### M2/CCC & SCDC



Examination into the Soundness of the Cambridge Local Plan and South Cambridgeshire Local Plan

# Matter 2 – Overall Spatial Vision and General Issues

Joint Matter Statement by Cambridge City Council and South Cambridgeshire District Council

October 2014

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#### **List of Abbreviations**

DPD	Development Plan Document
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme

NPPF National Planning Policy Framework

SA Sustainability Appraisal

SCI Statement of Community Involvement SCS Sustainable Community Strategy SEA Strategic Environmental Assessment SPD Supplementary Planning Document

TSCSC Transport Strategy for Cambridge and South Cambridgeshire

#### Introduction

- 1. This statement sets out both Councils' response in relation to Matter 2.
- 2. The Councils' key evidence in relation to overall spatial vision and general issues is Appendix 1. Documents are referred to with their reference document number throughout the statement.

Matter 2a: Is the overarching development strategy, expressed as the preferred sequential approach for new development, soundly based and will it deliver sustainable development in accordance with the policies of the National Planning Policy Framework?

#### **Introduction**

- 3. The Submitted Cambridge Local Plan and South Cambridgeshire Local Plan, both individually and taken together, provide a soundly based sustainable development strategy for the Greater Cambridge area that accords with the policies of the NPPF. Greater Cambridge is the term now embodied in the City Deal signed with Government for Cambridge and South Cambridgeshire. The City Deal agreement was signed on 19 June 2014, along with Cambridgeshire County Council, Cambridge University and the Cambridgeshire and Peterborough Local Enterprise Partnership. It recognises the strong inter-relationship between the two areas. In particular, it acknowledges that Cambridge City and South Cambridgeshire District Councils. along with Cambridgeshire County Council as the Transport Authority, "have worked closely together on new local plans and associated transport strategy and have aligned plan making processes to achieve the benefits of what amounts to a single overarching development, infrastructure and delivery strategy for Cambridge". Furthermore, as part of the City Deal arrangements, the Councils have agreed to prepare a joint Local Plan and Transport Strategy starting in 2019.
- 4. The Local Plans build on the sustainable development strategy included in the adopted plans, and now being delivered on the ground, to support the nationally important economy. The approach to development strategy is summarised in the joint Topic Paper Joint Working and Development Strategy<sup>2</sup>. The strategy, in both the adopted and submitted plans, focuses jobs and homes in and close to Cambridge and through a sustainable development sequence. This sequence maximises use of land within and on the edge of Cambridge compatible with protecting the Green Belt setting of the historic city and then in new settlements linked to Cambridge by sustainable transport corridors and finally in the larger and more sustainable villages.
- 5. The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC)<sup>3</sup> was prepared and consulted on by Cambridgeshire County Council alongside the Local Plans. This ensured that transport planning was integrated with the local plan

<sup>2</sup> Topic Paper – Joint Working and Development Strategy (RD/Top/010)

<sup>&</sup>lt;sup>1</sup> Greater Cambridge City Deal, page 7 (RD/Strat/300)

<sup>&</sup>lt;sup>3</sup> Cambridge and South Cambridgeshire Transport Strategy (RD/T/120) Strategy and Action Plan

making process, to consider the transport impacts of different strategy options and to provide a programme of improvements for the preferred strategy that would address growth needs as well as existing transport problems. The TSCSC was adopted by the County Council in March 2014 as part of the suite of Local Transport Plan documents.

- 6. The development strategy is soundly based. The plans are informed by a robust, credible and proportionate evidence base, considered all reasonable alternatives, and was prepared following extensive public consultation.
- 7. The National Planning Policy Framework<sup>4</sup> (NPPF) establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. Both Councils have completed a 'Statement of Compliance with the NPPF'5, which demonstrate that the Local Plans will deliver sustainable development as defined throughout the NPPF.
- 8. A wide range of issues affecting the Greater Cambridge area were identified through the Sustainability Appraisal process, evidence gathering, and consultation with the public and stakeholders. In summary the key issues facing the Cambridge area are<sup>6</sup>:
  - A strong and growing economy;
  - The need for new homes to support the jobs and the aim to provide as many of those new homes as close to the new jobs as possible to minimise commuting and the harmful effects for the environment, climate change and quality of life that it brings; and
  - A Green Belt drawn to protect the unique character of Cambridge as a compact, dynamic city with a thriving historic centre, to maintain and enhance the quality of its setting, and to prevent it merging with the ring of necklace villages, that helps underpin the quality of life and place in the Cambridge area, which is fundamental to economic success.
- 9. Achieving an appropriate balance between these issues is a key objective of the development strategy for the new Local Plans, along with ensuring the delivery of the necessary infrastructure to support growth. This includes provision of high quality transport infrastructure to facilitate more sustainable travel and the necessary associated community services and facilities.
- 10. As identified in paragraph 7 of the NPPF, the strategy must balance the three strands of sustainability: economic, social and environmental. This sets a considerable challenge for the Greater Cambridge area. There is a need for new homes to support jobs growth. The aim is to provide as many of those new homes as close to the new jobs as possible to minimise commuting and to minimise and mitigate harmful effects for the environment, climate change and quality of life. The need for jobs and homes

<sup>&</sup>lt;sup>4</sup> National Planning Policy Framework (RD/NP/010) paragraph 6

<sup>&</sup>lt;sup>5</sup> South Cambridgeshire Local Plan Self Assessment of Soundness (RD/Sub/SC/160); Cambridge Local Plan 2014 Application of the PAS Self-Assessment Toolkit, Comprising Soundness and Legal Compliance Tests (RD/Sub/C/160)

Issues and Options 2 Part 1 January 2013 (RD/LP/150) Paragraph 4.4

has to be considered within the context of a Green Belt, which aims to protect the unique character of Cambridge as a compact, dynamic city with a thriving historic centre, maintain and enhance the quality of the city's setting, and prevent the city merging with the ring of necklace villages. The Green Belt and its purposes help underpin the quality of life and place in Cambridge, which are fundamental to economic success. Achieving an appropriate balance between these competing arms of sustainable development is a key objective of the development strategy for the new Local Plans.

- 11. The Councils have not treated Green Belt on the edge of Cambridge as an absolute constraint, and undertook a comprehensive and principled review of the significance of land on the urban edge<sup>7</sup>. The review was consistent with paragraphs 84 and 85 of the NPPF. This provided comprehensive and robust reviews to see if land designated performed Green Belt purposes, and identified the significance of the impact of their development. This review confirmed that significant majority of the remaining Green Belt close to Cambridge is fundamentally important to the purpose of the Cambridge Green Belt. Critically the review highlighted that there are some small scale sites abutting the existing urban edge of Cambridge that could be released without significant harm to Green Belt purposes. The review emphasised that large scale strategic development on the edge of Cambridge would have major adverse impacts on the purposes of the Cambridge Green Belt. The landscape was examined in detail and, in some instances where potential release sites were identified, a sub-division of existing field areas was thought necessary in order not to include part of the field that would result in harm to the Green Belt.
- 12. The plans have responded to the issues facing the area by planning to meet the objectively assessed needs of the area in a sustainable way, balancing these competing objectives. The spatial strategy is considered to be the most appropriate when considered against the reasonable alternatives and guided by the findings of the Sustainability Appraisals<sup>8</sup> which accompany the plans. The Local Plans both individually and taken together provide a sustainable development strategy for the Greater Cambridge area.

#### The Development Sequence

13. The development strategy for Cambridge and South Cambridgeshire for the period to 2031 follows a broadly similar sequence for the preferred location and distribution of new development as the previous round of plans: Regional Planning Guidance Note 6<sup>9</sup>; the Cambridgeshire and Peterborough Structure Plan 2003<sup>10</sup>; and the Regional Spatial Strategy 2008<sup>11</sup>, Cambridge Local Plan 2006<sup>12</sup>, and South Cambridgeshire

<sup>&</sup>lt;sup>7</sup> Inner Green Belt Study Review 2012 (RD/Strat/210) Chapters 1-6 Plan 1 Plan 2 Plan 3 Plan 4 Tables

<sup>&</sup>lt;sup>8</sup> South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060); Sustainability Appraisal of the Cambridge Local Plan (RD/Sub/C/030)

<sup>&</sup>lt;sup>9</sup> Regional Planning Guidance Note 6 (RD/NP/131) Policy 22

<sup>&</sup>lt;sup>10</sup> Cambridgeshire and Peterborough Structure Plan 2003 (RD/AD/010) Policy P9/1

<sup>&</sup>lt;sup>11</sup> Regional Spatial Strategy 2008 (RD/NP/130) Policy CSR1

<sup>&</sup>lt;sup>12</sup> Cambridge Local Plan 2006 (RD/AD/300) Chapter 2

Local Development Framework 2007-2010<sup>13</sup>. This moves away from the previous dispersed development strategy that saw high levels of development in villages without good transport links to services and facilities in Cambridge or the market towns and had been rejected as being an unsustainable strategy. The development sequence is defined in the Submission Local Plans<sup>14</sup> as:

- Within the built up area of Cambridge;
- On the edge of Cambridge;
- At new settlements;
- In the rural area at Rural Centres and Minor Rural Centres.
- 14. As part of preparing the Local Plans, a review of the development sequence was undertaken by the Cambridgeshire and Peterborough Joint Planning Unit<sup>15</sup>. This considered the issues resulting from development at each stage of the sequence. It concluded that the sequence remains a robust starting point for considering the spatial strategy for the area. It should be noted that at paragraph 4.10 it acknowledged that any potential conflict with Green Belt purposes would be a key consideration in assessing the suitability of specific locations. It also acknowledged at paragraph 4.3 that the development sequence in the earlier higher order plans identified the ring of market towns around Cambridge falling between new settlements and sustainable villages, albeit that these lie outside the administrative areas of Cambridge and South Cambridgeshire.
- 15. To inform the preferred spatial strategy, and in recognition of the inter-dependence between the two areas, a joint SA was produced<sup>16</sup>, which has been incorporated into the respective sustainability appraisals undertaken by the two Councils<sup>17</sup>. This sets out the evolution of the preferred strategy during the plan making process and states at paragraph 104 that: "the SA identifies the importance of balancing the accessibility aspects of sustainable development and the environmental and social benefits it brings, with the significant harm to the landscape and setting environmental aspects of sustainability that development on land in the Green Belt would have, with the resulting irreversible adverse impacts on the special character and setting of Cambridge as a compact historic city and the risks that could have to the economic success of the Cambridge area, which is in part built on its attractiveness as a place to live and work."

<sup>&</sup>lt;sup>13</sup> South Cambridgeshire Local Development Framework 2007-2010 (RD/AD/100, RD/AD/110, RD/AD/120)

<sup>&</sup>lt;sup>14</sup> Cambridge Local Plan 2014 (RD/Sub/C/010) Paragraph 2.26; South Cambridgeshire Submission Local Plan (RD/Sub/SC/010) Policy S/6

<sup>&</sup>lt;sup>15</sup> Review of the sustainable development strategy - Cambridgeshire Joint Strategic Unit (RD/Strat/040)

<sup>&</sup>lt;sup>16</sup> Reviewing the Development Strategy for the Cambridge Area: Joint Sustainability Appraisal (May 2013) (RD/LP/180)

<sup>&</sup>lt;sup>17</sup> Reviewing the Sustainable Development Strategy for the Cambridge Area – See South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060) Part 3 Appendix 1: and Sustainability Appraisal of the Cambridge Local Plan (RD/Sub/C/030) Volume 1: Final Appraisal for Submission to the Secretary of State Section 4.2, pages 151 - 189

- 16. In weighing the merits, account was also taken that new settlements are of a scale and nature that will enable significant transport improvements to be focused on key corridors to deliver high quality public transport links to Cambridge, along with the community services and facilities needed to support development such as schools and health facilities and can deliver sustainable forms of development. New settlements also create more sustainable developments than the alternative of dispersed development in villages.
- 17. The transport implications of different spatial strategy options were tested through transport modelling<sup>18</sup> during the evolution of the development strategy. Options for additional growth on the edge of Cambridge, new settlements, or village focused growth were tested early in the plan making process. The modelling supported the search sequence, with new households near Cambridge using cars less than in villages (around 6% less trips). This equates to a 1% lower mode share of car use for all travel across Cambridge and South Cambridgeshire compared to village focused growth scenarios<sup>19</sup>. New settlements similarly had a greater potential to achieve higher public transport mode share than village focussed growth.
- 18. Following the Issues and Options consultations, development options were refined, and this work did not include large scale development on the fringes of Cambridge. Packages of transport improvements and mitigation measures were then considered, and developed alongside the preparation of the Local Plans. The inclusion of mitigation measures further highlighted the benefits of new settlements over more dispersed strategies<sup>20</sup>.
- 19. In particular the focus on new settlements will provide a degree of self-containment, through opportunities to live and work in the same place and can deliver higher model share by public transport, internalisation of trips, coordinated infrastructure on key routes in the form of public transport, and highway measures. This critical mass of people commuting on the various corridors into Cambridge will prove vital when aiming to establish long term, commercially viable passenger transport options.
- 20. When the preferred package of sites was identified, further testing was carried out to refine the package of transport measures. The measures identified would help to significantly increase trips by non-car modes and improve overall accessibility to and from the City. The measures directly result in non-car trips into Cambridge growing at double the rate they would otherwise be expected to (26% compared with 13%). TSCSC<sup>21</sup> proposes to create new High Quality Public Transport routes, in particular on the A10 corridor serving Waterbeach new town (in addition to the existing rail line) and on the A428 corridor serving Bourn Airfield and Cambourne West. These will

<sup>&</sup>lt;sup>18</sup> Cambridge Sub Regional Transport Modelling Report for Cambridge and South Cambridgeshire Local Plans (2013) (RD/Strat/160)

<sup>&</sup>lt;sup>19</sup> Cambridge Sub Regional Transport Modelling Report for Cambridge and South Cambridgeshire Local Plans (2013) (RD/Strat/160) section 2.1 <sup>20</sup> Cambridge Sub Regional Transport Modelling Report for Cambridge and South

<sup>&</sup>lt;sup>20</sup> Cambridge Sub Regional Transport Modelling Report for Cambridge and South Cambridgeshire Local Plans (2013) (RD/Strat/160) section 2.3

<sup>&</sup>lt;sup>21</sup> Cambridge and South Cambridgeshire Transport Strategy (RD/T/120) Strategy and Action Plan

provide a service frequency of at least every 15 minutes. The HQPT corridor proposals will reduce bus journey times to Cambridge by implementing measures that enables buses to bypass queuing traffic. In addition it includes measures to develop highly accessible pedestrian and cycling infrastructure.

- 21. The strategy will focus on achieving a journey time and quality of service for buses on these corridors that exceeds the equivalent car trip in peak periods, as has already been achieved on the Huntingdon and St Ives corridor with the Busway. In addition, Cambridge itself will see focussed interventions of walking, cycling and public transport – including more emphasis on orbital movements that link up key employment sites<sup>22</sup>. This will all help to ensure greater sustainable travel options are available and attractive from the new developments.
- 22. The TSCSC includes a programme of measures which compliment the development strategy, and which will address existing issues in the area to facilitate growth. A range of funding sources will be used to implement the strategy. This includes the funding from the City Deal<sup>23</sup> which includes major investment in sustainable transport infrastructure.
- 23. The plans have responded to issues raised in consultation and feedback, demonstrated through the Councils Statement of Consultation<sup>24</sup>. In 2012, both councils sought comments in their respective Issues and Options consultations on how the sustainable development strategy should be taken forward for the area. This included whether there should be a further review of the Cambridge Green Belt, and where the focus of development should be. The South Cambridgeshire Issues and Options consultation 2012 sought views on the development sequence and where development should be focused (Question 9)<sup>25</sup>. The most supported option was to focus development on new settlements, receiving around ten times as many supporting representations as either a Cambridge focus or a sustainable villages focus<sup>26</sup>. This was followed up in the Joint Issues and Options consultation in 2013<sup>27</sup>. Again the most favoured options were for new settlements in preference to Green Belt development. New settlements have the advantage of making use of previously developed land. The long lead-in time to bring forward new settlements is an important factor, and experience at Northstowe has informed the approach to phasing of the further new settlements included in the development strategy.
- 24. The Councils consider that the development strategy proposed in the two Local Plans strikes the right balance of the level of development at each stage of the development sequence, providing the most appropriate strategy when considered

<sup>24</sup> South Cambridgeshire Statement of Consultation (RD/Sub/SC/090) and Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080)

Part 1 2013 consultation (RD/LP/150) Chapter 8 Question1 Page 50

 $<sup>^{\</sup>rm 22}$  Transport Strategy for Cambridge and South Cambridgeshire (RD/T/120) Strategy and Action Plan
<sup>23</sup> Greater Cambridge City Deal (RD/Strat/300)

South Cambridgeshire Issues and Options 1(RD/LP/030) - Question 9 Chapter 4 Page 37 <sup>26</sup> Consultation results are summarised in the South Cambridgeshire Draft Final Sustainability Appraisal (RD/Sub/SC/060) Annex A – Audit Trail Chapter 2 Page A100 <sup>27</sup> Cambridge Local Plan and South Cambridgeshire Local Plan Issues and Options 2 Joint

against alternatives, and offers a sustainable development strategy for the area. The strategy:

- maximises development within the urban area of Cambridge focusing on previously developed land
- includes the existing major developments on the edge of Cambridge identified in the adopted plans through previous Green Belt releases
- releases limited land for development on the edge of Cambridge weighing in each case the sustainability merits of such locations with the significance of harm to the purposes of the Cambridge Green Belt
- focuses growth at new settlements on two corridors, supported by transport improvements to achieve sustainable high quality public transport and other infrastructure such as education
- continues to limit the amount of new development in villages whilst providing for new development focused at the more sustainable villages to provide some flexibility to meet local needs
- supports the recycling of land at villages and schemes to meet local needs, with the scale of schemes guided by the rural settlement hierarchy<sup>28</sup>.

## Matter 2b: Is it clear what other strategic options were considered and why were they were dismissed?

- 25. The development and refinement of the spatial strategy and the consideration of options available to accommodate the objectively assessed needs has been clearly documented at each stage of the plan preparation process. A summary of the process can be found in section 4 of the Topic Paper Joint Working and Development Strategy<sup>29</sup>. The respective Sustainability Appraisals<sup>30</sup> also document the identification of the development strategy, the alternatives considered through the plan making process, and the reasons for rejection of alternative approaches.
- 26. In 2012, both councils sought comments in their respective Issues and Options consultations<sup>31</sup> on how the sustainable development strategy should be taken forward for the area. This included whether there should be a further review of the Cambridge Green Belt, and where the focus of development should be. The joint Issues and Options 2 consultation in 2013<sup>32</sup> also sought views on the development strategy. As set out in paragraph 23, the highest levels of support were for strategies

<sup>29</sup> Topic Paper – Joint Working and Development Strategy (RD/Top/010).

<sup>&</sup>lt;sup>27</sup> South Cambridgeshire Submission Local Plan (RD/Sub/SC/010) Policies S/8 to S/11

<sup>&</sup>lt;sup>30</sup> South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060) and Sustainability Appraisal of the Cambridge Local Plan Volume 1: Final Appraisal for Submission to the Secretary of State (RD/Sub/C/030).

<sup>31</sup> South Cambridgeshire Local Plan Issues and Options 2012 (RD/LP/030) – Chapter 4 Spatial Strategy; Cambridge Local Plan Towards 2031 Issues and Options Report (RD/LP/240) – Section 3 Spatial Strategy.

32 Cambridge Local Plan and Section 2

<sup>&</sup>lt;sup>32</sup> Cambridge Local Plan and South Cambridgeshire Local Plan Issues and Options 2 Joint Part 1 2013 consultation (RD/LP/150) Question 1 page 90

which focused on new settlements, rather than major Green Belt review on the edge of Cambridge or a village focused strategy.

- 27. A wide range of site options were tested during the plan making process. In the urban area of Cambridge, the testing of sites is documented in the Cambridge SHLAA, the technical sites documents and Volume 2 of the SA, which identify undevelopable sites and reasons why they were rejected <sup>33</sup>.
- 28. On the edge of Cambridge, broad locations all around the urban area were tested at the Issues and Options 2012. Specific sites were considered jointly by the Councils in advance of the joint Issues and Options 2 consultation, including all sites put forward through the Councils' respective SHLAA processes. The reasons for rejection of individual sites were clearly stated, in particular where this related to the harm to the purposes of the Cambridge Green Belt identified in the Inner Green Belt Study<sup>34</sup>.
- 29. In South Cambridgeshire a large number of potential sites were tested through the SHLAA and Sustainability Appraisal, and the reasons for rejection of sites are included in those documents<sup>35</sup>. Sites at Group and Infill villages were rejected (unless proposed by a Parish Council reflecting a Neighbourhood Planning approach), as developable options are available higher in the development sequence. Some new settlement options were considered and rejected, having been identified in the South Cambridgeshire SHLAA and Sustainability Appraisal as having no development potential. These include land North of Cambourne (due to landscape impact and segregation caused by the A428) and extension north east of Northstowe (significant historic environment, townscape and landscape impacts, and the poor relationship with Northstowe being separated by the guided busway) <sup>36</sup>.
- 30. Building on the Sustainability Appraisals supporting each of the Issues and Options consultations, a high level assessment of the sustainability implications of focusing on different stages of the development sequence was carried out<sup>37</sup>. This was followed by testing of a total of eight packages covering full range of strategy options around the site options in the Green Belt, new settlement options, major expansion of

<sup>&</sup>lt;sup>33</sup> Cambridge SHLAA (RD/Strat/130) and 2013 Update (RD/Strat/140); Cambridge Local Plan – Towards 2031. Technical Background Document – Part 2 (RD/LP/260), and the 2013 Supplement (RD/LP/310); Cambridge City Council Sustainability Appraisal of the Cambridge Local Plan 2014. Volume 2: History of Site Allocations (RD/Sub/C/040).

Local Plan 2014. Volume 2: History of Site Allocations (RD/Sub/C/040).

34 Issues and Options 2: Part 1– Technical Background Document Part 1 (RD/LP/170), and summarised in the Issues and Options 2 document (RD/LP/150) Appendix 3. (Note: Also included in Sustainability Appraisal Reports)

<sup>&</sup>lt;sup>35</sup> South Cambridgeshire SHLAA August 2013 (RD/Strat/120) Appendix 7; South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060) Part 3 Annex B. Also Part 3 Annex A Appendices 2, 3 and 4 provides responses to issues raised in representations.

Reasons for rejection of new settlements: South Cambridgeshire SHLAA August 2013 (RD/Strat/120) Appendix 7i;South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060) - Annex A Appendix 3 and Appendix 8, and Annex B.

<sup>&</sup>lt;sup>37</sup> South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060) Part 3 Appendix 1 and Sustainability Appraisal of the Cambridge Local Plan (RD/Sub/C/030) Volume 1: Final Appraisal for Submission to the Secretary of State, Section 4.2, pages 151 - 189

Cambourne and the best available sites at villages have been identified and tested through Sustainability Appraisal<sup>38</sup>, to consider the relative sustainability impact of different development strategy packages. This included looking at different levels of growth at some of the site options to minimise adverse impacts and secure the most sustainable form of development. For comparison, the sustainability impacts of packages made up of site options identified by the councils were compared with package options that included major development sites on the edge of Cambridge that had been rejected through the assessment process.

- 31. The SAs are clear that development strategies that would rely on significant Green Belt development on the edge of Cambridge were rejected due to the significant harm to the landscape and setting environmental aspects of sustainability. This would result in irreversible adverse impacts on the special character and setting of Cambridge as a compact historic city and the risks that could have to the economic success of the Cambridge area, which is in part built on its attractiveness as a place to live and work<sup>39</sup>.
- 32. The dispersal of development across villages, particularly the less well served villages, has been discredited through previous plan reviews, and demonstrated not to provide a sustainable development strategy for the Cambridge area. A dispersed strategy would not enable the focused delivery of new infrastructure or improvements in transport infrastructure to support travel by sustainable modes. Education provision would be a significant constraint on development in many villages, with schools unable to be expanded to accommodate additional pupils.
- 33. Many South Cambridgeshire villages are small, offering few services and facilities, and often lacking amenities such as a primary school. Development in these locations would mean travel for accessing even basic services, and public transport opportunities are typically limited. Developments would not change this situation significantly, and they are therefore not sustainable locations for significant growth.
- 34. The South Cambridgeshire SA is clear that site packages with a strong reliance on village development particularly away from the best served villages performed poorly in relation to access to services and facilities, employment and transport. They were therefore rejected<sup>40</sup>.

Matter 2c: Is the Plan founded on a robust and credible evidence base?

<sup>&</sup>lt;sup>38</sup> South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060) - Part 3 Appendix 4 Appraisal of Alternative Site Packages and Sustainability Appraisal of the Cambridge Local Plan (RD/Sub/C/030) Volume 1: Final Appraisal for Submission to the Secretary of State, Section 4.2, pages 151 - 189
<sup>39</sup> As stated in Paragraph 105, South Cambridgeshire Draft Final Sustainability Report

<sup>&</sup>lt;sup>39</sup> As stated in Paragraph 105, South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060) Part 3 Appendix 1 and Final Submission Sustainability Appraisal for Cambridge (RD/Sub/C/030) Section 4.2.

<sup>&</sup>lt;sup>40</sup> See South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060) Part 3 Chapter 3, and further detail in Annex A (audit trail)

- 35. The Councils consider that the Local Plans are founded on a robust, credible and relevant evidence base in line with the requirements of the NPPF<sup>41</sup>.
- 36. The evidence base is detailed in Appendix A of the Submission South Cambridge Local Plan<sup>42</sup>, and the Bibliography of the Submission Cambridge Local Plan<sup>43</sup>. The plans are also supported by other relevant documents, detailed in the Reference Documents List<sup>44</sup>. In many cases the 'reasoned justification' text in the Local Plans also reference specific evidence.
- 37. Both Councils have prepared audit trails documenting the identification of issues, key evidence related to the issue, the options that were considered, the results of consultation, and the reasons for the preferred approach<sup>45</sup>. These are important documents providing a considerable level of detail on the evolution of the plans.
- 38. Many of the evidence base documents that have been prepared cover a number of local authority areas. For example, the Strategic Housing Market Assessment<sup>46</sup> covers the Cambridge Sub-Region housing market area, which includes seven local authority areas. A number of studies were prepared jointly by Cambridge City Council and South Cambridgeshire District Council, such as the Infrastructure Delivery Study<sup>47</sup>.
- 39. Preparation of the technical background studies has involved consultation and partnership with relevant agencies and stakeholders, such as the Environment Agency, Natural England. The County Council, as the Local Highway Authority, developed much of the transport evidence.
- 40. Other Main Matters deal with the substance of the evidence and how it informed the plans.

<sup>&</sup>lt;sup>41</sup> National Planning Policy Framework (RD/NP/010) paragraph 158

<sup>&</sup>lt;sup>42</sup> South Cambridgeshire Proposed Submission Local Plan (RD/Sub/SC/010)

<sup>&</sup>lt;sup>43</sup> Cambridge Local Plan 2014 – Proposed Submission (RD/Sub/C/010)

<sup>44</sup> Reference document library list (RD/Gen/010)

<sup>&</sup>lt;sup>45</sup> South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060) Annex A - Audit tables for all the issues and options assessed during the plan making process, Cambridge Statement of Consultation and Audit Trails (RD/Sub/C/080)

<sup>&</sup>lt;sup>46</sup> Cambridge Sub Region Strategic Housing Market Assessment SHMA (RD/Strat/090)

<sup>&</sup>lt;sup>47</sup> Cambridge City & South Cambridgeshire Infrastructure Delivery Study (RD/T/010) Chapters 1-9 & appendices 1-5

#### **Appendix 1: List of Reference Documents**

The Councils' evidence in relation to legal process and requirements is set out in the following documents in Reference Document Library order:

#### **National Policy:**

- National Planning Policy Framework (RD/NP/010);
- National Planning Practice Guidance (NPPG) (RD/NP/020);
- Regional Spatial Strategy 2008 (RD/NP/130);
- Regional Planning Guidance Note 6 (RD/NP/131).

#### **South Cambridgeshire District Council submission documents:**

- South Cambridgeshire Submission Local Plan (RD/Sub/SC/010);
- South Cambridgeshire Draft Final Sustainability Report (RD/Sub/SC/060);
- South Cambridgeshire Statement of Consultation (RD/Sub/SC/090);
- South Cambridgeshire Local Plan Self Assessment of Soundness (RD/Sub/SC/160).

#### **Cambridge City Council submission documents:**

- Cambridge Local Plan 2014 Proposed Submission (RD/Sub/C/010);
- Cambridge City Council Sustainability Appraisal of the Cambridge Local Plan 2014. Volume 1: Final Appraisal for the Submission to the Secretary of State (RD/Sub/C/030);
- Cambridge City Council Statement of Consultation and Audit Trails (RD/Sub/C/080);
- Cambridge Local Plan 2014. Application of the PAS Self-Assessment Toolkit, Comprising Soundness and Legal Compliance Tests (RD/Sub/C/160).

#### **Topic papers:**

• Topic Paper – Joint Working and Development Strategy (RD/Top/010).

#### Earlier stages in plan-making:

- South Cambridgeshire District Council Issues and Options Report 2012 (RD/LP/030);
- Issues and Options 2 Part 1 January 2013 (RD/LP/150);
- Issues and Options 2 Joint Part 1 2013 Joint Consultation on Development Strategy and Site options in the edge of Cambridge (RD/LP/150), Technical Background Document (RD/LP/170);
- Cambridge Local Plan Towards 2031: Issues and Options Report (RD/LP/240).

#### Adopted development plan documents:

- Cambridgeshire and Peterborough Structure Plan 2003 (RD/AD/010);
- Cambridge Local Plan 2006 (RD/AD/300);
- South Cambridgeshire Local Development Framework (adopted between 2007 and 2010) (RD/AD/100, RD/AD/110, RD/AD/120).

#### **Development strategy:**

- Review of the sustainable development strategy Cambridgeshire Joint Strategic Unit (RD/Strat/040);
- Cambridge Sub Region Strategic Housing Market Assessment SHMA (RD/Strat/090);
- South Cambridgeshire Strategic Housing Land Availability Assessment (RD/Strat/120);
- Cambridge SHLAA (RD/Strat/130);
- Cambridge Strategic Housing Land Availability Assessment (SHLAA) Update 2013 (RD/Strat/140);
- Cambridge Sub Regional Transport Modelling Report for Cambridge and South Cambridgeshire Local Plans (2013) (RD/Strat/160);
- Inner Green Belt Study Review 2012 (RD/Strat/210);
- Greater Cambridge City Deal (RD/Strat/300).

#### **Transport and infrastructure:**

- Cambridge City and South Cambridgeshire Infrastructure Delivery Study (RD/T/010);
- Transport Strategy for Cambridge and South Cambridgeshire (RD/T/120)
   Strategy and Action Plan.