

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Planning Policy Advisory Group 18 January 2007
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Report to consider the Council's response to the proposed changes to the draft revision to the Regional Spatial Strategy for the East of England and the Statement of Reasons

Purpose

1. The purpose of this report is to outline the contents of the Government's consultation on the proposed changes to the draft revision to the Regional Spatial Strategy and debate at the Planning Policy Advisory Group before the Planning Portfolio Holders report to the Cabinet is finalised..

Executive Summary

- 2 The Key issues to discuss are as follows-
 - Noting the need for an early review of the RSS and its implications for South Cambridgeshire if growth from 2021- 2031 is to be of the scale of that proposed up to 2021
 - The Cambridge Green Belt is not to be reviewed as a result of this RSS but it is implied that this may have to be reconsidered in the review of the RSS.
 - The removal of the reference to Cambridge as a compact city from the revised Policy CSR1.
 - The supporting text in mentioning Northstowe talks of a settlement of 'initially 8-10,000.
 - The requirement for employment to contribute to affordable housing has been removed from the plan
 - The 40% or more of housing in the Cambridge Sub-region to be affordable has been removed from the text in the RSS – regional target is 35%.
 - The RSS is no longer able to contain a policy opposing a second runway at Stansted because this is national policy
 - The housing figures in Policy H1 should be seen as a minimum requirement rather than a ceiling
 - Welcome inclusion of policy on provision for Travellers and gypsies
 - Policy T6 includes consideration of regional roads which means that A10 (N) and A1307 are now included
 - Cambridge area is included in list in Policy T15 where further study to be carried out on transport because it is recognised that these areas will have increasing transport pressures as a result of the RSS development strategy.
 - New chapters on carbon dioxide emissions and renewable energy and on water to reflect change in emphasis of whole RSS to consider climate change.

- For future review of RSS the spatial options that will be considered include major urban extensions and major and small new settlements with capacity to continue growth beyond 2031.

Background

3. The East of England Regional Assembly (EERA) prepared a draft revision to the initial Regional Spatial Strategy (RSS) called the East of England Plan, which was issued for consultation in December 2004. Following the consultation an Examination in Public (EiP) was held from November 2005 to March 2006 to test the soundness of the draft RSS. In June the Government published the report of the Independent Panel that conducted the EiP. This report makes recommendations as to how the draft RSS might be improved.
4. The current consultation is on the changes the Government now proposes to the draft RSS and the statement of reasons. The document consists of two parts
 - Part 1 A Schedule of the Secretary of State's decisions on each of the EiP Panel recommendations and the reason for them.
 - Part 2 The RSS text incorporating the Secretary of State's Proposed Changes
5. The process of revising the RSS has been informed by Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) at the draft Revisions and Proposed Changes stages and by Appropriate Assessment (AA) at the Proposed Changes stage.
6. The consultation period for the proposed changes is from 19th December 2006 until 9th March 2007. Ministers will give consideration to representations on the Proposed Changes before deciding on the final version of RSS.
7. The final version of the RSS will be published in mid 2007, along with a summary analysis of the responses to the consultation on the Proposed Changes and the final stage of the SA.
8. Throughout the report for reference purposes the page number in the consultation document has been included in brackets.

The Proposed Changes to the Draft Revision of the Regional Spatial Strategy

9. South Cambridgeshire District Council was generally content with the RSS as submitted to the Secretary of State, as it did not propose to increase the level of development in the District beyond that which is already being planned for. Neither the RSS EiP Panel nor the Secretary of States proposes any changes to the housing numbers for South Cambridgeshire. There has been no increase in either housing or job numbers for South Cambridgeshire District. However there have been some changes to reflect the contents of the recently published Planning Policy Statement 3 (PPS3). The proposed changes have

also incorporated the aspirations contained in the recent publication on Planning and Climate Change – a supplement to PPS1. But the Barker Review of Land Use Planning that was published in December 2006 came too late for its ideas to be incorporated into these proposed changes.

10. It is stated in the proposed revised text of the RSS ‘... that one of the key ambitions of this RSS is to allow the region to accommodate higher levels of growth in sustainable ways.’ (Page 82) One of the key roles of this RSS is putting in place a strategy that promotes rather than constrains, medium and long-term growth. Growth is to be focused on a group of significant urban areas named Key Centres for Development and Change (KCDC) – Cambridge has been confirmed as one of these centres.
11. **Early review** - In the chapter considering the core strategy it has been highlighted that an early review of the RSS will be needed because a group of factors have suggested that the rate of growth needs to both increase further and continue after 2021.
12. The factors prompting this review are
 - The most recent household projections,
 - The continued deterioration in housing affordability,
 - The proximity of London
 - Region’s economic potential.
13. This review is included in revised Policy IMP3. The review is to start in 2007 and be completed by 2010.
14. The Key Centres will be the focus for development and it is stated that at most, but not all, Key Centres there is likely to be the need for significant continued growth after 2021. (Page 88) This therefore could have implications for South Cambridgeshire if Cambridge is identified for further growth. It is also mentioned that where Key Centres adjoin or cross local authority boundaries, local planning authorities will need to work jointly or closely together to develop co-ordinated strategies and delivery mechanisms. (Page 88)
15. **Green Belt** – In Policy SS7 Green Belt this RSS does not provide for a further review of the Cambridge Green Belt beyond that undertaken through the Cambridgeshire and Peterborough Structure Plan and related local plans/LDDs. (Page 95) Where Green Belt boundaries are being reviewed in the RSS then it is stated that the aim should be to release sufficient land to avoid the need for further review before 2031. To achieve this, in preparing LDDs it should be assumed that the rate of development at the Key Centres in question will be the same from 2021 to 2031 as the average rate 2001 to 2021. (Page 96) In considering the Cambridge Sub Region the revised text states....’ The Cambridge Green Belt will be protected following the recent review in the Cambridgeshire and Peterborough Structure Plan 2003 and in local plans/DPDs, in order to deliver the vision for the sub-region. The issue may need to be revisited in the review of the RSS.’ (Page 200) This implies that as part of the review process the Cambridge Green Belt could once more

be re-examined. And this is further highlighted in the fact that the revised wording of Policy CSR3 omits the word compact when describing Cambridge.(Page 200) The reason given for omitting the reference to a compact city is that.....' it may give a misleading emphasis including in regard to future development options.' (Page 23) This spotlighting of Cambridge will need to be carefully examined as the review begins.

16. **Sequential approach-** In the Panel Report in June 2006 the Council considered that the absence of reference in the new Policy CSR1 that the list of locations for sustainable development is a sequence is an omission that should be clarified. In the revised Policy CSR1 wording has now been added to clarify that the sequence must be followed and that there has been no change of strategy in this respect. (Page 197) This is to be welcomed. The reason for inclusion now is that it is in accordance with Policy 22 in RPG6. (Page 23)
17. The EiP Panel's recommendation on Overall Spatial Strategy Policy SS2 also included the option that ...'it may be necessary at certain times and in particular places (as identified in LDDs) to depart from the strict terms of a sequential approach to previously developed land if this is essential to bring forward development to meet the requirements of Policy H1....' The Secretary of State has not accepted this option. (Page 86)
18. Mention is made however that the 60% target for development on previously developed land should be considered for amendment in the RSS review. There could be implications for South Cambridgeshire if this target is reduced and further greenfield land is put under pressure for development. (Page 87)
19. **Cambridge Sub Region-** The Government has rejected the suggestion made by the EiP Panel to exclude the market towns of Royston, Saffron Walden, Haverhill and Newmarket from the Cambridge Sub-region and therefore the boundaries of the sub-region remain unchanged. (Page 23)
20. In the supporting text to Policy CSR1 it states that ...' Northstowe will take advantage of the Cambridgeshire guided busway and should optimise the development potential of its location with a settlement initially of 8-10,000 new homes' (Page 198) In the South Cambridgeshire Core Strategy DPD it is stated that Northstowe will be a new settlement up to 10,000. The wording in the supporting text of the RSS as proposed to be changed would now imply that this figure could be exceeded.
21. In the draft RSS in the supporting text to Policy CSR2 regarding housing provision it was stated that 40% or more of the new housing in the Cambridge sub-region will be affordable housing. This requirement is no longer included in the revised RSS. This should be rectified and a target should be included for the Cambridge Sub-region
22. In the supporting text for Policy CSR2 in the draft RSS the following was included....'Employment development will also be expected to contribute towards affordable housing.' The Council had requested that this requirement

be included in the policy thereby giving it greater force. It would appear now that this has not been included in the policy and that it has also not been kept in the revised supporting text. (Page 199) This is an important requirement that must be included in Policy CSR2. It has been supported by the Inspectors who recently considered the Cambridgeshire and Peterborough Structure Plan and the Cambridge City Local Plan.

23. In the EiP Panel 's version of Policy CSR4 there is included the idea of a possible extension of the guided busway system as part of the transport infrastructure. This has been deleted by the Government because ..' a further extension of the guided busway is only a possibility at this stage and is more appropriately referred to in supporting text.'(Page 23) Also the term experimental has been omitted from the wording suggested by the Panel in relation to demand management measures for traffic to and within the city. (Page 200)
24. Policy CSR5 regarding infrastructure provision from the draft RSS has been omitted from the revised RSS in favour of having a region –wide implementation policy - Policy IMP1. (Page240) The proposed policy is more orientated to regional level co-ordination of working. There is a need for recognition of the value of sub-regional co-ordination and a policy included in this section of the RSS to facilitate such working.
25. **Employment** – There has been an addition to the Panel's proposed wording for Policy E1 in that LDDs should provide an enabling context to achieve the targets for job growth included in Policy E1. (Page 37) The targets may be revised through the RSS review in conjunction with a review of the Regional Economic Strategy (RES). It is intended that at the RSS review targets will be produced for each district. - albeit with a degree of flexibility at local level. Cambridgeshire has been given a job growth figure of 75,000 jobs (to support 58,010 new homes) with the flexibility to allocate between each of the five Districts which is to be welcomed.
26. In the supporting text for Policy E2 there is still the misleading impression that there will be a close link between employment allocations /take up (net) and employment growth although within the policy the job growth targets are described as indicative. As part of the evidence base for LDDs employment land reviews are to be carried out and as these reviews are carried out the indicative job targets may need to amended.- thereby still keeping the misleading link between land uptake and job numbers. (Page 105)
27. It is recognised that the economy in Cambridge needs continued management and there should be guidance on high technology clusters. (Page 110) In Policy E4 on cluster developments the Cambridge sub-region is identified in the policy as being a life-science regional super cluster.
28. The policy on the Regions' airports Policy E8 confirms that the 2003 Air Transport White Paper (ATWP) states the policy for Stansted – i.e. that a second runway will be located there and that the draft RSS could not include a policy contrary to this national policy.(Page 40 & 146) In Policy T12 access to

the region's airports is considered and it is indicated that airport developers will be expected to contribute to the delivery of improvements to surface access that may be required to serve any airport expansions.(Page 146) A key priority will be to ensure that airport surface facilities reinforces the shift to more sustainable travel sought by the Regional Transport Strategy (RTS).

29. Also in Policy E8 the Plan supports the relocation of operations at Cambridge Airport to a suitable alternative location subject to adequate environmental safeguards. Since it is consistent with Council policy this is welcomed (Page 115)
30. **Housing** - PPS 3 sets out the general approach to the supply of housing land at the local level and it is this that has informed many of the changes in the chapter on housing.
31. Policy H1 states that *at least* 508,000 additional dwellings will be provided in the region. (23,500 for South Cambridgeshire) (Page 117) The figures included in this policy are to be seen as a minimum requirement rather than a ceiling, which should not be exceeded. This is in line with the new emphasis of PPS3 on delivery and encouraging more houses to be provided. Local planning authorities are being encouraged to aim to exceed the annual average rates for 2006 –2021 if more housing can be delivered without breaching environmental limits and infrastructure constraints by –
 - a) Increasing density;
 - b) Encouraging opportunities on suitable previously developed sites
 - c) Making best use of policies on exception sites to provide affordable housing in rural areas
32. The continuation of the agreed development strategy into the RSS is supported by this Council on the understanding that the phasing of house building is co-ordinated with infrastructure and is balanced with jobs and employment opportunities. If more dwellings are built than stated in Policy H1 sufficient funding must be made available for the associated infrastructure supported by a similar growth in jobs. (Page 117) It is suggested in the supporting text for Policy H2 that phasing may need to take account of the need for additional infrastructure for water supply/ or treatment as provided for under new Policy WAT2. (Page 125 & 172)
33. The housing figures have increased for the region from those proposed by the Panel. The additional 4,300 proposed by the EiP Panel for Cambridge City has been retained in Policy H1. (Page 119)
34. The EiP Panel had proposed that the housing provision from 2006 to 2021 should be divided into three 5-year phasing periods. This has been rejected by the Government as being unnecessarily complex – instead the provision is expressed as single totals and average annual rates. The figures are divided into those, which have already been built, and the minimum still to build with an annual average rate presented in brackets. (Page 118)

35. Included in Policy H1 to comply with PPS 3 is the need to plan for continuous delivery of housing for at least 15 years from the date of adoption. (Page 118) It is recognised that where LDD preparation is already well advanced as in South Cambridgeshire that this requirement will be too late to achieve for these documents. This will have implications for the timing of a review of the Core Strategy DPD. The current period for this DPD is up to 2016 and the new requirement would need to consider up to at least 2021 and more likely up to 2022 to provide a 15 year supply of housing level.
36. For affordable housing the figure of some 35% of the new housing coming forward being affordable in the region as suggested by the Panel has been accepted. An additional requirement for LDDs to set specific, separate targets for social rented and intermediate has been included in Policy H3 to comply with PPS 3. In order to consider affordable housing the sub-regional housing areas are those used to inform investment in this market. The boundaries of these are different to the planning sub-regions and it is suggested that these be looked at as to whether they are fit for purpose when the RSS is reviewed. (Page 126)
37. Policy H4 on provision for Travellers and Gypsies is to be welcomed (Page 126) and this Council is already progressing the requirements of this policy and recognises the urgent need for provision for this section of the population. It is hoped that other districts progress the requirements of this policy and that the rapid progress of this Council is recognised by the Government and that this does not prove to be disadvantageous to this Council.
38. **Transport** – The policies in this chapter more obviously show the change in emphasis of the RSS towards recognising the future affects of climate change and the need to mitigate against them.
39. The Panel had aimed to have an absolute reduction in traffic and worded policies accordingly however the Government thinks this may be unrealistic. The Government has highlighted that there is no national policy to reduce traffic growth per se but rather the aim is to tackle its consequences, congestion and emissions by providing people with more choice with the aim of slowing the rate of traffic growth. The challenge is to ensure that people have options. (Page 46)
40. Policy T3 proposes that road pricing should be considered as part of a package of measures and also recognises the need to avoid disadvantaging the rural communities. The Government states that road pricing is not a panacea and it should not be overloaded with potentially conflicting aims – the primary aim is to tackle congestion and manage demand in a fair way. The EiP Panel had included an extra bullet point suggesting that resources from road pricing could support the objectives of this Regional Transport Strategy (RTS) The Government has rejected this since in their view it implies a net overall increase in resources which may or may not occur depending on a range of factors including future policy on national taxation. (Page 47)

41. Policy T6 includes consideration of both strategic and regional roads. The policy therefore now includes A10 (N) and A1307, which will be improved, managed and maintained according to the aims of the policy. Regional routes should be the lowest level carrying significant movement by heavy vehicles. Roads not identified within the hierarchy should carry predominantly local traffic and not be part of the region's lorry network. Since many of such non-regional roads pass through villages in this region, this policy is to be welcomed. (Page 49 & 139)
42. In the draft RSS Table 8.1 defined the minimum accessibility levels for public transport service. This table has been deleted since it is no longer recognised by the Government as the most appropriate way to measure accessibility. (Page 49) Instead wording has been placed in Policy T7 emphasising the need to improve accessibility to Key centres. In Policy T13 on public transport accessibility demand responsive services are included with the policy aiming for as high a proportion of households as possible having access to public transport to access core services which could be a more useful tool than the table and is generally in accordance with the South Cambridgeshire Core Strategy.(Page 52 & 147)
43. In Policy T15 Cambridge has been identified as an area where further study will be carried out because it is recognised that the areas listed in the policy are likely to come under increasing pressure as a result of underlying traffic growth and the development strategy of the RSS. (Page 53) The implication is that in the next rounds of investment these areas will be targeted which is why more information needs to be found out about them.
44. In Appendix A there is further information including funding sources for currently programmed schemes. (Page 249) There are a number of schemes that are not listed that are important in a local context and which should be re-instated.
 - M11 dual 3 lane J9-14 – was previously listed as ‘part of an endorsed transport strategy – further appraisal needed’.
 - A428 dualling A1 to Caxton – was previously listed as ‘part of an endorsed transport strategy – further appraisal needed’.
45. **New inclusions** – New chapters have been created in the proposed changes. This reflects the new emphasis on reducing climate change emissions within Government policy generally and the policy statement on renewable energy on 8th June 2006 and the draft PPS Climate Change and Planning in particular.
46. The chapters are entitled-
 - Carbon dioxide emissions and renewable energy (Page 56 & 166)
 - Water (Page 57 & 170))
47. **Carbon dioxide emissions and renewable energy** – The chapter on Carbon dioxide emissions and renewable energy contains two policies that were formally in the environment chapter. The policies place a stronger emphasis on carbon dioxide emissions and also include the development of regional

trajectories for the carbon performance of new residential and commercial development. Policy ENG1 on carbon includes a requirement by local authorities to encourage the supply of energy from on site renewable and / or decentralised renewable or low carbon energy sources and through DPDs set ambitious but viable proportions of the energy supply of substantial new development from these sources. In the interim as a minimum 10% of the energy consumed in new development should come from such sources. This is as set out in the new PPS on Planning and Climate Change. This Council already in its Development Control Policies DPD has policies to encourage the use of renewable energy and to reduce carbon emission levels. (Policies NE1 and NE2) Similar policies are included in the Area Action Plans.

48. Policy ENG2 sets renewable energy targets for the region, which are in line with the Panel recommendations. This Council also has policies for renewable energy generation (Policy NE3) albeit expressed differently
49. **Water-**The Panel Report recommended that following the advice from the Environment Agency at the EiP that a key requirement is for water consumption to be reduced by 25% in all new properties and also an aim to achieve 8% reduction in use through retrofitting in existing properties. This requirement was included in a revised policy on water efficiency but has subsequently been removed by the Government in their modifications on the basis that it would not be practical to monitor water consumption in new and existing development separately. (Page 57) Instead in new policy WAT1 the % is replaced by a single per capita domestic consumption target to be developed through EERA's monitoring framework. (Page 57 & 170)
50. It was suggested by the EiP Panel that a regional code or good practice guide on water efficiency standards be developed for public buildings. However the Government has extended this to include all buildings. (Page 171) This Council through the Development Control Policies DPD has a policy requiring development proposals greater than 1,000 m² or 10 dwellings to submit a Water Conservation Strategy to demonstrate how water conservation measures are to be achieved in the scheme. The implementation of this policy could be enhanced by the development of the proposed good practice guide.
51. There have been concerns that the proposed growth within the region would have problems because of the water supply and wastewater infrastructure not being able to cope with the increased demand placed upon it. Policy WAT2 aims to address this problem by ensuring that appropriate infrastructure is in place to cater for the levels of development. It is stated that new development may need to be phased to ensure it does not exceed the capacity / environmental limits of the infrastructure. The scale of the investment required suggests this will be a critical delivery issue for the region. (Page 173)
52. Also in Policy WAT2 it is proposed that LDDs should plan to site new development so as to maximise the potential of existing water/ waste water treatment infrastructure, thereby minimising the need for new / improved infrastructure. This could re-emphasise the idea of clustering more growth

around Cambridge since the waste water treatment works in the north of Cambridge is capable of taking more waste without the need for re-location.

53. **Waste** - Policy WM1 outlines the objectives for waste management and one objective recognises the particular locational needs of some types of waste management facility in determining planning applications and defining green belts boundaries. (Page 178) This seems to imply that green belt boundaries could be revised in order to provide waste management facilities in sustainable locations on the edge of existing towns and cities.
54. Imported waste from London is considered in Policy WM3. It is intended that after 2015 imported waste should be restricted to the landfill of residual waste that has been subject to the maximum practical level of recovery and treatment. When dealing with waste in DPDs local authorities must provide for an annual tonnage of imported waste in addition to that arising within their area, reflecting the apportionment from London for landfill.
55. **Implementation** – Policy IMP1 identifies Local Delivery Vehicles as a means of implementing the RSS. Their roles, functions and composition should be locally determined and will vary according to circumstances. (Page 242) It also states that the remit of any exiting vehicles may need to be revised in light of the proposals in the RSS. Cambridgeshire Horizon’s remit is currently being reviewed on the invitation of the Planning Minister Yvette Cooper.
56. The early review of the RSS is included in Policy IMP3 and the primary focus of it will be ‘...to provide for further growth and development for the 2021-31 period and any additional that may be possible in the period to 2021. As well as the organic growth of existing settlements it should consider spatial development options, including major urban extensions and major and small new settlements with the capacity for continuing development to and beyond 2031.’(Page 246)

Recommendation

57. This report is for discussion purposes.

Background Papers: the following background papers were used in the preparation of this report:

- The Secretary of State’s Proposed Changes to the Draft revision to the Regional Spatial Strategy for the East of England and Statement of Reasons December 2006.
- Report of the Panel Examination in Public – June 2006
- East of England Plan – draft revised Regional Spatial Strategy - December 2004
- Cambridgeshire and Peterborough Structure Plan 2003

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