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**HEARING STATEMENT
IN RESPONSE TO MATTER 2: OVERALL
SPATIAL VISION & GENERAL ISSUES**

**LAND AT HORNINGSEA ROAD, FEN
DITTON**

REPRESENTER : THE QUY ESTATE

REPRESENTATION # : 27995

**AGENT : CARTER JONAS
(MR RICHARD SEAMARK)**

OCTOBER 2014

1.0 INTRODUCTION

- 1.1 Carter Jonas is acting on behalf of The Quy Estate in promoting land at Horningsea Road, Fen Ditton for residential-led mixed-use development. The Quy Estate actively seeks to deliver 25ha of land around the village, providing 400-500 new homes (including 160-200 affordable units).
- 1.2 This Hearing Statement explains our objection to the Council's Overall Spatial Vision as set out in Proposed Submission Policy S/6: The Development Strategy to 2031, as supplemented by the Memorandum of Understanding between South Cambridgeshire District Council ('SCDC') and Cambridge City Council ('CCC') dated 9th September 2014. In particular we object to:
 - i. How the widespread support for a clear and understandable settlement hierarchy in the South Cambridgeshire Proposed Submission Local Plan ('SCPSLP') consisting of Edge of Cambridge ('EoC'), then New Settlements, then Rural and Minor Rural Centres, and the sustainability benefits such an approach can deliver, has subsequently translated into the allocation of 23% housing on the EoC, 49% in New Settlements; and 28% in Rural and Minor Rural Centres;
 - ii. How the principles of the spatial vision have been interpreted into policies that anticipate over 49% of the Council's housing requirement being provided in new settlements which will not be achievable in the earlier years of the Plan;
 - iii. Why the strategy proposes Green Belt release in the 'third tier' settlements of Sawston, Comberton and Histon, in preference to Green Belt release of sites in the 'first tier'.

2.0 RESPONSE TO 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 NPPF (para 6) states that the purpose of the planning system is to contribute to the achievement of sustainable development. Para 2.27 of the SCPSLP defines its interpretation of sustainable development to mean supporting the economic success of the Cambridge area, maintaining the setting of Cambridge as a compact historic city, and providing for development needs in a way that maintains the high quality of life enjoyed by residents, that makes it such an attractive place to live, work and study, and locates new homes close to services and employment or on high quality public transport routes.
- 2.2 We partially support SCPSLP Policy S6(1), in terms of directing growth to the EoC as a key priority. However, this Strategy fails by then only directing 23% of its housing growth to the EoC, compared to 49% in New Settlements, and 28% in villages. Whilst it is noted that by taking a joint approach with CCC, provision of 35% of new homes on the EoC (across both SCDC and CCC) is made, the actual provision on the EoC for SCDC provides the lowest amount of housing growth, contrary to its position at the top of the hierarchy.
- 2.3 This conflicts with the widespread acceptance that the EoC is the most sustainable development option for SCDC. Cambridgeshire and Peterborough Joint Strategic Planning Unit, in its Sustainable Development Strategy ('SDS') (2012) concluded that the most sustainable focus for development was within or on the EoC, and that large free-standing developments present delivery challenges over long timescales. Growth on the EoC would:
- enable new housing to be close to major employment locations (e.g. Cambridge Science Park, St Johns Innovation Park, and Cambridge Business Park), and main services and facilities (e.g. Cambridge Science Park Train Station and Interchange/Cambridge Station, major education institutions, city centre retail, commercial and leisure uses);
 - provide the opportunity to create new employment premises, benefitting from a large labour pool within the city and surrounds;
 - allow shorter journeys and use of existing well-established public transport, cycling and walking routes through urban concentration (e.g. the Guided Busway, existing and proposed green infrastructure in Cambridge such as the Chisholm Trail, which will be partially funded by the City Deal);
 - allow masterplanning to ensure a high standard of urban and built design that would complement existing communities;

- be viable, given the high property values close to the city; greater value means that necessary infrastructure and facilities are more likely to be provided.
- 2.4 In terms of bullet 2, Policy TSCSC1 of the Local Strategy for Cambridge and South Cambridgeshire (2014) states that transport is one of the critical factors in deciding where growth should occur. Previous experience suggests that with economic growth continuing, failure to provide new homes in the area will lead to greater levels of travel in Cambridge and South Cambridgeshire as people from outside the area travel through to access new jobs. Furthermore, the SDS states that reducing journey times, avoiding congestion, enabling choice and making the best use of existing infrastructure are all key considerations in determining the most sustainable development locations.
- 2.5 In turning to the alternative proposal of New Settlements, the SDS commented that whilst New Settlements might make a significant contribution towards housing supply, there are challenges to providing homes and jobs in the same location. This will likely result in out-commuting, undermining sustainability principles.
- 2.6 Furthermore, challenges exist around the deliverability of New Settlements due to the long term preparation, planning and overall lead-in times before development starts. The current SCDC Core Strategy has partially failed by employing a similar strategy of identifying major new developments (such as Northstowe, Cambridge East). Low housing delivery rates in the first half of the Plan period was justified at the time on the basis that the large new developments would have infrastructure in place to deliver a higher output of housing in the second half of the Plan period.
- 2.7 This strategy has, for various reasons, failed to deliver the requisite homes in the proposed timescales, resulting in a significant under-performance in housing supply across the Plan period, and which has now exposed SCDC to a five-year housing shortfall. SCDC has also persistently failed to deliver housing, which over a 15 year period (99/00 to 13/14), has only once delivered above its annual requirement (in 07/08). This therefore justifies the requirement for SCDC to allocate an additional buffer of 20% housing in the immediate 5-year period, brought forward from the end of the Plan period. A key consequence of this failed strategy is the significant shortfall of affordable housing in the district, calculated by the SHMA as requiring 11,838 new affordable homes through to 2031. This figure represents 62% of the proposed total housing number in South Cambs, despite its draft Policy H/9 of seeking 40% affordable housing from development schemes. To achieve the requisite number of

affordable housing in the district through to 2031, over 29,500 homes would have to be identified in the SCPSLP.

- 2.8 In response to paragraph, 2.39, it is considered that an increase from 766 homes per annum is not an appropriate step change for SCDC, as this is based on the premise that 766 homes was an acceptable delivery during the last plan period. It is considered that this level of delivery was the result of a combination of poor strategy e.g. an unrealistic focus on very large New Settlements and unfavourable market conditions/developer change in delivery expectations. Given the strength of developer demand in Cambridge and South Cambridgeshire, it is considered that had SCDC provided a more flexible strategy which allowed opportunities for smaller-scale (but still adequately sufficient in size), short term development e.g. on EoC in first half of the Plan period, delivery rates would have been higher. The percentage step change of SCDC targets and CCC targets is also fundamentally different (c.25% for SCDC; c.54% for CCC). If SCDC % step change was consistent with CCC % step change, it would result in an increase of housing per annum to c.1,172 per annum.
- 2.9 SCDC is therefore at risk of repeating mistakes by prioritising a higher delivery rate of housing towards the second half of the Plan period. The same arguments on the benefits of long term, high growth housing delivery in the New Settlements were played out by SCDC during the examination of the Core Strategy, and the experiences learnt from Cambridge East, Northstowe, is that reliance on a small number of very large sites will potentially again expose SCDC to further housing shortfall.
- 2.10 The SDS provided the following Sustainable Development Sequence Matrix, which provides strong support for the EoC over new settlements, yet the spatial strategy allocates more housing in new settlements:

Sustainable Development Sequence Matrix

		Sustainability considerations					
		Economy	Housing	Transport	Infrastructure	Quality of place and life	Deliverability & viability
Development sequence	Edge of Cambridge	++	++	++	+	+	+
	One or more new settlements	+/-	+	+/-	+/-	+	-
	Market towns	+/-	+	+/-	+/-	+	+/-
	Larger villages	+/-	+/-	+/-	0	+/-	+/-

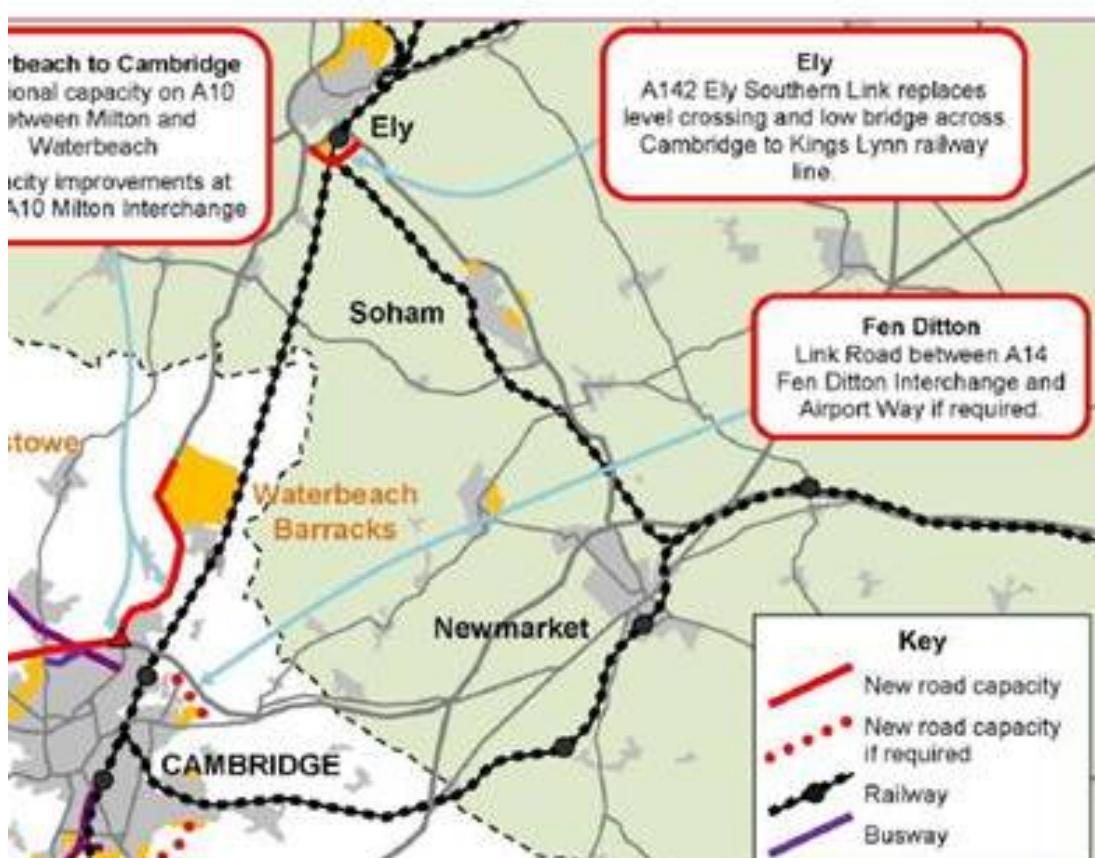
Key						
Very positive	Positive	Positive & negative effects	Neutral	Negative	Very negative	Unknown
++	+	+/-	0	-	-	?

- 2.11 The Green Belt has been incorrectly treated as a near-absolute constraint rather than a spatial planning policy instrument which could, and should, be adjusted if it facilitates the achievement of sustainable development, provided this can be achieved without undermining the purpose of the wider Cambridge Green Belt.
- 2.12 The spatial strategy is therefore a direct deviation of Paragraph 84 of the NPPF which requires reviews of the Green Belt to take account of the need to promote sustainable development. This failure to properly and proactively consider a comprehensive review of the Green Belt has ultimately culminated in the decision to direct development away from central Cambridge towards new settlements. Favouring new settlements over EoC sites is at odds to the Settlement Hierarchy and, based on historic trends, is potentially an undeliverable strategy which will have a significant adverse impact on the delivery of required housing and employment.
- 2.13 SCDC and CCC are seeking to use their existing centres of excellence in higher education and technology/research as a key opportunity to attract economic growth. The success of the Cambridge economy hinges on the spatial concentration of activity within the centre and fringe of Cambridge City – such a pattern typical to clusters of similar knowledge-based industries. Sub-regional employment growth has been shown to be less effective where attempts have been made to locate this away from the existing intellectual capital hub, for example Cambourne Business Park.

- 2.14 SCDC acknowledges that it is necessary to allocate land in the locations where companies wish to be (e.g. redevelopment of early phases of the Cambridge Science Park, allocation of land around the new station).
- 2.15 Allocating further land on the EoC for more housing is considered necessary to complement the increased levels of employment development on the EoC in accordance with the concept of the Compact City. The spatial distribution of development within the Plan together with decision to locate significant numbers of new homes beyond the Cambridge Green Belt does not address existing commercial aspirations or seek to promote an increase in sustainable travel patterns.
- 2.16 The identification of sites for housing within draft Policy H1 is also at odds to the Settlement Hierarchy. A total of 455 homes are proposed on sites in the third tier of the hierarchy (including 340 homes at Sawston, 90 homes at Comberton and 25 homes in Histon), all requiring Green Belt release. We would challenge that it would be arguably more sustainable to identify the 455 homes on the EoC, and would be less harmful to the Cambridge Green Belt by allocating homes on a single site released from the Green Belt on the EoC, as opposed to three individual sites being taken out of the Green Belt.
- 2.17 In conclusion, SCDC has identified the correct settlement hierarchy sequence but has not then identified housing land in accordance with this. This therefore results in a strategy that is not justified, positively prepared, effective or consistent with national policy. Its focus for growth in Cambridge should remain aligned to the hierarchy established within the SCPSLP. Thus, the majority of additional growth should be accommodated in and around Cambridge through a combination of urban intensification and sustainable urban extensions. This could be achieved through the release of additional sites in the Green Belt (without compromising the overall spatial function of the Cambridge Green Belt) and maintaining the intrinsic characteristics of the Compact City.

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

- 2.18 The sites under promotion for The Quy Estate were given reference numbers by SCDC of SC159 and 160. The assessment given in the Sustainability Appraisal Proforma did not accurately reflect what the proposed Area of Search for housing, as specified within the site representations, referred to. Site representations sought the



development of c.500 homes predominantly on site 159, together with a smaller level of development on land to the east of Horningsea Road (site 160).

- 2.19 SCDC has instead appraised both sites 159 and 160 for development occurring across the entirety of the land, which could potentially skew the findings of the appraisal.
- 2.20 The Proforma assessment does not also include reference to the proposed relief road linking Horningsea Road with Airport Way (Cambridge East), as set out in the County Council's Local Strategy for Cambridge and South Cambridgeshire ('LSCSC') (see below), which will inevitably materially affect the assessment of Green Belt in this area; pedestrian and cycle access between Fen Ditton and the new Train Station and Interchange (together with the Science Park, Business Park and St Johns Innovation employment clusters) via the proposed bridge crossing (http://www.cambridgeshire.gov.uk/info/20051/transport_projects/62/cambridge_science_park_station/2), linking up to the Chilsholm Trail; and the County's current search for a new 7 Form of Entry school in North East Cambridge, of which the Quy Estate land is one of three sites under consideration. All of the above would substantially add to the sustainability offer of the sites in question.

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

Green Belt

- 2.21 The 2012 Inner Green Belt Boundary Study is fundamentally flawed in a number of ways. The methodology fails to provide a definition to the criteria for the thresholds used when assessing importance. Subjective judgement results in a process which is not replicable or transparent. There is incorrect interpretation and analysis of some of the criteria against the purposes of the Green Belt and the weighting given to the criteria.
- 2.22 We are of the opinion that the assessment of land relating to that which is owned by the Quy Estate was incorrectly applied. The Quy Estate commissioned a Green Belt Critique ('GBC' which concluded that the 6 parcels assessed in the Inner Green Belt Study ('IGBS') would lead to a moderate adverse effect on the functions of the Green Belt, if developed.
- 2.23 The key differences noted in the GBC to that of the IGBS, for the sites under consideration here for development, were that landform is set at a much lower level than Area 1 which has sloping topography that gently slopes up towards the A14 (In contrast the 2012 assessment notes that land fall towards the A14); sites are more characteristic of the Rural Lowland Mosaic - Eastern Transition Lands Landscape Character Area; there are no views of the Historic core of Cambridge City; and foreground views are relatively flat and mixed in quality and provide limited importance to the setting of Cambridge.
- 2.24 Had the correct assessment methodology been applied, we believe that there would be a downgrading in the significance level of the Green Belt in this area, which could have allowed SCDC to consider a site such as this on the EoC, in preference to the allocation of land in lower tier settlements e.g. Sawston.
- 2.25 Consideration should also be given to the County's LSCSC, which proposes a new orbital relief road across land, which SCDC and CCC consider to be of either High or Very High Significance to the Green Belt.

Sustainability Appraisal

- 2.26 See comments given above in respect of Proforma Assessments.

SHMA

- 2.27 The Council's evidence base comprising the Cambridgeshire SHMA (2012) and the Population, Household and Employment Forecasts Report (2013) are not considered to be robust, credible or compliant with the NPPF. Significant flaws include, the absence of most up-to-date data as contained in the 2011 Census, the failure to demonstrate how affordable housing needs will be met (especially when the demands of new infrastructure are taken into account); the plans do not account for market signals which would reveal significant under-provision of housing in Cambridge; the methodology used is a basic approach using an occupancy ratio to relate population to dwellings – inconsistent with modelling approaches adopted by other local authorities and fails to consider local evidence or the structure or dynamics of the local population.
- 2.28 Analysis undertaken by *NLP* as part of Commercial Estates Group's representation submitted in September 2013 shows that the housing target across both Plans of 33,000 does not meet objectively assessed need for housing and, certainly, will not support achievement of the two plans' employment growth target of 44,000 jobs.
- 2.29 The housing trajectory is based upon over-optimistic assumptions about deliverability and density.

3.0 SUGGESTED MODIFICATIONS TO POLICY

- 3.1 To be consistent with the Settlement Hierarchy we would propose the highest percentage of housing to be in EoC sites; a lower percentage to be in New Settlements; and then a lower percentage to this in Rural Centres/Minor Rural Centres. This will require some key changes to proposed housing sites, including considering deleting H/1: b, c, d and h; and/or deletion of a New Settlement e.g. Bourne; together with the allocation of new sites on the EoC, including the allocation of 500 homes on land to the west and east of Horningsea Road, Fen Ditton.