

Matter 6: Green Belt

CCC Respondent Personal Reference ID: 5408

Name of Representors: Dr Emma Rudd and Dr James Rudd

Submission Date: 12th January 2015

Cambridge City Council and South Cambridgeshire District Council

Examination of Submitted Local Plans 2013

Background Statement:

We accept all of the Cambridge City Local Plan with the single exception that we do not accept that the Plan establishes any need to take Green Belt land for housing. Since there is no scientific evidence for needing the 430 dwellings proposed for the GB1 and GB2 sites, we believe that removing these sites from the Plan will have no material impact on the Plan as a whole. The Plan can in our view be viewed as sound with the simple removal of these two relatively small sites.

i.a Does the level of need for new jobs and homes constitute the exceptional circumstances necessary to justify the proposed removal of sites from the Green Belt?

- i. **No** for the following reasons:
- ii. As we showed in our submission on Matter 3 the Cambridge City Council (CCC) Local Plan fails to justify its estimate of housing demand of 14,000 dwellings in Cambridge between 2011-2014. In this submission we argue that this failure completely negates the need for 430 additional dwellings on Green Belt land at GB1 and GB2. Without a demonstrated need for the dwellings there can of course be no 'exceptional needs' as required by the NPPF.
- iii. To recap the argument, we accept the Local Plan estimate of a projected population total for Cambridge in 2031 at 150,000. This is also the figure in the latest published version of the East of England Forecasting Model (EEFM 2013). We also accept the translation of projected population into required dwellings using the occupancy ratio assumptions from the EEFM 2013. However these forecasts do not translate into a figure of 14,000 required dwellings . The figure published on the Cambridgeshire Insight website (www.cambridgeshireinsight.org.uk/EEFM) from the EEFM 2013 is 12,112 additional dwellings for Cambridge over the period 2011-31.
- iv. The reason the Local Plan arrived at the precise rounded figure of 14,000 additional dwellings (agreed by Cambridge City and South Cambridgeshire Councils prior to the latest evidence becoming available) was due to an unorthodox and unacceptable rounding procedure. The correct use of unrounded figures shows that Green Belt land is not needed. Table 2.3 in the Local Plan states that 13,761 actual and potential sites will be available within Cambridge City 2011-31 excluding the 430 sites on Green Belt land. This supply of sites is well above the demand for 12,113 dwellings estimated in the EEFM 2013.
- v. The Cambridgeshire Insight website also publishes a high migration scenario based on the EEFM 2013. This shows a demand for 13,178 additional dwellings in Cambridge. Once again this is less than the 13,761 sites already identified

(including windfall sites) and hence fails to establish any need for Green Belt land.

- vi. We note the evidence from Cambridgeshire Past Present and Future that alternative sites for residential use are available both within the urban area and beyond the Green Belt in South Cambridgeshire. Together with the lack of a demonstrated need for the 430 Green Belt dwellings this alternative supply again means there is absolutely no exceptional need for Green belt land.

i.b What would be the consequences if the boundary of the GB was to be retained in its current location:

- i. The consequences would be negligible.
- ii. Since the Local Plan identifies more sites than the scientific and correctly assessed evidence suggests are needed, the removal of the GB1 and GB2 sites from the Plan can have no impact on need. Nor would this tiny increase in supply have any significant impact on the average price and affordability of housing within or around Cambridge.
- iii. Since the 430 dwellings at GB1/GB2 account for less than one percent (0.7%) of the total projected housing provision in 2031 even if it could be established that these dwellings were needed the figure would be well within any reasonable margin of error in projecting demand, and even in this case could not be considered as 'exceptional circumstances.