

## **SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL**

---

**REPORT TO:** Leader and Cabinet

8 February 2007

**AUTHORS:** Executive Director / Senior Planning Policy Officer

---

### **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 (RSS) and to agree the response to the Secretary of State from South Cambridgeshire District Council. Copies of the East of England Plan are available in the Members' Lounge.

#### **Executive Summary**

2. This report outlines the contents of the consultation on the proposed changes to the draft revised RSS and recommends the suggested responses by this Council to the following issues:
  - (a) RSS changes do not increase the housing or jobs figures for the District and Cambridge is confirmed as a Key Centre for Development and Change.
  - (b) 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.
  - (c) The removal of the reference to Cambridge as a compact city from the revised Policy CSR1.
  - (d) The supporting text in mentioning Northstowe talks of a settlement of 'initially' 8-10,000.
  - (e) 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%.
  - (f) The requirement for employment to contribute to affordable housing has been removed from the plan.
  - (g) There must be a continuation of the policy for selective management of the economic growth in the Cambridge Sub-region.
  - (h) The RSS is no longer able to contain a policy opposing a second runway at Stansted because this is national policy but the relocation of Cambridge Airport is supported by the RSS.
  - (i) The housing figures in Policy H1 should be seen as a minimum rather than a ceiling.
  - (j) Welcome inclusion of policy on provisions for Travellers and gypsies.
  - (k) Welcome policy that identifies regional roads as well as strategic ones.
  - (l) Welcome that the Cambridge area will be subject to a further transport study but that there needs to be a commitment within the RSS that further investment will be available in this area. And that previously listed road schemes be reinstated.
  - (m) Welcome new chapters on water, carbon emissions and renewable energy.
  - (n) The RSS review implies that further growth could be identified in the Cambridge Sub-region. This District is already meeting a challenging agenda

for growth. Continued sustainable growth may only be possible if the remaining Districts in the Cambridge Sub-region play a greater role.

### **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:
  - (a) Part 1 A Schedule of the Secretary of State's decisions on each of the EiP Panel recommendations and the reason for them.
  - (b) 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 19 December 2006 until 9 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. This can be accessed via the following link: <http://www.goeast.gov.uk/goee/docs/193657/193668/ProposedChanges.pdf>

### **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 State 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. 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.

**Suggested response by South Cambridgeshire District Council**

11. *This is consistent with the challenging levels of development for which South Cambridgeshire and Cambridge City are already planning. Further development on the edge of Cambridge cannot be accommodated without calling into question the fundamental purposes of the Cambridge Green Belt to protect the character and setting of the historic city or to prevent villages in the vicinity of Cambridge merging with the City or with one another.*
12. **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). Elsewhere in the region 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)
13. 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.

**Suggested response by South Cambridgeshire District Council –**

14. *The Council welcomes the fact that the Cambridge Green Belt will not be reviewed through this RSS but is concerned at the suggestion that it may be examined in the future as part of the RSS review. The potential for revising the boundaries of the green belt around Cambridge without undermining the purposes of the Cambridge Green Belt was comprehensively explored during the preparation of the Cambridgeshire and Peterborough Structure Plan. The evidence is that opportunities for further revisions to deliver regionally strategic levels of development post 2021 are unlikely to be found without harming the character and setting of Cambridge or resulting in coalescence with nearby villages. . Whilst this does not form part of this review of the RSS the District Council advises caution on the assumption that growth can continue at the same rate post 2021 in or close to Cambridge.*
15. **Compact City** - 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) The term compact stems from work commissioned by this Council into planning for this area and was subsequently included in the Cambridgeshire and Peterborough Structure Plan 2003 and the draft RSS 2004. The removal of this term should not be taken lightly since it would imply a change of approach to planning in Cambridge. There is no evidence base upon which the Secretary of State can rely to make this proposed change to the purpose of the Cambridge Green Belt In contrast, the Structure Plan Examination in Public Panel who inserted those words into the purposes of the Cambridge Green Belt had available to them a substantial evidence base including the Cambridge Green Belt

Study prepared by Landscape Design Associates commissioned by the District Council.

16. If Cambridge is not to be planned as a compact city this has implications for South Cambridgeshire since it may be increasingly difficult to protect the villages of the District from encroachment from Cambridge. If as is implied that the rate of growth will continue beyond 2021 at the level proposed in the RSS then S Cambridgeshire could have an annual growth of some 1,900 houses if Cambridge City is considered full.

***Suggested response by South Cambridgeshire District Council –***

17. *The Council objects to the deletion of the term 'compact' from the description of Cambridge in Policy CSR3.*
18. **Northstowe** - 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.
19. There is no explanation given to this proposed change of wording. South Cambridgeshire in planning for the new settlement of Northstowe considered carefully its population size, how it will relate to nearby villages and how it will sit in the local landscape. If the settlement is to be bigger this must be planned for from the outset in order that its centre will be large enough to serve the ultimate size of the town. Most towns and cities evolve over centuries, their centres being able to grow through the redevelopment. Northstowe will be a new settlement built at a high density, which will not have such opportunities for redevelopment for decades to come. Neither is it like the old 'new town' of Harlow that is proposed for expansion in the RSS. This old 'new' settlement was built at a low density and so there is potential for infill and redevelopment of its ageing fabric, albeit 60 years later than the stage at which we now are with Northstowe.
20. ***Suggested response by South Cambridgeshire District Council –***  
*Reference to Northstowe as a settlement of initially 8-10,000 houses should be deleted and its size confirmed in the revised wording to Policy CSR1.*
21. *In Policy CSR1 when Northstowe is mentioned the population size should be included as follows '..... at the new settlement of Northstowe, with a population size of up to 10,000, linked to the guided busway....'*
22. **Affordable housing** - 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. There is much evidence in the Cambridge Sub-region in the Housing Needs Assessment studies for Cambridge City and South Cambridgeshire that there is a need for an affordable target above the regions proposed 35%.
23. Furthermore, 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 for the region as a whole and that it has also not been kept in the revised supporting text. (Page 199) This is an important requirement inserted by the Examination in Public Panel for the Cambridgeshire and Peterborough Structure Plan and continues to be relevant for inclusion in Policy CSR2. It has also been supported by the Inspector who recently considered the Cambridge City Local Plan.

24. ***Suggested response by South Cambridgeshire District Council –***  
*In Policy CSR1 there should be a new paragraph added after the second paragraph using the following wording....' In recognition of the pressures for housing arising in the Cambridge Sub-region at least 40% of new housing needs to be affordable. Employment development will also be expected to contribute towards affordable housing. '*
25. *Policy H3 should specifically recognise the problem of affordability in the Cambridge Sub-region and the following wording should be added to the end of the policy.....' In some areas of the region such as the Cambridge Sub-region there will need to be set higher targets for affordable homes'.*
26. **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.
27. ***Suggested response by South Cambridgeshire District Council –***  
*The Council welcomes the flexibility for the job growth figure for Cambridgeshire County to be allocated between each of the five Districts provided that the level of job growth in Cambridge and South Cambridgeshire continues to be governed by the 'selective management of growth' policy to encourage the growth of high technology research and development companies that need a location close to the historic city of Cambridge..*
28. **Stansted airport** - 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) The exclusion of this policy will not prevent this Council from continuing its opposition to a second runway at Stansted.
29. 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).
30. ***Suggested response by South Cambridgeshire District Council –***  
*In the context that it is government policy to promote a second runway at Stansted and the Secretary of State is required to agree the RSS, it is understandable that the RSS is proposed to be modified to remove references to opposition to a second runway. However, equally the Council can continue its opposition to the proposal of Stansted to have a second runway and welcomes the recognition that the airport developers will be expected to contribute to any surface access improvements necessary as a result of the expansion of the airport.*

31. **Cambridge Airport** - In Policy E8 the Plan supports the relocation of operations at Cambridge Airport to a suitable alternative location subject to adequate environmental safeguards.(Page 115)
32. **Suggested response by South Cambridgeshire District Council –**  
*The Council welcomes the inclusion of this mention of Cambridge Airport.*
33. **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.
34. Policy H1 states that *at least* 508,000 additional dwellings will 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 approach may be acceptable for other parts of the region but in South Cambridgeshire District the level of growth already proposed in the Cambridgeshire and Peterborough Structure Plan and included in the RSS is far higher than any other district in the county not considering those across the region. Whilst the proposed annual average rate for this district between 2006 - 2021 is 1,330 houses for East Cambs it is 360; Fenland 510; Huntingdonshire 550 and Cambridge 1,100, even Harlow is less at 1,010. For Districts such as South Cambridgeshire, which are already planning very high levels of development, the RSS housing figures should be targets to be achieved rather than minimums as proposed in the modifications.
35. **Suggested response by South Cambridgeshire District Council**  
*The RSS should be revised to recognise the existing step change in growth that the Cambridge Sub-region has taken and the words ‘at least ‘ be removed from Policy H1 for Districts planning for annual growth in excess of 1,000 dwellings.*
36. Included in Policy H1 to comply with PPS 3 is the need to plan for continuous delivery of housing for at least 15years 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. The review of the South Cambridgeshire Core Strategy is programmed to begin towards the end of this year, shortly after the Secretary of State finalises the RSS.
37. **Travellers and Gypsies** - Policy H4 considers the provision for Travellers and Gypsies across the region (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.
38. **Suggested response by South Cambridgeshire District Council**  
*The Council welcomes the inclusion of Policy H4. 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.*
39. **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.

40. Policy T6 includes consideration of both strategic and regional roads. The policy therefore now includes A10 (N) and A1307 (formerly A10 south), 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. (Page 49 & 139)
41. ***Suggested response by South Cambridgeshire District Council***  
*This policy is to be welcomed by the Council since many of the non-regional roads pass through villages in this District.*
42. 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 have more funds made available to them.
43. 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.
44. ***Suggested response by South Cambridgeshire District Council***  
*The Council welcomes the recognition that the Cambridge area will be subject to a further study but there needs to be a reassurance that this will be linked to further commitment to investment in infrastructure in the Cambridge Sub-region if further growth.*
45. *It is of great concern that schemes have been omitted from the tables in Appendix A that are seen by this Council as being important to supporting the growth agenda.*
46. *The following schemes should be reinstated into Appendix A:*
- (a) *M11 dual 3 lane J9-14 – was previously listed as ‘part of an endorsed transport strategy – further appraisal needed’.*
  - (b) *A428 dualling A1 to Caxton – was previously listed as ‘part of an endorsed transport strategy – further appraisal needed’.*
47. **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 8<sup>th</sup> June 2006 and the draft PPS Climate Change and Planning in particular.
48. The chapters are entitled:
- (a) Carbon dioxide emissions and renewable energy (Page 56 & 166)
  - (b) Water (Page 57 & 170))
49. These new chapters contain policies that reflect the thinking of the Government as set out in the consultation document ‘Building a Greener Future: towards Zero Carbon Development. (Published in December 2006) In this the Government states its key goal is to achieve zero carbon new homes within a decade. It sets out the problem of ‘energy security’ in that soon Britain will be a net importer of oil and dependent on imported gas at a time when global demand and prices are increasing. There needs to be a move towards creating a healthy diversity of energy supply. Also

within this document the Government highlights the problem that too few houses have been built since the early 1980s to meet demand and that housing affordability is an increasing problem. It then relates these two problems by proposing that the new houses that need to be built should be built in such a way as to cut carbon emissions. The scale of the new development it is hoped will deliver economies of scale and bring down costs of environmental technologies that could be applied to the new homes.

50. In this document the Government sets a target for moving to carbon neutral housing:
- (a) 2010 to a 25% improvement in the energy/carbon performance set out in building regulations
  - (b) 2013 to a 44% improvement
  - (c) 2016 to zero carbon
51. Alongside this consultation document the Government published 'The Code for Sustainable Homes'. The Code uses a sustainability rating system - indicated by 'stars' to communicate the overall sustainability performance of a home (one being the least and six the most sustainable). From April 2008 the Government intend to propose that this voluntary code will be made mandatory and be linked to building regulations. The one star rating contains minimum standards for water and energy efficiency and the new RSS chapters will assist in moving to carbon neutral homes.<sup>1</sup>
52. ***Suggested response by South Cambridgeshire District Council***  
*The Council welcomes the inclusion of policies on water, carbon emissions and renewable energy but considers that improved sustainability at the dwelling level will need to be complemented with measures to promote the overall sustainability of the development as a whole.*
53. **Early review** - The proposal for an 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) The review is to start in 2007 and be completed by 2010.
54. The factors prompting this review are:
- (a) The most recent household projections,
  - (b) The continued deterioration in housing affordability,
  - (c) The proximity of London
  - (d) Region's economic potential.
55. The Government in all its recent publications relating to climate change has stressed the need for an increase in house building to meet national demand and the opportunity this presents to build more energy efficient homes. The Cambridge Sub-Region has already accepted this challenge and is already planning for the step change in growth proposed in the RSS. This step change in house numbers was needed because of the rapid growth of the economy due to the increase in high technology industry in Cambridge. The Structure Plan contained policies to

---

<sup>1</sup> Zero carbon means that over a year the net carbon emissions from energy used in the home will be zero



selectively manage this economy. This selective management has been included in the RSS – Policy CSR2. If further growth is planned for this area it must be related directly to the local economy and not just added on to the housing figures.

56. In the RSS it states that the Key Centres will be the focus for development and 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. If the term compact is to be removed from Cambridge then this implies that either the City will be allowed to expand further, inevitably into South Cambridgeshire District, or a new settlement will be proposed relatively close to the City. Both these scenarios would have significant implications for this District. There needs to be an opportunity for this District to implement the growth that is already planned for before further growth is imposed. The focus for the current strategy has been to locate most of the housing growth in the Cambridge Sub-Region in or close to Cambridge in order to provide more houses close to the current focus of jobs in the Sub-Region. The other Districts in the Cambridge Sub-region will be planning for substantial reductions in development during the period up to 2021.

57. ***Suggested response by South Cambridgeshire District Council***

*The Council is already meeting a very challenging agenda of growth and considers that if further growth is to be imposed on the Cambridge Sub-region it must be at a level directly related to local job growth, environmental, social and infrastructure capacity all of which will be stretched by the current RSS in that part of the Sub-Region close to Cambridge. Continued sustainable growth may only be possible if the remaining Districts in the Cambridge Sub-Region play a greater role in accommodating housing and employment growth after 2021.*

**Implications**

58.	Financial	None
	Legal	The Council will be obliged to amend its Local Development Framework documents to reflect any changes in policy in the revised RSS
	Staffing	The Development Plan Documents already produced by the Council will have to be revised to comply with the requirements of the revised RSS
	Risk Management	Seeking an agreed response from all of the Cambridgeshire Local Authorities
	Equal Opportunities	None

**Effect on Annual Priorities and Corporate Objectives**

59.	Affordable Homes	The RSS has set a target for affordable homes in the region
	Customer Services	
	Northstowe and other growth areas	The RSS has policies that will affect the planning of these areas
	Quality, Accessible Services	The RSS has policies that will affect the future accessibility of services within the District
	Village Life	The RSS has broad policies that could affect village life
	Sustainability	The RSS has as one of its aims to promote sustainability
	Partnership	The RSS aims to promote joint working

### **Conclusions/Summary**

60. South Cambridgeshire District is generally content with the RSS as submitted to the Secretary of State with some reservations as highlighted in this report.

### **Recommendation**

61. Cabinet is recommended to agree the responses to the proposed changes to the draft revision to the Regional Spatial Strategy for submission to the Secretary of State.

**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

**Contact Officer:** Alison Talkington Senior Planning Policy Officer  
Telephone: (01954) 713182