

Cambridge City and South Cambridgeshire Local Plan Examination

Statement for Matter 2: Overall Spatial Vision and General Issues

On behalf of St John's College (ID. 698)

- Representation number 27964

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(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?

1.1 This Pre-Hearing Statement has been prepared by Savills (UK) Limited on behalf of St John's College who are a participant under Matter 2 "Overall Spatial Vision and General Issues". St John's College seek the identification of the Grange Farm site in West Cambridge as a housing site and thus the removal of the site from the Green Belt as a part of the development strategy up to 2031.

1.2 Before identifying the City Council's own interpretation of its development strategy, it is relevant to underline that whatever strategy comes forward, it must reflect the need to address the opportunities that Cambridge presents. The City must be allowed to grow consistent with Cambridge's world-class reputation for education, research and knowledge based industries and its historic environment. As the City Local Plan makes very clear, it is a place that people want to visit, live, work and study in. Clearly in such circumstances, it must apply a development strategy that addresses these key issues whilst ensuring that the very conditions that attract people to live, work and visit here, are not compromised.

1.3 Of course, it is the case that a development strategy cannot simply be identified for Cambridge in isolation – the Cambridge area (including both the City and South Cambridgeshire) possesses a number of key characteristics which in themselves may not be exclusive to the Cambridge area, but certainly provide a context for what is needed to be addressed in land use planning policies over the next plan period.

1.4 The Cambridge area is now synonymous with high house prices and an ever-increasing gap between income and those prices as well as a dispersed pattern of development which contributes to significant amounts of commuting and consequent congestion. Yet it remains the case that the historical and cultural qualities of the local environment, the access to attractive green spaces and the extensive amount of important listed buildings, makes Cambridge a magnet for many.

- 1.5 The City continues to display low levels of unemployment compared to other locations and has been able to withstand the factors that caused economic decline elsewhere within the country. Cambridge, whilst not immune to economic pressures, has thus been able to maintain its attractiveness to employers, investors, visitors and residents even at the time of economic difficulties elsewhere. There is no reason why Cambridge should not continue to balance its advantages with the demands for new employment and housing growth in the next plan period.
- 1.6 The City Council's vision for Cambridge up to 2031 is of "a compact, dynamic city located within the high quality landscape setting of the Green Belt" (Submission Local Plan paragraph 2.3). The same paragraph states that its historic core and its open spaces will provide the inspiration for the City over the period up to 2031. The City will encourage innovative development including the promotion of sustainable modes of transport, helping to support the transition to a more environmentally sustainable and successful low carbon economy. It will also expand the knowledge-based economy whilst providing new high quality housing with balanced and mixed communities through a mix of sizes and types including affordable housing.
- 1.7 The City's Local Plan lists 15 strategic objectives set against the vision of the City up to 2031 (with Section 2 of the Submitted Local Plan). Such objectives are broadly supported in the context of the Council appropriately addressing its development needs. In this context, St John's College is one of the three parties that have instructed G L Hearn to provide analysis on the Council's housing requirements including taking account of the 2012 Sub-National Population Projections. Whilst we appreciate that the housing figures will be the subject of specific discussion under the heading of Housing Need under Matter 3, it is relevant to note at this stage that G L Hearn conclude that significant levels of new housing are needed in both Cambridge and South Cambridgeshire over and above those identified in the submitted Local Plans. If such numbers are to be met and the strategic objectives are to be complied with, then there is little option but to revisit the Cambridge Green Belt and to take on further releases comparable to those sites identified at GB1 and GB2 (land North and South of Worts' Causeway) and set out in Policy 26 of the Plan.
- 1.8 The identification of land within the Green Belt to accommodate new housing numbers is already part of the City Council's development strategy and in the instance where the Council has to meet in full its objectively assessed housing needs, it should continue to review Green Belt to accommodate new housing levels as identified by G L Hearn.
- 1.9 The move to remove land from the Green Belt for new development is of course nothing new. Certainly the 2006 Cambridge Local Plan identified a number of major sites for development in the Green Belt around the edge of Cambridge and which are now coming through as major

housing sites. Indeed, in the light of recent guidance within National Planning Policy Guidance issued on 6th October, it remains the case that the City Council is following in the way of established policy to the effect that a review of the Green Belt should be done, and can be done, via development plans when a proper, long term assessment can be made of both development/growth requirements and also an assessment of the boundaries of the Green Belt. Nothing in government policy or guidance suggests that a development plan review cannot in appropriate (ie exceptional) circumstances include the redrawing of Green Belt boundaries and the release of sustainable areas of land needed for development .

1.10 Paragraph 1.5 of the Submitted Local Plan confirms that this Plan is “essentially a pragmatic continuation of the 2006 Growth Strategy” and in the context of continuing to assess the appropriateness of the Green Belt against the need to address housing need sustainably, then this is indeed the case.

1.11 Whilst significant amounts of land were taken out of the Cambridge Green Belt in 2006, it was the case that they were meeting a need at that time. We are now in 2014, some years on from the analysis undertaken for the 2006 plan. Whilst priorities may change, it remains the case that the most sustainable location for new growth is within or on the edge of Cambridge.

1.12 Paragraph 84 of the National Planning Policy Framework makes it clear that:

“when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards town and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”

1.13 In this context we appreciate that the strategy for the Cambridge area includes provision for allocations at Cambourne and at Waterbeach as new settlements and whilst the College accepts that such a balanced approach to identifying growth in these broad locations is generally acceptable in our view, it remains the case that the City Council has not addressed the required objectively assessed needs for housing. In the instance where such identified need has to be met, it is our view that it should be met on the edge of Cambridge, compliant with the City Council’s development strategy. If sustainability is at the heart of the City Council’s plan, then the Council must embrace the wording within paragraph 84 of the NPPF in terms of undertaking the consequences of identifying new development locations outside of the Green Belt.

1.14 In closing, we would confirm that the College is supportive of a general development strategy being permitted whereby new growth is directed towards firstly, the urban area of Cambridge

and then its urban edge and then new settlement locations and then to the larger villages. The difficulty is to easily identify the strategy within Section 2 of the Local Plan where the text appears largely to address past policies for the Cambridge area. Table 2.2 purports to be a “2031 Strategy Approach” but simply refers to figures apportioned to development areas in the Cambridge area. Indeed many of the homes needed to be delivered between 1995 to 2016 have been moved across to the plan period 2011-2031.

- 1.15 With regard to the overarching development strategy and whether it is robust, we would suggest that it can be made so, but only in the circumstances where the Council meets its objectively assessed housing needs as submitted within the G L Hearn report and the identification of new housing sites in sustainable locations, i.e. Green Belt releases on the edge of Cambridge which includes the Grange Farm site in the ownership of St. Johns College

- 1.16 To this end we are aware that representations have also been made by landowners at West Cambridge (the large employment site which is referred to in Policy 18) which is in the ownership of the University of Cambridge and also College landowners on land of Barton Road. There is general agreement between the parties that a co-ordinated development could be delivered if needed, with appropriate transport connections and an orbital cycle route providing links between housing and employment. We all want Cambridge to continue to be a place where people want to work, live, visit and play and to continue a tradition of the University and Colleges working together to deliver successful high quality and award winning projects.

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

2.1 Following the publication of an Issues and Options consultation document in 2012, a second Issues and Options report was published in January 2013 which was a joint consultation on options for the development strategy for the wider Cambridge area and for site options for housing or employment development on the edge of Cambridge on land currently in the Green Belt. The development also looked at options for sub-regional sporting, cultural and community facilities and site options for a community stadium.

2.2 The document acknowledges that there is a strong relationship between Cambridge City and South Cambridgeshire. It summarised at paragraph 3.17 of the document that:

“On the whole, South Cambridgeshire looks towards Cambridge in functional terms whilst Cambridge is affected by a tight administrative boundary and surrounding Green Belt, and therefore any discussion relating to the Spatial Strategy in South Cambridgeshire is likely to have an impact on Cambridge and vice versa.”

2.3 Clearly the issue of the Green Belt and the release of land from this definition for new development was an important issue for the Councils to address in their joint consultation document. The history of the Green Belt and the reviews of those Green Belt boundaries feature extensively in the document and paragraph 7.16 sums up the Council’s position in advance of receiving people’s views on the role of the Green Belt in accommodating development. Paragraph 7.16 of Issues and Options 2 (January 2013) states:

“given that the inner Green Belt boundary was looked at very closely only a decade ago it should not be unexpected that the new review has found that most of the inner Green Belt continues to be important for Green Belt purposes and specifically important to protect the setting and spatial character of Cambridge as a historic city.”

2.4 This position is further strengthened by paragraph 8.3 of the same document which states:

“...the alternative would be to consider allocating further large sites on the edge of Cambridge where the evidence is clear that there would be very significant harm to the purposes of the Green Belt, although they would have the benefit of being more sustainable in other respects.”

2.5 The authorities would have seemed to have made their mind up even before receiving the responses to their posed question (Question 1: Where do you think the appropriate balance lies between protecting land on the edge of Cambridge that is of high significance to Green Belt purposes and delivering development away from Cambridge in new settlements and at better served villages?).

- 2.6 One of the key issues that would not have been addressed is our assertion that the Plan fails to address objectively assessed need. In the circumstances where the Plan has to accommodate (in our view) significantly more dwellings to meet that need, then the balance to be struck in releasing Green Belt or to increase commuting and thus jeopardise sustainability, would need reassessment. Such a reassessment in our view should incorporate a review of the Green Belt to accommodate new development.
- 2.7 In conclusion, we consider that the strategic options were considered but firstly, at a time when lower levels of new housing were being put forward and secondly, against a clear background where the Councils appeared to seek to influence the outcome of the questions being asked.

(c) Are the plans founded on a robust and credible evidence base?

- 3.1 It is certainly the case that both Councils have submitted their plans with a huge amount of background information and where claims of joint working have enabled (in their view) a robust assessment of their particular circumstances and which requires a particular development strategy to come forward.
- 3.2 Matters have become rather confused of late in the circumstances where a Memorandum of Understanding was published in September 2014 between the two authorities which now confirms an agreement under the duty to co-operate that the housing trajectories for the 2 areas should be considered together, including for the purposes of calculating 5 year housing land supply. This flies in the face of the conclusions reached by the Inspector at the Section 78 appeals at Waterbeach who stated that applying the housing supply situation in Cambridge would not be correct. The Memorandum, in short, makes a change to the Councils plans and admits (to a point) that as submitted to the Secretary of State that they were not sound.
- 3.3 In addition to the above, we would also confirm that G L Hearn were instructed by Savills on behalf of St John's College to assess what degree the level of housing provision proposed by the two Councils meets the requirements of national planning policy to meet full objectively assessed housing within the housing market area. Paragraph 14 of the NPPF requires plans to meet objectively assessed needs. Consequently every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. This is in the context of the Government's ambition to significantly boost the supply of housing as expressed in paragraph 47 of the NPPF.
- 3.4 The G L Hearn report concludes that both Councils will need to provide 2,325 homes per annum over the plan period (1,060 in Cambridge and 1,265 in South Cambridgeshire). In such circumstances we feel that the Councils evidence base to justify housing numbers is flawed. Any strategy that emerges from the use of incorrect projections clearly is in conflict with NPPF and NPPG. These issues will be addressed in detail under Matter 3 Housing Need.