

Matter 2: Overall Spatial Vision and General Issues

2.1 Martin Grant Homes and Harcourt Developments Ltd submitted representations in response to consultation on the South Cambs Submission Local Plan (SCLP) in October 2013. As part of these representations, MGH/Harcourt raised issues relating to the process and evidence base that has informed the development strategy in Local Plan and identified flaws in both. We have addressed some of these matters in relation to the Sustainability Appraisal in the written statement for Matter 1. MGH/Harcourt consider that the flaws identified in relation to the SA are replicated in the analysis and selection of sites for development. The focus of this written statement is therefore on the inconsistencies in this level of analysis, specifically in the SHLAA, and particularly that component of the analysis that relates to the A428 corridor / Bourn Airfield.

a. 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?

2.2 The MGH/Harcourt written response to Matter 1 addresses the evidence base for the spatial strategy as identified in the SCLP. The SCLP at paragraphs 2.14-2.17 refers to a number of documents as providing the background to, and justification for, the spatial strategy contained in the plan, which includes:

- the 'Cambridgeshire Development Study' (CDS - not listed as a library document) (2009);
- the 'Cambridge and South Cambridgeshire Sustainable Development Strategy' (SDS) (2012) (Doc ref: RD/Strat/040); and
- the 'South Cambridgeshire Draft Final Sustainability Appraisal' (2014) (Doc ref: RD/Sub/SC/060).

2.3 The MGH/Harcourt written response to Matter 1 identified inconsistencies between the content of the CDS and the SDS and the findings of the SA. The inconsistencies that were highlighted relate specifically to the spatial option of new settlements. The CDS and SDS both acknowledge the contribution that new settlements can make to housing supply and yet also identify the challenges associated with such developments where they are free-standing, including:

- greater challenge involved in creating new places and a sense of community cohesion;
- new settlements generally result in out-commuting;
- providing all the necessary infrastructure may present viability challenges;
- free standing new towns have the additional burden of having to fund transport links;
- challenges exist in relation to deliverability due to the long preparation, planning and overall lead-in times before development starts.

2.4 It is the SDS that sets out the 'Sustainable Development Sequence', which in order of preference is as follows:

- within the built up area of Cambridge;
- on the edge of Cambridge;
- one or more new settlements;
- within or adjoining market towns; and
- at sustainable villages.

2.5 In relation to the third level of the sequence i.e. new settlements, the balance of the analysis contained in SDS, at paragraphs 4.11-4.15, is that there are risks associated with free-standing new settlements, albeit that these can be addressed by having regard to factors such as the location of the new settlement and its proximity to other main urban areas and access to good quality public transport.

2.6 MGH/Harcourt broadly support the 'Sustainable Development Sequence'. However, in order to address the risks associated with free-standing new settlements identified in the SDS, MGH/Harcourt propose that there should be a refinement to the sequence that introduces differentiation in the category of new settlements. The refinement proposed is to identify a preference for new settlements where they represent an expansion of an existing community, either an existing new settlements e.g. Cambourne or other settlements that would provide access to currently available infrastructure and facilities e.g. at Waterbeach.

2.7 This amendment to the 'Sustainable Development Sequence' would address some of the failings that we have identified in relation to the 2014 SA. In the written statement for Matter 1 we identified a number of instances where the 2014 SA is not consistent with the findings of the CDS and SDS, specifically in Part 3, Appendix 4: 'Appraisal of Alternative Packages'. For example in relation to SA Objective 18; 'Will it encourage engagement with community activities?' the analysis states:

'The assessment of individual sites assumed that larger more focussed developments are more likely to be able to deliver a wider range of new services. On this basis packages 1, 2, 4, 5 and 9, which include new settlements, are more likely to perform well and provide positive support for this sub-objective.'

2.8 Equally, in relation to SA Objective 19 concerning enhanced competitiveness and providing locally available jobs the analysis states:

'New settlements would be mixed use developments incorporating provision of employment land, hence the strongly positive performance for the packages providing new settlements (1, 2, 4, 5, 7, 8 and 9) and the less positive performance of package 3, which would not deliver a new settlement.'

2.9 In both of these extracts, some of the challenges associated with the delivery of free-standing new settlements – those identified by the SDS and CDS – are completely overlooked in the SA. Indeed a wholly different perspective has been taken such that new settlements achieve a positive score when in the SDS and CDS identify potential adverse effects. The proposed amendment to the 'Sustainable Development Sequence' would assist in drawing out these issues and ensure that the SA was undertaken on a consistent basis as the findings of the CDS and SDS.

b. Is it clear what other strategic options were considered and why they were dismissed?

2.10 MGH/Harcourt have no comments in terms of 'strategic' options and consider the matter in relation to site options in response to question c below.

c. Are the Plans founded on a robust and credible evidence base?

2.11 In response to question a), we have set out a critique of the evidence base for the SCLP and identified significant inconsistencies between the CDS and SDS when compared with the

analysis contained in the SA. To address some of these inconsistencies we have proposed an amendment to the 'Sustainable Development Sequence'. The identified inconsistencies in the evidence base and the proposed amendment to the Sequence will require that the SA be reviewed and amended accordingly. In addition, the process by which specific sites have been assessed and identified as allocations is also flawed, specifically in relation to the way in which the new settlement sites have been appraised.

2.12 MGH/Harcourt are content that its proposal for land north of Cambourne is appraised alongside other 'new settlement' options in the SHLAA at Appendix 7i. However, the proposition at Cambourne is very different from a 'free-standing' new settlement. The proposals for land north of Cambourne – referred to as 'Harbourne' – have been formulated with the objective of creating a fully integrated extension of the existing community of Cambourne. The proposals are explained in more detail in the document that we submitted in support of the MGH/Harcourt representations, entitled '*Harbourne New Village: delivering a sustainable community*' (which we have submitted to the examination library for reference). The proposal has the objective of creating an overall community of some 10,000 dwellings (including the Cambourne West allocation) and thereby achieving a critical mass that will make the combined community of Cambourne / Harbourne more sustainable.

2.13 Despite this important differentiation in the proposals for Harbourne versus free-standing new settlements being made clear in our earlier representations, this is not apparent in the way the site is assessed in the SHLAA. For any significant development proposal in the A428 corridor the issues of traffic generation and highway capacity are of key importance. In the SHLAA this issue is addressed in the proforma under the heading 'Infrastructure'. In relation to both Bourn Airfield and land north of Cambourne the SHLAA analysis refers to the advice of the Highways Agency and in the second paragraph states:

'... there is some scope for these large sites to enhance the overall transport sustainability of Cambourne and other local settlements through better integration, with the potential to offset some of the new demand. The capacity to accommodate new development on this corridor is directly related to this scope, which will need to be demonstrated by the promoters.'

2.14 In relation to land north of Cambourne, technical discussions have taken place between MGH/Harcourt and the County Council as highways authority and, on the basis of those discussions, a technical note was issued by them dated 2nd October 2013 (included in our representations to the Submission Draft LP). The technical note makes a number of points in relation to this key issue of corridor capacity on the A428 and the proposal north of Cambourne:

- agreement in general terms that increasing the size of Cambourne can improve the level of self containment that occurs within the settlement.
- locating a P&R with access directly off the old A428 will help intercept traffic from the strategic network before it reaches the existing Madingley Road P&R site and, being located close to the exit junction on the A428, should further encourage use.
- the proposed P&R may also be used by existing residents of Cambourne.
- an enhanced Citi 4 or a new service would enable the development to be served by bus.

2.15 Taken together these elements of the proposal amount to a strategy that will meaningfully contribute towards mitigating its effects on the A428. It is also a unique set of advantages that the land north of Cambourne has that no other site in the A428 corridor is capable of delivering. However, this is not reflected in the site analysis contained in the SHLAA.

2.16 Similarly, we have provided detailed landscape evidence to the Council in relation to the proposal north of Cambourne in the form of a report prepared by Cooper Partnership (also submitted to the examination library), which includes a detailed assessment of the site and its visibility. The report shows how the effects of the development are proposed to be mitigated using existing woodland and proposed new planting. Despite having submitted this detailed analysis, the relevant SHLAA entry states:

'... it would not be possible to mitigate the landscape impacts. The scale of the development and types of buildings proposed would be difficult to integrate into the local landscape and would have a significant adverse effect on existing settlements and landmark buildings.'

2.17 The analysis on which the Council's comments are formulated has not been published and so we have not had the opportunity to review and comment upon it. Notwithstanding this point, the Council's conclusions are not consistent with the Cooper Partnership report that concludes:

'The landscape and visual appraisal shows that there are some constraints to development on the site, but that, contrary to the SCDC conclusions on the SHLAA, these constraints can be successfully accommodated by sensitive masterplanning, which respects key landscape characteristics and views of the site. The site therefore offers good potential for high quality development, such as that shown on the proposed illustrative masterplan, without undue harm to the landscape and to visual amenity of the site and surrounding area.'

2.18 It appears to be on the basis of the Council's assessment of the landscape effects of the land north of Cambourne that in Tier 2 of the SHLAA proforma it states that the site does not warrant further assessment. For the reasons set out above we consider this conclusion to be flawed and not supported by the relevant evidence. Indeed in some aspects there simply is no evidence to support the conclusions reached.

2.19 In many respects we support the strategy in the SCLP, including the 'Sustainable Development Sequence' (albeit in a modified form), the balanced strategy of Green Belt release and new settlements and the identification of the A428 corridor as a potentially sustainable location for strategic growth. However, the dismissal by the Council of the land north of Cambourne as an option for development is strategically important. It is through this process that the Council has come to the conclusion that the land at Bourn Airfield is the preferred location for a new settlement in the A428 corridor. We fundamentally disagree with this conclusion. For the reasons set out in this written statement and in representations to the Submission Draft LP, the selection of Bourn Airfield as the preferred location is flawed in that it is not based on a robust and credible evidence base.

2.20 It is therefore our proposition that this analysis be undertaken again albeit this time on the basis of a reliable evidence base. This can be undertaken now, albeit with some delay to the Local Plan process. Alternatively, the Local Plan should be reworded to confirm the A428 as a strategic corridor for the location of a new settlement, but with the decision on the precise location of that development left to a further stage of plan-making, potentially in the form of an Area Action Plan. The second option is the least preferred, but would allow the Local Plan to proceed to adoption should the inspector find that in other aspects the SCLP is 'sound'.