

Matter 3 – Housing Need

CCC Respondent Personal ID: 1801

SCDC Respondent Personal ID: 20942

Name of Representor: Cambridge Past, Present & Future (CambridgePPF)

**Cambridge City Council and South Cambridgeshire District Council
Examination of Submitted Local Plans 2013**

Cambridge Past, Present & Future (CambridgePPF)

CCC Representation Number: 26798

SCDC Representation Number 58877

Summary:

- a) CambridgePPF believes that both Councils have struck a reasonable balance between the contrasting needs for further growth and for keeping Cambridge a compact city.
- b) CambridgePPF accepts the housing provision figures of 14,000 and 19,000 as being reasonable and as being objectively assessed. We therefore are drawing up a ***Statement of Common Ground*** with both Councils regarding this issue.
- c) CambridgePPF stresses the difference between housing demand, as manifest in the numerous Omission Sites, and housing need: it is what Cambridge actually needs that should be provided for.
- d) CambridgePPF does not accept that city fringe extensions are automatically more sustainable than well designed large settlements with all the necessary services and facilities, including high quality public transport.
- e) CambridgePPF believes it would be premature to release significant additional areas around the city fringe until the impact on the character and ambience of the city of the sites released through the 2006 Local Plan have been properly assessed.
- f) CambridgePPF stresses that in the Cambridge context ‘sustainable development’ must include the need to minimise the risk to the character and ambience of a historic city with a global reputation, and that with this definition significant further development in the city fringe is unsustainable.

It is CambridgePPF’s view that the Housing Needs have been objectively assessed, have been produced in accordance with the Planning Practice Guidance, and will deliver sustainable development. It is our opinion therefore that both plans are sound. There are elements of both Council’s policies to which we object and where we have proposed alternative text, but in our opinion these amendments do not detract from the overall soundness of the plans.

1. Introduction:

1.1 CambridgePPF is a local charity with some 1,500 members drawn from the local community, which, in its former guise as the Cambridge Preservation Society, has been actively involved with planning and development in and around Cambridge for more than 80 years. Its influence was largely instrumental in the creation of the Cambridge Green Belt in the 1970s. Its policy and position on major development issues is determined by its Planning Committee comprising some 15 members with exceptional experience in urban planning and design, business development, architecture, heritage management, transport, landscape architecture, and other relevant disciplines.

2. Housing Need:

- 2.1 CCC and SCDC have been faced with the difficult task of seeking to reconcile the demand for further rapid growth of Cambridge and its surroundings with the need to maintain the character and ambience of the historic city and its green setting. It is the belief of CambridgePPF that both Local Plans get this balance about right.
- 2.2 In deriving the targets of 14,000 and 19,000 new homes, we are not in a position to challenge the methodology that generated these forecasts. Indeed, arguing about the merits of different methodologies would seem pretty esoteric when the degree of uncertainty in any forecast is inevitably going to be great when dealing with such a dynamic situation as the future growth of Cambridge. We accept that for planning purposes a figure is needed for future provision, and from our perspective the figures of 14,000 and 19,000 new homes seem reasonable. The fact that the figures coincide with the targets produced by the now-defunct East of England Plan, which were based on a major evidence-based exercise, does give us some reassurance. We are satisfied that these projections have been the subject of a comprehensive objective assessment, and have been prepared in accordance with advice in the Planning Practice Guidance. We believe they provide a sound basis for planning over the next two decades. For this reason, **CambridgePPF is exploring with both Councils a *Statement of Common Ground covering Housing Needs*.**
- 2.3 Obviously Cambridge must continue to grow but at a rate and scale that does not swamp the capacity of the city to absorb such growth. An average delivery of some 700 dwellings per year by CCC and of around 950 per year by SCDC over the next two decades would seem to us to be at the higher end of what the infrastructure can absorb, but we recognise that it is deliverable in practice based on the current rate of starts. We therefore find common cause with both Councils in supporting this provision.
- 2.4 We appreciate that a qualitative approach is difficult to defend, but as a local charity rooted in the Cambridge and South Cambridgeshire communities, we believe we do have a special insight into what local people actually need. Understandably sites like Waterbeach and Bourn create fierce opposition from the communities directly affected, and special measures will be needed to protect the interests of these people. However, looking at the wider strategy we believe the overall impact will be less from creating major new Settlements where essential services and facilities can be provided, particularly efficient public transport links, rather than scattering the same volume of housing around the villages of South Cambs or concentrating them into more urban extensions around the city fringe.
- 2.5 We are aware of the considerable pressure for the upward revision of the projections by those respondents with a commercial interest in accelerating the rate of development. However, despite the number of **Omission Sites**, we have yet to see any comprehensive independent research that provides a credible challenge to the housing provisions of both plans. There is no doubt that landowners are keen to sell and, because of the special attractions of Cambridge, developers are keen to build, but the fact that more houses could be built does not automatically mean that the area actually

needs the additional housing over and above the Plan targets. Do we have to satisfy housing demand that exceeds what the city actually needs just to pander to the self-interest of those with a commercial interest? It is 'Housing Need' and not 'Housing Demand' we are seeking to quantify – and the two are very different.

- 2.6 We are also aware that developers would much prefer a growth pattern based on urban extensions in the city fringe rather than new Settlements beyond the Green Belt. The justification given for this preference is enhanced sustainability through reduced car dependency. We question this. Is it any more, or less, sustainable to create an urban extension on the edge of the city that is likely to overload the local infrastructure, rather than to create a major new urban area that is large enough to provide the necessary services and facilities to make it largely self-contained, together with an efficient public transport link? Improved sustainability is not axiomatic with city edge – sustainability does not have a geography rider. We have seen no evidence to substantiate the claim that city edge is more sustainable than well designed and serviced new settlements. What we are certain of however is that extensive edge of city development will jeopardise the vision of Cambridge as a compact, dynamic city with its historic setting and high quality of life protected by its Green Belt.
- 2.7 What makes Cambridge and the surrounding district so attractive to developers is not just the dynamism of the two Universities and the expansion of the high-tech sector: it is also the character of the city and the exceptionally high quality of life of people living in the area. A 'dash for growth' to satisfy demand risks overloading the city's infrastructure and jeopardising what makes the area so attractive in the first place. It is from this qualitative perspective, rather than through a quantitative research exercise, that CambridgePPF has approached the question of housing growth. How much more can the city and surrounding villages accommodate without despoiling what we all hold so dear? We appreciate that both Councils share this concern that forms the basis for our common interest.
- 2.7 CambridgePPF endorsed the release of large areas of the inner Green Belt for housing in the 2006 Cambridge Local Plan. Much of this has yet to be built. Until this is completed and we can assess the impact of these urban extensions on the city's character and ambience, it is premature to release more city fringe land. Do people in the urban extensions actually use their cars less?
- 2.8 In the Cambridge context, it is important to appreciate that 'sustainable development' does not mean just the usual combination of economic growth tempered by environmental factors and social justice. It must also include the need to minimise the risk to the character and ambience of a historic city with a global reputation. We regard the claims of those promoting further growth in the city fringe that their sites represent 'sustainable development' as being unproven.
- 2.9 Our seeking common ground with the Councils has also been influenced by the likely consequences if either Plan is found to be unsound. Until new approved Plans are in place, both Local Authorities will be vulnerable to speculative applications in inappropriate locations. Many of these will end up being decided through the appeal

process, which does not lie comfortably with the principle of greater local community involvement in decision making. It is our belief that the risks arising from the argument that the housing provision is inadequate, often made for reasons of financial self-interest, outweigh any doubts about the precision with which the housing figure has been derived.

2.10 CambridgePPF has argued right from the beginning of the process of preparing both Local Plans that a combined plan for the whole Sub-Region was needed. In our opinion, it was short-sighted to prepare a plan for an urban district with a tightly drawn boundary and such a limited supply of development land separately from the district that totally surrounds it. We have long argued for a single integrated plan for the Sub-Region, including the Transport Strategy. CambridgePPF therefore welcomes the decision to create the new Combined Authority under the City Deal and the Memorandum of Understanding (MoU) between CCC and SCDC on their joint housing trajectories (document RD/Strat/350), both of which we believe must be regarded as formative considerations in the examination of the two Plans.

3. Areas of Remaining Uncommon Ground:

3.1 Although CambridgePPF has agreed a Statement of Common Ground with both CCC and SCDC, this covers only the housing provision. There are a number of areas relating to Housing Needs where we disagree with both submitted Plans including:

- a) The development sequence and the spatial distribution of where the new housing should be located
- b) The implementation of the development sequence
- c) Additional sites within the urban area that should be examined before the release of any city fringe land
- d) The forward trajectory of housing delivery which does not comply with the development sequence

3.2 Our objections to these issues are presented in our written statement relating to Matter 2 as we understand that Matter 3 is confined to Housing Need and does not therefore include spatial issues.

4. Modifications to the Submitted Plans:

4.1 CambridgePPF calls for a number of amendments to the submitted plan with regard to the housing policy, as detailed in our written statement relating to Matter 2. We regard these changes as comprising Minor Modifications which therefore do not challenge the overall soundness of either plan. These amendments include:

- a) CCC Policy 3, Para 2.40 (and elsewhere throughout the plan) should delete reference to GB1 and GB2, and should instead state that 'an allocation of 400 dwellings is ascribed to the city fringe in additional site(s) to be determined following the new review of the Green Belt';

- b) CCC Para 2.29 should be amplified to confirm that so far as possible, sites will be developed in the order of the preferred sequence. Additional large sites within the urban area will also be developed as they are identified and the Council will continually seek out such sites throughout the plan period to reduce the need for more fringe extensions;
- c) CCC Para 2.26 should be elevated to the status of a separate policy in the same way as has been done by SCDC (its Policy S/6). This should present the combined Preferred Development Sequence for both Councils. SCDC Policy S/6, Para 1 should also be amended as follows:
 - i. *The need for jobs and homes will be met as far as possible in the following order of preference, having regard to the purposes of the Cambridge Green Belt:*
 - a) *Urban extensions around the city fringe that already have planning permission;*
 - b) *Sites within the existing urban area, both sites identified in the CCC submitted plan and additional sites that may come forward during the plan period;*
 - c) *New Settlements outside the Green Belt with high quality transport links;*
 - d) *In the rural area at Rural Centres and Minor Rural Centres outside the Green Belt with high quality transport links;*
 - e) *Nearby Market Towns with high quality transport links;*
 - f) *New releases of Green Belt at Rural Centres and Minor Rural Centres;*
 - g) *New releases of Green Belt at the city fringe.*
 - ii. *Sites in the urban area will be developed first, both those sites identified in the plan and additional sites that may subsequently be forthcoming during the plan period, in accordance with this preferred development sequence.*
 - iii. *Wherever possible, priority will be given to the re-use of land that has already been developed (brownfield land) in accordance with the Principles of the NPPF.*
 - iv. *Further releases of Green Belt land, both around the city fringe and around villages in South Cambridgeshire, will be approved only as the option of last resort once sites higher in the preferred sequence have either been undertaken or discarded.*
 - v. *Whilst recognising the need for flexibility to accommodate market forces, the forward trajectory will as far as possible adhere to this preferred sequence.*
- d) CCC Para 2.29 should explain how the exceptional circumstances required by the NPPF for the release of Green Belt land have been satisfied, bearing in mind that pressure for housing or employment is not in itself an adequate justification.
- f) CCC Para 2.29 should explain how the exceptional circumstances required by the NPPF for the release of Green Belt land have been satisfied, bearing in mind that pressure for housing or employment is not in itself an adequate justification.