

Statement on behalf of Bourn Parish Council (Representations 59165 and 59159) in response to Inspector's Matters and Issues for Joint Hearing Sessions, Block 1, in November 2014.

This statement is submitted by Bourn Parish Council on behalf of Coalition of Parish Councils, formed to oppose unsustainable major housing developments in the A428 corridor¹. It responds to issues under Matter 2 (Overall Spatial vision and general issues).

Although the examples we give relate mainly to the A428 corridor, in the west of the district, we consider this valid because the major development planned in this area are an important component of SCDC's overall spatial vision and strategy, which we *consider is unsound*

Matter 2: Issue (a): Is the overarching development strategy....soundly based and will it deliver sustainable development in accordance with the principles of the NPPF?

In our opinion, the Local Plan is unsound, in a number of key respects, and will not deliver sustainable development in accordance with the NPPF.

- 1. The proposed major new housing developments in the A428 corridor are located too far away from jobs (and centres of shopping, leisure, education and entertainment).**

The National Planning Policy Framework (NPPF), paragraph 37 states:

Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

Cambridge and South Cambridgeshire is one of the fastest growing regions in the UK. This growth is being driven by hi-tech industries (IT and bio-technology), which are concentrated in the City of Cambridge and in science parks to the north and south of the city in South Cambridgeshire.

Approximately 75,000 people currently work in South Cambridgeshire, of which 20,175 (27% of the total) work in hi-tech industries. The spatial concentration of employment is likely to continue in future. The 2012 Cambridge and South Cambridgeshire Sustainable Development Strategy² identifies 18 major employment locations within South Cambridgeshire. The biggest increases in jobs are expected where the jobs currently are - to the north and south/south-east of the City of Cambridge.

¹ The **Coalition of Parish Councils** comprises: Arrington, Bourn, Caldecote, Cambourne, Caxton, Croxton, Elsworth, Eltisley, Eversdens, Hardwick, Knapwell, Longstowe, Madingley, Toft parish councils.

² *Cambridge and South Cambridgeshire Sustainability Strategy*, prepared by the Cambridgeshire and Peterborough Joint Strategic planning Unit, 2012.

Between 2011 and 2031, the total number of people employed in Cambridge and South Cambridgeshire is expected to grow by about 25% from approximately 175,000 to 220,000. Of the additional 45,000 jobs over 80% are expected to come in: (i) areas to the north and northwest of Cambridge, centred on the Cambridge Science Park and Cambridge Research Park; and (ii) to the south and southeast of the city, especially the biomedical campus at Addenbrooke's.³ Only 2,800 new jobs (6% of the total) are expected in the A428 corridor. These new jobs in the A428 corridor will be offset by the loss of 1,600 jobs from the area, in 2016, when Papworth Hospital - one of the biggest employers in the west of the district – moves to the new biomedical campus at Addenbrooke's Hospital (to the south of Cambridge). As a result only 1,200 new jobs are expected in the western part of the district. **Why build houses where there are no jobs?**

In the period up to 2031 (and beyond), the main centres of employment, education and entertainment will continue to be found in Cambridge and areas south and north of the city to the east of the M11.

It is unsound to locate major housing developments in the A428 corridor since this will increase journey lengths, compared to developments closer to Cambridge and to the south of the city, which is contrary to the NPPF.

- 2. The spatial pattern of development proposed in the Local Plan will result in unnecessary extra car journeys (compared to alternatives of building closer to Cambridge and nearer to jobs) and will impact significantly on carbon levels.**

The NPPF, paragraph 30 states:

Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.

As was noted above, the SCDC **Local Plan does not support a pattern of development that facilitates the use of sustainable modes of transport or which seeks to encourage solutions that support reductions in greenhouse gas emissions and reduce congestion.**

The proposed A428 corridor development of over 5,000 houses, for example, would be located over 10 miles away from a railway station, six miles from the busway and while it should be possible to improve bus services into Cambridge it is highly unlikely that sustainable and frequent bus services to other parts of the district would be viable. (Currently, over 75% of people in Cambourne commute by car and only 5% by bus. They also travel further to work than people in other parts of the district⁴).

The A428 corridor developments, if they go ahead, would add 2500 tonnes of CO₂ per year which represents 0.5 tonnes per new household. To put this in context,

³ The Sustainability Strategy estimates 19,700 new jobs to the north (44%) and 16,700 to the south (37%).

⁴ *Living in Cambourne*. Cambridgeshire County Council, 2006.

this is the equivalent of 10% of the average CO2 emission per UK household per year of 5 tonnes⁵. Detailed calculations are given in Annex A.

This is totally unnecessary and could be avoided if new housing is developed in areas:

- **close to main centres of employment**, where most of the growth in employment in the next 10-20 years is expected to take place; and
- where it is possible for people to get to work using high quality public transport (e.g., trains, busway, bus services) or by cycling and walking.

This would be consistent with the National Planning Policy Framework (paragraphs 30 and 37). Such areas might include:

- the northern fringe of Cambridge and neighbouring areas of South Cambridgeshire (e.g., Waterbeach); and
- the southern fringe of Cambridge and neighbouring areas of South Cambridgeshire (e.g., Fulbourn and the Duxford/Hinxworth and the surrounding area).

These two areas are expected to account for 80% of the growth in employment in Cambridge and South Cambridgeshire over the next 10+ years.

Although development in the southern fringe of Cambridge might involve taking land from the green belt, this is permissible, where strong arguments on sustainable development can be made.

3. **SCDC's Sustainable Development Sequence Matrix is not used consistently.** The allocation of positive, neutral, negative and very negative scores has not been applied objectively and fairly across all sites and the rationale for deciding on sites was not made clear.

For example, under the parameter - Will the site minimise impacts on climate change (including greenhouse gas emissions)? There is no consistency in the way ratings are applied. Bourn Airfield is given a positive +/+++ rating, which is justified on the grounds that: *'development would create minor additional opportunities for renewable energy. A new settlement of this scale would be expected to include many additional renewable energy options.* This benefit of creating additional renewable energy options is not applied to all sites. Indeed the majority of other sites are simply rated with the comment 'standard requirement for renewables would apply'. Very little account is taken in any of the sites of the published SCDC criteria on which this parameter is to be weighted (e.g., will it improve air quality? will it reduce traffic volumes? and will it support transport by means other than car? etc). At the same time, no account is taken in the assessment of this site to the enormous impact of increase vehicular greenhouse gas emissions, which would result from the Bourn Airfield development!

In addition, the whole of the SCDC Local Plan Sustainability Appraisal process seems to have neglected the principles of the Regional Planning Guidance for East Anglia Government Office East of England RGP6 November 2000, which are reinforced by the NPPF, and were to *'maximise energy efficiency and minimise harmful emissions and waste by minimising the need to travel, reducing reliance on the private car and the promotion of walking, cycling and public transport.'*

⁵ Department of Energy and Climate Change *United Kingdom housing energy fact file 2012*. It is decreasing by 1.2% annually.

Matter 2: Issue (b) - Is it clear what other strategic options were considered and why they were dismissed?

SCDC's own Local Plan Submission Sustainability Appraisal acknowledges that, under the Local Plan:

'housing development, which would have taken place in Cambridge was dispersed to towns and villages beyond the outer boundary of the Green Belt, with people commuting back to jobs in Cambridge contributing to congestion, greenhouse gas emissions, air quality problems and other quality of life issues.'

Despite of this admission, and the high demand for housing on the periphery of the built up area of Cambridge, SCDC dismissed development on the edge of Cambridge, preferring to develop new settlements and extending existing new settlements.

The SCDC Green Belt review by Landscape Design Associates did not preclude development in the Green Belt. Indeed it **suggested areas for potential development in the green belt and advised that more assessment was needed on other potential sites.**

Policy P9/3c of the draft of the Structure Plan (Cambridgeshire County Council 2002) suggests a number of locations that Local Plans should consider for development. Our broad scale study of the whole Green Belt indicates that there might be some potential to develop parts of five of the areas suggested in the draft Structure Plan (north of Newmarket Road, North of Cherry Hinton, Cambridge Airport, at Clay Farm and areas east and south of Trumpington, and between Huntingdon Road and Histon Road), without causing significant detriment to Green Belt purposes. Our broad scale assessment has not identified opportunities for large scale development in the two other areas suggested in the draft Structure Plan (south of Addenbrooke's Hospital, or between Madingley Road and Huntingdon Road). More detailed assessment might, however, identify some sites in these four areas, or in other parts of the Green Belt, that could be developed without causing significant detriment to Green Belt purposes.

These sites have not been fully investigated and the further assessments suggested have not been done. This represents a failure on part of the Council and points to an inherent weakness in their development of a sound Local Plan.

Annex A: Additional CO2 emissions from commuting

According to the 2011 census there were 0.998 commuting car journeys per dwelling in the Bourn ward². Based on this figure, an additional 4989 commuting car journeys will be generated by building 5000 extra houses in the area.

Assuming the provision of bus services has a similar effect on car journeys in the corridor as it did when they were provided as part of the Cambourne development (10% reduction³) this will equate to an additional 4092 commuting car journeys in the area.

On average residents of the Bourn ward work 213 days per year² and it has been shown that Cambourne residents travel an additional 10 km to work than the rest of South Cambs¹. Assuming the residents of the new developments follow a similar work pattern, these figures combined with the additional commutes means that there will be 4260 km travelled each year by new residents of the West Cambourne and Bourn Airfield developments as a consequence of the developments being further from the main areas of employment in the region.

Assuming the new residents all have cars no older than 5 years (unlikely seeing as the “affordable housing” argument is being pushed) this will lead to **an additional carbon footprint of 2,521 tonnes per year**. Even if their bus plans achieve a 20% reduction in commuting car journeys, there will still be 1969 tonnes of carbon emissions generated each year by the extra 10km residents have to travel to work.

1. Living In Cambourne, Cambridgeshire County Council, 2006
2. <http://ukcensusdata.com>
3. DfT Traffic Counts