



Cambridge City and South Cambridgeshire Local Plan Examinations Matters and Issues Statement

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CCLP ID **5423**
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Matter 2 Overall Spatial Vision and General Issues (Wednesday 5 and Thursday 6 November 2014)

- 1.0 **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 The development strategy set out in the Local Plans is not soundly based and will not deliver sustainable development in accordance with NPPF policy.
- 1.2 In preparing their plans, both local planning authorities have, at various stages, identified the close social, economic and environmental relationships and interactions between Cambridge City and South Cambridgeshire, and the important role of the Cambridge urban area, leading to the identified sequential approach for development. This sequential approach is identified by Cambridge City Council ('CCC') in the Cambridge Local Plan (para 2.26) in the following terms:
- "the preferred sequential approach for new development can be described as: (first) being within the existing urban area of Cambridge; (second) being within the defined fringe sites on the edge of Cambridge; (third) within the six small-scale Green Belt sites proposed to be released from the inner Green Belt boundary, four of which are within the city; (fourth) within existing and newly identified new settlement locations at Cambourne, Northstowe, Bourn Airfield and Waterbeach; and lastly in identified villages*
- 1.3 Draft South Cambridgeshire Local Plan Policy S/6 (p27) sets out a similar approach (having regard to Cambridge Green Belt purposes) with locations on

the edge of Cambridge preferred over new settlements and, in turn, (Minor) Rural Centres. SCLP para 2.42 also refers.

- 1.4 It is of note that the evidence underpinning the limits of the six small Green Belt sites to be released in the City, and the two in South Cambridgeshire, is wholly unclear. Moreover, the Councils' stated strategy clearly identifies that it is preferable to develop housing on the fringe of Cambridge than it is to develop in New Settlements and villages/Rural Centres. This is logical in terms of delivering more sustainable patterns of development, given how travel to work by non-car modes is demonstrably higher in and on the edge of Cambridge than it is in new settlements and in villages¹ and the nature of Cambridge's economic cluster being focused in and on the edge of the existing urban area. However, this sequential approach has not been applied in practice, with fully 45% of proposed new housing being located in fourth and fifth choice locations².
- 1.5 The accompanying text (para 2.29 of the Cambridge Local Plan) purports to explain the reasoning for this:
- "The edge of Cambridge is the next most sustainable location for growth in the development sequence. However, the joint sustainability appraisal of the overall strategy does identify the importance of balancing the accessibility aspects of sustainable development and the environmental and social benefits it brings. This includes consideration of the significant harm to the environmental sustainability of development on Green Belt land. Removing large sites from the Cambridge Green Belt could irreversibly and adversely impact on the special character of Cambridge as a compact historic city and risk jeopardising the economic success of the Cambridge area, which is in part built on its attractiveness as a place to live and work. The detrimental impacts of further large-scale major development on the edge of Cambridge were demonstrated in the Inner Green Belt Study Review 2012. The assessment process identified six small-scale Green Belt sites as potential options for development and this limited refinement of the Green Belt as proposed would mean that Cambridge is able to meet all its objectively assessed needs within its administrative area."*
- 1.6 Similarly, notwithstanding the sustainability merits of land in the Green Belt on the edge of Cambridge recognised at SCLP para 2.42, the SCLP does not justify the limited release of Green Belt, either generally at para 2.44 or in relation to the extent of the two releases identified (Allocations SS/2 and E/2).
- 1.7 There is no basis for giving any weight to the assertion that the Councils' approach claims to have met the needs of Cambridge within its administrative

¹ Representations originally submitted by CEG highlight that travel to work by car is 76% in Bourne Ward (Cambourne New Settlement) compared to just 35% in Cambridge City. The figures for active travel (walking, cycling) are 7% and 45% respectively.

² Table 2.2 of the Cambridge Local Plan.

area. This is firstly because the objectively assessed needs are greater than stated (a topic for Matter 3); but secondly, it is the Housing Market Area (not the administrative area) that is the relevant unit of geography for assessing soundness of the strategy in terms of the NPPF (for example, para 47).

- 1.8 More specifically, the proposals of the Plans to not develop further on the edge of Cambridge appear to rely almost wholly upon:
- a The Councils' approach to the Green Belt review. It follows that if elements of that review are demonstrably flawed, and if land appraised within that review has been appraised incorrectly, then such land (assuming it is in all other respects suitable and available for development) should be released in line with the development strategy, before new settlements are considered. CEG's representations include a comprehensive critique of the Green Belt review and show a number of problems with the approach, identifying a number of areas on the fringe of Cambridge where a review of Green Belt boundaries could release land for development consistent with the NPPF³.
 - b An assumption, in interpreting the findings of the Green Belt review and within the Sustainability Appraisal, that Green Belt automatically weighs against the site being concluded as a sustainable location for development, and without considering the impact of the alternative to developing the fringe of Cambridge (increasing development outside Cambridge), creating less sustainable patterns of development. This approach does not reflect paragraphs 84-85 of the NPPF in terms of the approach and criteria for a Green Belt review, notably the requirement in para 84 to take account of the "*need to promote sustainable patterns of development*" and to "*consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.*"
 - c An assertion (unproven) that expansion of the urban area leads almost inevitably to adverse impacts on its compact historic character and thus risks jeopardising economic success of Cambridge. However, nowhere is there any coherent analysis of the risk of economic jeopardy associated with situating development beyond the Green Belt in locations, where:

³ Problems relate to a lack of transparency of assumptions and thresholds, and incorrect interpretation of criteria. Most significantly, the Green Belt review incorrectly assesses broad areas of land in a way that attributes the highest value of overall importance to the whole area, rather than considering localised variations within an area or the performance of individual parcels of land, taking account of topography and other features. The Councils' assessment rules out locations with a varied topography from Green Belt release even though such land could be released without compromising Green Belt objectives through careful masterplanning.

- i it is much less likely that people will walk or cycle to work, particularly in existing and growing clusters such as the Bio-Medical Campus emerging at and around Addenbrooke's in South East Cambridge;
- ii linkages to existing communities and networks are lower, reducing the ability of residents to access community and social infrastructure; and
- iii it is more likely that car-borne journeys will predominate, increasing rather than reducing congestion in the City.

1.9 CEG's representations clearly demonstrate the sustainability benefits which would be secured through an urban extension approach, including for sustainable travel patterns and supporting economic growth in Cambridge.

1.10 A further challenge associated with the Plans' reliance on New Settlements to deliver 45% of new housing proposed is that such developments:

- a take a significant amount of time to bring forward, being extremely complex to plan;
- b rely upon significant investment in up-front infrastructure, meaning that in order to be viable such developments are less able to:
 - i contribute to CIL, or
 - ii deliver affordable housing at rates proposed in other locations. For example, Phase 1 at Northstowe will, due to viability, deliver affordable housing at only 20% against a policy target of 40%. The increased upfront costs associated with new settlements means they will be making lower contributions to meeting affordable housing needs relative to similar sized sites on the Cambridge fringe with lower infrastructure costs – the implications of alternative spatial choices to an important sustainability criteria was not reflected in the Sustainability Appraisals;
- c in the case of Cambridge, rely upon large-scale infrastructure improvements such as the A10 and A14 over which there is significant uncertainty over the timing of delivery, including uncertainty over the 'triggers' to release City Deal resources (see details in CEG's Matter 5 Statement);
- d do not deliver rates of housing completions at the pace anticipated, by the Plans, thus meaning they are unlikely to yield the number of dwellings anticipated (as highlighted in Section 5 of the Housing and Employment Technical Assessment [HETA] Update – appended to CEG's Matter 3 Statement); and
- e make the delivery of a significant amount of the Plans' housing reliant on effective delivery of a small number of large schemes, meaning that the Development Strategy is not sufficiently flexible to respond to change,

such as delays, infrastructure delivery challenges, or a slower rate of progress due to it taking time to establish a local market. In this regard, it is of note that Northstowe was first proposed via the Structure Plan process in 2001 and is still yet to see its first completion.

1.11 It is of note that none of these points are reflected in the South Cambridgeshire Issues & Options 2 Report which compares the sites (see Chapter 10).

1.12 In summary, the Plans put forward a Development Strategy based on a sequential approach that seeks to focus development in and on the edge of Cambridge, but then express this strategy through proposals that rely on New Settlements and Villages to deliver 45% of the new housing. The Green Belt is the reason for this discontinuity, with a flawed Green Belt review and a misapplication of paragraphs 84 and 85 of the NPPF. This expression of the Development Strategy will result in a less sustainable pattern of development and is not consistent with the Local Plan strategy for meeting identified requirements for sustainable development.

2.0 **B. Is it clear what other strategic options were considered and why they were dismissed?**

2.1 It is not clear what other strategic options were considered and why they were dismissed, although background documents and the City Council's Development Plan Scrutiny Sub-Committee minutes provide some clues as to the influences which affected the approach. Ultimately it is clear that the City Council drove the process by virtue of its application of its approach to Green Belt.

2.2 The Issues and Options process had a number of problems:

- a The Issues and Options report (June 2012) put forward options for different levels of housing provision but did not set out how these different levels of provision related to objectively assessed need for housing which the Plan would need to meet. It was thus not possible for those considering different options to take into account of how far different levels of development or individual sites would meet needs, as required by paragraph 14 of the NPPF;
- b The Cambridge Local Plan & South Cambridgeshire Local Plan Issues & Options 2 report similarly did not include any evidence or reference to Objectively Assessed Need for housing. Its comparison of sites and rejection of Green Belt sites was therefore not able to meet the requirements of paragraph 85 of the NPPF to ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development. It was not possible to weigh the NPPF requirement to meet development needs with policy on protection of the Green Belt.

- c The Issues and Options 2 report also did not allow for comparison of Green Belt sites that were being considered for development against locations beyond the Green Belt, particularly new Settlements proposals. It has thus misapplied its sequence of development. For example, Appendices 3 and 4 of the Issues and Options 2 Report show the comparative appraisal of Green Belt sites and seek to justify their rejection. The overwhelming reason is Green Belt which is treated as an absolute judgement (based on the five purposes of the Green Belt), rather than, as it should be, a relative judgement based on applying paragraphs 84 and 85 of the NPPF, in the context of objectively assessed need for development.
- d The Sustainability Appraisal did not assess the relative ability of New Settlements and Cambridge fringe sites to come forward without long lead in times and costly upfront infrastructure, nor did it consider the relative ability of these locations to deliver the policy requirement for affordable housing at 40%. The delivery of only 20% affordable housing within Northstowe Phase 1 (in contrast with edge of centres sites which require less new infrastructure so are capable of delivering more affordable housing) highlights an important distinction which was not considered.

3.0 **C. Are the Plans founded on a robust and credible evidence base?**

3.1 CEG carefully examined the evidence bases which informed the plans when the original representations were prepared. As a consequence, the CEG representations are supported by a suite of technical documents which carefully examine the supporting evidence used to inform a number of key aspects of the planning strategy, specifically housing, employment, transport, Green Belt and sustainability matters. A summary of the findings of this analysis is presented in the Synopsis of Representations, and the original HETA prepared by NLP has been updated to take account of the latest data, including market signals, and is appended to CEG's Matter 3 Statement.

3.2 CEG and its team have subsequently considered additional material published by the Councils since the publication of the draft Plans.

3.3 Overall, CEG concludes that the Plans are not founded on a robust and credible evidence base. This relates to individual concerns about specific topic areas, generating problems that are compounded when considered together in the context of the Plans' proposals. We summarise our concerns below.

Housing Evidence

3.4 CEG's main concerns in relation to the housing evidence base are:

- 1 There is little reasoned justification for the population projections adopted, and the selection of the indicative 'mid-point' population in

particular, leading to concern that an insufficient quantum of housing is planned.

- 2 The implications of important population profile changes such as an ageing population and household structure have not been considered, raising the issue that the planned provision will not meet certain specific needs.
- 3 The relationship between job growth and housing numbers is wholly unclear and unsubstantiated, raising concerns that the housing proposed will not support the economic growth potential of the area.
- 4 There is no evidence that affordable housing needs, economic demands and market signals have been taken into account in the conclusions on objectively assessed needs.
- 5 There is insufficient robust and credible evidence to support the assumptions about the density of development.

Economic Evidence

- 3.5 The evidence base which supports economic policy and the objectives for economic growth, including the strategic objective to secure 44,000 new jobs, does not adequately identify a trajectory, or trajectories, for the delivery of these jobs or how these relate to the focus on the urban area of Cambridge. This omission contributes to the failure to credibly align housing and job creation targets, fails to recognise the primary role of the Cambridge urban area in accommodating the majority of this job growth, and as a consequence the planned delivery of 44,000 jobs is put at significant risk.

Transport Evidence

- 3.6 In relation to the evidence base which has informed transport policy, transport infrastructure provision and the promotion of sustainable travel patterns, the principal concerns are:
- 1 There is no robust and credible evidence to demonstrate the timing and deliverability of the essential infrastructure on which the new settlement sites rely, leading to serious concerns that these allocations, which are essential for meeting the housing need under the current spatial strategy, will not be delivered within the timescale needed to support the job targets.
 - 2 There is insufficient evidence that options to maximise sustainable travel patterns have been considered, with a reliance on expensive and uncertain major transport infrastructure projects presented without robust and credible justification within the plans.

Green Belt Review Evidence

- 3.7 The Green Belt Boundary Reviews which informed the preparation of the Local Plans, including the release of development sites, are not robust and credible. Specifically, a critique of the Green Belt Review methodology reveals that:
- 1 The methodology is not clear and cannot be replicated, raising immediate concerns about its credibility.
 - 2 The definition of land parcels is flawed, especially in locations with varying topography, leading to the assessment of broad locations in a way which fails to appropriately score and identify land parcels suitable for release.
- 3.8 The significant consequence of these flaws in the Green Belt Reviews, and the related unjustified weight attached to green belt considerations in the Sustainability Appraisals, is the failure of the Plans, and the Cambridge Local Plan in particular, to implement their own sequential approach to identifying locations for development. This approach also fails to address the NPPF requirement (at para 84) to consider the review of green belt alongside the need to promote sustainable patterns of development.
- 3.9 The Green Belt Review submitted by CEG demonstrates that a robust and credible evidence base would identify additional land capable of release for development without compromising green belt purposes. This in turn would enable the Councils, and the City in particular, to accommodate additional development to meet the identified housing and employment needs in more sustainable locations and in accordance with the Councils' own sequential approach to the location of development.

Evidence of the Consideration of Alternative Strategies

- 3.10 Finally, as noted in CEG's Matter 1 Statement, there is no robust and credible evidence that the Councils considered the merits of a joint plan, or whether a joint approach would maximise the effectiveness of the spatial planning strategy and the delivery of strategic priorities. In fact, the limited evidence available suggests that the City Council started the plan making process from an assumption that an independent plan for the City was needed to maintain the special character and setting of Cambridge before it had considered the evidence (in many respects jointly prepared).
- 3.11 The Sustainability Appraisals also fail to provide a robust and credible consideration of alternatives for the reasons explained in the Review of Sustainability Appraisals submitted as part of CEG original representations and summarised in the CEG Matter 1 Statement.
- 3.12 It is not possible to conclude that the Plans are sound based on the existing evidence base. Detailed work by CEG has filled gaps in the existing evidence base and identified important considerations which together lead to a

conclusion that a more effective strategy, which promotes more development on sites on the edge of the existing urban area through a joint plan, exists to secure sustainable development and national planning policy objectives.