



**Report to Cambridge City Council and South
Cambridgeshire District Council**

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Government**

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PLANNING AND COMPULSORY PURCHASE ACT 2004

SECTION 20

**REPORT ON THE EXAMINATION INTO THE NORTH WEST CAMBRIDGE AREA
ACTION PLAN**

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 19 May 2008

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1 Introduction and Overall Conclusion

- 1.1 Under the terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004, the purpose of the independent examination of a development plan document (DPD) is to determine:
 - (a) whether it satisfies the requirements of s19 and s24(1) of the 2004 Act, the regulations under s17(7), and any regulations under s36 relating to the preparation of the document
 - (b) whether it is sound.
- 1.2 This report contains our assessment of the North West Cambridge Area Action Plan DPD in terms of the above matters, along with our recommendations and the reasons for them, as required by s20(7) of the 2004 Act.
- 1.3 We are satisfied that the North West Cambridge Area Action Plan (AAP) meets the requirements of the Act and Regulations. Our role is to consider the soundness of the submitted DPD against the tests of soundness set out in Planning Policy Statement PPS12. When the DPD was submitted, PPS12 (2004): *Local Development Frameworks* was in force, but in June 2008, it was replaced by PPS12 (2008): *Local Spatial Planning*, which is a material consideration. Although the tests of soundness are now presented in a different and simpler way, they cover the same matters as before. The revised PPS12 requires that to be sound, a DPD should be justified, effective and consistent with national policy, along with a continuing requirement for the DPD to satisfy the legal/procedural requirements and be in conformity with regional planning policy. Justified means that a DPD should be founded on a robust and credible evidence base, and the most appropriate strategy when considered against the reasonable alternatives. Effective means that the submitted DPD should be deliverable, flexible and able to be monitored.
- 1.4 The Government intends that spatial planning objectives for local areas, as set out in the LDF, should be aligned not only with national and regional plans, but also with shared local priorities set out in Sustainable Community Strategies where these are consistent with national and regional policy. National policy emphasises the importance of spatial planning. It requires local planning authorities to produce a Statement of Community Involvement and follow its approach, and to undertake proportionate sustainability appraisal. PPS12 (2008) also confirms that the rigour of the examination process remains unchanged and Inspectors will be looking for the same quality of evidence and content as before. Consequently, the publication of the new PPS12 does not materially affect the procedure or matters to be examined in terms of this DPD.
- 1.5 In line with national policy, the starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The changes we have specified in this binding report are made only where there is a clear need to amend the document in the light of the legal requirements and/or the tests

of soundness in PPS12. These changes include a larger development footprint than that in the submitted AAP. This is the result of our consideration of further work carried out by the Councils at our request. This work included public consultation and sustainability appraisal. The remaining changes we recommend do not materially alter the substance of the overall plan and its policies, or undermine the sustainability appraisal and participatory processes.

- 1.6 Our report firstly considers the legal requirements, and then deals with the relevant matters and issues considered during the examination in terms of testing justification, effectiveness and consistency with national policy. Our overall conclusion is that the AAP is sound, provided it is changed in the ways specified. The principal changes which are required are, in summary:

- a) The addition of an explanation of the establishment of need by the University.*
- b) Clarification of the requirement to establish need for individual applications*
- c) Enlargement of the Major Development Site to the west and by reducing the extent of the central open area.*

The report sets out all the detailed changes required, including those suggested by the Council, to ensure that the plan meets the legal requirements and the three tests of soundness.

2 Legal Requirements

- 2.1 The North West Cambridge Area Action Plan is contained within the South Cambridgeshire District Council's Local Development Scheme, the updated version being submitted in March 2009, and in the 2008 Cambridge City Local Development Scheme, shown as having a submission date of June 2008. South Cambridgeshire District Council has yet to produce a Statement of Community Involvement, but the Statement produced by Cambridge City Council has been found sound by the Secretary of State and was formally adopted on 13 September 2007. It is evident from the documents submitted by the Councils, including the Regulation 28 Statement, Regulation 31 submissions, and the Self Assessment, that the Councils have met the requirements as set out in the Regulations. Test i of paragraph 4.50 of PPS12 is met.
- 2.2 Alongside the preparation of the DPD it is evident that the Councils have carried out a parallel process of sustainability appraisal.
- 2.3 In accordance with the Habitats Directive, we are satisfied that an Appropriate Assessment has been undertaken and that there would be no significant harm to the conservation of any European sites as a result of the policies and proposals within this DPD.
- 2.4 We are satisfied that the DPD has had regard to national policy.

- 2.5 The East of England Regional Assembly has indicated that the DPD is in general conformity with the approved Regional Spatial Strategy, and maintained that view in relation to the larger site option. We are satisfied that it is in general conformity.
- 2.6 We are satisfied that the DPD has had regard to the sustainable community strategies for the area.
- 2.7 We are satisfied that the DPD complies with the specific requirements of the 2004 Regulations including the requirements in relation to publication of the prescribed documents; availability of them for inspection and local advertisement; notification of DPD bodies and provision of a list of superseded saved policies.
- 2.8 Accordingly, we conclude that the legal requirements have all been satisfied.
- 2.9 We go on to assess the AAP against the tests of justification, effectiveness, and consistency with national policy, organising the material on the basis of the main matters for consideration of soundness which we identified early in the examination.

3 Main Matter 1 – The Need for the Development by Cambridge University

- 3.1 Saved Policy P9/2b of the Cambridgeshire and Peterborough Structure Plan 2003 requires Local Planning Authorities to carry out a review of the Green Belt in their areas to identify the boundaries of land to be released from the Green Belt to serve the long-term development needs of Cambridge, in the locations set out in Policy P9/2c. This latter saved Policy names land between Madingley Road and Huntingdon Road (effectively the area covered by this AAP) as one of the areas where land is to be released from the Green Belt. The land should be reserved for predominantly University-related uses and only brought forward when the University can show a clear need for the land to be released. This AAP is designed to bring forward this land, for predominantly University-related uses.
- 3.2 Although the Panel which carried out the Examination in Public of the Structure Plan was satisfied there was a need for development by the University, the Policy P9/2c test of need was nevertheless included in the Structure Plan. The Cambridge Local Plan 2006 was also adopted on the basis that need had been shown. However, a substantial part of the area allocated for development in this AAP falls within South Cambridgeshire and is not covered by the Local Plan. Furthermore, the development area proposed in the AAP involves a significant section of the Cambridge Green Belt, a section of the Green Belt which is significant in terms of the purposes of the Cambridge Green Belt (see 5.3 et seq below). Finally, a new development plan system has been put in place since the Structure Plan and Local Plan were prepared. In order to meet the test of justification imposed by this

new system, a clear need, on behalf of Cambridge University, must be shown for the land to be released.

- 3.3 We consider need of 2 main types, firstly for academic and research and development uses, and secondly housing need.

Needs for Academic and Research and Development Uses

- 3.4 Teaching and research are primary reasons for the University's existence. In world rankings, Cambridge University is one of the group of 5 leading universities, this group being headed by Harvard. This position is a key element in attracting major commercial companies to the Cambridge locality.

The Economic Importance of the University

- 3.5 A measure of the considerable importance of the University to the national and regional economies is provided in a report by Library House¹, produced in 2006 in association with the University and others, and entitled 'The Impact of the University of Cambridge on the UK Economy and Society'. This report estimated that, if the University did not exist, the impact of the loss of its expenditure and employment over the next 10 years would require the replacement of a net present value of £21.2bn and 77,000 new jobs regionally and £4.8bn and 10,800 new jobs nationally. These figures do not take into account the 'spin-off' benefits the University has brought in the form of businesses. The number of companies which had 'spun-out' directly from the University was 51. In addition 250 companies still in existence had been started based on knowledge transfer from the University.
- 3.6 The University is an important part of the local economy of the Cambridge sub-region, employing 8722 staff in 2006. Nationally, it has the highest score of any university as assessed by the recent Research Assessment Exercise. In 2004 8% of all European venture capital was attracted to Cambridge. There is an international significance to the University's research and the work of commercial companies and non-profit research institutions collaborating with the University. The world faces a number of serious problems: research involving the University offers a chance of finding solutions.
- 3.7 Government policy recognises the importance of education and research, the innovation which stems from them and from their relationships with the commercial world, and their potential contribution to the national economy. Government policy therefore gives strong encouragement to research: it aims to increase funding for research and development (R&D) to 2.5% of GDP by 2014, and to increase public sector R&D funding available to universities in real terms year on year during the current spending review period 2004-2008. There has been an 8% rise per annum in science funding to 2007/8. Public spending of institutions and support for students was

¹ A Cambridge-based business providing information on private high-growth companies in the UK.

set to grow by an average of 2.5% each year over the 3 year Comprehensive Spending Review period, although savings on staff and teaching because of the recession will reduce this.

- 3.8 Cambridge receives the largest amount of research grant funding from the Research Council of any UK university. It is the UK's leading research university and is normally placed first in league tables of all European universities.
- 3.9 Its importance is increased by the 'cluster effect' brought about by the relationship between research excellence and commercial investment in innovative developments arising from the research. Researchers in different fields and companies benefit from the interchange of ideas. The results include the identification and delivery of solutions to problems, the commercialisation of scientific ideas and research, and the invention and manufacture of new products. Physical proximity is a key factor in all this. The phenomenon is encouraged by government policy, and specifically for the Cambridge Sub-Region in Policy CSR2 of The East of England Plan. The University takes a pro-active role in encouraging the co-location of academic departments, academic research institutions, and commercial businesses.

Land Availability and Requirements

- 3.10 Land for academic and R&D purposes operated by, or associated with, the University, is needed to ensure the continuing health of the hi-tech cluster of uses in Cambridge. The University's sites in central Cambridge are densely developed, in some cases with buildings which are outmoded, and certain sites would benefit from redevelopment. This would enable departments working in related areas of research to locate together, bringing its own opportunities for new thinking. The University is currently developing a large site in West Cambridge to provide for such co-location and for the continuing demands for new development, including private sector development. Hence the need for the release of land in North West Cambridge for these uses is not immediate.
- 3.11 The University has a need itself for higher education uses, including academic faculty development, and research institutes. The principal force behind the physical growth of the University is research growth. The 8% annual growth in research funding has driven a 2% annual growth in the University estate. These levels of growth are averaged over a 25 year period of varying economic circumstances, which provides a degree of confidence, in the light of the current recession, that they are reliable for forecasting purposes.
- 3.12 The University estate has about 100,000m² of space remaining for development, including land at West Cambridge. Continued growth of the estate as a whole at past rates would see this land used up by about 2015, and the proposed North West Cambridge land would then last until 2019. The development of the West Cambridge site has continued during the period of the examination, and preparation

for further developments there, including the provision of infra structure, is ongoing.

- 3.13 Before 2015, and on the North West Cambridge site itself, a conservation campus is planned. This is proposed to take advantage of the presence on the site of the World Conservation Monitoring Centre. Benefits such as this should be taken into account, as well as needs, in assessing the justification for bringing the site forward for development.
- 3.14 Commercial concerns seeking co-location with academic departments and research institutes also need to be provided for on the basis that collaboration and interactions, resulting from the integration of these uses, provide the benefits set out in 3.9 above. Business start ups sparked off by the development of ideas in the University should also be accommodated.
- 3.15 A measure of the scale and rate of development of land for these purposes is given by examining the speed of development at the Cambridge Science Park and at West Cambridge. The former has been built at an average annual rate of about 5,000m², the latter at a markedly slower rate. However West Cambridge got off to a slow start and has not been the subject of significant marketing to businesses.
- 3.16 Forecasting on the basis of past rates of development at West Cambridge alone suggests that site itself could last until 2020 or later. On the other hand, 3 of the 6 principal businesses currently located at West Cambridge were seeking to expand on site, at the time of the commencement of the hearings into this AAP. This could have taken up a substantial part of the remaining commercial land available, leaving only about 15,000 m² of such land, which might represent only 3 years of supply. The level of interest in expansion has reduced during the recession, but these figures indicate that an improvement in the economic climate could result in the fairly rapid development of the remaining land at West Cambridge.
- 3.17 There is also evidence of pent-up demand from private investors for collaborative projects with the University, a demand which the availability of serviced land at West Cambridge will help to meet.
- 3.18 Other sites in the City have been provided, or are allocated, for hi-tech uses. Those currently available have limited areas of land remaining. Those located near Addenbrooke's Hospital are required for research and development associated with the Hospital and other medical uses. Land is allocated at Cambridge East but this land does not offer the same co-location advantages for Cambridge University as sites on the west side of the City. It seems to us that there are no substantial relevant alternative sites the availability of which reduces the need for academic and R&D land at North West Cambridge.

- 3.19 Development of the proposed conservation campus and some expansion based on the existing University development in the vicinity of Madingley Rise (south of the eastern part of the AAP area) could be appropriate in the near future. However, on the basis of the evidence discussed above, it may be several years before the University needs to commence large-scale non-residential development at North West Cambridge. Nevertheless it is desirable to secure the allocation of the land in time to allow the necessary masterplanning and other planning procedures to be accomplished in good time so that research organisations and companies potentially locating on the AAP land can be assured of the availability of serviced land. In addition, research foundations and commercial companies seeking locations near the University will be easier to attract if there is the assurance of readily available serviced land and buildings for occupation at the time required, perhaps with the possibility of expansion. Given the importance of the University nationally (see 3.4 - 3.7 above) we consider that there are distinct benefits in bringing the land forward, as a development plan allocation, at this time.
- 3.20 During the examination into this AAP the recessionary effects of the credit crunch became apparent. The University is not dependent on bank loans for funding: resources are dominated by government funding. The savings being sought from the University's research budget are less than 1%, and the Research Council science budget is the only public sector fund which is ring-fenced. The University's own endowment fund has been reduced but provides a small proportion of the University's income. The amount the University draws from it has not been reduced. The amount of private investment in R&D is difficult to forecast, although major companies continue to work closely with the University. The University will not be insulated against the effects of the recession, but planning should be for the long term and the constraints of pessimism should be avoided, lest they themselves limit beneficial growth which might otherwise take place.
- 3.21 Policy NW10 of the AAP intends to provide 100,000m² of floorspace for academic and R&D uses. This would provide for some years of development needs (see 3.11-3.16 above) and the release of smaller quantities would be less worthwhile. The wording of the Policy in relation to the subdivision of the floorspace total is, however, rather inflexible. It allows (only) for up to 60,000m² of Class D1 uses and up to 40,000m² of research uses. If one of these 2 categories falls short of its permitted amount then the development would fail to provide the 100,000m² sought overall. A more flexible wording of the Policy would pass the test of effectiveness, whilst at the same time recognising the educational purpose of the University and the sub-regional policy to balance housing and employment. Reasoned justification changes would be necessary to accompany the Policy rewording and to remove the suggestion that the evidence for development comes from the Cambridge Local Plan rather than from this examination.

Housing Needs

- 3.22 There are 3 forms of housing need which are relevant to the release of this site for development: University staff/key worker housing shortages arising from affordability difficulties; needs for student accommodation; and the need for the development to include a substantial quantity of market housing to make the development as a whole viable.
- 3.23 The University has undertaken a survey of housing conditions amongst its staff. Many University members of staff are living in poor accommodation, because of the high costs of housing in Cambridge, especially relative to salaries. The problem particularly affects staff recruited in recent years.
- 3.24 There is a significant turnover of staff. Contract research staff are typically in post for about 2.5 years. Over 2000 staff are recruited annually, and this number will be significantly higher by 2021, bearing in mind the increase in research. Many new recruits come from outside the Cambridge area. The proportion from outside the area is likely to rise with the increase in research activity and the lower rate of increase in the numbers of postgraduate students. Staff numbers have continued to increase despite the recession, as they are driven largely by research needs.
- 3.25 There are therefore substantial numbers of newly recruited staff seeking housing in Cambridge's relatively expensive market each year. By 2021 the University might be recruiting annually 100 academic staff, 630 contract research staff and 300 support staff from outside the Cambridge area, assuming continued growth in research needs. About three-quarters of staff in these groups seek rented accommodation. Hence by 2021 about 760 households annually could be seeking affordable rented accommodation.
- 3.26 If staff spend 30% of their incomes on housing, single income households could afford to rent only a bedsit in a shared house, and dual income households could afford to rent only one bedroom accommodation. House purchase is unaffordable from income alone. These findings are for the average household and pre-date the recent fall in property prices. In Cambridge these falls have levelled out. There would need to be further substantial falls for staff to be able to afford to buy a house. Any improvement would be unlikely to survive a return of the housing market to, or close to, its pre-recession position.
- 3.27 In fact, of those moving into the Cambridge postcode area in the year before the housing survey, 38% were occupying shared bedsit accommodation, and a further 28% were living in self-contained one bedroom flats. Thus new members of staff in their mid-late twenties might find themselves spending a considerable amount of their limited contract period searching for housing, and then be forced to continue living in conditions they experienced as students, perhaps

sharing a flat above a shop. The prospect of the continuation of such conditions affects recruitment and also the retention rates of more permanent staff. Furthermore, key senior staff will not choose to work for the University if the University cannot recruit good quality research staff.

- 3.28 The land proposed in the AAP for development is owned by the University. It offers the opportunity for the University to provide University and College staff with housing of satisfactory quality. Rents would be set at levels which would be affordable by the groups of staff at which the housing provision would be aimed. It would also take some of the pressure off the housing market in the City by accommodating annually some hundreds of households which would otherwise be seeking dwellings from the remainder of the City's housing stock.
- 3.29 The submitted proposal for about 1250 affordable dwellings would provide about 435 lettings each year if all the dwellings were to be rented. This is equivalent to about 57% of those in these staff groups in 2021 (760 households – see 3.22 above) who would be seeking rented accommodation. Thus the proposed development (even with increased numbers of affordable dwellings on an enlarged site – see below) would by no means meet all the forecast needs for affordable key worker housing. However, it would be a very valuable addition to the resources of housing for University staff.
- 3.30 There is an existing level of need for housing represented by the present levels of recruitment, coupled with the desirability of providing housing of a satisfactory standard which new University staff could afford. Although teaching and research are the *raisons d'être* of the University, staff of the right calibre are required. There is competition from other leading universities in the world for the best staff. In view of the importance of Cambridge University in national, regional and local terms, the best staff ought to be recruited, and this would be increasingly difficult without satisfactory housing.
- 3.31 Market housing is needed to make the University's development of the AAP proposal a viable proposition (see Main Matter 2 below).
- 3.32 Market housing will also contribute to meeting the overall housing requirements of South Cambridgeshire and Cambridge itself. However it is not the general housing needs of the area which are the key to releasing the land, but the University's particular needs. This is true even taking into account the status of the land as a site on the edge of Cambridge, the second choice category for the release of land to meet the sub-region's housing requirement.
- 3.33 Unmet student housing needs are for postgraduate students. 99% of undergraduate housing need is met by Colleges. A survey of student housing needs conducted in May 2008 reveals that the current unmet need is for 1049 units, almost all for postgraduates. Colleges do not

have sufficient housing for this group of students. Many therefore have to live in poor quality and expensive private sector accommodation.

- 3.34 Recessions increase participation rates in education, and student numbers grew faster than anticipated in 2008/9, but projection of student numbers to 2026/7 at a cautious low growth rate (1.07% per annum, compared with the actual rate of 1.52% pa over the last 12 years), and allowing for a continuation of past rates of new build and conversions providing student housing on other sites, results in a conclusion that 2303 additional units of accommodation for students would be required by 2026/7. This figure includes the current unmet need set out above. The equivalent figures for 2016/7 and 2021/2 are 1443 and 1835.
- 3.35 Several Colleges have fundraising campaigns under way, in the context of the University's 800th Anniversary Campaign, with the aim of providing postgraduate housing.
- 3.36 The AAP intends to provide about 2000 units of student accommodation, sufficient to provide for needs into the 2020s. A failure to provide satisfactory accommodation for students, particularly postgraduate students, could render the University less attractive to the best students. This could harm the international position of the University and its ability to contribute to research and to the national, regional and local economy.

Overall Conclusions

- 3.37 We conclude that the University's need for the land to be released for development is a very weighty consideration in assessing whether the AAP passes the test of justification. The need for affordable key worker housing is both immediate and urgent. The need for academic and research uses is longer term but of great significance in view of the University's educational and economic importance.

Absence of justification in the submitted AAP

- 3.38 However, there is an absence of any justification for the release of the land in the submitted North West Cambridge Area Action Plan. In order to justify land release, specific wording should be included in the AAP. Various forms of wording were discussed during the examination and provide the basis for that which we use below.

Justification of Need in individual applications

- 3.39 The phasing Policy (NW30) could be interpreted to mean that the overall need investigation must be repeated for every planning application for development on this site. The AAP contains material that clearly accepts the University's need for the development, hence it would be unreasonable if effectively that need had to be demonstrated again for each individual element of development. The

wording we recommend makes clear that the strategic need has been accepted and that need is only to be demonstrated for specific uses as applications come forward to ensure effective use of this limited resource.

Other Matters

3.40 Both the South Cambridgeshire Core Strategy and the Cambridge Local Plan include housing requirements for the period to 2016. The principal housing Policy in the AAP should indicate how much housing should be provided by 2016. This would also improve consistency with other AAPs proposing land release around the City. Our inclusion in the AAP of a safeguarding policy adds a further argument for the reference to 2016 in Policy NW5. These arguments are of greater strength than the fact that the AAP has a housing trajectory. The wording change is detailed below, following our overall conclusions as to the scale of development and Policy NW5.

Action Needed to Achieve Soundness

3.41 **The following changes are required to make the document sound:**

- i) **Delete the first line and part a of Policy NW10 and replace with:
"Employment and academic development at North West Cambridge will constitute 100,000m² of floorspace as follows:
Approximately 60,000m² of higher education uses, including academic faculty development and a University Conference Centre within Use Class D1: and"**
- ii) **Delete paragraph 5.5 and replace with: "Evidence from the University indicates that the University has a need for 100,000m² of Use Class D1 higher education uses, University-related research institutes, and commercial research uses at North West Cambridge. If the floorspace guide limit stated in part a of the Policy is exceeded, a requisite reduction would be required in the floorspace for uses under part b of the Policy. This is to ensure the scale of overall development does not undermine the strategy for the development of the sub-region and to ensure that emphasis is given to meeting the higher education uses proposed for the site."**
- iii) **Delete the last sentence of paragraph 2.1 and replace with: "The Structure Plan 2003 accepted that the AAP location should be released from the Green Belt for development following a boundary review, and that once released it should be reserved for predominantly University-related uses and only brought forward for development when the University could show a clear need for the land to be developed. The evidence base produced for the examination of the soundness of this**

AAP, and specifically the evidence produced by the University, identifies a clear need for the land to be brought forward for development, with a current need for University key worker affordable housing."

iv) Add after paragraph 2.1: "The University's development needs arise from its requirement to:

- Continue to fulfil its mission to contribute to society through the pursuit of education, learning and research at the highest international levels of excellence;**
- Respond positively to Government policy for growth in the higher education sector; and**
- Work actively to support the expansion of the knowledge-based economy.**

To achieve its objectives the University will remain a collegiate organisation, primarily residentially based. To this end it seeks additional student housing to reflect the rising student population and to reduce the proportion of postgraduate students relying on the commercial housing sector. Given the longstanding difficulties in the local housing market the University needs to achieve a fourfold increase in its provision of housing available to staff. This need is to deal with recruitment and retention problems arising from local house prices and rental levels.

The University's development needs relate not only to academic buildings. The University's research activities are increasingly carried out collaboratively with public and charitable sector research institutes, and industry. It needs to be able to provide a range of opportunities for such collaborations from small embedded units within academic departments to sites for major research facilities proximate to related University activities. Above all the University needs to be able to respond rapidly to opportunities arising from breakthroughs in research, technological advances and new funding sources."

v) Replace Policy NW30 and paragraph 10.8 as submitted to read:

Policy NW30: Phasing & Need

- 1. A Needs Statement must be submitted with any planning application to demonstrate that the University has a need for the land to be released for the specific development the subject of the application;**
- 2. Phasing of the development will be determined through masterplanning and as the needs of the University are proven.**

10.8 The overall strategic need for University development at North West Cambridge has been

accepted. The site is likely to be developed in a number of phases in the period to 2021 and beyond. As land is only being released from the Green Belt to meet the long term development needs of the University and is a limited resource, it is important to ensure effective use of the land and that evidence of need is demonstrated as applications come forward for different uses over time. It is anticipated that the University's Housing Needs Study forming part of the evidence base for the Area Action Plan, updated as necessary, will form a key part of the Needs Statement of planning applications that include residential development. The site is in proximity to the University's existing West Cambridge site, south of Madingley Road, which is the current focus for the growth of the University, where capacity will last for some time yet. Other sites in the City are allocated for University and student housing uses in the Cambridge Local Plan. Accordingly, a Needs Statement is required to support planning applications for built development to satisfactorily demonstrate the need for the development and that it cannot reasonably be met elsewhere. This would take into account factors such as viability, the demand for various uses, land availability, ownership, location, accessibility and suitability.

4 Main Matter 2 – The Viability of the Development and the Mix of Uses

- 4.1 Our report on Main Matter 1 above makes clear the needs of the University for academic and research purposes as well as for University staff/key worker housing, student accommodation and enabling market housing. The AAP has been produced, insofar as housing numbers are concerned, on the basis that the University was seeking between 2,000 and 2,500 dwellings in this area. On the other hand, currently the University asserts that a minimum of 2,500 dwellings are required. Both these figures are based on a 50/50 split between market and affordable housing. We do not comment on the figures that were put forward by the University up to the preparation of the Submission Draft of the AAP. What is important is that an assessment of the University's current needs is based upon a sound evidence base.
- 4.2 As far as housing is concerned, it will be seen from our conclusions on Main Matter 1 that 1250 affordable dwellings would not meet all the forecast needs for affordable key worker housing, and should be regarded as a minimum to aim for. In addition, there will be a need for market housing which is the enabling development for the affordable housing. We turn to viability and the market housing shortly. In addition, there is no controversy about the number of student housing units required at 2,000 units, where a cautious low growth rate shows a need for 2300 additional units by 2026/7: 2,000 units would provide for needs up to some time in the 2020s.

- 4.3 In addition to the very urgent affordable housing requirement and the student accommodation, we are satisfied that it is prudent for the University to provide for 100,000m² of academic and R&D floorspace. As can be seen from Paragraph 3.12 above, 100,000m² might last until about 2019. Since this is the last land resource of any size which will be available for development in close proximity to the established University focus, it is important to utilise it to the full. It would be wrong to plan for anything less than the 100,000 m² academic and commercial research floorspace.
- 4.4 We refer in paragraph 4.2 above to the requirement for market housing to provide enabling funding for the affordable key worker housing. The University's intention is to obtain a planning permission and approval for the Masterplan, and then seek a private sector partner to carry out the housing development. The current state of the national economy, and the housing market in particular, means that this is not the most propitious time to rely on such plans. It is, however, clear that the University must seek a cautious approach to the funding of the development of its lands in North West Cambridge. We accept that this method of funding the affordable housing development is the only one available to the University; the question being more one of the timing of the development than the means of achieving it. We deal with the question of viability below, but we accept the basis on which this Area Action Plan has proceeded so far: that the affordable key worker housing must be matched in number of units by the enabling private housing. With the University's ownership of the land, this 50/50 split arrangement should be workable, but it would not be prudent to proceed on any lesser proportion for the enabling element. Therefore the total housing requirement for key worker and private housing is a minimum of 2,500 units, although this would by no means meet all of the need (see 3.29 above).
- 4.5 With 2,500 dwellings or more, and 2,000 units of student accommodation, plus the academic and research floorspace, there is clearly a need for a local centre together with provision of educational and other social facilities.
- 4.6 The University's Land Budget figures are derived from masterplanning work, based on a rigorous site analysis and a detailed knowledge of the site. We consider that this provides a sound evidence base on which to proceed. This masterplanning work has given rise to a larger development footprint than the AAP footprint, because the AAP footprint would not provide for the full housing requirement now demonstrated and would not allow for the full 40,000 m² of University-related research institutes. We go on to consider the extent of the development footprint in the next main matter, but here we conclude that, for the AAP proposals to provide for a viable development, in the sense of meeting the University's demonstrated needs, it must be capable of supporting the various elements of development we have identified: a minimum of 2,500

dwellings, 2,000 units student accommodation, 100,000 m² academic and commercial research floorspace, and a local centre with retail, educational and other social facilities.

- 4.7 Turning to development economics and financial viability, we have been provided with details of the modelling which has been carried out to appraise the University's approach, using residual land values. Such models are highly sensitive to the various assumptions which underlay the inputs, but this is the most effective way of comparing options and seeking to understand the financial viability of the development. We accept that it is necessary for the University to proceed on a 'minimum risk' basis.
- 4.8 The modelling uses the assumption that the housing would start first, being put out to tender after planning permission has been granted. The developer would not have to put money up-front for land purchase, and the market housing would fund the key worker housing. Infrastructure would be put in on a phased basis, maximising the value of the market housing, being funded by the University's own finance or by borrowing. As far as the commercial research development is concerned, the model assumes land sales to a commercial developer. The collegiate and academic research space has been assumed to be cost neutral. The modelling, which of course has to take into account such matters as the need to enhance transport infrastructure and public utility services, demonstrates that the University's Masterplan would result in a relatively low Net Present Value, showing that the scheme is viable, but only just.
- 4.9 As a result of these considerations, it is clear that the development of the land identified in this Area Action Plan will only come forward if the economics can be made to work, particularly in relation to the funding of the infrastructure, and in terms of securing a satisfactory partnership with a housing developer. Nevertheless, it is of critical importance for the future development of the University that the planning system should enable the development to take place. With enabling policies in place, it will then be for the University to carry the project forward. If it cannot do so, or if it can only do so in the long term, the land will remain as a resource and in the meantime will continue to fulfil its role in providing a setting for the City.
- 4.10 This conclusion, highlighting that, as far as can be judged at present, the development will be viable but recognising that relatively small changes in a number of variables could reverse the position, means that the AAP must go as far as it can towards meeting the needs of the University, particularly in terms of key worker housing and the enabling residential development. Under the next main matter we examine the scope for making changes to the AAP which would provide a better fit between the needs of the University and the necessary constraints that must be weighed in altering the Green Belt to facilitate the development.

5 Main Matter 3 – Green Belt, Footprint, Strategic Open Space

- 5.1 Paragraph 3.1 above sets out the Structure Plan Policies governing the release of land from the Green Belt in this area. At the time of the approval of the Structure Plan the great majority of the AAP land was included in the Cambridge Green Belt. That part of the land which falls within South Cambridgeshire District is still Green Belt. Most of the site lying within Cambridge City was removed from the Green Belt when the Cambridge Local Plan was adopted in July 2006. However the Inspector's report on the Local Plan makes it clear that the removal of the Green Belt notation was to give the necessary freedom to devise a Masterplan. Following the completion of the Masterplan suitable land could be added back into the Green Belt via the AAP. A Masterplan has not been completed, but this AAP is the vehicle for determining which land should be allocated as the major development site, and which land should be released from the Green Belt, retained in the Green Belt, or, if appropriate, returned to the Green Belt.
- 5.2 The Structure Plan Policies provide the strategic base for reviewing the Green Belt in this locality.

The Green Belt Value of the Proposed Development Site as a Whole

- 5.3 In addition to national Green Belt purposes, the Cambridge Green Belt serves other particular purposes. The second such purpose, defined in the Cambridge Local Plan, in the Core Strategy for South Cambridgeshire, and in the East of England Plan, is to maintain and enhance the quality of the City's setting.
- 5.4 The majority of the land is well seen from the M11, which gives views of the eastern slopes of the Washpit Brook valley, the crest of the slope, and, to an extent, of the plateau above. The M11 is an important source of views because of the numbers of vehicles using the motorway, which links Stansted Airport with the North, and is one of the routes from London to the North. The AAP land is an attractive feature when seen from the motorway, because of its open nature and its topography, the eastern valley side appearing as a forward slope.
- 5.5 The M11 past the site does not provide views of the historic centre of Cambridge, or views in which substantial areas of the City are seen, although the tower of Girton College is visible. However, the motorway south of the AAP area offers good views of the historic centre. The site is adjacent to the City, and is seen prior to, or soon after (depending on the direction of travel) a viewing corridor from which historic features are appreciated.
- 5.6 It is our judgement that the area included within the AAP is of substantial value to the setting of the City. This is because of its prominence viewed by many people travelling on the M11, its relationship to the City, and its attractive qualities.

- 5.7 The site comprises a large area of open countryside. In terms of the purposes of including land in the Green Belt set out in national policy (PPG2), the AAP area generally checks the unrestricted sprawl of the large built-up area of Cambridge and assists in safeguarding the countryside from encroachment. Finally, having regard to the Cambridge Green Belt purposes, part of the site prevents the settlement of Girton, just outside Cambridge's built-up area, from merging with the City.

The Balance Between Green Belt Purposes and Need

- 5.8 The AAP area performs several Green Belt functions. These are especially valuable in the context of Cambridge, and Cambridge is a City with a noteworthy character because of its world-class, and therefore widely-known, historic University. However it is the need to retain and, if possible, increase the educational, intellectual, and economic roles of the University which has led to the proposal to release for development the major part of the area contained within the AAP boundaries. In our judgement the needs shown by the evidence submitted to the examination are of greater weight than the Green Belt functions of the land. In our opinion the University has shown a clear need for the land between Madingley Road and Huntingdon Road, considered generally, to be released, and in this respect the submitted AAP is founded on a robust and credible evidence base. There are exceptional circumstances for removing land from the Green Belt to accommodate the development. It remains to consider how much land, and which land, between the 2 roads should be released for development.

What Should be the Westerly Extent of the Major Development Site?

- 5.9 The area intended in the AAP for built development is referred to in the AAP as the major development site. It was also referred to in the examination as the development footprint, or footprint.
- 5.10 The eastern part of the AAP area is not seen from the M11, and is relatively enclosed by existing development to the north, south and east. Building only on this section of the site would meet a relatively small proportion of the University's needs. The major development site should extend considerably further west to provide a worthwhile contribution to meeting needs. It is the western extent of the proposal which is most sensitive in visual and character terms.
- 5.11 The release of land in this area for large scale University-related development would expose a lengthy urban edge to view from the M11 and other viewpoints west of the motorway. Although the effects of the new built-up area on the character of the locality could be softened by design and landscaping, some of the individual buildings could be expected to be large in scale.

- 5.12 The overall effects of this type of development would be harmful to the setting of the City regardless of whether development was restricted to the plateau area above the valley slope of the Washpit Brook, or was allowed to spill down the eastern slope towards the motorway to the extent proposed either in the AAP or by the University. For the reasons given in the preceding paragraph, building the type and size of development necessary to meet a substantial part of the University's needs would damage the setting of the City in any case. The AAP proposal to limit the footprint to a particular line part of the way down the eastern valley slope does not limit the harm in any meaningful way. It is the loss of a major part of the extensive sweep of open land which causes the harm, and such a loss is common to the AAP and the University's suggested footprints.
- 5.13 In the extreme north-west, the major development site stops short of the M11/A14 intersection. However the development here would be so close to the intersection, and so open to view from it, that no material purpose is served by retaining open land between the development and the road system.
- 5.14 The AAP as submitted is unsound because the western extent of the major development site is not supported by robust and credible evidence. In view of the scale of the University's need, especially for affordable housing, the development footprint as submitted is not the most appropriate strategy for meeting those needs. Nor is the footprint as submitted effective, as it would meet less of the need than could be met by extending the footprint further down the western slope.
- 5.15 The development boundary suggested by the University would not result in a material increase in the harm to the setting of Cambridge, and would enable the development to make a greater contribution to meeting important needs. The AAP would be sound if altered to include the western development boundary proposed by the University.
- 5.16 The proposed development boundary retains an area of open land between the M11 and the major development site. The M11 at present runs through the open countryside, and the corridor of land to be retained would retain an open foreground in views from the motorway. This would soften the urban edge and prevent an oppressive urban character from being created alongside the motorway (see also 5.29 below).

What Should be the Southerly Extent of the Major Development Site?

- 5.17 Structure Plan Policy P9/2b provides for the protection of green corridors running from the countryside into the urban area as generally indicated on the Key Diagram. That Diagram indicates a green corridor along the north side of Madingley Road. The land north of Madingley Road provides a relatively green and open approach to the City from the west. The Structure Plan proposal is

reflected in the AAP, which excludes a substantial corridor north of Madingley Road from the major development site. This corridor includes fields of pasture land and also the Madingley Road park and ride site, which contains a good deal of open land and landscaping, and which is well screened.

- 5.18 One of the purposes of the Cambridge Green Belt, as most recently expressed in the East of England Plan, is to preserve the character of Cambridge as a dynamic City with a thriving historic centre. Corridors of open land penetrating into the urban area from the countryside are characteristic of the City. Reference to this characteristic is made in both the Cambridge Local Plan and the South Cambridgeshire Core Strategy. In terms of national Green Belt policy, Cambridge is a historic City and green corridors are part of its special character.
- 5.19 The footprint as submitted extends as far south as the northern boundary of the Madingley Road park and ride site. The pond on the northern part of the park and ride site was found in 2001 to contain great crested newts, but 3 subsequent surveys have failed to find these creatures in the pond, although they are present in a pond in the residential area south-east of the AAP area. An open buffer is proposed between that residential area and the major development site in the AAP.
- 5.20 The newts have not been found on the AAP land. There is no evidence that the proposed development would harm the status of the newts. On the other hand, there is evidence that the proposal could incorporate features which would enhance that status. Such features could include an open corridor of land along the southern edge of the developed area: such an open area would also allow recreational access to undeveloped areas to the west. Drawing the boundary of the major development area along the northern edge of the park and ride site would also be likely to make a greater contribution to meeting the needs of the University than a boundary drawn back to the north.
- 5.21 The AAP is sound in respect of the southerly extent of the proposed area for development. There is robust and credible evidence to support the inclusion of land in the southern part of the area, and the inclusion of this land for development is the most appropriate strategy.

Should the Major Development Site be Divided in Two by a Central Green Corridor/Open Space?

- 5.22 The northern edge of the AAP area has a frontage to Huntingdon Road. This open land separates Girton from the built-up area of the City and fulfils an important Green Belt purpose (see 5.7 above). The separating open land should remain undeveloped in order to prevent Girton from merging with the City.

- 5.23 South of the land separating Girton from the City is the Traveller's Rest Pit Site of Special Scientific Interest. This too should be kept open because of its national geological interest (see 8.2 below).
- 5.24 The SSSI would form the basis for a central open space area within the proposed development footprint. An open space within the scheme would give the opportunity for some recreational uses to be sited away from the noise of the M11. It also enables a link to be formed with the open land separating Girton from the City, and beyond that to the corresponding open land on the north side of Huntingdon Road. South of the SSSI, there is, again, the opportunity for an open link to be retained within the site, leading to the green corridor along the north side of Madingley Road. Thus an open corridor through the development, as found elsewhere in Cambridge, could be created, and is proposed as part of the AAP.
- 5.25 The SSSI and the links from it towards Huntingdon Road and Madingley Road would provide a substantial central open space. Bearing in mind the scale of the need, and the inability of the AAP (or any rival scheme) to meet all of the need, the scale of the central open space should not be too great. In the face of the need, the Councils do not provide sufficient robust and credible evidence for the width of the open space west of the SSSI and for the spur of open land north of the SSSI. In these respects the AAP is unsound, but can be made sound by using the major development site boundaries in this area proposed by the University.
- 5.26 This would result in a central open area about 300m wide, which would have a considerable visual and environmental impact. Large space users, such as sports pitches, could be located within it and north of the park and ride site. A substantial area of open space would also be available between the footprint and the M11, and other open space provision could be made throughout the developed area, as well as in the central open space. It is possible that the western fringes of the development might offer opportunities for sports uses, dependent on investigations into air quality. These are matters for further detailed work. Multiple use of various open spaces would be possible. Masterplanning could cater for ecological considerations by providing open space within and on the edge of development areas.
- 5.27 There is no value in incorporating in the AAP another, or different, green corridor south of Girton. Relatively little of the settlement of Girton is located south of Huntingdon Road – mostly ribbon development facing the road, with a little backland development. The width of the separation between Girton and the City is determined by the extent of existing development along each side of the corridor. The separating function of open land south of Huntingdon Road diminishes with distance from the road. The new development would not be an extension to Girton as its functional relationships at the local level would be largely internal and not with Girton. Introducing additional green corridors would materially reduce the amount of land available upon which to meet the needs of the University.

Should the Open Land Outside the Major Development Site be Green Belt?

- 5.28 The preceding sections of this report determine what land should be released from the Green Belt to constitute the major development site. It remains to be decided how the land outside that site should be treated - in particular, should it be part of the Green Belt or protected as open land by some policy other than Green Belt policy?
- 5.29 Structure Plan Policy P9/2b identifies why land is to be released from the Green Belt, namely to serve the long-term development needs of Cambridge. No more land should be released than is necessary to serve those needs, and the effect of Structure Plan policy is to keep in the Green Belt the land between the development edge and the M11. A substantial area of open land would remain between the M11 and the western limit of the built-up area. The open area would be of sufficient scale to retain its Green Belt functions of safeguarding the countryside from encroachment and checking the unrestricted sprawl of the built-up area of Cambridge.
- 5.30 Policy P9/2b says that, in determining the boundaries of the areas to be released from the Green Belt, Local Planning Authorities will ensure the protection of green corridors running from open countryside into the urban area. For this reason, and for those reasons given in 5.17 *et seq* above, the green corridor north of Madingley Road should be included within the Green Belt.
- 5.31 Because of its separating function, land fronting Huntingdon Road, referred to in paragraph 5.22 above, should be retained in the Green Belt. This land connects to the north with an open corridor running alongside the settlement of Girton and connecting with the countryside to the north. The network of linear open spaces formed by the AAP proposals and their links to other open land would echo the characteristic Cambridge pattern of green corridors referred to earlier.
- 5.32 The edges of the major development site against the Green Belt have not yet been built or designed. This is a similar situation to that experienced in the case of the major development site at East Cambridge. The solution adopted at East Cambridge could be used here, with adjustments to the detailed Green Belt boundary via a review of the development plan following detailed design or construction of development. Alternatively the boundary used in the AAP could be marked by landscaping and other features to be introduced by way of masterplanning and more detailed work.
- 5.33 The submitted AAP has a robust and credible evidence base for its designation as Green Belt of the green corridors which would run through the plan area. The strategy of Green Belt designation is the most appropriate strategy. This designation would give long term protection to the green corridors. In the light of the Structure Plan Policy and of the contribution of green corridors to the character of

Cambridge, application of a non-Green Belt protective open space policy would not be appropriate.

Overall Conclusions Regarding the Development Footprint

- 5.34 Our conclusions following from the above analysis are that an area larger than the submitted major development site should be allocated in the AAP for the University and related development. This conclusion also takes account of the strength of the University's need, and the benefits of meeting that need as fully as possible, especially in terms of key worker housing and enabling residential development.
- 5.35 The principal differences between our recommended major development site and that allocated in the submitted AAP is the additional land we include on the western side of the development footprint, and the narrower (but still extensive) central open corridor. This corridor, and the open land south and west of the major development site, should be Green Belt.
- 5.36 Our conclusions have repercussions for policy wording. Most importantly, the major development site we have decided upon would have a dwelling capacity of approximately 3000, which would provide for 1500 affordable dwellings and a similar amount of market housing.

Safeguarding

- 5.37 In contrast to other Area Action Plans covering major development areas near Cambridge, this AAP has no policy to safeguard land for longer term development. Structure Plan Policy P9/2c, too, and the Cambridge Local Plan Policy for the City part of this area, have clauses to safeguard land not required for development until after 2016.
- 5.38 There is a stronger case for a safeguarding policy applying to the major development site in this AAP because of the particular circumstances of the land release. The land is valuable as Green Belt. It is being released from the Green Belt only because of the special circumstances of the University's needs. It is being released to provide for those needs and not to be developed for other purposes.
- 5.39 There is a weakness in the evidence supporting the absence of a safeguarding policy in the AAP, and the omission of such a policy is not the most appropriate strategy in view of the reasons for releasing the land and the use of safeguarding policies in comparable AAPs. The plan is unsound without a policy of this type, and satisfactory wording was discussed during the examination.

Action Needed to Achieve Soundness

5.40 The following changes are required to make the document sound:

- i) In Policy NW4, replace the figure of 73ha with that of 91ha.**
- ii) Add the following to the end of Policy NW4: "Any land not required for development by 2016 will be safeguarded for predominantly University-related development for the period post-2016 to meet the longer-term development needs of Cambridge University."**
- iii) Add at the end of paragraph 3.1 "The Structure Plan calls for any land that is not required for development by 2016 to be designated as safeguarded land to meet longer-term development needs. This site is the last major land resource of the University and should be safeguarded for University purposes over the long term."**
- iv) In Policy NW5, replace the first sentence with "Approximately 3,000 dwellings will be provided (about 1050 by 2016), with a priority on providing for University needs"**
- v) Delete the third sentence of paragraph 4.1.**
- vi) Delete the major development site as defined on the Submission Proposals Map, and on the Concept Diagram (where it is shown as "Indicative Built Environment"), and replace with the major development site as defined in the Council's consultation on the Inspectors' Larger Site Option.**

6 Main Matter 4 – Housing Trajectory and Phasing

- 6.1 At the hearing into this matter we examined the likely start date for housing development, bearing in mind the effects of the current recession in the housing market and the University's need to secure a housing developer partner, the inevitable complexity of negotiating a masterplan and legal obligation, and recent experience of other large sites being promoted in Cambridge and nearby. We conclude, and there did not appear to be substantial opinion at the hearing which differed, that a 3¹/₂ year lead-in to the first construction of houses would be likely. Taking a mid 2009 starting point, this would mean that the first houses would be built late in year 2012/2013 and would be few in number. Thereafter the build-up in annual numbers would follow something like that shown in the Housing Trajectory in the Plan. It is extremely difficult in present circumstances to be particularly confident about these annual numbers, but annual monitoring by the Councils will enable the situation to be kept under review.
- 6.2 Another variable which cannot be determined at present is the phasing of housing development and where development would start. The enlarged development footprint has implications for this,

with the possibility that the first phase might be around and include development of the local centre. This would clearly bring advantages in terms of providing necessary community facilities from the outset, but cannot be a policy requirement at present because the detailed evidence is not yet available which will enable a determination of this. There would be an additional implication of a start around the local centre in that it would probably bring development into the South Cambridgeshire part of the site at an earlier stage. Since this cannot be determined, we recommend a form of words in the reasoned justification to explain the assumption used as an addition to paragraph 10.21. This has been agreed between the Councils and the University.

- 6.3 We conclude that the Housing Trajectory in the Plan is unsound because it is not deliverable. We set out in our recommendation a revised trajectory which follows from our assessment in paragraph 6.1 above, with 50 dwellings in the Cambridge part of the site in the year 2012/13. Our best estimate at present for the timing of the first housing in the South Cambridgeshire part of the site is 75 dwelling in 2014/15. In order to assess the split in housing numbers between the City and the District we have used the ratio given in the information from the University's Masterplan framework as being the best guide at present since it is based on an assessment of development plots. We have necessarily adjusted the total number of dwellings to 3,000. Inevitably the trajectory becomes less certain as the years progress, but this will be a matter for annual monitoring by the Councils.
- 6.4 The Housing Trajectory heading and footnote are also unsound. The heading to the Trajectory refers to the period 2009 – 2017, whereas the table itself runs to 2021. At the same time, the top line headings set the period as 2009 – 2025. This lack of consistency needs correcting. At the hearing it was agreed that the whole of the Trajectory should be based on the period 2009 – 2021, which is shown on the amended Trajectory which we recommend. As to the footnote, this does not now reflect the intended total number of dwellings, and is unnecessary in the light of the addition to Paragraph 10.21 of the reasoned justification which we have already dealt with. It should therefore be deleted.

Action Needed to Achieve Soundness

- 6.5 **The following changes are required to make the document sound:**
- i) Replace the Housing Trajectory table with the following:**

Housing Trajectory for North West Cambridge (2009 – 2021)

Period 2009-2021	Projections												Total
	2009 / 2010	2010 / 2011	2011 / 2012	2012 / 2013	2013 / 2014	2014 / 2015	2015 / 2016	2016 / 2017	2017 / 2018	2018 / 2019	2019 / 2020	2020 / 2021	
Projected annual completions	0	0	0	50	250	300	450	450	575	400	375	150	3000
Cambridge	0	0	0	50	250	225	300	250	250	75	75	75	1550
South Cambridgeshire	0	0	0	0	0	75	150	200	325	325	300	75	1450

- ii) **Replace the Housing Trajectory graph with one which represents the table above.**
- iii) **Delete the footnote to the Housing Trajectory.**
- iv) **Insert the following in paragraph 10.21 of the reasoned justification before the penultimate sentence beginning "The split identified...":**

"The trajectory assumes that development will take place generally from east to west. There may be advantages in terms of place making of a central start to development around the local centre which, if deliverable, would result in a somewhat different split between districts, although the overall trajectory for the site as a whole would remain similar. Any changes to the split by district will be addressed through the Councils' respective Annual Monitoring Reports".

7 Main Matter 5 – Monitoring

- 7.1 At the hearing the Councils accepted that some of the targets set out in Table 11.1: North West Cambridge Core and Local Output Indicators are not all as clear and capable of being monitored as they could be. In addition, some of the policy references are wrong and should be corrected. In respect of Indicator NWC12 it was accepted that it is not meaningful to have a target which simply states "targets to be detailed through S106 agreement or planning obligations." As a result the plan is not sound because it would not be capable of being effectively monitored on the basis of these output indicators. However, the output indicators can be amended to make the plan sound, as set out in our recommendations below, which have been agreed at the hearing. We also recommend changes to Indicators which result from recommendations we have made relating to the number of dwellings and to the Housing Trajectory
- 7.2 In addition, the layout of the table is not easy to read. Whilst this is largely a presentational point it was agreed that the layout should be improved to make the Plan more effective.

Action Needed to Achieve Soundness

7.3 The following changes are required to make the document sound:

- i) Change Indicator NWC01 by replacing reference to "2,000 to 2500 dwellings" with "3,000 dwellings".**
- ii) Change the targets for indicator NWC04 so that they read: "(1) 100,000m² of employment and academic development. (2) Approximately 60,000m² of higher education uses, including academic faculty development and a University Conference Centre, within Use Class D1."**
- iii) Change the target for indicator NWC05 to read "100% of completed development for B1 uses in the Local Centre in units not exceeding 300 m²."**
- iv) Change Indicator NWC09 by replacing "550 dwellings" with "50 dwellings".**
- v) Change indicators NWC10 and NWC11 to both refer to Policy NW24.**
- vi) Change the target of indicator NWC12 to "Trigger points set out in s106 agreements or planning obligations"; and change the policy under column 4 to Policy NW31.**
- vii) Revise the layout of this table so that it is either in portrait format, or if remaining in landscape format, it can be read from top to bottom without turning the document through 180°.**

8 Main Matter 6 – Traveller's Rest Pit SSSI

- 8.1 This Site of Special Scientific Interest (SSSI) is inaccurately portrayed on the submitted Proposals Map. Furthermore, recent investigations have revealed that the SSSI boundaries do not correspond to the limits of the true area of national interest here.
- 8.2 The Pit has been the subject of study for many years. The SSSI was notified for its geological interest, providing a unique exposure in fossiliferous cold stage gravels, sands and silts of a high-level terrace (Observatory Gravels) of the River Cam. Artefacts from the Lower Palaeolithic era have also been found and more recent studies have discovered buried channels beneath the land. Nevertheless the northern part of the notified area consists of made ground which does not have national interest for its geology.
- 8.3 On the other hand, land to the west and south of the currently notified area contains a reserve of the Observatory Gravel which is of national geological interest.
- 8.4 Natural England therefore intends to develop a case for revising the SSSI boundary to exclude the northern part of the existing SSSI and to add land to the west and south. An indicative boundary has been

supplied by Natural England. This boundary overlaps with the boundary of the proposed development footprint in the submitted AAP. There is a very small overlap with the footprint as proposed by Cambridge University.

- 8.5 The Proposals Map does not have DPD status in its own right, but its portrayal of the SSSI is incorrect and does not accord with the area within which the national geological interest lies. This element of the Map does not agree with the evidence. The submitted Proposals Map ought to be changed to show the SSSI correctly and to show also the indicative area of national interest, which should be protected.
- 8.6 Wording changes would also assist in making the plan effective. Such changes would make plain the recent history of the SSSI, the up to date position, and that geodiversity should be protected and enhanced.
- 8.7 The land of national interest, together with a necessary 10m buffer to provide access for study and other purposes, overlaps with the major development site boundary. As only a small overlap is involved, and in view of the wording changes which should be made, the development footprint need not be changed for geological reasons. There is also the potential to protect geodiversity (and biodiversity) through masterplanning and other detailed work. However, changes to the footprint should be made for other reasons (see preceding sections of this report).

Action Needed to Achieve Soundness

- 8.8 **The following changes are required to make the document sound:**
- i) Delete the Traveller's Rest Pit SSSI as shown on the Submission Proposals Map and on the Concept Diagram, and replace with an accurate representation of the boundaries of the SSSI.**
 - ii) Show on the Proposals Map the indicative boundary of national geological interest, incorporating a 10m buffer, taken from the plan requested by the Inspectors, and supplied by the parties, for discussion at the examination hearing on 2 December 2008.**
 - iii) Add to paragraph 2.3 p), after the words "To protect", the phrase "special geological interest,".**
 - iv) Add to sub-clause 2f of Policy NW2 the words "geodiversity and" between "enhance the" and "biodiversity".**
 - v) Delete the last 3 sentences of paragraph 2.7 and replace with a new paragraph to follow 2.7, the new paragraph to read as follows:
"Consideration will need to be given as to how to protect the special geological importance of the Traveller's Rest Pit SSSI which provides a unique**

- exposure of fossiliferous cold stage gravels, sands and silts of a high-level terrace (Observatory Gravels) of the River Cam. Recent studies confirm that the special geological interest is located on the southern part of the existing SSSI and on land to its south and west, while the northern part of the existing SSSI no longer has any special geological importance. Natural England has carried out a review of the scientific information from surveys by Boreham (2008a, b & c) and Green (2008). In the light of this it appears that additional land is eligible for notification. The Local Team therefore intends to develop a case for reviewing the SSSI boundary (including additional land to the south and west and removing land to the north), although no definite timescale for this has been agreed at present. Development proposals will need to take into account advice from Natural England that a 10m buffer around the SSSI will be required during the masterplanning and planning applications stages to ensure that the scientific value of the site is not compromised by the development at North West Cambridge."**
- vi) In Table 11.1, against Indicator NWC08, add in the right hand column a further sentence, to start on a new line and to read "Protection of Traveller's Rest Pit SSSI and surrounding geodiversity".**
 - vii) In the Glossary, under the heading "Green Infrastructure", add "and geodiversity" after the word "biodiversity".**

9 Main Matter 7 – Climate Change and Sustainable Design

Should Higher Standards be required of this development than would be required by National Provisions?

- 9.1 National policy seeks sustainable development. The design of new development should be planned to limit carbon dioxide emissions and to minimise future vulnerability in a changing climate. The development at North West Cambridge is intended to be an exemplar development in this respect particularly, as indicated by Objective (c) of the AAP. National policy envisages situations where it could be appropriate for planning authorities to anticipate levels of building sustainability in advance of those set out nationally, including where there are clear opportunities for significant use of decentralised energy (see 9.10 below).
- 9.2 National policy also, in effect, requires any policy relating to local requirements for sustainable buildings (and for decentralised energy supply – see below) to be evidence based and viable. Policy NW24

requires residential development to achieve higher levels of sustainability than those of the Code for Sustainable Homes. As the purpose of the AAP is to provide a large sustainable development area in the form of an extension to the urban area of Cambridge, and bearing in mind the circumstances of this specific site, the achievement of nationally sought levels of sustainability earlier than elsewhere can be expected. The site has other advantages which should enable its development to achieve higher standards than other developments without rendering the scheme non-viable. These advantages include a relatively unconstrained greenfield site, with one landowner possessing a long-term interest in the site, and also the likelihood of decentralised energy provision. Against this background, it is reasonable for Policy NW24 to require residential development to achieve higher levels of sustainability than those of the Code for Sustainable Homes.

- 9.3 Code Level 4 has already been agreed with developers of other major sites in the City for the provision of all the affordable housing and part of the market housing. North West Cambridge is a particularly large site, with opportunities to cut costs, relative to other sites, by the provision of decentralised energy.
- 9.4 There is no date for the introduction of Code Level 5 nationally, whereas the AAP requires this Level for all dwellings approved on or after 1 April 2013. Nationally, Level 6 is presently set to be required in 2016. There is a very substantial increase in the demands imposed by Level 6 compared with Level 4, and, with delays to the start of construction (see above) compared with what was expected at the time of submission of the AAP, a greater number of dwellings will have to be built to Level 6 in any case to satisfy the present government commitment. Given the advantages of the NWAAP development, there are grounds for expecting that it should be possible to achieve Level 5 on the way to meeting the national requirement 3 years later.
- 9.5 The Policy date for applying Level 5 in place of Level 4 is intended to coincide with anticipated changes to the Building Regulations. Unqualified application to the number of dwellings approved would enable developers to avoid the Level 5 requirement by securing approval for all dwellings before the key date in 2013. The use of a limit on the number of dwellings to which Level 4 can be applied closes this loophole. The limit itself is set by the number of houses expected to be built by the key date. This number needs to be altered, as the start date for the construction of the site is delayed and fewer dwellings will be built before March 2013. With this change, clause 3e of the Policy is clear and therefore effective. There is no supporting text to explain this clause. Inclusion in the AAP of reasoned justification will make the plan effective in this respect.
- 9.6 Without the Code Level 5 requirement, the only way in which the residential development would be ahead of the Code for Sustainable

Homes would be via the application of Code Level 4 instead of Code Level 3 to 50 dwellings. This would be a missed opportunity.

- 9.7 However, at this stage, although there are general indications that the development possesses features which will assist with viability, it is not possible to assess directly the viability aspects of Policy NW24. The development is a complex mixed use scheme intended to be built over a long period of time. For example, the detailed layout, form, density distributions and phasing of the various uses are not known. Nor are the exact costs. However, Policy NW24 contains the flexibility, via clause 5, to take account of cost and technical difficulties in meeting its standards. In the situation described above, and because of the difficulties of arriving at a reliable assessment of viability, it is reasonable to rely on a viability qualification of the Policy, and this is contained in Policy clause 5.
- 9.8 In relation to water conservation, a concise policy can be achieved, in the interests of effectiveness, by deleting a lengthy sub-clause which repeats national policy, and replacing it with a reference in the relevant part of the Policy.
- 9.9 Overall we consider that there is a robust and credible evidence base for the above elements of Policy NW24. In the light of the characteristics of the site, and the evidence, the Policy (as we recommend it to be changed) passes the test of effectiveness.

Decentralised Energy Provision

- 9.10 National policy states that new development should be planned to make good use of opportunities for decentralised and renewable or low carbon energy. The advantages of this site referred to above are likely to result in opportunities for decentralised energy provision here. Hence it is appropriate for Clause 2 of Policy NW24 to require such provision, bearing in mind the viability qualification in clause 5. Alternative wording merely to require investigation of decentralised energy provision is weak and does not accord with the evidence.
- 9.11 Clause 2 of the Policy also lists the order of priority in which various forms of decentralised energy should be provided. This is too prescriptive in view of the lengthy timescale for development and the rapidly evolving background, research and knowledge concerning these forms of energy provision. Clause 2 of the Policy does not represent the most appropriate strategy, and needs to be expressed in a more general form to make the AAP sound in this regard.
- 9.12 Decentralised energy is likely to be more viable if applied to the whole site, or the majority of the site. As the exact mix, density and detailed locations of various parts of the development are not yet known, it is not possible to provide a statistical definition of how much of the development should be served by decentralised energy. The alternative formulation of the final part of clause 2 put forward by the Councils at the relevant hearing is a more appropriate

approach than that used in the submitted AAP. It allows all circumstances to be taken into account, including those where low density and/or peripheral parts of the development are not suited to decentralised provision.

9.13 Furthermore, the logical approach to this Policy dealing with countering climate change is to focus first on targets for carbon reduction and then on the means by which those targets should be achieved. Accordingly for the sake of clarity and effectiveness the Policy should be re-ordered so that clause 2 follows clauses 3 and 4 dealing with standards.

9.14 Alterations to the reasoned justification for the Policy result from the various changes. This includes a definition of decentralised energy to enable building by building solutions to be taken into account.

Action Needed to Achieve Soundness

9.15 **The following changes are required to make the document sound:**

- i) **Replace clause 2 of Policy NW24 with the following: "Decentralised energy will be required at North West Cambridge to meet the targets specified above. The form of decentralised energy system to be used will be determined on the basis of minimising carbon and greenhouse gas emissions. The system will need to serve the whole site unless there are specific circumstances which would render it inappropriate."**
- ii) **Relocate clause 2 of Policy NW24 to follow clause 4, and renumber the clauses accordingly.**
- iii) **In sub-clause 3(e) of Policy NW24, change the figure of 550 to 50 in the 2 places in which the figure occurs.**
- iv) **Before the semi-colon at the end of sub-clause 3(e) of Policy NW24, add "(these Levels include water conservation measures)".**
- v) **Delete sub-clause 3(g) of Policy NW24.**
- vi) **Delete paragraph 9.4 and replace with the following: "The Policy takes a flexible approach to energy reduction through provision of decentralised energy on the site, to ensure that the measures that would produce the greatest carbon emissions reductions are delivered as appropriate for the mix and phasing of development proposed. The term 'decentralised' refers to site-wide systems and smaller scale systems for groups or individual dwellings. There are a number of different types of decentralised energy systems, either fuelled by renewable energy or fossil fuels, which might be appropriate for use at North West Cambridge. The carbon emission savings will vary depending on the technology and fuel used. For example a renewably fuelled CHP system will have lower carbon emissions than a fossil fuelled system. This site, with its proposed mix of uses, is likely to be very suitable for**

CHP. The Policy requires that any proposals include the system that can viably deliver the greatest carbon savings for the site as a whole, bearing in mind factors such as technical and financial viability and phasing of the development. "

- vii) **Add a new paragraph after paragraph 9.7, to read:
"The housing trajectory has been used to determine the dwelling thresholds at which the CSH requirements will change. This is to ensure that a substantial proportion of the development will be delivered at higher sustainable design and construction standards, bearing in mind the overall viability of the development. It is possible that in the future the housing trajectory may change due to the changing economic climate, and as such these dwelling thresholds would be amended accordingly. Thresholds will be revised in consultation with developers, through the Councils' Annual Monitoring Reports."**

10 Main Matter 8 – Travel

Can a Modal Share of No More Than 40% of Trips by Car be Achieved?

- 10.1 Policy NW11 of the AAP aims to achieve a maximum car modal share of 40%. This is to be done by the provision of local facilities such as primary schools within the development, a high quality public transport system, infrastructure to encourage cycling and walking, controls on car parking, and other means such as car sharing facilities and travel planning.
- 10.2 Although much of the site is not within convenient walking distance of the City Centre for many people, many educational and other facilities will be located within the development itself, as will considerable sources of employment. The majority of dwellings to be built on the site are intended for those studying or working at the University and related employers. The site will remain in the ownership of the University, which is committed to a sustainable approach and which, for example, operates a bus service connecting West Cambridge with Addenbrooke's Hospital and University sites *en route*. The staff travel survey carried out by the University shows that in 2008 only 22% of its staff drove alone to work. The car sharing scheme operated by the University is now running on a more formalised basis and offers the potential to increase the share of this mode of travel.
- 10.3 Residential travel planning would inform residents of the opportunities for non-car travel. This is an emerging tool which can help to reduce the need to travel and boost alternatives to the car. Surveys in Cambridge and London indicate reduced single car occupancy and car travel in connection with specific measures to achieve this. The daily patterns of movements undertaken by

students can be complex, but this militates against car use, and there is little parking available for students.

- 10.4 Both student and staff parking are strictly controlled by the University. Not only is this control likely to assist in encouraging more sustainable forms of travel, but it is also likely to help prevent overspill parking from affecting areas outside the site. The experience of the local authorities in Cambridge is that such parking can be prevented. Design measures and controls are available to that end.
- 10.5 The AAP land falls within the area considered in the North West Cambridge Transport Study. The analysis leading to the choice of 40% as a realistic modal share is based on a methodology which has been used in connection with the planning of significant development sites in Cambridgeshire over a 5 year period. The methodology is evidence-based, uses local knowledge, and has been the subject of consultation involving various transport consultants.
- 10.6 Comparison with areas within and outside the City has been undertaken, bearing in mind that the AAP land is on the edge of the City. Using data from the 2001 Census, a 2001 survey, and the TRICS database, suggested mode shares were arrived at for the development. These were then adjusted to take account of the package of sustainable transport measures planned for the development. It should also be borne in mind that since 2001 there have been considerable improvements in public transport provision in Cambridge, and specific provision for the AAP development is proposed. This indicated a likely reduction in car mode share of 8% from the suggested level (from 45% to 37%). Testing by the use of SATURN modelling suggested that the proposed modal share is realistic.
- 10.7 A Travel Plan will be used to assist in securing the delivery of a sustainable development. This Plan will be monitored to ensure that the desired modal split is reached or bettered. Should there be difficulties in this area, contingencies could be met by a number of measures such as investing more in the public transport system, diverting funds from unsuccessful actions to measures which are succeeding, and by introducing measures from other strategies including the Local Transport Plan and local authority strategies. The Section 106 agreement provides the mechanism for dealing with difficulties in driving down car use, and the AAP is flexible in this respect.
- 10.8 Having regard to the methodology and sources used, the characteristics of the development, and the sustainable transport measures proposed, we conclude that the modal share level aimed at in Policy NW11 should be achievable. There is a robust and credible evidence base for it, and the AAP is likely to be effective in achieving it.

10.9 As the evidence is for travel to work, and as monitoring will cover this type of travel, it is this travel to which the Policy should refer. In addition, as car sharing and car clubs are to be 2 of the means by which sustainability is to be improved, the 40% figure should exclude trips by car passengers.

Would the Development Result in Unacceptable Levels of Congestion?

10.10 Huntingdon Road and Madingley Road are 2 of the main radial routes into Cambridge. There is substantial queuing of traffic on them in the peak periods, back towards the proposed site accesses from junctions giving access to the City Centre. Queues also form at light-controlled junctions on Madingley Road west of the proposed access point to the site from that road.

10.11 The general growth of traffic will result in severe congestion on these roads by 2025 or an earlier date. Congestion results in delays and inconvenience to individuals travelling to and from work and other destinations. It also has wider impacts. Buses are delayed, cycling becomes less pleasant, and non-car modes of travel are rendered less attractive. Pollution increases.

10.12 There are harmful effects on the economy of Cambridge as a result of congestion in the City and wider area generally. Footloose companies already established in the City may be driven to leave the area and new companies are less willing to set up in Cambridge. The ability of the City to boost the national economy is reduced.

10.13 The development proposed in the AAP will add to overall traffic growth and therefore to congestion. These harmful effects of the proposed development must be taken into account in deciding whether or not to allocate the land for development. The harm needs to be viewed in the context of an overall strategy for the sub-region of locating growth in Cambridge and on the edge of the City. This strategy has been tested through the Structure Plan and regional planning processes. It is the most sustainable approach to the growth of the Cambridge area, which is an important contributor to the economic well-being of the region and nation.

10.14 The likely contribution of the AAP development to traffic growth would be relatively small – of the order of 1% of the growth. The increase in this contribution as a result of extending the development footprint as indicated above is marginal. The site is located on the edge of the City. The proposal includes a package of sustainable transport measures which should support a relatively low level of car use, bearing in mind the ownership of the site by the University and other factors rehearsed above. The use of this site for the major development proposed is preferable to the use of less sustainable land further from the City. The growth in congestion will arise partly because of the dispersed growth strategy previously pursued in the area.

- 10.15 Given the traffic flows predicted, and the sustainable transport measures to form part of the development, the expert evidence does not point to a harmful increase in congestion on the Strategic Road Network near the AAP land. During the construction phase, the impact of construction vehicles on traffic flows on the M11 and A14(T) could be managed by controlling the routes used and the timing of HGV visits. Noise and air quality effects on the development, from M11 and A14 traffic, are matters which can be accommodated during detailed masterplanning of the site, working within the overall development footprint allocated by this plan. However, in view of the extension westwards of the development footprint we are recommending, the evidence of traffic noise and pollution and the need for an effective response to these problems requires a stronger acknowledgement of the need to take account of these factors.
- 10.16 Harm from congestion, added to the harm to the Green Belt functions of the land, must be weighed in the balance against the needs for and benefits of the development. Because of the factors set out in the 2 preceding paragraphs, and the substantial importance of the development in local, regional and national terms, we conclude that traffic and congestion harm, considered with Green Belt harm, is outweighed by the positive features of the proposal. Congestion resulting from the development has to be accepted as a result of desirable growth. The allocation of the major development site is the most appropriate strategy.
- 10.17 With regard to Policy NW15, the provision of highway infrastructure to serve the development will be made in a variety of different circumstances and the timing of provision in relation to the construction or occupation of the development element to be served will vary. The wording of Policy NW15 does not reflect this and the AAP fails the test of effectiveness as a result. The Policy should reflect the circumstances likely to be met, in order to remedy the deficiency.

Action Needed to Achieve Soundness

10.18 The following changes are required to make the document sound:

- i) Replace the final clause of the first sentence of Policy NW11 with the following: "to achieve a modal share of no more than 40% of trips to work by car (excluding car passengers)".**
- ii) Replace the second line of paragraph 6.3 with "reduction in the modal share for journeys to work by car drivers (reducing the modal-----"**
- iii) Replace Policy NW15 with the following: "Highway provision will be funded by development, as appropriate, and the provision of key links will be timed to relate to the commencement of development, or to the first occupation, of the relevant phase of development."**

- iv) **Add to paragraph 2.8 an additional, penultimate, sentence "Masterplanning and the detailed planning application process will need to determine the appropriate disposition of uses, location and design of buildings, and mitigation measures."**

11 Other Matters

Education

- 11.1 It is likely that 2 primary schools will be required for the scale of residential development proposed. The wording of the AAP allows for only one school. This does not accord with the evidence, is not the most appropriate strategy, and would not be effective in meeting the educational requirements of the population of the scheme. A simple wording change would remedy the situation and make the AAP sound.
- 11.2 On the other hand, the Local Education Authority does not require a secondary school to be located in this development. A new school, to respond to the increased development in the wider area of North West Cambridge, could be provided on the large site to be released for development between Histon Road and Huntingdon Road. A secondary school on the AAP land would not accord with Structure Plan policy. This valuable land is to be released only because of the University's needs, and for predominantly University-related uses. A secondary school which would meet the needs of the north-western sector of the City as a whole would not fall within these categories. National policy, and the AAP, allow for the AAP development to meet its share of school provision costs.

Road Access

- 11.3 At the time of submission of the AAP the location of the access from the development onto Huntingdon Road at the Girton Gap was not settled. An access along the western edge of the Girton Gap offers advantages over other solutions and the AAP should indicate that this will be the location of the access.
- 11.4 It is likely that a secondary access from Madingley Road will be required as well as the main southern access into the development from that road. However the location of the secondary access is a matter for masterplanning and it would be misleading to suggest such a location now. However given the likely need for the access the possibility of its provision should be stated.

Provision for a household recycling centre

- 11.5 The County Council contends that the Plan fails to have full regard to the adopted Cambridgeshire Waste Local Plan 2003 and the emerging Cambridgeshire and Peterborough Minerals and Waste Plan. It seeks to have text added which refers to the adopted Waste

Local Plan and the emerging Minerals and Waste Plan, and that the former identifies all major new developments as preferred locations for waste management facilities. It refers to its Household Waste Recycling Centre Strategy, December 2006, and that new Recycling Centres to serve Cambridge will need to be located in developments associated with, among others, the northern part of Cambridge. It suggests that there is an option site in North West Cambridge which remains valid.

- 11.6 However, it is not the role of the AAP to include policies for waste. Nor should the AAP repeat policies which are in other parts of the development plan, or attempt to interpret them. The Waste Local Plan does not identify any site required for waste management within North West Cambridge. Indeed, the extract from the Minerals and Waste DPD Preferred Options 2 attached to the local planning authorities' statement shows a site that is not within the area covered by this AAP and which is identified as not preferred by the County Council. Should it be determined through the Minerals and Waste DPD process that such a facility is required within the North West Cambridge AAP area, the masterplanning process allows all parties interested in waste management to plan provision as necessary. We conclude that the plan is sound in this respect.

Glossary

- 11.7 It has been drawn to our attention that the definition of a 'Local Centre' in the Glossary does not conform to the definition given in PPS6: Planning for Town Centres, in so far as it omits 'small supermarket' from the typical range of shops in such a centre, referring only to a general grocery store. We note that the reasoned justification for Policy NW21: A Local Centre sets out a range of services and facilities which, as far as retailing is concerned, simply includes "b. An appropriate level of local shopping and other services", and that the AAP relies on the definition of a local centre set out in the Glossary. Soundness requires that DPDs are effective and consistent with national policy. The document would be sound if the definition of local centre in the Glossary included a reference to 'small supermarket'.

Proposals Map and Concept Diagram

- 11.8 There are some errors on the Concept Diagram and the Proposals Map. The Key to the Diagram omits the background colour notation for the Park and Ride site. The Proposals Map wrongly indicates a Green Belt designation for the south-eastern corner of the AAP, a site which is not now in the Green Belt and which will be comfortably within the built-up area when the development is constructed. There is also a small discrepancy between the AAP boundary and the major developed site to the rear of properties fronting Huntingdon Road. The land is owned by the University and has been included in the major developed site in public consultation.

Action Needed to Achieve Soundness

11.9 The following changes are required to make the document sound:

- i) Express the term "(a) primary school" in the plural in Policies NW17 and NW18, and in paragraphs 7.8, 7.10, 7.10a, and 7.10d.
- ii) Remove from the Concept Diagram the notation "B2" denoting an access at the eastern side of the Girton Gap and amend notation "B1" to "B". Add the correct colour to the Park and Ride notation on the Key to the Concept Diagram.
- iii) Delete the last sentence of paragraph 6.7 and replace with: "The new road linking to Huntingdon Road will be located on the western side of the strategic gap to provide a staggered junction with development proposed to the north of Huntingdon Road. It will need to be designed to avoid impacts on the purposes of the Green Belt and the amenity of the strategic gap within the development area. The existing buildings in the Green Belt on the eastern side of the strategic gap should be demolished and the area returned to open countryside to maximise the openness of the Green Belt."
- iv) Delete the final sentence of paragraph 6.6 and replace with: "A secondary access into the development from Madingley Road may be required to serve the eastern part of the site. The potential need for, and purpose of, a secondary access will be explored through masterplanning and any planning application and associated transport assessments. If the need for a secondary access is demonstrated, the decision on the most appropriate route for such a road will have regard to the environmental and landscape impact of any such road on the immediate and wider area, the impact on residential amenity and the operation of existing activities, land ownership constraints and deliverability, and timing and phasing in relation to the development."
- v) Amend the definition of 'local centre' in the Glossary to include a reference to 'small supermarket'.
- vi) Delete the Green Belt notation on the Proposals Map from the land in the south-eastern corner of the AAP area shown as open space.
- vii) Amend the Submission Proposals Map so that the boundary of the AAP follows the boundary of the major developed site to the rear of properties fronting Huntingdon Road west of the City/District boundary.

12 Minor Changes

12.1 The Councils agree that some minor changes to the submitted DPD should be made in order to clarify, correct and update various parts of the text. Although these changes do not address key aspects of soundness, we endorse them on a general basis in the interests of clarity and accuracy. In addition, the Preface refers to the submission process and consultation. Its content will have been overtaken by the adoption of the Plan and it should be deleted.

Action Needed to Achieve Soundness

12.2 **The Councils agree to the making of the following minor changes, which should be put into effect:**

- i) **Add to the end of paragraph 9.8 "It should be noted that the requirements of the 2006 Building Regulations will be taken as the baseline for the 20% renewable energy target."**
- ii) **In paragraphs 6.8, 6.14 and 6.18 change references to "Histon Road" to read "the B1049 (Histon Road/Cambridge Road)".**
- iii) **Delete the Preface.**
- iv) **Identified typing errors should be corrected and the text should be updated as identified in the Councils' 'Fact Check' Table 2, so long as substantive changes are not made which have not been the subject of consultation.**

13 Overall Conclusions

13.1 We conclude that, with the amendments we recommend, the North West Cambridge Area Action Plan DPD satisfies the requirements of s20(5) of the 2004 Act and meets the tests of soundness in PPS12.

Cliff Hughes
Terry Kemmann-Lane

INSPECTORS