

MATTER 2 OVERALL SPATIAL VISION & GENERAL ISSUES

WRITTEN STATEMENT

SOUTH BARTON ROAD LAND OWNERS GROUP

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL ID. 21301

LOCAL PLAN EXAMINATIONS

CAMBRIDGE CITY AND SOUTH CAMBRIDGESHIRE



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1. INTRODUCTION

- 1.1 This Statement has been prepared by Januarys on behalf of the South Barton Road Land Owners Group (South BRLOG) to the Local Plan Examinations for Cambridge City and South Cambridgeshire. South BRLOG comprises four landowners, as follows: Corpus Christi College, King's College, Queens' College, and Selwyn College. The four landowners are like-minded organisations that take a long term approach to development and retain an interest in the ownership and management of their sites. The landowners want Cambridge to continue to be a successful place. South BRLOG owns land to the South of Barton Road which is on the south western built-up edge of Cambridge. It is currently located within the Green Belt. The site is wholly within the administrative boundary of South Cambridgeshire District Council. In October 2013 representations were submitted on behalf of South BRLOG to draft South Cambridgeshire Local Plan (Draft SCLP).
- 1.2 The South BRLOG representations to Draft SCLP were supported by the following technical documents: Ecological Appraisal; Initial Landscape & Visual Appraisal; Response to review of the Inner Green Belt Boundary Study; Transport Submission; Flood Risk Assessment; Initial Archaeological Overview; and Housing Requirements Study. Where relevant we will refer to the findings of these previous studies and our original representations.
- 1.3 We have separately promoted land to the North of Barton Road through draft Cambridge Local Plan (Draft CLP2014) and Draft SCLP for the North Barton Road Land Owners Group (North BRLOG).
- 1.4 We are aware that there is agreement between the landowners of three potential development sites on the western edge of Cambridge between Maddingley Road, Barton Road and the M11; University of Cambridge, St John's College, and North BRLOG. The landowners agree that a co-ordinated development could be delivered in the area to the north of Barton Road. If the land in the area to the north of Barton Road is released from the Green Belt and allocated for development in Draft CLP2014 and Draft SCLP, it would be appropriate to identify Land to the South of Barton Road as 'safeguarded land' to meet future development needs beyond the plan period.
- 1.5 In our previous representations to Draft SCLP we requested the following changes to the overarching development strategy:

We request that the development strategy is amended to identify additional land on the edge of Cambridge to meet objectively assessed housing needs. A comprehensive review of the Green Belt boundary should be undertaken, based on meeting those development needs. We request that Land to the South of Barton Road is identified as safeguarded land to meet longer term development needs beyond the plan period.

2. MATTER 2 – OVERALL SPATIAL VISION & GENERAL ISSUES

a. Is the overarching development strategy, expressed as the preferred sequential approach for new development, soundly based and will it deliver sustainable development in accordance with the policies of the National Planning Policy Framework?

- 2.1 The overarching development strategy is set out in Policy S/6 of Draft SCLP. The joint spatial approach is explained in Paragraphs 2.14 to 2.17 of Draft SCLP.
- 2.2 We commented on the development strategy in Section 7 of our Draft SCLP Representations Reports. We commented on Policy S/6 (of Draft SCLP) in Paragraphs 9.27 to 9.34 of our SCLP Representations Report.
- 2.3 The Plans have given inadequate weight to the assessment of sustainability matters in the Sustainable Development Strategy November 2012 [Doc Ref. RD/Strat/040]. This identified the significant sustainability advantages of locating development on the edge of Cambridge. The sole reason that additional land on the edge of Cambridge has not been selected for development or for ‘safeguarded land’ is the Green Belt designation. The Councils have inappropriately treated this as a factor which overrides all other sustainability considerations, irrespective of how they balance. The development strategy has therefore been driven by a single issue at the expense of other key planning considerations.
- 2.4 This has resulted in an overall development strategy which is unsound because:
- a. it fails to consider all three dimensions of sustainable development jointly and simultaneously (NPPF Paras. 7 and 8);
 - b. it is contrary to the core planning principles (NPPF Para.17);
 - c. it does not support the economy of Cambridge, which has an international reputation, in that research facilities and high technology companies want to locate within or as close to the City as possible (NPPF Paras. 19 and 20);
 - d. it fails to promote future travel by sustainable modes of transport (NPPF Para. 30); and,
 - e. it will not deliver even on its own limited objectives in terms of housing need.
- 2.5 The planning strategy put in place by the Regional Planning Guidance for East Anglia (RPG6) in 2000 and the Cambridgeshire & Peterborough Structure Plan in 2003 - which sought to concentrate development at Cambridge - has been given insufficient time to take effect.

Achieving Sustainable Development

- 2.6 Paragraph 7 of the NPPF identifies the three dimensions of sustainable development; social, economic and environmental. Paragraph 8 expects all three dimensions of sustainable development to be addressed jointly and simultaneously. The social role of sustainable development expects housing needs to be met. As set out in our representations, the objectively assessed housing needs of Cambridge and South Cambridgeshire have not been

identified in Draft SCLP (or indeed Draft CLP2014). The strategy fails to acknowledge the crucial link between housing and the economy in Cambridge. The economy of Cambridge is to a large extent based on the success of higher education, research facilities and high technology companies. These uses are focussed on and want and need to locate within or as close to Cambridge as possible, and this is unlikely to change during the plan period or for the foreseeable future. The people that work in those uses should be able to live close to where they work.

Core Planning Principles

- 2.7 Paragraph 17 of the NPPF identifies a set of core planning principles. The relevant principles relate to meeting development needs, protecting the natural environment, and directing development to locations which can be accessible by non-car modes of transport. Cambridge is and will continue to be the main focus for jobs in the area. The delivery of sustainable development should as a basic principle seek to locate housing close to where people work. Draft CLP2014 and Draft SCLP already make provision for development on previously developed land, but this is insufficient on its own to meet housing needs. Additional land for development should be allocated on the edge of Cambridge through Draft CLP2014 and Draft SCLP, with additional sites identified as ‘safeguarded land’ to meet future development needs. It is development on the edge of Cambridge – such as Land to the South of Barton Road – which is likely to successfully encourage the use of public transport and cycling for journeys to work in the long term.

Competitive Economy

- 2.8 Paragraph 19 and 20 of the NPPF expects the planning system to support sustainable economic growth and to meet the development needs of business. The development strategy over-emphasises the need to protect all of the existing Green Belt in the interests of quality of life and economic success in Cambridge. There is no evidence to demonstrate that somehow the economy would be damaged if some additional land was released from the Green Belt. Cambridge will continue to be the key focus for jobs and the economy both now and for the foreseeable future; the history of planning policy in the area over many years shows that whatever efforts are made to encourage employers to relocate outside Cambridge, research facilities and high technology companies want to locate within or as close to the City as possible. It is highly unlikely that such businesses would relocate to employment sites within the proposed new settlements.
- 2.9 Cambridge has an international reputation for higher education, research institutions and high technology businesses, and it is a driver of the UK economy. As such, development which supports those uses, including housing for students and key staff, should be actively supported through policies and strategic allocations in Draft SCLP. The development strategy promotes a dispersal strategy that seeks to direct development and housing in particular away from Cambridge. This approach will lead to an increase in in-commuting to Cambridge by car for job opportunities. A more sustainable strategy would be to direct development to sites on the

edge of Cambridge which could be easily connected to the existing bus, cycle and footpath networks.

Sustainable Transport

- 2.10 Paragraph 30 of the NPPF seeks to reduce greenhouse gas emissions and reduce congestion by directing development to locations where sustainable modes of transport could be used. The decision to direct development away from Cambridge will lead to unsustainable travel patterns. The development strategy will increase congestion on the main routes into and out of Cambridge. It is only by identifying ‘safeguarded land’ on the edge of Cambridge – including Land to the South of Barton Road – which are likely to succeed in changing travel behaviour and encouraging the use of public transport and cycling for journeys to work in the future
- 2.11 In contrast, the car is likely to be the predominant means of travel to Cambridge from the proposed new settlements.

Housing Supply

- 2.12 Paragraph 47 of the NPPF seeks to “*boost significantly the supply of housing*” and “*meet in full, the objectively assessed needs for market and affordable housing*”. The objectively assessed need for housing will be addressed in Matter 3. In summary, the development strategy proposed in Draft SCLP (and in Draft CLP2014) does not seek to correctly identify or meet objectively assessed housing needs. This approach has negative consequences for the social dimension of sustainable development, and would not achieve the aim of making people’s lives better.
- 2.13 A key component of the development strategy is the new settlements. The delivery of the proposed new settlements will be complex and they are likely to be subject to delays. The new settlements would require a substantial amount of on-site primary infrastructure as well as associated transport improvements to the edge of Cambridge at the start and in the early stages of development, and the funding required to meet the CIL/planning obligations requirement would also be substantial. The over-reliance on new settlements is a flawed strategy. There is a lack of evidence to support the deliverability assumptions used for the proposed new settlements.

Green Belt

- 2.14 Paragraphs 84 of the NPPF expects the Green Belt boundaries to take account of the need to promote sustainable patterns of development, and the consequences for sustainable development of those boundaries. Paragraph 85 deals with the process of defining Green Belt boundaries, and sets out a series of criteria to be met. The relevant criteria for land South of Barton Road are as follows:
- 1st bp: ensure consistency with the development strategy for meeting identified requirements for sustainable development;

- 3rd bp: identify areas of ‘safeguarded land’ between the urban area and the Green Belt, to meet longer-term development needs;
 - 4th bp: make it clear that ‘safeguarded land’ should only be developed following a local plan review; and
 - 5th bp: seek to ensure that Green Belt boundaries will not need to be altered at the end of the development plan period.
- 2.15 The Green Belt has been incorrectly treated as a near absolute constraint, when in fact it is a planning policy tool which can and should be varied to meet development needs provided that can be achieved without undermining the purpose of the wider Cambridge Green Belt. The failure to properly consider a comprehensive review of the Green Belt to meet development needs has resulted in the decision to direct development away from Cambridge towards new settlements. The designation of the Green Belt cannot be separated from meeting development needs including long term needs beyond the plan period.
- 2.16 The Councils have failed to consider or identify ‘safeguarded land’ in Draft SCLP to meet longer term development needs. Cambridge will continue to be the key focus for jobs and the economy both now and for the foreseeable future, and there will be a need for housing and affordable housing in Cambridge and South Cambridgeshire beyond the plan period. It is not stated, but should be expected, that any land identified as safeguarded must be available for development. The availability of Cambridge Airport for residential development in the future is uncertain for the following reasons: the Airport is operational; it will be difficult to find a suitable and available site for the Airport to relocate to; and, the range of airline operators and available flight destinations from the Airport has expanded within the last couple of years.
- 2.17 In Paragraphs 8.25 to 8.29 of our Draft SCLP Representations Report we highlighted the outcome of the Bath & North East Somerset examination. In September 2013, the Inspector published an Interim Note which raised concerns about the permanence of the Bath Green Belt boundary in the long term because of the failure of the Council to identify ‘safeguarded land’. In June 2014, the Inspector published his final report which recommended modifications to the Core Strategy to remove additional land from the Green Belt for ‘safeguarded land’.
- 2.18 The failure to identify available ‘safeguarded land’ in Draft SCLP to meet longer term development needs means that the Green Belt boundary has no permanence and will not endure beyond the plan period.
- 2.19 The technical studies prepared in support of these representations demonstrate that there are no significant constraints to development at Land to the South of Barton Road. It is development on the edge of Cambridge – such as Land off Barton Road – which is likely to successfully encourage the use of public transport and cycling for journeys to work. The longer term development of the site could provide a highly sustainable addition to Cambridge, whilst safeguarding the important characteristics on the western edge of the City. The long term involvement of the Colleges will ensure the on-going commitment to the quality of the environment, and the management of the built environment and green estate.

2.20 We request that Land to the South of Barton Road is identified as ‘safeguarded’ land to meet future development needs beyond the plan period.

b. Is it clear what other strategic options were considered and why were they dismissed?

2.21 A range of strategic options were considered, but the reasons for rejection of clearly the most appropriate strategy for the plan areas i.e. greater focus on growth at the City was rejected on an inadequate basis. The Green Belt has been treated as an absolute and inflexible constraint irrespective of other considerations.

2.22 The failure to properly consider a comprehensive review of the Green Belt to meet development needs now or in the future has resulted in the inevitable decision to direct development away from Cambridge towards additional new settlements. This is demonstrated by the decision of Cambridge City Council and South Cambridgeshire District Council to reject potential Green Belt sites at second Issues & Options stage, before the development needs had been determined.

2.23 There has been no consideration or assessment of options for the release of land from the Green Belt for ‘safeguarded land’ through Draft SCLP (or Draft CLP2014). We commented on Policy SS/3 (Cambridge East) in Paragraphs 9.52 to 9.52 of our Draft SCLP Representations Report. It is proposed that part of the land at Cambridge East is identified as ‘safeguarded land’. However, no other options for ‘safeguarded land’ were considered, and no assessment was made as to whether Cambridge East would be available after 2031.

2.24 The Green Belt is due to be examined in more detail in the second block of hearing sessions. We intend to comment on the issue of ‘safeguarded land’ at that time.

c. Are the Plans founded on a robust and credible evidence base?

2.25 No. We briefly comment on the evidence base as it relates to the overarching development strategy, because that evidence base will be examined in more detail in other Matters within this first block of hearing sessions or in the second and subsequent sessions.

Housing

2.26 The Councils assessment of need for housing is set out within Cambridgeshire County Council’s Population, Housing and Employment Forecasts: Technical Report (April 2013) [Doc Ref. RD/Strat/080]. The Technical Report takes no account of market signals or the evidence of affordable housing need in drawing conclusions about housing needs. The Councils’ evidence base is thus not compliant with either the NPPF or Planning Practice Guidance.

2.27 A key component the overarching development strategy is the delivery of new settlements, with development taking place towards the end of the plan period and beyond. There is no assessment in Draft SCLP of the deliverability or potential outcomes associated with a development strategy that is reliant on new settlements. Significant delays to the delivery of the new settlements and delayed or non-delivery of affordable housing cannot be acceptable

outcomes, particularly in an area with a substantial need for both housing and affordable housing. The need for housing and affordable housing in Cambridge and South Cambridgeshire will continue beyond the plan period. Therefore, we conclude that the evidence to justify the over-reliance on new settlements is not robust or credible.

Green Belt

- 2.28 Draft SCLP is based on a development strategy which effectively concludes that Cambridge has limited growth potential i.e. it has reached its development limits and no more outward expansion should occur. The development strategy is also based on the assumption that each and every part of the setting of the City is so important that it outweighs the long term development needs of Cambridge and the surrounding area. This approach is completely inappropriate for Cambridge, which has an international reputation for higher education, research institutions and high technology businesses, and is a driver of the UK economy. As set out above, the Green Belt is treated as the most important factor in determining the development strategy over-riding all other sustainability matters. The Green Belt has been incorrectly treated as a near absolute constraint, when in fact it is a planning policy tool which can and should be varied to meet development needs provided that can be achieved without undermining the purpose of the wider Cambridge Green Belt.
- 2.29 The Green Belt is due to be examined in more detail in the second block of hearing sessions. We intend to prepare hearing statements for those sessions. At this stage, we comment on the robustness of the evidence dealing with Green Belt matters, which in turn led to an overarching development strategy which treats the Green Belt as the most important matter. The 2012 Inner Green Belt Boundary Study is the Council's evidence base upon which it has decided whether there are areas of land on the edge of Cambridge which could be released from the Green Belt and allocated for development '*without significant harm to Green Belt purposes*'. Paragraph 80 of the NPPF identifies the five purposes of the Green Belt. The 2012 Inner Green Belt Study only considers the setting of historic towns (4th bp) and merging of neighbouring towns (2nd bp) purposes, and incorrectly includes landscape character within the assessment process (which is not one of the purposes of the Green Belt). We conclude that the Inner Green Belt Study does not represent a robust or credible evidence base. There is no evidence submitted with Draft CLP2014 or Draft SCLP which assesses the concept of Cambridge as a 'compact city' and what this means in the context of Cambridge in the 21st Century. Yet this is an aim of the overarching development strategy and the reason why additional land has not been released from the Green Belt. In our opinion, Cambridge would continue to be a compact city even if additional land was released from the Green Belt in the south western edge of the City.
- 2.30 As set out in (b) above, there has been no consideration or assessment of options for the release of land from the Green Belt for 'safeguarded land'. It is proposed that part of the land at Cambridge East is identified as 'safeguarded land' – see Policy SS/3 in Draft SCLP. The consideration of potential options for 'safeguarded land' was not part of the 2012 Inner Green

Belt Study, and in any event as set out above we have concerns about the robustness and credibility of that Study.

- 2.31 It is inevitable that further land will need to be released from the Cambridge Green Belt in the next plan period i.e. after 2031, and therefore land should be identified in Draft SCLP as 'safeguarded land' to meet those long term development needs.
- 2.32 These themes will be explored further in the Green Belt hearing session in the second block of sessions.