

Matter 11.3: Joint Omission Sites – North of Barton Road

North Barton Road Land Owners Group

Cambridge City Council Id. 5336

South Cambridgeshire District Council Id. 21302

Rep Id Nos. CCC 27506 and 6619, SCDC 59582 and 59608

Local Plan Examinations

Cambridge and South Cambridgeshire

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1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Carter Jonas LLP on behalf of the North Barton Road Land Owners Group (North BRLOG) for Matter 11.3 Joint Omission Sites – North of Barton Road. North BRLOG comprises four landowners, as follows: Corpus Christi College, Downing College, Jesus College, and University of Cambridge. North BRLOG owns land to the North of Barton Road which is on the south western built-up edge of Cambridge. The Site is currently located within the Green Belt. It crosses the administrative boundary between Cambridge City and South Cambridgeshire.
- 1.2 Matter 11.3 is a joint session with St John’s College, who are promoting land at Grange Farm. The University of Cambridge also own the West Cambridge site which is located to the north of both Grange Farm and the North BRLOG site (allocated in Policy 7/6 of Cambridge Local Plan 2006 and Policy 18: West Cambridge Area of Major Change of Draft Cambridge Local Plan 2014).
- 1.3 A plan showing the different landownerships is provided in **Appendix 1**.
- 1.4 There are three potential development sites on the western edge of Cambridge between Maddingley Road, Barton Road and the M11; West Cambridge owned by University of Cambridge, Grange Farm and North of Barton Road. The Greater Cambridge City Deal project includes two projects that affect land to the west of Cambridge; the Cambourne to Cambridge A428/A1303 Corridor and the Western Orbital Route.
- 1.5 There is agreement between most of the landowners of land to the west of Cambridge (University of Cambridge, St John’s College and North BRLOG) that a co-ordinated development could be delivered in this location with appropriate transport connections and an orbital cycle route providing links between housing and employment. The three potential development sites are controlled by like-minded organisations that want the success of Cambridge to continue, take a long term view of development opportunities, retain an interest in the ownership and management of sites, and deliver high quality and award winning projects.
- 1.6 The North of Barton Road and the Grange Farm sites are promoted separately, and can be delivered independently of one another with no landownership or highway access constraints. The Composite Scheme Illustrative Masterplan (submitted with North BRLOG representations to Local Plan Modifications in January 2016) show how a combined development could look if both sites were allocated. For ease of reference the Illustrative Masterplan is provided in **Appendix 2**.

Previous Representation Documents

- 1.7 In summary, representations and statements have been made on behalf of North BRLOG as follows:
- In 2013 representations were submitted on behalf of North BRLOG to Draft Cambridge Local Plan 2014 (draft CLP2014) and Draft South Cambridgeshire Local Plan (draft SCLP).
 - In January 2016 representations were submitted to the Local Plan Modifications.
 - In October 2014 hearing statements were submitted for the first block of strategic matters: Matter 2: Overall Spatial Vision & General Issues, Matter 3: Housing Need, Matter 3b: Housing Need Methodology, and Matter 5: Infrastructure/Monitoring/Viability.
 - In January 2015 hearing statements were submitted for the second and third block of strategic matters: Matter 6: Green Belt, Matter 7: Transport and Matter 8: Housing Land Supply & Delivery. A Written Statement was submitted for Matter 9b: Cambridge East.
 - In May 2016 hearing statements were submitted for the strategic proposed modifications sessions: Matter PM1A: Objectively Assessed Housing Need, Matter PM1B: Housing Supply & Joint Trajectory, and Matter PM2: Green Belt Review Methodology.
 - In February 2017 a Hearing Statement was submitted for Matter SC6C: Policy SS/6 New Village at Bourn Airfield.
 - In April/May 2017 Peter Brett Associates, on behalf of North BRLOG, contributed to the Transport Modelling Principle Issues Note for the reconvened Matter 7: Transport session (which is due to take place on 4th July 2017).

Representations to City Deal Consultations

- 1.8 In the Matter 5: Infrastructure/Monitoring/Viability and Matter 7: Transport hearing statements and hearing sessions the Greater Cambridge City Deal project was discussed. The City Deal project is particularly relevant to the draft CLP2014 and draft SCLP because the delivery of new transport infrastructure is necessary to make the proposed strategic sites to the west of Cambridge, i.e. the extension at Cambourne West and the new settlement at Bourn Airfield, sustainable and acceptable in transport terms. The City Deal is expected to provide a significant proportion of the funding for high quality public transport improvements on the A428/A1303 Corridor, and this is included within Tranche 1 funding. As set out above, there are two City Deal projects that affect land to the west of Cambridge, and representations were submitted on behalf of North BRLOG to consultation events for these projects. In November 2015 representations were submitted to

the Cambourne to Cambridge A428/A1303 Corridor consultation, and these are provided in **Appendix 3**. In March 2016 representations were submitted to the Western Orbital Route consultation, and these are provided in **Appendix 4**.

- 1.9 The work to identify a preferred route and detailed design for the high quality public transport improvements on the A428/A1303 Corridor has not been completed. However, whichever route option is selected the University's West Cambridge site will become a transport hub, and the existing public transport services and cycling and walking connections will improve in the western part of Cambridge.

- 1.10 The Western Orbital Route improvements are expected to be funded through City Deal Tranche 2 funding. North BRLOG supports a Western Orbital Route to the east of the M11, a Park & Ride site located to the north east of Junction 12 of the M11, and improvements to the cycle route along Barton Road. North BRLOG owns the land which might deliver these improvements. It is willing to assist in the delivery of the Western Orbital Route and associated infrastructure, and to contribute towards the funding of that infrastructure in conjunction with development on land north of Barton Road which it is pursuing through draft CLP2014 and draft SCLP.

2. PREVIOUS REPRESENTATIONS

- 2.1 We set out below a summary of our previous representations. We maintain our position that the Draft CLP2014 and Draft SCLP are unsound.
- 2.2 Draft CLP2014 and draft SCLP have given inadequate weight to the assessment of sustainability matters in the Sustainable Development Strategy November 2012 [Doc Ref. RD/Strat/040], and this approach is unchanged in the Development Strategy Update Report November 2015 [Doc Ref. RD/MC/060]. These documents identified the significant sustainability advantages of locating development on the edge of Cambridge, compared to other alternatives that have been selected by the two Councils. The sole reason that additional land on the edge of Cambridge has not been selected is the Green Belt designation. The Councils have inappropriately treated this as a factor which overrides all other sustainability considerations, irrespective of how they balance. The strategy has therefore been driven by a single issue at the expense of other key planning considerations.
- 2.3 The Councils accept that exceptional circumstances exist to justify the release of land from the Green Belt, as confirmed in Paragraph 2.54 of Draft CLP2014 and Paragraph 2.32 of Draft SCLP which relate to the need for jobs and homes. We agree that exceptional circumstances do exist, but consider that the housing requirement is far higher than the proposed target in Draft CLP2014 and Draft SCLP, and as result additional land should be released from the Green Belt in a sustainable location on the edge of Cambridge to meet that housing need. CSa commented on the methodology for the Inner Green Belt Study in the hearing statement for Matter PM2.
- 2.4 We commented on the housing requirement in Section 6 of our Draft CLP2014 Representations Report and Draft SCLP Representations Report. GL Hearn assessed housing need for North BRLOG and others. The latest position on housing need, as contained in the hearing statement for Matter PM1A: Objectively Assessed Housing Need (prepared by GL Hearn) is as follows:
- 15,200 dwellings in Cambridge between 2011 and 2031 (760 dwellings per year);
 - 27,000 dwellings in South Cambridgeshire between 2011 and 201 (1,350 dwellings per year);
 - The alternative housing need figure is not based on assuming all people live where they work, but that current commuting patterns are maintained and that affordability will be improved so that young people can form households at 2001 levels.
 - The combined alternative housing need figure for Cambridge and South Cambridgeshire - at 2,110 dwellings per year - is equivalent to the level

envisaged previously in the East of England Plan.

- 2.5 We commented on the delivery of new settlements and housing delivery in our Representation Report to Draft SCLP. There will be significant delays in the delivery of the new settlements, the upfront infrastructure costs and planning obligation requirements would affect the viability of the new settlements, and the new settlements will inevitably not deliver policy compliant levels of affordable housing.
- 2.6 In our previous representations we highlighted the transport related sustainability credentials of development on the edge of Cambridge compared with new settlements. We also raised concerns about the delivery timetable and funding available for the transport infrastructure required for the new settlement at Bourn Airfield.

Summary of Representations

- 2.7 The significant sustainability advantages of locating development on the edge of Cambridge have been identified and acknowledged, but then dismissed by the Council in the development strategy. The sole reason that additional land on the edge of Cambridge has not been selected is the Green Belt designation. The Councils have inappropriately treated this as a factor which overrides all other sustainability considerations, irrespective of how they balance. The strategy has therefore been driven by a single issue at the expense of other key planning considerations.
- 2.8 The development strategy is unsound because:
- it fails to consider all three dimensions of sustainable development jointly and simultaneously (NPPF Paras. 7 and 8);
 - it is contrary to the core planning principles (NPPF Para.17);
 - it does not support the economy of Cambridge, which has an international reputation, in that research facilities and high technology companies want to locate within or as close to the City as possible (NPPF Paras. 19 and 20);
 - it fails to promote future travel by sustainable modes of transport (NPPF Para. 30);
 - it will not meet housing need objectives (NPPF Para. 47); and,
 - it will not address the housing supply and demand in the Cambridge area, and significant affordability pressures (NPPF Para. 47).
- 2.9 In summary, we have previously requested the following changes:
- The housing target for Cambridge should be increased to 15,200 dwellings between 2011 and 2031. If those needs cannot be met within Cambridge then

they should be met within South Cambridgeshire with associated increases to the housing requirement in Draft SCLP.

- The housing target for South Cambridgeshire in Policy S/5 should be increased to 27,000 dwellings between 2011 and 2031. The unmet needs from Cambridge should be met within South Cambridgeshire through the DtC and added to the requirement in Draft SCLP.
- The Green Belt boundary should be reassessed in conjunction with the delivery of sustainable development and in particular meeting full objectively assessed housing needs.
- That land north of Barton Road is released from the Green Belt and identified as a strategic site allocation.
- All references to a joint housing trajectory are deleted from Draft SCLP.
- A more robust assessment of the sites is undertaken and the housing trajectory is adjusted accordingly. We note that South Cambridgeshire cannot demonstrate a 5 year housing land supply – the South Cambridgeshire AMR 2016 (Doc Ref RD/AD/480] states that 3.7 years supply exists when the correct method of a 20% buffer because of persistent under-delivery and the Sedgefield approach to meet the current housing shortfall is applied.
- The findings of the Bidwells' Report 'Assessment of the Deliverability of Sites from the Housing Trajectory' (submitted with Matter 2 and Matter 8 statements) is taken into account in assessing the soundness of the new settlements. There will be significant delays in the delivery of the new settlements, the upfront infrastructure costs and planning obligation requirements would affect the viability of the new settlements, and the new settlements will inevitably not deliver policy compliant levels of affordable housing. In contrast, the evidence in the Bidwells' Report demonstrates that, unlike new settlements, the urban extensions to Cambridge are delivered quickly, remain viable, and do provide policy compliant levels of affordable housing.
- The proposed new settlement at Bourn Airfield is deleted.

2.10 There is a need to address the current housing land supply shortfall, and for a robust assessment of housing delivery to be undertaken in a revised housing trajectory. As set out above, we conclude that the housing target should be increased, and that the proposed new settlement at Bourn Airfield should be deleted. All of the above factors, both individually and combined, indicate that additional land for housing needs to be identified in draft CLP2014 and draft SCLP and as such we request that land north of Barton Road is allocated. In the next section deal with identify the site specific merits of land north of Barton Road for a residential-led urban extension in the context of the NPPF tests of soundness.

3. MATTER 11.3 - LAND NORTH OF BARTON ROAD

i. Is the Plan unsound without the allocation of Land North of Barton Road, as proposed in the relevant representations, and if so why?

- 3.1 In Section 2 we explained how the proposed development strategy contained on draft CLP2014 and draft SCLP is unsound. In summary, the housing target is insufficient to meet housing and affordable housing needs. The development strategy is flawed and is unsustainable because it would direct development away from Cambridge. The Green Belt has been incorrectly treated as an absolute constraint. The land north of Barton Road is needed to deliver a sustainable development strategy, to meet the housing and affordable housing needs, and to support the economy of Cambridge.
- 3.2 We consider that draft CLP2014 and draft SCLP are unsound without the allocation of land north of Barton Road.
- 3.3 Land to the north of Barton Road could provide student and key worker housing alongside market housing; the fact that this Site is owned by a consortium of Colleges and the University means that it would be in the landowners' interests to ensure that housing is provided to meet the needs of their students and research staff, and that those facilities could be managed by those institutions. Cambridge has an international reputation for higher education, research institutions and high technology businesses, and it is a driver of the UK economy. We believe that development which supports those uses, including housing for students and key staff, should be actively supported through policies and strategic allocations.
- 3.4 The Site is well-related to West Cambridge and other employment facilities in the City. It is also the case that research facilities and high technology businesses want to be located within Cambridge, in order to be connected to one another and to maintain existing relationships. There is no interest from such facilities or businesses to relocate far beyond the edge of Cambridge, and certainly not to locations elsewhere in Cambridgeshire or to the new settlements. Sustainability is enhanced when employment and housing are provided together.
- 3.5 The land to the north of Barton Road represents one of the most sustainable locations for development on the edge of Cambridge. The Site is likely to successfully encourage the use of public transport and cycling for journeys to work.
- 3.6 The development at land to the north of Barton Road would be contained within the boundary of the M11 corridor. The M11 corridor could become the new boundary

for the Green Belt on the edge of Cambridge. The Site would need to incorporate strategic landscaping and other landscape enhancement measures, alongside open space and recreation facilities. A wildlife reserve and country park would be provided as part of the Site to enhance ecology. The Site would include a substantial amount of green infrastructure and strategic landscaping, to acknowledge the fact that it is currently located within the designated Green Belt and is on the edge of the City. The Site would be sustainable in transport terms by providing connections to the existing and planned cycle network and by reducing the need to travel by private motor vehicle. The Site would have no significant effect on the purposes of the Cambridge Green Belt, as it has only a localised effect on the setting of the City and would not lead to coalescence with outlying villages. Any development on the Site would not be at risk of flooding or cause increased flood risk to others. The areas of greatest archaeological potential are outside or on the northern and western edges of the Site and any development would avoid such area, and as such there are no archaeological constraints to the principle of development.

- 3.7 The benefits of development at land to north of Barton Road and to the west of Cambridge, include;
- An accessible country park with connections to Coton Countryside Reserve;
 - Other green infrastructure and strategic landscaping to address visual impact and provide a buffer with the M11 to address noise and air quality impacts;
 - Improve walking and cycling routes to encourage travel by non-car modes of transport;
 - Potential land for A1303 bus corridor improvements, which is a City Deal project;
 - Potential land for Western Orbital Route, which is a City Deal project and to create additional north south public transport and cycle routes, and provide connections to existing developments at NW Cambridge, West Cambridge and Addenbrookes/Cambridge Biomedical Campus;
 - Housing and affordable housing for key workers; and
 - New local centre for the west Cambridge area.

Findings of SA Addendum Report

- 3.8 The SA Addendum Report assessed land north of Barton Road (Broad Location 2 – Land North of Barton Road Site Ref: CCSC1001 – see pg. 171 to 182 of Annex 1 (Part 2)) against the sustainability criteria. Our comments on the following findings of the Site Assessment in the SAA Report are as follows:
- The air quality, noise and pollution matters do need to be investigated further, but built development at the Site would be located some distance away from the M11;

- The initial ecological surveys of the Site have been undertaken and the existing features would be retained and enhanced within the proposed development;
- The landscape, townscape and Green Belt impacts could be addressed through strategic landscaping and green infrastructure measures;
- The Green Belt score for the Site of 'dark red' is incorrect, which clearly indicates that Green Belt is the over-riding factor in decisions about the preferred development strategy and that no planning balance has been undertaken between sustainable development and the Green Belt;
- The Site is located adjacent to the employment and research facilities at West Cambridge;
- The Site is located adjacent to existing cycle and bus routes, and the proposed development is capable of delivering improvements to public transport and cycling facilities;
- The proposed development would provide new local and community facilities and it would connect with existing and planned services and facilities in neighbouring areas and the City Centre, making it more likely that residents would use non-car modes of transport for journeys; and
- The planned City Deal projects in the vicinity of the Site have not been included within the assessment process. The proposed development at land north of Barton Road, and other land to the west of Cambridge, would derive sustainability benefits from the A428/A1303 Corridor and the Western Orbital Route projects. Furthermore, development at North BRLOG could provide land and additional funding for these City Deal projects.

New Policy – Land North of Barton Road

- 3.9 We request that land to the north of Barton Road is identified as a strategic site. The site should comprise the following uses:
- Residential development – approximately 1,500 dwellings;
 - A school;
 - A local centre;
 - Open space and recreation areas;
 - A substantial amount of green infrastructure;
 - Relocated sports pitches for Colleges;
 - Cycle and footpath links to surrounding area; and
 - Access roads.
- 3.10 In our original representations to draft CLP2014 and draft SCLP we requested a new site specific policy for land north of Barton Road which is similar to the other strategic sites, and that an Area Action Plan should be prepared to inform the detailed design and layout of the proposed development. The requirement for an AAP has been deleted from the new settlements and other strategic sites, and as

such it would be inconsistent to provide such a document for land north of Barton Road.

- 3.11 We set out below the key principles of new policy for land north of Barton Road, which is based on the Promotion Document (prepared by FPCR). The content of the new policy is based on Policy SP/2 (North West Cambridge Huntingdon Road to Histon Road) in South Cambridgeshire Site Specific Policies DPD [see pg.11 of Doc Ref. RD/AD/120], which is a site on the edge of Cambridge that was released from the Green Belt previously.

NEW POLICY: Land North of Barton Road, Cambridge

- Land north of Barton Road is allocated as a sustainable housing-led urban extension to Cambridge for approximately 1,500 dwellings including affordable housing. The development will also provide local services and facilities including primary school, local centre, community facilities, outdoor sport and recreation facilities, and open space.
- Vehicular access to the site will be provided from Barton Road.
- The site will connect with the existing and planned walking, cycling and public transport network in the local area to provide a highly accessible development that supports sustainable travel.
- The Green Belt boundary in this location is revised to accommodate development.
- A Masterplan for the allocated site will be prepared to demonstrate that the development will integrate effectively with the wider west Cambridge area. The Masterplan will set out the main principles for the development, including design.
- A Landscape Strategy will be prepared for the site which respects the Green Belt setting of Cambridge and key views of the City.
- A Countryside Enhancement Strategy will be prepared for the site to provide landscape, biodiversity, and public access enhancements including new footpaths, cycleways and bridleways.
- A Surface Water Drainage Strategy will be prepared for the site to manage surface water run-off and flood risk.
- A Noise Impact Assessment will be prepared for the site to mitigate noise impacts from the M11.
- An Air Quality Assessment will be prepared for the site to mitigate air quality impacts from the M11.
- A Construction Strategy will be required for all phases of development at the site.

Conclusions

3.12 In conclusion, land north of Barton Road needs to be allocated as a residential-led strategic site for the following soundness reasons:

- There is a need for additional sites including land currently within the Green Belt to meet the housing and affordable housing needs of Cambridge and South Cambridgeshire. **[positively prepared and consistent with national policy]**
- It is sites on the edge of Cambridge that are delivered quickly, remain viable, and can deliver policy compliant levels of affordable housing. **[positively prepared and consistent with national policy]**
- It is sites on the edge of Cambridge that connect housing with employment and deliver enhanced sustainability outcomes, including by providing housing close to the research facilities and high technology businesses located within Cambridge. **[effective and consistent with national guidance]**
- It is land north of Barton Road which is owned by the University of Cambridge and a number of Cambridge Colleges that would provide housing to meet the needs of students, research staff, and key workers to benefit the local economy. **[consistent with national policy]**
- The land north of Barton Road is one of the most sustainable locations for development on the edge of Cambridge, with excellent access to West Cambridge, NW Cambridge, the City Centre, and Addenbrookes/Cambridge Biomedical Campus. **[effective and consistent with national policy]**
- The location of land north of Barton Road would encourage the use of public transport and cycling for journeys to work. **[consistent with national policy]**
- The land north of Barton Road could assist with the delivery of City Deal projects during the plan period, including a Western Orbital Route to the east of the M11, a Park & Ride site located to the north east of Junction 12 of the M11, and improvements to the cycle route along Barton Road. **[positively prepared and consistent with national policy]**