
Examination of the South Cambridgeshire District Council Local Plan Examination 2014

Matter 2: Overall Spatial Vision and General Issues
on behalf of MCA Developments Ltd (3652)

Objector Reference 60593

October 2014

**Examination of the
South Cambridgeshire District Council
Local Plan Examination 2014**

Matter 2: Overall Spatial Vision and General Issues

Project Ref:	19102/A5/P8/SK/SO		
Status:	Draft		
Issue/Rev:	01		
Date:	October 2014		
Prepared by:	Steven Kosky		
Checked by:	NTH		

Barton Willmore
St Andrews House
St Andrews Road
Cambridge
CB4 1WB

Tel: 01223 345 555
Fax: 01223 345 550

Ref: 19102/A5/P8/SK/SO
File Ref: 19102.P8.MS2.SK
Date: October 2014

COPYRIGHT

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore Planning LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

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 South Cambridgeshire is a rural district council with no large towns, rather, a number of rural centres (classified within the Plan as either rural centres or minor rural centres) together with a distribution of smaller village centres. A soundly based spatial strategy for such a district should therefore primarily seek to strengthen and enhance all these existing rural centres as part of any district-wide or wider Cambridge growth strategy. The submitted spatial strategy however fails to do this as it primarily focuses upon a limited number of new settlements and is therefore completely inflexible.

- 2 The largest and most sustainable rural centres in South Cambridgeshire, such as the existing new settlement of Cambourne, are the most logical centres to accommodate additional growth to meet the district's needs, whilst proportionate sustainable development at the minor rural centres and larger villages is necessary to help underpin the long term vitality and viability of existing local services. For a spatial strategy to be considered sound, it must not create any situation where a proposed new centre is located in an area where it will directly or indirectly compete with an existing centre for housing market share and other inward investment. To do so would be unsustainable, illogical and counter-productive to the objective of increasing housing delivery.

- 3 The spatial strategy advanced in the submitted Local Plan under Policy S/6 however does exactly this, as the main focus of new growth is upon a limited number of new settlements. One of these new settlements, at Bourn Airfield, is also located directly proximate to the existing new settlement of Cambourne, which will make it a future competitor for housing market share and inward economic investment, both of which would be more sustainably located within Cambourne itself, given its existing scale of development and its potential for further enhanced sustainability.

- 4 The Council's order of growth preference remains on the edge of Cambridge, although there are no new large strategic Green Belt releases currently proposed, only a roll forward of the existing Area Action Plans. This is followed by growth at new settlements and then finally at the rural centres themselves. This reflects the same spatial strategy which has already been applied to the district over the last 10 years, which has largely failed. The spatial strategy in the adopted Local Development Framework (LDF) has seen some development successfully take place on the southern edge of Cambridge, such as at Trumpington Meadows and Clay Farm.

- 5 However major elements of the LDF spatial strategy (such as Northstowe and the Cambridge East) have failed to deliver any dwellings as part of the original LDF Core Strategy, resulting in very large housing shortfalls and the need for a second major new settlement at Waterbeach.
- 6 With regard to the Council's highest order of sequential preference, we do not advocate that a moratorium should take place on any further development in the Green Belt at the edge of Cambridge, provided for example that the site in question was a logical infill of modest scale and genuinely sustainable.
- 7 However with regard to larger scale major urban extensions to Cambridge, the Green Belt around Cambourne was comprehensively reviewed as part of the adopted LDF and recent narrative additions to the National Planning Practice Guidance on 6th October 2014, by the Secretary of State, reaffirm that once Green Belt boundaries have been defined they should only be reviewed in exceptional circumstances.
- 8 Therefore there will only be justification for further strategic scale development in the Green Belt around Cambridge if exceptional circumstances are shown to exist, such as a lack of reasonable alternatives. However South Cambridgeshire does have reasonable alternatives in its own district, some of which are not constrained by Green Belt, such as Cambourne. This suggests that in relation to future large scale growth the 'Cambridge first' preference should only relate to the existing committed development in the Area Action Plans.
- 9 However, the continued sequential preference, expressed in Policy S/6, implies the further consideration of Green Belt releases around Cambridge as a first priority, which could become relevant should the Inspector find that there are insufficient site allocations to meet the assessed housing need in the district at this examination (including any accrued shortfalls that need to be made good in the plan period).
- 10 Our view is that there is no scope for further major strategic Green Belt releases around Cambridge, as its historic, compact character could become seriously compromised and exceptional circumstances could not be easily demonstrated. This is because there is potential to sustainably disperse growth to the larger rural centres, most of which are well connected to the major transport corridors. Accordingly, this part of the spatial strategy search sequence would be difficult to implement, having regard to the NPPF and so is no longer valid as a priority in the search sequence.

- 11 Turning to the issue of new settlements, we do not advocate that a bottom up approach to meeting future development needs in the district is the most sustainable solution. However, given the very large accrued housing shortfalls in the extant LDF and the consistent failure in the current Plan period to deliver sufficient housing against identified annual plan targets (resulting in the current acknowledged lack of a five year housing land supply) the recycled spatial strategy proposed in the submitted Local Plan risks repeating the failures of the past.
- 12 In essence, the spatial strategy advanced in the Local Plan makes the similar mistake of over relying on the specific delivery at a given point in time for a large quantum of development from a limited number of new settlements, some of which do not yet exist, to the detriment of the larger rural centres.
- 13 Where necessary, new settlements have a role to play in a robust spatial strategy as part of broad ranging delivery framework. However it is an inevitable consequence of their nature that there will also be proportionately greater levels of uncertainty and longer lead in times with large new settlements (to accommodate strategic new infrastructure etc) relative to sustainable urban extensions to existing smaller settlements. Accordingly, a spatial strategy which is predicated mainly on high delivery from a low number of new settlements, with high rates of delivery expected in the latter stages of the Plan period, will be exposed to two key delivery risks:
- 14 Firstly where the spatial strategy relies on high rates of delivery from new settlement locations in the later stages of the housing trajectory there is the risk that a large amount of housing delivery can be lost before the end of the Plan period for every individual year that the commencement of the new settlement is delayed.
- 15 Housing delivery targets for new settlements are also very difficult to simply increase later on to remedy any delay in commencement. This is evidenced by the recent planning history of Northstowe, which was originally due to commence in 2006 but actually did not commence until 2014, leading to very large accrued housing shortfalls which could not be recovered.
- 16 Secondly, where housing need increases over the Plan period, for example if the housing requirement is substantively increased during the examination of the Local Plan itself, or if other strategic allocations subsequently become unavailable (as was the case with the Cambridge East LDF allocation and Marshalls Airport) there is little or no flexibility to address such a scenario with a limited new settlement approach.

- 17 Planning permissions and construction lead in times for more complex projects cannot be materially brought forward for such schemes simply on demand, or projected housing delivery rates increased after commencement, to compensate for any additional housing numbers required in the Local Plan or to make good non-delivery from other strategic sites. There is also little incentive for a private developer to accelerate their delivery plans for a strategic site (which will be geared to market capacity) just to accommodate the future wishes of the Local Planning Authority.
- 18 With regard to local market demand and capacity, it should be noted that both Northstowe and Waterbeach have local housing markets and land values which are not the same (or as buoyant) as the City or the settlements which lie immediately to the south and south west of Cambridge, some of which have good rail connections to London. Accordingly, the technical (physical ability to build) rate of housing delivery anticipated from Northstowe and Waterbeach is not an accurate barometer of delivery.
- 19 These rates are technical projections only and cannot be relied upon over the longer term with the same degree of confidence as perhaps some other areas in the south and west of the district. This is of particular relevance to Northstowe, which will effectively have to create its own entirely new housing market from scratch. This is compounded by the fact that it will also take many years to establish a self sustaining new community and one which can offer the same level of community and other facilities as those already available elsewhere.
- 20 Whilst we accept that Northstowe and Waterbeach are key components of the South Cambridgeshire spatial strategy to 2031 and beyond, they can do little to address the immediate issue of the lack of a five year housing land supply, nor can they be materially brought forward (i.e. Waterbeach) or be made to deliver in greater numbers over the same period, should the Inspector find that a greater level of housing must be provided for in the Plan period to 2031, to make up the major historic shortfalls.
- 21 We however reject the spatial logic of a new settlement at Bourn Airfield, which is fundamentally flawed on a number of levels, by reason of its scale and location. Primarily, the Bourn allocation is of an insufficient scale to function properly as a new settlement, relative to Northstowe and Waterbeach and so will take many years to achieve any form of self-reliance, requiring out-commuting for anything more than the most basic of facilities, rendering it a residential dormitory during most of its construction. It is also questionable if this scale of new settlement is actual viable given the high infrastructure requirements required by SCDC policy.

- 22 There is also the demonstrable issue of coalescence with other historic settlements, notably with the village of Caldecote and to the south with Bourn itself. However, of most significance, with no precedence elsewhere in Cambridgeshire (or as far as we are aware, the UK) is the conscious location of a new settlement, of a lesser scale, only metres from the existing settlement of Cambourne, but with no vehicular links available and in direct opposition to it. This demonstrates a particular misunderstanding of how the local market operates, which is driven in part by the successful internal market of Cambourne, to which the new settlement at Bourn Airfield will be completely unrelated.
- 23 A further critique of the spatial strategy, apart from its inflexibility to meet any higher level of housing need that may be required, is that the new settlement focused approach will constrain the ability of new housing delivery to keep pace with new employment delivery, particularly if any of the three new settlements (Northstowe, Waterbeach and Bourn) fail to deliver over the plan period as required.
- 24 This is evidenced in the Cambridge sub-Region SHMA 2013 (Table 14) which compares the ratio of jobs increase to dwellings increase in South Cambridgeshire to 2031, with that of other Cambridgeshire authorities. In this respect, it can be seen that (with the exception of the City itself) South Cambridgeshire has the highest ratio of new jobs to dwellings (1.16) than any other Cambridgeshire Authority. For example, East Cambridgeshire has a ratio of only 0.54 and Fenland even less at 0.42. Accordingly, should one or more of the new settlements stall (as has previously been the case with Northstowe) there will be a growing surplus of employment delivery over housing delivery with the inevitable likelihood of further in-commuting.
- 25 The solution required to help deliver sustainable development in accordance with the policies of the National Planning Policy Framework is to refocus growth in favour of the major rural centres, notably at Cambourne, which is unconstrained by Green Belt or other landscape designations. A more diverse spatial strategy would be more capable of responding to a greater level of assessed housing need than the 19,000 dwellings to 2031, currently proposed in the Local Plan.
- 26 Our assessment of housing need is that South Cambridgeshire should be planning for at least **1,100** dwellings per annum in the period to 2031. We have also advocated in other responses to the earlier consultation stages of the Plan that the current, extant, LDF has itself under-delivered by over 6,000 dwellings relative to its original requirements at this point in time. A more diverse spatial strategy is therefore essential to deal with a higher annual need and to make up the accrued major housing shortfalls.

- 27 The current spatial strategy, with its continued reliance on Northstowe (which SCDC requires to be delivering 350 dwellings per year by 2018) together with Waterbeach, has no flexibility to deal with this scenario and further major strategic expansions of Cambridge into the Green Belt are completely unjustifiable. Accordingly, there is a need to retain the commitment to Northstowe and Waterbeach, but divert growth away from Bourn towards other major rural centres which are more sustainable, and which can accommodate significant additional dwelling requirements such as at Cambourne.
- 28 In this respect, land at Cambourne West offers a clear opportunity to create a larger, more sustainable settlement, via an increase in the scale of the somewhat arbitrary linear urban extension currently allocated in the Local Plan. A larger western urban expansion of Cambourne would also be fundamentally different to that proposed at Bourn Airfield in that it is not a freestanding new settlement but an urban extension of Cambourne. As such it will form a cohesive part of the overall settlement, taking the currently planned 4,250 homes up to 6,600 homes and can be developed quickly at around 200 dwellings per year. This will create an overall settlement with twice the critical mass of that proposed at Bourn Airfield and significantly, it would be of a sufficient economic scale to attract the inward investment it needs to be fully self-sustaining by completion.
- 29 In short, due to Cambourne's existing modern infrastructure and inherent expansion potential, Cambourne West offers large new settlement benefits, at more rapid urban extension rates of delivery.

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

- 30 The spatial strategy for South Cambridgeshire is not founded on a credible evidence base. A Memorandum of Understanding signed in September 2014 between South Cambridgeshire and Cambridge City confirms an agreement between the two Councils that the housing trajectories for the two areas should now be considered together for Local Plan purposes, including for the purposes of calculating 5-year housing land supply.
- 31 The effective conjoining of these two trajectories will however clearly have an impact upon the spatial strategy as originally submitted to the Secretary of State, since if Cambridge City is now to help meet South Cambridgeshire's needs (and vice versa) then the previously separate spatial strategies are now also effectively conjoined and will be treated as a single entity.

- 32 This however was not the basis upon which the submission version of the spatial strategy was originally consulted, which has resulted in a substantive prejudice to site promoters who have not had the opportunity to be consulted on the *de-facto* wider spatial strategy now presented for examination. In addition, the last minute appendage of the City's internal spatial strategy to that of South Cambridgeshire is clearly indicative of an inherent weakness in the strategy proposed by the latter, requiring the 11th hour safety net of the adjoining City authority which currently has a greater supply of housing land available (at least in the short term).
- 33 However this approach is fundamentally flawed on numerous levels, primarily because the City intends to provide 22,000 new jobs, but only 14,000 new dwellings, which is an even higher jobs to homes ratio of 1.57, which calls into question how there will be any surplus dwelling provision to assist South Cambridgeshire in meeting its unmet needs in the short term. In addition, the two housing markets are completely different, with land values in the City substantially higher than the rural hinterland of South Cambridgeshire (i.e. akin to the London Market). This is evidenced in Table 5 of the 2013 SHMA, which shows that the mean house price to income ratio in South Cambridgeshire was 6.9 in March 2013, whilst in the City this ratio was significantly higher at 9.3.
- 34 The conclusion to be drawn is that there is more likely to be a need for movement away from the City into the more affordable areas of South Cambridgeshire in the short term at exactly the time when the intended Memorandum of Understanding is intended to be operating in reverse (i.e. the City supporting SCDC in the early years of the joint trajectory and South Cambridgeshire 'repaying the favour' in the latter years of the trajectory via the implementation of the new settlements).
- 35 This combined approach is unlikely to work in practice due to the issue of relative affordability between the two market areas. However, it would be particularly disadvantageous to the City if after having expended most of its sites in the early years to assist South Cambridgeshire, the new settlements did not come forward as quickly as planned, which would leave the City little option but to release further substantial areas of Green Belt at some future date, to the detriment of the historic character of the City.
- 36 On this basis, the South Cambridgeshire spatial strategy fails the test of soundness, as it is clearly not self sustaining and instead relies on other sites in other areas which are considerably less affordable.