

Cambridge City and South Cambridgeshire Local Plan Examinations

Matter 2 - Overall Spatial Vision and General Issues

On behalf of Grosvenor/Wrenbridge (ID. 21321)

October 2014

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CAPL/208076/A6



Matter 2 - Overall Spatial Vision and 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?

1. The planning and development strategy for Cambridge developed in the 1950s sought to direct housing growth away from Cambridge to protect it as “the last true University city in England”. In order to protect the character of the city as an historic town a green belt was designated to encircle the city to prevent its outward growth. Although housing was restrained, employment grew quickly on the back of Cambridge’s international reputation as an education centre and the concentration of research activity linked to Cambridge University, Addenbrooke’s Hospital and independent and company research centres. This has become known as the ‘Cambridge Phenomenon’ with clusters of businesses in developing technologies characterised by links to Cambridge University, together with high levels of new business formation and spins-offs.
2. As a result of that strategy:
 - new homes were developed in locations away from Cambridge, unsupported by local employment;
 - Cambridge’s commuting hinterland was extended with commuters overwhelmingly travelling by car, exacerbating carbon emission;
 - high land and house prices and difficulties for many people in affording housing that meets their needs; and
 - skill shortages and recruitment difficulties for employers.
3. As a consequence, RPG6: Regional Planning Guidance for East Anglia (2000) introduced a fundamentally different approach in order to support the Cambridge economy, tackle affordability issues and to address climate change impacts. RPG6 required that the authorities put in place a strategy which focussed growth on Cambridge rather than dispersed growth to the Ouse Valley and Fens. The RPG6 strategy was taken further by the Cambridgeshire Structure Plan 2003, Cambridge City Local Plan (2006) and the various South Cambridgeshire Development Plan Documents (adopted from 2007 though to 2010). That strategy sets out a sequential approach to development, starting with land within the existing urban area. In order to deliver substantial growth at Cambridge, the plans reviewed the green belt and released land on the edge of Cambridge for development.
4. The purpose of RPG6 was to introduce a fundamentally different strategy in the interests of tackling climate change, affordability and supporting the technology led economy. That was not intended as a short term approach to the issues facing Cambridge.

5. The Structure Plan required that 8,000 homes were built, on the edge of Cambridge on sites released from the Green Belt by 2016. Additional land was removed through local plans to provide for between 11,749 homes and 13,749 homes after 2016. In total land for 19,740 homes was released from the Green Belt. With the core of the airport site now delayed until after 2031, effectively the planning strategy is only likely to deliver around 1,700 homes at Cambridge East by 2031 – 1,300 homes North of Newmarket Road (based on the submitted planning application) and 400 homes north of Cherry Hinton (as shown in Cambridge Annual Monitoring Report 2013). Therefore, in total, from the strategy set out in the Structure Plan and current adopted local plans, around 8,300 to 10,300 fewer homes will be delivered at Cambridge than had been anticipated.
6. The Cambridge Local Plan sets out at Table 2.2 a comparison between the Structure Plan and the new local plans and states it is a continuation of the strategy set in train. That is not considered to be an appropriate comparison or evidence of a continuation of the strategy, as in effect all that has happened is that development not delivered by 2016 through the current local plans is rolled into the period 2011 to 2031 and significant development at Cambridge East is pushed beyond 2031. The structure plan strategy was not about the proportions of development at the locations in the hierarchy it was about delivering development needed at Cambridge.
7. Both plans identify that Cambridge is the most sustainable location for growth and that the edge of Cambridge is the next most sustainable location for growth (eg 2.29 of Cambridge City Submission Local Plan). The plan goes on to state that those accessibility aspects of sustainable development needs to be balanced with environmental and social benefits. We agree to the extent that social and environmental benefits need to be factored in. It appears however, in this balancing act that economics benefits have not been taken into account, as no mention is made of taking into account that element of sustainable development.
8. The Cambridge Local Plans lists 4 constraints as effecting the strategy:
 - Cambridge historic environment
 - Limited supply of land, as well as conservation constraints
 - Transport and other infrastructure under pressure
 - The Green Belt
9. We do not accept that a Cambridge centred strategy is necessarily harmful to Cambridge's historic environment. That is an issue of quality of development. Indeed, the car-borne dispersal strategy pursued in the past has been significantly detrimental to Cambridge's historic character.
10. We do not agree that there is a limited the supply of land. This "constraint" is simply a reflection [and indeed an admission] of the point below under b, that the strategy has not looked holistically

across the area and at land in South Cambridgeshire on the edge of the City to meet Cambridge's needs.

11. All areas suffer from pressure on infrastructure. This is matter of proper planning for infrastructure needs.
12. We do not consider that the Green Belt should be a determinant of planning strategy. Rather it is a planning policy tool to deliver a planning strategy. It was devised to constrain the growth of Cambridge.
13. Whilst the plans state that the issues are about balancing accessibility with social and environmental benefits, the constraints listed do not fall into those categories. In particular there is no social dimension included in those constraints. Cambridge is an area of significant housing pressure and affordability issues. Table 2 (13.2.5.1) of the SHMA shows that for Cambridge City, current annual affordable housing need plus new annually arising need less annual supply results in a total net need of 2,140 dwellings. This compares unfavourably with a projection-based assessment to provide only 700 market and affordable dwellings annually.
14. The City Local Plan states an intention to address the current unmet need over the first five years (1,548 per year). Together with addressing newly arising net need (592 homes per year) this would require 10,700 affordable homes in the first five years. Once the current backlog of need is addressed, the assumption is that only newly arising affordable need would be required to be provided for (currently projected at 592 homes per year - *figure 3: visualising net affordable housing need over the coming years*). Addressing the backlog of need plus newly arising need would require 19,580 affordable homes to be provided in the first ten years. This exceeds by a significant margin the total planned provision for the whole twenty year plan.
15. Assuming that the newly arising need for the latter decade of the plan (i.e. for the plan years 2021 to 2031) remains constant at 592 affordable homes per year, this would require a further 5,920 dwellings to be provided, lifting the overall objectively assessed need for affordable housing to 25,500 dwellings. This figure is significantly higher than the planned housing requirement of 14,000 dwellings. The local plan housing trajectory at Figure 2.2 identifies net delivery in the last seven years of the plan as below 300 dwellings a year for market and affordable housing.
16. Whilst the plan says there is a need to balance accessibility issues with "social benefits", it is clear that the social dimension has not in fact been taken into account. It is clear that there will be significant social disadvantage, with increasing numbers of people not having their housing needs

met, exacerbating affordability issues and with more people falling into housing need at the end of the plan period than at the beginning. That can not be a sustainable strategy.

17. Development at Cambridge significantly increases the opportunities for travel by non-car modes, so significantly reducing Carbon emissions and the contribution to climate change. Data from Census 2011 demonstrates almost 17% of people in Cambridge walk to work, 7% travel by bus and 32% cycle. Just 34% drive to work.
18. Whilst the plans acknowledge “accessibility”, they do not appear to acknowledge Climate Change as an “environmental” issue in relation to locating more development at Cambridge.
19. The Green Belt should not be a determinant of planning strategy. That will exacerbate Cambridge’s existing problems. It will lead to further increase house prices, force more people into need for affordable housing and increase car-borne travel into the City, increasing congestion.
20. Section 39 of the Planning and Compulsory Purchase Act 2004 Act requires that
 - The person or body must exercise the function [plan-making] with the objective of contributing to the achievement of sustainable development.
21. The core planning principles of the NNPF include supporting the transition to a low carbon future. The NNPF explains that local authorities should:
 - support reductions in greenhouse gas emission and reduce congestion (para. 30);
 - support a pattern of development which facilitates the use of sustainable modes (para.30)
 - ensure that developments which generate significant movement are located where the need for travel will be minimised (para. 34),
 - should exploit opportunities for the use of sustainable transport modes (para. 35)
22. The most significant way that the local plan can achieve sustainable development is through the location of development in sustainable locations. Indeed, both plans identify that the edge of Cambridge is the next most sustainable location after the urban area. Both plans therefore are unsound and fail in relation to the statutory duty of S39 of the Planning and Compulsory Purchase Act 2004 Act.

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

23. Para 2.15 of Cambridge City's Submission plan refers to the plan meeting Cambridge's objectively assessed needs. Paragraph 2.17 says that the plan is meeting the City's needs in full.
24. Paragraph 2.11 of South Cambridgeshire Submission plan states that South Cambridgeshire's need is for 19,000 new homes.
25. On that basis both plans seek to deliver their own needs. And accordingly the plans have looked at making allocations to meet those needs based on their local plan area, rather than considering the most suitable strategy. The plans as submitted have not summed the figures and sought to distribute those.
26. The Memorandum of Understanding (MoU), introduced in the run up to the Examination, now seeks to say that in effect the housing figures are joint needs figure. That is not consistent with the submission Local Plans. For example, paragraph 2.37 of the Cambridge Local Plan states the City will meet its need within its area. If the figure is now being said to be a joint housing need figure, then the sustainability appraisals should have considered the most appropriate approach to distributing 33,000 homes. There appears to have been no consideration as to whether it would be more appropriate to meet Cambridge's need on land within South Cambridgeshire immediately adjoin the urban area. For example, land at Worts Causeway is proposed to be removed from the Green Belt as it is within Cambridge City and would meet Cambridge's need. Sites such as Trumpington Meadows have therefore been considered as an alternative on the basis that is predominantly in South Cambridgeshire. The plans have therefore failed to assess reasonable alternatives as required under the SEA Directive. A sustainability appraisal of the merits of sites across boundaries is required.
27. Given that both plans identify that they are meeting that Districts own needs, there is no need for a joint housing trajectory. Each plan must deliver its own needs. If there is to be a joint housing trajectory, and therefore the housing need is to be considered as being met across the two authorities, strategic options need to be reconsidered because the plans are based at present on meeting their own needs.

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

28. We consider that the evidence base is not robust. The housing assessment is flawed, which is covered in our statement on Matter 3.
29. In addition, the plans are not founded on robust assessments of the social infrastructure needed to support communities, in particular the sporting needs to tackle social issues such as obesity. The evidence base which does exist identifies significant shortfalls in open space and sporting provision, yet the plan does not meet those needs. In particular there is no update to assessment of sporting needs and sports pitch provision – we understand that this work is currently ongoing and not due to report until 2015.
30. The City Council's Sport Strategy 2009 to 2013 identifies that *"it does appear that in Cambridge, participation is not increasing in line with the national 1% increase year on year target."* (4.1.2 b).
31. Cambridge City Council's *Sustainable Community Strategy (SCS)* (RD/SPD/170) sets out a vision for the city and a route map for improving the quality of life for people living, working in and visiting it. It aims to ensure that people in the City live in sustainable communities that are strong, **healthy** (our emphasis), active, safe and inclusive. It seeks a reduction in the inequality in life expectancy between different parts of the City and the enhancement of personal health and wellbeing. Amongst other things, the SCS seeks to achieve:
- a reduction in the rise of obesity; and
 - to get more adults participating in regular moderate intensity sport or active recreation.
32. The *Improving Health Partnership* is a joint strategic partnership with representation from statutory and voluntary organisations in Cambridge City and South Cambridgeshire. The partnership strives to improve health, reduce inequalities and promote social inclusion through identifying needs and implementing effective measures to improve health outcomes. The Partnership's key areas for action include tackling obesity and increasing physical activity.
33. The City Council's Open Space and Recreation Strategy 2011 identifies that the supply of sports pitches is significantly below that required under its adopted open space standards. In relation to Trumpington it notes (at 4.32) that *"Whilst many of the sports fields within the ward are of a good standard, the level of accessibility to sports provision is not high"*. Para. 6.3 also notes that *"Within the existing built up area of Cambridge, there are limited opportunities for creating new open space"* and that *"The optimum use of existing open space must be made, and opportunities must be sought to improve existing spaces and address deficits."* Paragraph 6.8 states that *"There are opportunities for new provision... including within the Green Belt."*

34. In order to engage more people in sport, and lead healthy lifestyles and tackle obesity, the provision of new facilities is critical if these important national and local priorities are to be met. Given the issues identified in these high level strategies it is surprising the further work has not been undertaken to support the local plans and to ensure delivery of facilities.
35. The same situation arose under the previous round of development plans, with studies being undertaken after adoption or too late to be taken into account in plan-making. As a consequence, the facilities identified have not been delivered. If these local plans are not based on robust assessments and do not make provision for the facilities required, there is considerable risk that vital social and community infrastructure will not be delivered.
36. The plans are not based on a robust assessment of sporting needs.

Conclusions

37. The plans fail the following soundness tests:
- positively prepared – not based on a robust assessment of objectively assessed needs for development;
 - justified – not the most appropriate strategy, when considered against the reasonable alternatives, as do not meet affordable housing needs nor under delivery from previous plans;
 - effective - the plans will not deliver the social and sporting infrastructure needed for sustainable communities ;
 - consistent with national policy – the plans will not enable the delivery of sustainable development in accordance with the policies in the NPPF because the plans fail to tackle affordable housing needs and affordability will be worse at the end of the of the plan period than the start.
38. Neither local plan will meet the needs for new homes, nor the social infrastructure to support sustainable communities. A strategy and sites are required which delivers more homes and plans for the delivery of sporting and social infrastructure.