Matter Number: 2

CCC Respondent Personal Reference ID: 1801
SCDC Respondent Personal ID: 20942

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

Date: 13th October, 2014

Matter 2: Overall Vision and Spatial Strategy

SCDC Representation Numbers 58865, 58867, 58882

Summary:

a) CambridgePPF supports the overall spatial strategy of both Councils. We welcome the commitment to keeping Cambridge a compact city with its historic setting protected by the Green Belt.
b) CambridgePPF supports the principle of locating major new settlements beyond the Green Belt provided firstly that the necessary facilities and services are incorporated to create relatively self-contained communities, and secondly that high quality public transport links are provided.
c) In the light of the above, CambridgePPF is exploring a **Statement of Common Ground with both Councils covering the Overall Spatial Vision and Protection of the Green Belt.**
d) CambridgePPF questions the automatic assumption that sustainability is greater in urban extensions than in well-designed new settlements with good transport links. We have seen no evidence to support this assumption.
e) CambridgePPF believes that as a general principle priority for scarce development land within the city should be allocated to employment with housing located in SCDC. We would like to see some of the new urban sites currently allocated for pure housing re-allocated for mixed-use combining employment and retail with residential to create vibrant communities.
f) CambridgePPF supports the CCC preferred development sequence but objects to its implementation in that second level development in the city fringe is scheduled to be undertaken before the first level has been completed.
g) CambridgePPF believes there are other significant development sites within the city boundary that have not been included in the submitted City plan and which could provide more than adequate housing to preclude the need to release more Green Belt land. These sites are identified in Appendix A.
h) CambridgePPF proposes some additional wording to Para 2.29 of the CCC plan to clarify that urban sites will be taken first and that city fringe sites will be taken only as the option of last resort when all urban sites have been undertaken or discarded as undeliverable.
i) CambridgePPF proposes a minor amendment to SCDC Policy S/6 to clarify that its first priority in its development sequence is not new Green Belt land but sites around the city fringe that already have planning permission.
j) CambridgePPF argues that the exceptional circumstances required by the NPPF to release Green Belt land for development cannot be satisfied merely by the need to accommodate the urban area shortfall, and that the plan in unsound in this respect.
k) CambridgePPF objects to the selection of Sites GB1 and GB2 as city fringe sites on the grounds that the methodology for the 2012 review of the inner edge of the Green Belt, which identified these sites, is flawed, and calls for a new review of the whole Green Belt using a robust, independent methodology.
l) CambridgePPF argues that this new review should be based on the full suite of Green Belt purposes set out in the NPPF, and not on the selected sub-set used for the 2012 review.
m) CambridgePPF proposes that for the purpose of meeting the planned residential provision, a 'floating allocation' of some 400 dwellings (just 3% of the CCC housing provision) is allowed with its location in the city fringe dependent on the new comprehensive Green Belt review.
n) CambridgePPF objects to Sites GB3 and GB4 as employment sites on the grounds that CCC has failed to demonstrate the exceptional circumstances required to release the land from Green Belt.

o) CambridgePPF objects to Sites GB3 and GB4 for the additional reason that CCC has failed to list the criteria for screening companies that might want to re-locate into Cambridge so that they do 'support the Cambridge Cluster'.

It is CambridgePPF's view that the Overall Vision and Spatial Strategy has, with the exception of some minor details, been prepared in accordance of the NPPF, that it will deliver sustainable development, and that it is therefore sound. We regard our objections and proposed changes as Minor Amendments that do not detract from the overall soundness of both submitted plans.

1. Intoduction:

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.

2. The Overall Spatial Vision:

2.1 It is CambridgePPF's belief that the Greater Cambridge Sub-Region now faces a stark choice for the direction of its future development. Obviously Cambridge must continue to grow if its future economic and social prosperity is to be maintained. The choice relates to how this growth is to be delivered. With such limited development land within the city boundary, the pressure for growth can be satisfied either by allowing substantial development with more urban extensions around the city fringe, or by encouraging the new development to take place in South Cambridgeshire beyond the Green Belt so that the character and ambience of Cambridge is protected. The first option would mean that the Green Belt has outlived its usefulness and has become an impediment to essential growth: the second that the Green Belt still has a valid role to play in keeping Cambridge a compact city with its historic setting protected from urban sprawl by the Green Belt.

2.2 The overall spatial Vision of both CCC and SCDC is to take the second option – to keep Cambridge as a compact city, to protect the Green Belt, and to push development out into South Cambridgeshire in the form of major new settlements. In principle, CambridgePPF endorses this decision. For this reason, we support the overall vision and spatial strategy of both Councils.

2.3 The key consideration in determining the spatial growth of the Sub-Region is public transport. A policy of pushing development out into South Cambs beyond the Green Belt will work only if high quality efficient public transport can be provided. Traffic congestion and the problems of commuting by car into Cambridge risk jeopardising the quality of life for both residents and new arrivals. This in turn threatens the attraction of living in the area, which is itself one of the main drivers of Cambridge's growth. We must not kill the goose that lays the gold eggs.

2.4 Those organisations with a commercial interest in promoting more growth will argue that development in the form of urban extensions in the city fringe is the more sustainable option. We question this. Is it any more, or less, sustainable to create an urban extension on the edge of the city that depends on the existing local infrastructure, rather than to create a major new urban area which 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.

2.5 Indeed, in the Cambridge context, CambridgePPF argues that 'sustainable development' does not just mean 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. In this respect, it is our belief that the urban sprawl from fringe extensions would threaten the character of the city so that such development is unsustainable.

2.6 We accept the general principle of large new settlements in South Cambs which we believe represents a better option than jeopardising the rural character of the district through development scattered over all the villages. This support for the SCDC spatial strategy is tempered by our concern about the adequacy of the public transport provision to support the proposed new settlements. Indeed the viability of the whole SCDC strategy is dependent on the availability of City Deal funding for transport investment.

2.7 As a general principle, CambridgePPF believes that with the supply of development land in the City so limited, greater priority should be given to its use to meet the demand for employment. Companies want to be located within the city and not in some satellite business park in South Cambs. Some of the proposed residential sites in the City would be better developed for mixed-use combining housing with employment and retail, this helping to create viable communities rather than just housing estates (for example, Sites R10, the Mill Road Depot, and R12, Ridgeon's Cromwell Road). The resulting 'shortfall' of housing within the City should be taken up by SCDC. Similarly, the employment target within SCDC should be proportionately reduced by increasing the housing provision with the 'shortfall' taken up within the City. There would be no change to the overall employment or housing targets for the Sub-Region but there would be a spatial re-allocation between the two Councils.

2.8 The Vision statements of both Councils and their commitment to protect the Green Belt show that the Councils both support the strategic option of keeping Cambridge a compact city with development pushed out into South Cambs. It also shows that both Councils appreciate that the future prosperity of Cambridge and the surrounding area depends on maintaining its special character and quality of life, and that these would be compromised by excessive and unsustainable development. This is a blueprint for the further development of the Sub-Region which CambridgePPF endorses. **CambridgePPF is therefore exploring with both CCC and SCDC a *Statement of Common Ground covering the Overall Spatial Vision and Protection of the Green Belt*.**

3. The Preferred Development Sequence (Cambridge City Council):

3.1 In principle, we support the development sequence set out by CCC in Para 2.26. We believe this sequence is of such importance to the development of the city that it warrants its own Policy (as has been done by SCDC). We believe that the approach of taking sites within the existing urban area as the first priority and then secondly looking at city fringe sites, is correct. It also coincides with the recent pronouncements from DCLG about giving priority to brownfield sites.

3.2 Where we disagree is in the implementation of this sequence. The Forward Housing Trajectory presented in the Cambridge Annual Monitoring Report 2013 shows that the city fringe sites are to be taken mid-way through the plan period before some of the larger new urban area sites have been started – ie the urban fringe is being taken out of sequence.

3.3 We appreciate that the timetable for new developments is largely outside the control of the Council and that flexibility is therefore required. However, the urban fringe sites will require the Council to release land from the Green Belt for development. It is CambridgePPF's contention that the 'exceptional circumstances' required under Para 83 of the NPPF cannot be satisfied

merely because a Local Planning Authority has a shortfall in its urban sites and therefore has to release Green Belt just to meet its provision or its five-year supply. Pressure for land for development is not exceptional in Cambridge: indeed it is the normal circumstance and provides the context for enlightened planning.

3.4 We are encouraged by the recent statement made by the Secretary of State, DCLG, (4.10.14) that brownfield sites should be prioritised and that 'when planning for new buildings, protecting our precious Green Belt must be paramount'**.** CambridgePPF believes that releasing land from the Green Belt for development when alternative sites within the urban area have not been taken cannot justify the requirements of the NPPF. **In this respect, CambridgePPF believes the plan does not comply with the NPPF and has not been properly prepared so that in this specific context it is therefore unsound. We consider this objection to be a Minor Amendment that does not challenge the overall soundness of the spatial strategy.**

4. The Preferred Development Sequence (SCDC):

4.1 The first level of the SCDC sequence, 'on the edge of Cambridge', seems to give top priority to Green Belt development. We assume that what is actually meant is 'on the edge of Cambridge in sites already approved with planning permission'. If indeed SCDC does really mean new fringe sites in the Green Belt, then we would object vigorously to such a diametric contradiction to the recent announcements from DCLG

4.2 The Cambridge & South Cambs Transport Strategy proposes High Quality Passenger Transport links along all major access roads. This is welcomed. It does also raise the possibility of nearby Market Towns outside the SCDC area, like Royston, Newmarket, Huntingdon, Ely, and the like, contributing to the CCC and SCDC housing provision. This potential has not been recognised in the spatial strategy of either submitted Local Plans, and is an important missing element.

5. Additional Sites in the Urban Area that have not been Included in the Submitted Plan (CCC):

5.1 CambridgePPF has identified a number of sites within the city boundary with development potential, which with encouragement could come forward during the plan period. The total housing capacity of these sites is over 2,000 dwellings, more than enough to remove the necessity to release more city fringe land to meet the housing shortfall.

5.2 CambridgePPF raises these sites to show that there are additional potential sites within the first level of the development sequence which we would like to see addressed before starting on the second level. These sites, which we have discussed with the Council, have not been included in the submitted plans because they do not meet the high deliverability requirement. Some have been considered and rejected through the SHLAA process but it is our contention that with greater determination and leadership, they could be delivered. If they are to be considered as 'windfall', then the windfall allowance of 1,850 is a substantial under-estimate. A listing of these sites is presented in Appendix A.

6. Urban Fringe Development (CCC):

6.1 It is the contention of CambridgePPF that the identification of Sites GB1 and GB2 in the urban fringe is unsound. Our justification for this claim is two-fold:

a) The methodology used in the 2012 assessment of the inner boundary of the Green Belt was flawed. It did not adopt a recognised evaluation procedure so it is possible the outcome may not be wholly objective;

b) The purposes of the Green Belt against which the 2012 assessment was carried out did not include the full suite of Green Belt purposes as set out in Para 80 of the NPPF but a selected sub-set which excluded the highly relevant purpose of preventing urban sprawl.

6.2 It is CambridgePPF's opinion that before any sites are identified around the city fringe for development, a comprehensive review should be undertaken of the whole Green Belt using a recognised independent methodology with the assessment against the full suite of Green Belt purposes.

6.3 For planning purposes to meet the housing provision, CambridgePPF recommends that a 'floating allocation' of some 400 houses is agreed for the urban edge with specific sites to be determined by the outcome of the new Green Belt review. Considering the two sites GB1 and GB2 contribute such a tiny proportion of the housing provision (just 3% of the CCC provision and 1% of the total sub-Region provision), we can see no reason why a floating allocation would not be acceptable without compromising the soundness of the plan.

6.3 We object to CCC Policy 2, Spatial Strategy for the Location of Employment Development, on the grounds that the policy does not give adequate control over the use of sites GB3 and GB4. 'Employment purposes that support the Cambridge Cluster' is not sufficiently precise. We would like the criteria for assessing whether a company has to be located in Cambridge to be clearly spelt out. Both these sites are in the Green Belt and the Council needs to explain how the 'exceptional circumstances' are to be satisfied.

7. **Modifications to the Submitted Plans:**

7.1 CambridgePPF calls for the following amendments to both submitted plans. We believe these are Minor Modifications and thus do not challenge the overall soundness of either plan.

- **a)** CCC Policy 4, Table 2.4 should include the full suite of purposes presented in the NPPF against which the importance of the Cambridge Green Belt should be assessed;
- **b)** CCC Policy 4, Para 2.54 should propose a new comprehensive review of the Green Belt against the full suite of purposes using an independent methodology;
- **c)** 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';
- d) 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;
- ***e)*** 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, and should replace SCDC Policy S/6, Para 1. **Wording for this new Policy are presented in our statement for Matter 3 – Housing Need;**
- g) CCC Policy 2, Para 2.37 should explain how the exceptional circumstances required by the NPPF for the release of Green Belt for employment use at GB3 and GB4 have been satisfied, bearing in mind that pressure for employment land is not itself an adequate justification.