

**Matter Number: 2**

**Personal Reference: 16004**

**Name of Representor: Robin Pellew**

**Date: 12<sup>th</sup> October, 2014**

## Cambridge City and South Cambridgeshire District Councils Submitted Local Plans 2014

### Written Statement submitted by Robin Pellew

#### **Matter 2: Overall Spatial Vision and Strategic Plan**

**Respondent Number: 16004**

**Representation Numbers: 58036, 58061**

*[This written statement is submitted in place of the verbal statement I have been selected to make. This statement is submitted in a personal capacity and represents my views as a resident of Cambridge.*

*I will in addition be representing Cambridge Past, Present & Future giving verbal evidence to the Examination in my role as Chairman of the CambridgePPF Trustees. The comments in this submission are my own and should not be seen as representing the policy or position taken by CambridgePPF].*

#### **Statement Summary:**

- a) The combined spatial strategy of both Councils will deliver sustainable development of the Sub-Region, has been prepared in accordance with the NPPF, and is therefore sound.
- b) The Spatial Strategy of both Councils will deliver sustainable development only if adequate investment is made to implement the public transport improvements, especially for the urban extensions and the new settlements, as set out in the Transport Strategy. With the funding from the Cambridge City Deal, this is realistic. The Spatial Strategy is therefore sound.
- c) A higher priority should be given to employment in the city where companies want to be located with more residential provision in SCDC. The overall provision for the Sub-Region would remain the same but with some re-distribution between the two Councils.
- d) Both the housing and employment provisions of both Councils have been objectively assessed and are sound.
- e) Some elaboration of the preferred development sequence of both Councils is required to emphasise that additional sites at the edge of the city in the Green Belt will be taken only as the option of last resort when all urban sites have been undertaken or discarded as undeliverable.
- f) Allowance should be made for large additional sites within the urban area that are not included in the CCC forward trajectory but that may come forward during the plan period: these should be taken before the release of more Green Belt land.
- g) A comprehensive new review of the Cambridge Green Belt should be undertaken against the full suite of NPPF purposes using a robust independent methodology.
- h) The city fringe sites identified in the CCC plan, GB1 and GB2, should be omitted and a 'floating allocation' of some 400 houses should be ascribed to the city fringe with the specific site dependent on the new Green Belt review.

#### **1. Overall Spatial Vision:**

- 1.1 It is impossible to consider the vision and spatial strategy of the City separate from SCDC and visa-versa. Cambridge City has a tightly drawn boundary with a very limited supply of development land, and is total surrounded by SCDC. The future growth of Cambridge can realistically be addressed only on a Sub-Regional basis involving both local planning authorities. My comments therefore cover the combined spatial strategy of both Councils.
- 1.2 With development land within the city boundary in such short supply, Cambridge is now at a 'tipping point'. What sort of place do we want Cambridge to be in 20 or even 50 years time? There are essentially two alternative scenarios: either the Green Belt is seen to have outlived its

usefulness and is merely restricting essential growth, or Cambridge should remain a compact city with a tightly drawn boundary with growth pushed out into South Cambridgeshire beyond the Green Belt where efficient transport links can be provided. These are the stark alternatives we face today.

- 1.3 It is my opinion that the two Councils have got the balance between these alternative scenarios about right. I strongly support the City's Vision to keep Cambridge as a dynamic compact city with its historic setting protected by its Green Belt. The urban extensions approved in the CCC 2006 Plan should continue to completion, meeting much of the need for the first half of the plan period. For the second half, the new SCDC settlements will start to come on stream, especially Northstowe and the extension of Cambourne. This seems a sensible and realistic strategy.
- 1.4 Whether this strategy works or not will depend on the provision of effective and reliable high quality public transport linking the new extensions and settlements with the major employment centres, city centre, railway station, and Addenbrookes hospital. In this context, I am persuaded that the City Deal is a potential game changer with its funding for infrastructure improvements.
- 1.5 What is now urgently needed is a clear and compelling long-term Vision for the strategic planning of the whole Sub-Region. Hopefully the new Combined Authority to be created through the City Deal will tackle this bigger question of how the Sub-Region should develop. In the meanwhile, I accept the Vision statements of both Councils as a relatively short-term holding position.

## **2. Spatial Planning:**

- 2.1 With the supply of development land in Cambridge so limited, greater priority should be given to its use to meet the demand for employment. Companies want to be located within the city and not in some satellite business park in South Cambs. Some of the proposed residential sites in the City would be better developed for mixed-use combining housing with employment and retail, thus helping to create viable communities rather than just sterile housing estates (for example, Sites R10, The Mill Road Depot: and R12, Ridgeon's, Cromwell Road). Others should be retained for exclusive employment purposes (for example, Sites R17, Mount Pleasant: M1, Milton Road: and M2, Clifton Road). The resulting 'shortfall' in housing within the City should be taken up by SCDC.
- 2.2 Similarly, the employment target within SCDC should be proportionately reduced by increasing the housing provision with the 'shortfall' taken up within the City. There would be no change to the overall employment or housing targets for the Sub-Region as a whole but there should be a spatial re-distribution between the two Councils. Such re-adjustment would be possible only if the two Councils could undertake a fully integrated joint plan.
- 2.3 In the absence of an integrated plan for the Sub-Region, I accept that the figures by both Councils have been objectively assessed and are sound.
- 2.4 The Examination will hear a lot about the pressures from commercial interests to have the provision figures for both employment and housing revised upwards, manifest in the number of Omission Sites. In my opinion, such pressures should be resisted for the following reasons:
  - i. the provision targets presented by the two Councils have been derived from a rigorous quantitative methodology – they have been objectively assessed. Despite the subjective claims of unmet demand from objectors, no credible alternative assessment has been forthcoming to challenge the Councils' targets;

- ii. the commercial self-interest undermines the objectivity of the representations from those with a development interest;
- iii. demand is not the same as need, especially in the Cambridge context. There is no doubt that dozens of companies would welcome the opportunity to re-locate to Cambridge, but do we actually need to accommodate them? Cambridge is an extremely attractive place to live which generates a high demand from companies wishing to re-locate and for new housing, but do we actually need all these additional homes? Do we have to accede to the pressure of those with a commercial interest to expand? There clearly is a substantial unmet need for more housing, especially affordable and social housing, and both Councils have attempted to accommodate a rate of expansion that they believe is sustainable without compromising the quality of life for current residents;
- iv. Cambridge is a city with an international reputation for its culture and heritage as well as for the quality of its science and technology. If demand was to be unfettered, a 'dash for growth' will be unleashed which would overwhelm the infrastructure, jeopardise the quality of life, and threaten what makes Cambridge so special – and so attractive to developers in the first place. Growth must be sustainable. In the Cambridge context, 'sustainable development' does not just mean the usual combination of economic growth tempered by environmental factors and social justice. It must also include the need to minimise the risk to the character and ambience of a historic city with a global reputation. We must not allow Cambridge to be trashed by excessive growth.

### 3. Preferred Development Sequence:

- 3.1 The CCC sequence is urban area first and then city fringe: the SCDC extends this with city fringe first, then major new settlements, and finally selective larger villages. It is easier to consider the two combined. In general, I agree with this sequence but with the following concerns:
- a) it is curious that the top priority for development for SCDC is the Green Belt – or 'on the edge of Cambridge'. This surely cannot be right, especially in the light of the recent statement (4.10.14) from the Secretary of State at DCLG that 'protecting our precious Green Belt must be paramount'. Yet here is a Local Planning Authority apparently making Green Belt its top priority for development. SCDC Policy S/6 para 1a. must be qualified with the wording, '*urban extensions around the city fringe that already have planning permission or are in the pipeline*'. Then a new clause is needed as para 1.g), '*new releases of Green Belt at the city fringe*'.
  - b) the justification for the high priority given to more urban extensions is the enhanced sustainability in the city fringe on the grounds of reduced environmental impact through lower use of private cars. Where is the quantitative evidence to support this theory? Is a new settlement several miles out of the city any more or less 'sustainable' than a site on the edge of the city if it has an efficient and reliable public transport service? A new settlement will have all the shops, facilities, and services to be largely self-contained whereas a site of a few hundred houses on the city edge will merely overload the local services which may be so distant as to encourage car use. Sustainability does not have a geography rider. Edge of Cambridge cannot be taken as being automatically more sustainable. And if protecting the green setting of the historic city is included in the Cambridge definition, then more urban extensions are definitely unsustainable.
  - c) the SCDC sequence completely ignores the potential contribution from nearby Market Towns. The Transport Strategy calls for the development of High Quality Passenger Transport links along all the main access routes. This implies that towns such as Royston, Newmarket, Huntingdon, Ely, and others could contribute to the city's housing provision. A new clause is required in SCDC Policy S/6 as para 1.e), '*local Market Towns linked to Cambridge by new High Quality Passenger Transport routes*'.
  - d) because of the importance of the preferred development sequence, it should be elevated to the status of having its own Policy in the CCC plan rather than buried in Paragraph 2.26 (as

has been done in SCDC Policy S/6). This new Policy should show the development sequence of the two Councils combined as follows:

- i. *The provision of jobs and homes within the Cambridge Sub-Region will be met as far as possible through the implementation of an order of preference for development, recognising the need to keep Cambridge as a dynamic, compact city within the high quality landscape setting of the Cambridge Green Belt. With the need for flexibility to accommodate market forces, the forward trajectory of housing provision will as far as possible adhere to the following development sequence:*
  - a) *Urban extensions around the city fringe that already have planning permission or are in the pipeline;*
  - b) *New sites within the existing urban area, both those sites identified in the plan and others than may come forward during the plan period;*
  - c) *New Settlements outside the Green Belt;*
  - d) *In the rural area at Rural Centres and Minor Rural Centres outside the Green Belt where good public transport is available or can be provided;*
  - e) *Nearby Market Towns linked to Cambridge by High Quality Passenger Transport routes;*
  - f) *New releases of Green Belt at Rural Centres and Minor Rural Centres;*
  - g) *New releases of Green Belt at the city fringe.*
- ii. *Priority for new sites will be given to the urban area which will be developed first, both those sites identified in the plan and additional sites that may subsequently be forthcoming during the plan period, in accordance with this preferred development sequence.*
- iii. *Wherever possible, priority will be given to the re-use of land that has already been developed (brownfield land) in accordance with the Principles of the NPPF.*
- iv. *Further releases of Green Belt land, both around the city fringe and around villages in South Cambridgeshire, will be approved only as the option of last resort once sites higher in the preferred sequence have either been undertaken or discarded as undeliverable.*

#### **4. Forward Housing Trajectory:**

- 4.1 The Housing Trajectory figures in CCC Figure 2.2 do not show how they have been compiled. The figures for the forward timetable of proposed start dates for different sites are buried in the Cambridge Annual Monitoring Report 2013. SCDC are to be congratulated for presenting this information in the body of their plan as Figure 3.
- 4.2 Clearly flexibility is required in viewing both forward timetables as the building programme is at the mercy of market forces, but there are some significant strategic issues to consider:
  - a) CCC apparently intends to commence development of the new urban extensions at GB1 and GB2 half-way through the plan period before a number of larger urban sites have commenced – ie the fringe sites are to be taken out of the declared sequence. These urban sites lie in the Green Belt. The NPPF requirement is that Green Belt should be released only under exceptional circumstances. Such circumstances cannot be deemed to have been met when undeveloped urban sites are available. It is appreciated that there may be logistical reasons why these urban sites are being deferred but with a lead-in time of nearly ten years, these should with determination be resolvable. It looks as if the urban fringe is being taken yet again as the ‘easy option’ – this is unacceptable.
  - b) There are a number of large sites within the existing urban area not included in the forward trajectory that are likely to come forward within the plan period. The larger of these additional sites, which have been proposed by Cambridge Past, Present & Future (Appendix A of the CambridgePPF statement relating to Matter 2), include the area currently used for surface car-parking at the Newmarket Road and Beehive Retail Parks, the Cambridge

Northern Fringe Area of Major Change, and the southern fringe of the Cambridge East Safeguarded Land linking sites R40 and R41. Their total provision could be in excess of 2,000 new dwellings. Such a major contribution should not be taken merely as 'windfall' unless the windfall provision is substantially uplifted. Either way, the provision from the CCC's first level of its development sequence is likely to mean that the GB1 and GB2 sites become redundant.

- c) in the light of these additional sites, the following wording is proposed as shown in the proposed new Policy under para 3.1.d) above:

Clause i.b *New sites within the existing urban area, both those sites identified in the plan and others than may come forward during the plan period;*

Clause ii. *Wherever possible, priority will be given to the re-use of land that has already been developed (brownfield land)...*

## 5. City Fringe:

- 5.1 The sites carried forward from the 2006 Cambridge Local Plan should be implemented first.
- 5.2 No new urban extensions should be agreed until a comprehensive assessment has been undertaken of their impact on the city and the quality of life of the residents. What is the level of car use in the new extensions? Are these urban extensions any more sustainable than development outside the Green Belt with good public transport?
- 5.3 In accordance with the recent clarification of the Planning Practice Guidance and the statement from DCLG (4.10.14), the Green Belt should be taken as the option of last resort, and only when all urban sites have been undertaken or discarded as undeliverable. Until then, the exceptional circumstances required by the NPPF cannot be satisfied.
- 5.4 The 2012 review of the inner edge of the Green Belt, which identified GB1 and GB2 as being of low importance, is flawed. The methodology used appears to have lacked the necessary rigour, and the purposes against which the Green Belt importance was assessed was a selected sub-set of the full suite of purposes set out in the NPPF, omitting the key purpose of preventing urban sprawl. A new comprehensive review using a rigorous independent methodology is urgently needed. Until such an objective assessment has been done, no sites within the urban fringe should be selected.
- 5.5 For the purposes of the submitted plans to show how the residential provision is going to be delivered, it is proposed that a 'floating allocation' of some 400 new dwellings is allocated to the City's second level of its development sequence, the edge of the city, with the actual sites to be released from the Green Belt deferred until the new review has been completed. 400 homes is less than 3% of the CCC provision, so such a minor modification does not detract from the overall soundness of the CCC plan.
- 5.6 With additional sites forthcoming from within the existing urban area, it is highly unlikely that any additional land will need to be released from the Green Belt for housing if the policy of 'option of last resort' is adopted. In the meanwhile, it is completely unacceptable for the residents of the Queen Edith's Ward to have this threat held over their heads. The sites should be deleted.
- 5.7 Changes to the CCC plan:  
*GB1 and GB2 should be excluded from the plan and be replaced by a floating allocation of 400 new dwellings in the city fringe, the exact location of which will be deferred until a new independent review of the Green Belt has been completed.*

