrinsic environmental value including sites of international, national, regional or sub-regional significance. | Core              |                            |         |
| LOI1             | Amount of new development completed within, or likely to adversely affect, internationally or nationally important nature conservation areas: RAMSAR sites, SPAs, SACs, NNRs, SSSIs  | Local             |                            |         |

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**ST/j To ensure that the district's built and natural heritage is protected and that new development protects and enhances cherished townscape assets of local urban design, cultural, and conservation importance, and character of the landscape.**

| Indicator number | Indicator | Type of Indicator | Related Strategy Core Policies | Targets |
|------------------|-----------|-------------------|--------------------------------|---------|
|                  |           |                   |                                |         |

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|-------------|--|--------------|--|--|
| <b>LOJ1</b> | Number of listed buildings and buildings at risk | <b>Local</b> |  |  |
|-------------|--|--------------|--|--|

| <b>ST/k To locate development where it will ensure maximum use of previously developed land and minimise loss of countryside and the best and most versatile agricultural land.</b> |                          |                                       |  |
|---|--------------------------|---------------------------------------|--|
| <b>Indicator</b>  | <b>Type of Indicator</b> | <b>Related Core Strategy Policies</b> | <b>Targets</b>   |
| Percentage of new and converted dwellings on PDL  | Core                     | ST2                                   | <b>At least 37% of all dwellings (new and converted) on Previously Developed Land.</b> |
| Percentage of Core Indicator CO1a, by type, which is on previously developed land   | Core                     |                                       |  |
| Amount of inappropriate development in the Green Belt by type   | <b>Local</b>             |                                       |  |