

**CAMBRIDGE LOCAL PLAN AND SOUTH CAMBRIDGESHIRE
LOCAL PLAN EXAMINATION IN PUBLIC**

MATTER 5

INFRASTRUCTURE / MONITORING / VIABILITY

PREPARED BY

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ON BEHALF OF

PIGEON LAND AND LANDS IMPROVEMENT HOLDINGS

CCC Respondent Number:

5102 (Representation References: 27628)

SCDC Respondent Number:

20801 (Representation References: 59925)

Respondent: Karen Beech - Pigeon Land

Agent: Mike Carpenter - CODE Development Planners Ltd.

1. Introduction

- 1.1. This statement has been prepared on behalf of Pigeon Land and Lands Improvement Holdings. It should be read in conjunction with previously submitted representations (ref 27628 and 59925) and the six attached appendices.

What parts of the Local Plans are unsound?

- 1.2. Both Local Plans are unsound as they aim to create significant unsustainable growth locations for housing and employment. The investment proposed to make the significant growth areas sustainable in transport terms is questionable in its funding, effectiveness, justification and deliverability. This raises reasonable doubt on whether the infrastructure proposed is deliverable in a timely manner as required by the NPPF (Paragraph 177) and subsequently whether the growth projections can be achieved within the plan period.

What Soundness Criterion Do the Plans Fail and Why?***Effective***

- 1.3. The Local Plans identify a package of transport measures they claim to be adequate to support the development, however there is no evidence to support this contention. The strategic policy of developing new settlements away from the most sustainable locations means that major investment in transport infrastructure has a limited effect on mitigating the impact of the development, and is less cost effective when considered in relation to potential alternative development within the Cambridge fringe.

Justified

- 1.4. The Local Plans identify a package of transport measures they claim to be adequate to support the quantum and dispersed location of development, however there is no evidence to support this contention and the Sustainability Appraisal does not assess the essential infrastructure required or reasonable alternatives to it not being provided.

Consistent with national policy

- 1.5. There is significant doubt about both the funding and deliverability of the transport infrastructure identified to support the growth strategy. One of the twelve core planning principals detailed in the NPPF is that plan making should:

actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;

- 1.6. The current strategy proposed by both Local Plans does not make the fullest possible use of non-car transport modes and focuses significant development in locations which are currently unsustainable and that even with significant investment will remain unsustainable.

How Can the Plan be Made Sound?

- 1.7. We consider that to enable the plan to be made sound the following should be undertaken:

- An SA on the alternatives for the development strategy; this should take into account the infrastructure requirements for each strategy option
- Consideration by SCDC and CCC of releasing available and deliverable land in locations which are or can be made sustainable
- To develop an infrastructure strategy, reflective of the above points, based on realistic levels of private and public funding which can then deliver infrastructure in a timely manner and meet market demands.

2. Matter 5 Questions

a) Do the Plans clearly identify the essential elements of infrastructure needed to deliver development as proposed?

- 2.1. The 2013 Infrastructure Delivery Study Update (IDSU 2013) (RD/T/020) assesses the cost and delivery of critical and necessary infrastructure items which we have taken to mean the same as essential. However, the identification of the critical and necessary infrastructure is flawed as:
- The transport strategy has not been adequately tested against reasonable alternatives as required by the SEA Directive.
 - Cambridgeshire County Council's consultants' 2013 CSR Modelling Report (RD/Strat/160), which assesses the Transport Strategy supporting the New Settlement Strategy, assesses only the complete transport package and contains statements which are skewed to support an unsustainable transport strategy.
- 2.2. To comply with the SEA Directive the range of essential infrastructure required to provide for the range of development strategies should be assessed or contained within the baseline of the SA. The Councils have failed to undertake an SA of the reasonable alternatives for growth strategies including the necessary infrastructure/transport strategies to make them happen.
- 2.3. This issue is highlighted in the successful challenge of the Greater Norwich Development Partnership Joint Core Strategy (Heard v Broadland District Council 24.2.12. Appendix 3 para 73) and again commented upon by the Inspector in his subsequent report (Appendix 4 para 26).
- 2.4. Amongst 2013 CSR Modelling Report's (RD/Strat/160) weaknesses is that it analyses the infrastructure package as a complete package, therefore there is no understanding in modelling terms of the impact of failing to deliver any individual essential infrastructure scheme.
- 2.5. Phase 2 of the Modelling Report assessment focussed on the implications of the new settlements and village expansion options. The strategy does not provide information relating to the relative performance of the Cambridge urban/fringe.

- 2.6. The Modelling Report attempts to promote the effectiveness of the unsustainable growth/transport strategy:

Waterbeach has a larger number of walk and cycle trips to Cambridge compared to the village development strategy. (Pg4)

- 2.7. From Waterbeach, Cambridge City Centre is approximately 8 miles and the Science Park 5 miles. It is unlikely that commuters will walk these distances while cycling will not be that attractive. The word larger is misleading. This does not indicate that there will be a large number just that there would be more than would cycle from village development.
- 2.8. Figures 1 - 10 (Appendix 6) identify the areas within a 30 minute walking and cycling distance of the new settlements and of the promoted Cambridge South development. These highlight the relative isolation of the new settlements to key destinations compared to the excellent accessibility of fringe development and indicate why walking and cycling trips from these new settlements would be limited.
- 2.9. Page 4 of the Modelling Report indicates that even with significant sustainable transport infrastructure, the forecast AM public transport mode shares for Waterbeach and Bourn Airfield would be 6% and 7% respectively, compared to around 60% of trips being made by car.
- 2.10. Therefore despite significant infrastructure improvements, the growth settlements locations mean that the car will remain the dominant form of transport. This is reinforced by 2011 Census data for journeys to work for South Cambridgeshire compared to Cambridge City and the Trumpington Ward, which is located on the southern fringe of Cambridge (Appendix 1, Page 1, Tables 1&2). This demonstrates that there would be expected to be a marked difference between a Cambridge Fringe strategy and a New Settlement strategy when it comes to car use and, its inevitable impact on the road network and air quality. Again this highlights the Plans' failure to meet with one of the NPPF core objectives to make the fullest of opportunities to increase non vehicle travel movements and the investment will not make an unsustainable location sustainable.
- 2.11. The Modelling Report also focuses on the benefits of the transport infrastructure package when compared to not having the infrastructure package. It shies away from reporting the resultant impact of the development proposals and the implementation

- of the transport package. It also puts a positive, and sometime misleading, spin on the results of the testing.
- 2.12. The Modelling Report (pg. 8 2nd chart) highlights that car journey times will increase significantly with or without the package. While there will be improvements to public transport journey times on some corridors, this will only be of benefit to the limited number of people forecast to use public transport. It also identifies significant increases in journey time from Bourn for both car and public transport. Presumably the limited shift from car to public transport with the implementation of the transport package is because the journey time increases to public transport are less than for the car. Again this highlights that although the essential infrastructure may have been identified the strategy is unjustified and ineffective.
- 2.13. The Modelling Report suggests that public transport use will increase from 4% to 29%. What this means is the change in public transport use will increase by this amount. The public transport use from Waterbeach will still only be 6%. Hardly a dramatic proportion given the expenditure proposed and nowhere near the 29% the report tries to suggest.
- 2.14. The Modelling Report forecasts that the fully implemented strategy would result in an 8% increase in walking and cycling. This would however equate to an increase of just over 2% in terms of overall mode share. In relation to the amount of money the essential infrastructure would cost this does not indicate that it would be effective or consistent with the NPPF para 34, especially when compared with the results which would be resultant from developing sustainable locations on the fringe.
- 2.15. The Appendix E of the Modelling Report (Appendix 5) indicated that while the overall number of vehicle kilometres travelled is anticipated to increase by 28% between 2011 and 2031 in Cambridge and South Cambridgeshire with the modelled level of growth and assessed transport strategy, there would be a 105% to 113% increase in the level of delay. The level of increases in both distance and delay would be greater in the South Cambridgeshire District than Cambridge and does not suggest a sustainable growth strategy supported or mitigated by investment in transport infrastructure.
- 2.16. The Plans and the technical supporting documents may have identified essential infrastructure to deliver the Plans' growth objectives but this transport infrastructure

strategy is not justified as it has not been compared with any reasonable alternatives; it is also not effective at delivering the basic aims of sustainable transport and therefore is inconsistent with the advice contained in NPPF Para 34.

b) How will these be funded and delivered in a coordinated manner?

- 2.17. A review of the Infrastructure Delivery Study Update (IDSU 2013) has identified that critical or necessary transport infrastructure with an identified cost of some £808,000,000 is required. Despite some £472,000,000 being identified as funded by private sources, there is still a funding gap of over £306,000,000 (Appendix 1, Page 1, Table 3). This funding gap provides for uncertainty in the delivery of the Plans' strategic growth locations over the entire plan period; contradictory to NPPF Para 182.
- 2.18. There is no clear definition of public or private funding or how these have been identified for individual schemes. The level of private funding for the transport infrastructure schemes is considerable for the proposed strategic growth areas and no explanation is provided in the IDSU 2013 as to how this is to be secured. An initial explanation would be that the authors expected that private funding would come from a combination of S106 and CIL contributions. However, it should be noted that major transport schemes to support the strategic growth locations have been listed as ineligible to receive CIL payments in the SCDC Draft Regulation 123 list (RD/T/230).
- 2.19. IDSU 2013 identifies that the transport infrastructure will need to be delivered early. This is consistent with ensuring adequate access and sustainable transport choices are available from the outset.
- 2.20. As shown in Appendix 1 (Page 2, Table 4), the relevant transport infrastructure for Waterbeach, Bourn Airfield and West Cambourne would be delivered by the end of the 2031 plan period with a total of £445,000,000 of privately funded infrastructure (which cannot include CIL payments), this would facilitate for the creation of only 4,300 dwellings.
- 2.21. While noting that this is intended to deliver housing beyond 2031, the relative cost per dwelling by the end of the plan period is £105,814. This is more than doubled to £247,222 when considered against infrastructure and housing delivery projections to

2026. This is a significant front loading of costs against development and highlights that the delivery of these homes within the plan period is unrealistic and therefore ineffective.
- 2.22. Since the publication of the IDSU 2013 and the Local Plan Submission Documents, it has been confirmed that City Deal Funding has been secured. This would initially see £100million made available for transport improvements in the period 2015–2020, with potentially a further £200million available for 2020–2025 and £200million from 2025 onwards, these further payments of £400 million are dependent on as yet unknown triggers.
- 2.23. City Deal money is not intended to be used to bridge shortfalls in developer contributions (as confirmed by City Deal Project Manager, Appendix 2), which would therefore cast further doubt on deliverability.
- 2.24. Subsequent to the IDSU 2013, a number of schemes have been identified by the County Council in the Transport Strategy for Cambridge and South Cambridgeshire – Action Plan and Scheme Details 2013 (RD/T/120) which would be funded by City Deal money. However, it appears that amongst these schemes are a number which were identified in the IDSU 2013 as being privately funded, and therefore not contributing to the funding gap. This indicates that the City Deal would form part of a funding package to reduce developer contributions for these schemes. This does not coordinate with the advice contained in Appendix 2.
- 2.25. Without confirmation of the City Deal triggers, it is not possible to determine the likelihood of achieving the funding. There therefore remains doubt as to the future availability of this funding source which is required to deliver some of the proposed transport infrastructure, whether that be as a standalone investment or as a package to make up shortfalls in developer contributions.
- 2.26. The timings of the delivery of the A14 appear to be optimistic and based on a Development Consent Order being submitted in Autumn 2014, with a decision from the SoS identified for late 2015/early 2016 and construction to begin in late 2016. It is proposed to open to traffic in 2019/2020.
- 2.27. This appears to be a very tight programme to guide a £1.5bn scheme through the planning and construction processes. Any delays would then be expected to impact on the delivery of Northstowe. Although 1,500 homes are proposed to be delivered

by 2019/2020, in line with the 2012 planning permission, further growth beyond this amount of dwellings is limited by the need for construction of the A14. The Local Plan projections identify the delivery of 400 homes per year from 2020 onwards which would presumably be compromised by any A14 delays, as witnessed in the long planning history of this development.

- 2.28. The A14/A10 Milton Interchange has also been identified for improvement and is seen as critical to the deliverability of Waterbeach. This is only at option identification at this stage. As part the East Cambridgeshire Infrastructure Study the Highways Agency identified current capacity concerns at this junction and the ability to provide additional capacity without significant changes to its layout, for which a suitable option is not identified. Given the potential complexities associated with any scheme, the potential to deliver the required improvements remains a doubt.
- 2.29. The Transport Strategy details that on the key radial routes and in particular on those servicing the western corridors for new development at Cambourne and Bourn, significant bus priority will be required in lieu of a guided busway (at least in the short term) or rail provision. The extent to which the potential deliverability of these on-road bus priority measures have been investigated to date is not clear.
- 2.30. To meet the funding gap identified in the IDSU 2013 there is a reliance on privately funded front loaded investment from developers to unlock previously undesirable employment and housing land. If the required funding is actually achieved it should also be noted than none of the major infrastructure schemes have progressed beyond option identification stage and therefore their physical delivery is also in doubt. These matters raise significant doubts as to the reasonable prospect of the identified transport infrastructure being delivered in a timely manner and of the chosen growth strategy being delivered across the plan period.

c) Is there evidence that the combined requirements for developer contributions and/or CIL will not render development unviable?

- 2.31. Major transport schemes to support the strategic growth locations have been listed as ineligible to receive CIL payments (RD/T/230) and the growth locations are CIL exempt.
- 2.32. The extent of private funding identified is questionable when considered against the new settlements which the improvements are intended to support. For infrastructure schemes for the Waterbeach growth area, some £348,000,000 of private funding had been identified. This is to help the delivery of 8,000 homes during the Local Plan period and beyond. This equates to some £43,500 per dwelling, a considerable requirement and one which raises doubts about cost effectiveness and deliverability. (Appendix 1, Page 2, Table 4)
- 2.33. A similar situation, although not to the same extent, is apparent for the western strategic growth areas. At Bourn Airfield and West Cambourne, private funding of £97,000,000 is identified to deliver 4,700 homes. This equates to around £20,600 per dwelling.
- 2.34. The overall cost per dwelling detailed above may be considered appropriate by SCDC and they may feel that a CIL charge of zero is sufficient to balance this financial burden. The main concern is that by requiring the infrastructure early within the development phasing the upfront cost to developers will not be considered attractive and therefore the model put forward does not reflect the advice of NPPF Para 173.

d) Is it clear how the Plans will be monitored? Are targets identified and is it clear what action will be taken if targets are not met?

- 2.35. As discussed within our Matter 1d submission, it is a requirement of the SEA directive that significant environmental effects of the implementation of the plan be monitored to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action. It is a requirement of the NPPF that a Local Plan be produced in accordance with the SEA requirements.
- 2.36. The monitoring proposed does not achieve the requirements of the Directive in that at an early stage unforeseen adverse effects should be monitored to undertake

appropriate remedial action. The indicators/triggers will not achieve this early warning as they are not specific and will not achieve the high level of protection which is the fundamental objective of the Directive.

Word Count (2,938 words excluding paragraph numbers)