

SOUTH CAMBRIDGESHIRE LOCAL PLAN EXAMINATION

MATTER 2: OVERALL SPATIAL VISION AND GENERAL ISSUES

1. This Hearing Statement has been prepared by Boyer Planning pursuant to the duly-made representations submitted on behalf of RLW Estates Ltd and the Defence Infrastructure Organisation (DIO).

(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. Realising the economic potential of Cambridge is an issue of national significance and requires dynamic intervention through the planning process. Capacity for further development within the city's administrative area is severely constrained. Consistent with the long-standing objective to maintain the compactness of the city, and the importance of preserving the integrity of the Green Belt, South Cambridgeshire has a vital role to play in meeting an element of the city's needs, as well as those within the District itself.
3. Strategic policy in the Cambridge Sub-Region since 2000 has recognised that the city's housing and employment needs must be met as close as possible to the city itself in the interests of sustainability. The earlier strategy of dispersal to market towns and villages elsewhere in Cambridgeshire (and beyond) had led to increased travel (especially by car), congestion, house price inflation, and lack of affordable housing. RPG6 (November 2000) effected the change of approach, making provision for a new settlement (and potentially another in the longer term) as a key means of focusing housing provision close to the city.
4. This Cambridge-focused strategy has been pursued through the Cambridgeshire & Peterborough Structure Plan (2003), the South Cambs Core Strategy (2007), and is carried forward into these Local Plans. The emphasis on integrating housing and employment provision and minimising the need to travel has intensified since then and is a fundamental component of the NPPF.
5. Para 151 of the NPPF reflects the statutory requirement that a plan-making authority exercises its functions *'with the objective of contributing to the achievement of sustainable development'*¹. Policies 3 of the City Local Plan and S/6 of the South Cambs Local Plan adopt a Cambridge-

¹ Planning & Compulsory Purchase Act Section 39(2)

focused strategy. We are clear that this will best contribute to the delivery of sustainable development in a way which balances economic, social and environmental considerations in accordance with the NPPF.

6. In pursuing a Cambridge-focused strategy, there are significant constraints to the capacity for additional development within and immediately adjoining the city. Its historic core and compact urban form are characteristics which successive strategies have sought to protect. The established Green Belt plays a crucial role in securing this objective. Para 2.29 of the City Local Plan provides a succinct synopsis of the adverse consequences of any further major Green Belt release on the edge of the city.
7. National policy (NPPF paras 83 and 85 etc) emphasises the key characteristics of Green Belts for plan-making purposes: boundaries should be established with a view to permanence, capable of enduring beyond the Plan period; only in exceptional circumstances should boundaries be adjusted in Local Plan reviews.
8. On 6th October 2014 the Government introduced amended guidance as part of the Planning Practice Guidance (“Housing and Economic Land Availability Assessment”) with the specific objective of reinforcing the importance of Green Belt protection. This includes re-iterating the guidance in para 83 of the NPPF that once Green Belt boundaries have been established they should only be altered in exceptional circumstances.
9. The 2003 Structure Plan and related Green Belt Review provided for the release of a number of sites from the Green Belt around the edge of the city. Those developments are now well advanced. In accordance with national policy there is as a result a prima facie presumption against any further Green Belt releases in this Local Plan.
10. The SHLAA and other evidence base documents have demonstrated that there are appropriate alternatives available and thus we support the Councils’ conclusions that only a limited amount of additional development should be found from Green Belt sites. Thus the exceptional circumstances required to justify a further review of Green Belt boundaries do not exist and any alternative strategy based on significant Green Belt release would be in fundamental conflict with national policy set out in the NPPF.
11. A significant element of the capacity is provided by new settlements. New settlements are an established component of settlement strategy around Cambridge, providing the means of accommodating a large quantity of development, including in particular housing, in locations close and/or easily accessible by sustainable means of transport, to the city without compromising the Green Belt.

12. Specifically we highlight the Waterbeach New Town site which lies immediately beyond the Green Belt, but is extremely well related to the city both in terms of physical proximity and, importantly, accessibility by sustainable travel modes.
13. In the smaller towns and villages in South Cambridgeshire, the focus should be on satisfying local needs and objectives. Para 55 of the NPPF states that promoting sustainable development in rural areas means that *'housing should be located where it will enhance or maintain the vitality of rural communities'*. This may be taken as a proxy for the correct approach as regards development generally and so is directly applicable to the spatial strategy to be pursued in the rural area of South Cambs. Sub para 4 of Policy S/6 is consistent with this approach and we endorse its focus on *'limited'* development *'consistent with the level of local service provision and quality of public transport access to Cambridge or a market town'*.
14. Thus we consider that the overall spatial strategy, and specifically the sequential preference set out in Policy S/6(1) of the South Cambs Local Plan, is soundly based and represents the best approach to delivering sustainable development over the Plan period and beyond. The opening sentence of Policy S/6 includes the phrase *'having regard to the purposes of the Cambridge Green Belt'*. In accordance with the analysis of national policy set out above, this is a particularly important qualification in the interpretation of the first tier in the hierarchy, *'on the edge of Cambridge'*.

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

15. Within Cambridge City, optimising the use of available and suitable development capacity should be a common feature of any strategy to deliver sustainable development in accordance with national policy. Beyond that, the consideration of alternatives to the proposed spatial strategy is applicable to both Local Plans as far as Green Belt issues are concerned, and South Cambs in other respects.
16. The South Cambs Issues & Options document of July 2012 provided for a broad-ranging consideration of options:
- Alternative development strategy options (Q9)
 - Potential to identify exceptional circumstances to justify Green Belt release (Q11)
 - Possible broad Green Belt locations (Q12)
 - Alternative rural settlement hierarchies (Q13)
 - Development options, including new settlements (Q16).
17. The City Local Plan Issues & Options Report of June 2012 addressed alternative strategic options on a more restricted basis proportionate to its administrative boundaries:
- Should there be more development than is already committed on the

edge of Cambridge (Q3.9)

- Should more land be released from the Green Belt and if so where (Q3.10/11))
- Any other possible approaches (Q3.12).

18. The joint Issues & Options document of January 2013 represented a progression of the emerging strategy in response to consideration of the above options. This was based on joint working between the two authorities as expected by national policy where development requirements of one authority need to be met by an adjoining one (NPPF para 179). Having stated the emerging consensus of the two local authorities, it invited comment on the balance between Green Belt protection, new settlements and better served villages (Q1) and included further specific Green Belt site options (Q2/3).

19. The Pre Submission documents for both Plans provide an explanation and justification for the spatial strategy proposed.

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

20. Para 2.42 of the South Cambs Local Plan rightly states that the development sequence has been carried forward from the previous Plan. One key change however, as noted above, is in the way in which the phrase 'on the edge of Cambridge' in the first tier of the hierarchy is to be interpreted. The approach to accommodating development requirements on the edge of the city has to reflect national policy on sustainable development and Green Belts.

21. The capacity and deliverability of the proposed strategic allocations (Policy S/6(3)), together with the SHLAA and related documents, provides the evidence base to demonstrate that the satisfactory implementation of the strategy does not require the release of Green Belt land because there are appropriate alternatives available. The opportunity to deliver significant high quality development from a new settlement at Waterbeach, which is not only close to but effectively as accessible to key destinations in the city as conventional urban extension sites, illustrates this.

22. Through the detailed evidence base which we have submitted in support of the Waterbeach New Town proposal (provided for the Reference Document Library), we have highlighted that the capacity of Waterbeach New Town is greater than indicated in sub para 3 of Policy S/6 and that there is potential for it to make a more significant contribution to housing provision in the Plan period through an earlier start to development. These representations will plainly be addressed at a later stage in the Examination and consequently we do not pursue them further at this point.