

**MATTER 5**

**INFRASTRUCTURE/MONITORING/VIABILITY**

**NORTH BARTON ROAD LAND OWNERS GROUP**

**CAMBRIDGE CITY COUNCIL ID. 5336**

**SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL ID. 21302**

**LOCAL PLAN EXAMINATIONS**

**CAMBRIDGE CITY AND SOUTH CAMBRIDGESHIRE**



**October 2014**

**Prepared by: Brian Flynn MA MRTPI**

**Januarys, York House, Dukes Court, 54-62 Newmarket Road, Cambridge, CB5 8DZ**

**Tel: 01223 326823 Fax: 01223 329402 email: [brian@januarys.co.uk](mailto:brian@januarys.co.uk)**



## CONTENTS

<b>1.</b>	<b>INTRODUCTION.....</b>	<b>1</b>
<b>2.</b>	<b>MATTER 5 – INFRASTRUCTURE/MONITORING/VIABILITY.....</b>	<b>3</b>



## 1. INTRODUCTION

- 1.1 This Statement has been prepared by Januarys on behalf of the North Barton Road Land Owners Group (North BRLOG) to the Local Plan Examinations for Cambridge City and South Cambridgeshire. North BRLOG comprises four landowners, as follows: Corpus Christi College, Downing College, Jesus College, and University of Cambridge. North BRLOG owns land to the North of Barton Road which is on the south western built-up edge of Cambridge. It is currently located within the Green Belt. The site crosses the administrative boundary between Cambridge City and South Cambridgeshire. In September and October 2013 representations were submitted on behalf of North BRLOG to both draft Cambridge Local Plan (Draft CLP2014) and draft South Cambridgeshire Local Plan (Draft SCLP); separate representation reports were prepared to address the specific policies and supporting text in each document.
- 1.2 The representations to Draft CLP2014 and Draft SCLP were supported by the following technical documents: Ecological Appraisal; Initial Landscape & Visual Appraisal; Response to review of the Inner Green Belt Boundary Study; Transport Submission; Flood Risk Assessment; Initial Archaeological Overview; Housing Requirements Study; and Development Vision & Masterplan. Where relevant we will refer to the findings of these previous studies and our original representations.
- 1.3 Since those representations were submitted in late 2013 discussions have taken place between the landowners of three potential development sites on the western edge of Cambridge between Madingley Road, Barton Road and the M11; West Cambridge (owned by University of Cambridge and allocated in Policy 7/6 of Cambridge Local Plan 2006 and Policy 18: West Cambridge Area of Major Change of Draft CLP2014), St John’s College, and North BRLOG.
- 1.4 There is agreement between the landowners that a co-ordinated development could be delivered with appropriate transport connections and an orbital cycle route providing links between housing and employment. The three potential development sites are controlled by like-minded organisations that want the success of Cambridge to continue, take a long term view of development opportunities, retain an interest in the ownership and management of sites, and deliver high quality and award winning projects. In addition, the University and Colleges have a good track record of working together to deliver projects. Furthermore, the University of Cambridge is a signatory to the City Deal.
- 1.5 Separate statements have also been prepared for North BRLOG in respect of Matter 2 (Overall Spatial Vision and General Issues) and Matter 4 (Employment and Retail). A combined Statement on behalf of North BRLOG, St. John’s College and Pigeon Land/Lands Improvement Holdings has been prepared by GL Hearn in respect of Matter 3 (Housing Need).
- 1.6 In summary, in relation to Matter 5, we have significant concerns about the costs and delivery of infrastructure associated with the proposed new settlements. There are also substantial planning obligation requirements for new settlements. These two factors will affect the viability of those proposals, which in turn will affect the amount of affordable housing that can be provided particularly in the initial phases of development. As set out in our Matter 2 Hearing Statement, there will be significant delays to the delivery of the new settlements, and

the assumptions about Councils' assume annual delivery rates from the new settlements are not realistically achievable. It is also a fact that South Cambridgeshire District Council cannot demonstrate a five year housing land supply, against the housing target contained in Draft SCLP.

## 2. MATTER 5 – INFRASTRUCTURE/MONITORING/VIABILITY

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

- 2.1 The Cambridge and South Cambridgeshire Infrastructure Delivery Study (August 2012) [Doc Ref. RD/T/010] and Update (August 2013) [Doc Ref RD/T/020] identifies the infrastructure items needed to deliver development. Appendix C in the Study Update document sets out the items in the South Cambridgeshire Infrastructure Schedule. In this Hearing Statement we focus in particular on the highway infrastructure items required for the proposed new settlements, because of the substantial costs and uncertainty about who would provide the identified funding shortfalls. We also highlight two education items which are subject to significant costs.
- 2.2 The Infrastructure Delivery Study Update identifies an overall funding shortfall for infrastructure during the plan period of approximately £162 million in Cambridge and approximately £1.45 billion in South Cambridgeshire.
- 2.3 The infrastructure items that we have particular concerns about are set out in the table below. There is a funding gap of approximately £165 million to deliver key and critical items of infrastructure (e.g. transport and education) associated with the Strategic Sites to the west of Cambridge.

Ref.	Infrastructure Item	Funding Gap	Timescale	Requirement
1450	Education - New 6FE Secondary School to serve the development at Bourn Airfield.	£22,000,000	2031-2041	Necessary
274	Education - New 12FE Secondary School (with associated sports Hub) at Northstowe.	£46,823,400	2016-2021	Necessary
1008	Access - A1303 inbound bus priority, A428 to M11 in Cambourne West, Cambourne and Bourn Airfield.	£14,000,000	2016-2021	Critical
1009	Access - A1303 Madingley Road inbound bus priority, M11 to Queens Road in Cambourne West, Cambourne and Bourn Airfield.	£31,000,000	2016-2021	Critical
1007	Access - Busway / bus priority links from the A428 / A1198 Caxton Gibbet junction through West Cambourne, Cambourne and Bourn Airfield, linking to the A1303 at its junction with the A428.	£30,000,000	2021-2026	Critical
1010	Access - 1,000 space Park & Ride site, Bourn Airfield / Cambourne area.	£12,000,000	2021-2026	Critical
1011	Access - High quality pedestrian and cycle links to Cambridge and surrounding villages (Cambourne West, Cambourne and Bourn Airfield).	£10,000,000	2021-2026	Critical

*Source: Information extracted from Infrastructure Delivery Study Update (August 2013)*

2.4 New settlements would also require a substantial amount of on-site primary infrastructure as well as associated transport improvements to the edge of Cambridge at the start and in the early stages of development. The funding to be paid to meet the planning obligations requirement would also be substantial. There is every prospect that the effect of pursuing a new infrastructure heavy strategy that other contributions most particularly affordable housing would need to be reduced in order for any development to proceed. That is not a sound strategy given the extent of the housing need. Table 12 in the Bidwells Report (see Appendix 2 of the Matter 2 Statement) already demonstrates that the sales revenues achieved at the existing new settlements are lower than edge of Cambridge urban extensions. Lower sales revenues mean that less money would be available to fund the necessary infrastructure and obligations that are required to successfully deliver the new settlements.

**b. How will these be funded and delivered in a co-ordinated manner?**

2.5 There is no evidence that the items identified in (a) above will be funded or delivered in a co-ordinated manner. The City Deal may address some of the identified funding gap, however, while the City Deal has been signed it is not yet clear what infrastructure projects it will be used to fund. Furthermore, while the first tranche of funding from the City Deal has been identified, the remainder is dependent on the timely delivery of projects. The infrastructure funding gap is substantial and City Deal will not address the shortfall in full during the timeframe anticipated for infrastructure projects and the proposed new settlements.

2.6 We have significant concerns about the costs associated with the proposed highway improvements required for the new settlements and whether the highway improvements required within and on the edge of Cambridge to make these developments acceptable in terms of traffic and congestion are actually deliverable. There is no evidence to demonstrate that these projects are deliverable and that sufficient funding is available to fully implement them. If the highway infrastructure improvement works are delayed this would further delay the delivery of the new settlements. If insufficient public funding is available to implement the highway improvements this would put further pressure on the viability of the new settlements.

2.7 In addition, the location of the proposed new settlements and the distances to Cambridge are unlikely to make a significant difference to means of travel for journeys to work; the car is still likely to be the main mode of transport.

2.8 Transport issues are due to be examined in more detail in the second block of hearing sessions. We intend to comment on the deliverability of some of these highway infrastructure projects at that time.

**c. Is there evidence that the combined requirements for developer contributions and/or CIL will not render development unviable (Paragraph 173 of the Framework)?**

2.9 The Infrastructure Delivery Study Update has identified the infrastructure requirements, the costs associated with individual infrastructure items, and where funding gaps exist. The City Deal may address some of the identified funding gap, but it is not yet clear what infrastructure

projects it will be used to fund. At this stage it is not clear whether funding exists to fill the identified infrastructure gaps on individual developments, and therefore whether those developments would be viable or not. If the identified funding gaps for infrastructure items cannot be met, then it is likely that other contributions including affordable housing would need to be reduced in order for the development to proceed.

- 2.10 As set out in our Matter 2 Hearing Statement, and in more detail in the Bidwells’ Assessment of the Deliverability of Sites from the Housing Trajectory Report (see Appendix 1 of Matter 2 Statement), the upfront infrastructure costs and planning obligation requirements would affect the viability of the new settlements. Paragraphs 6.5 and 6.6 of the Bidwells’ Report provide a summary of the viability issues:

*6.5 Viability plays a key role in enabling Strategic Sites to come forward for delivery. It is well documented that new settlements detached from existing settlement boundaries require significant investment in infrastructure to enable their delivery. These costs are front-loaded. Strategic sites are also reliant on onsite provision of education and community facilities as they are detached from existing settlements. Strategic Sites are also projected to generate lower revenues when compared to urban extension to Cambridge and this is documented by the market conditions.*

*6.6 As a result of high infrastructure and planning obligation costs and relatively lower revenues, Strategic Sites are often unable for viability reasons to deliver a policy compliant affordable housing provision. Strategic Sites in the District at Cambourne and Northstowe phase 1 have been unable to deliver a policy compliant level of affordable housing. Whereas, urban extension to the fringe of Cambridge including Trumpington Meadows, Clay Farm, Glebe Farm and Darwin Green have proven viable with a policy compliant level of affordable housing and this allows the District to meet it’s objectively assessed housing need.”*

- 2.11 We conclude that the costs associated with infrastructure items which are required to make the new settlements acceptable in transport terms, and the planning obligation requirements which are necessary for the delivery of a sustainable community, would make the new settlements unviable. As set out in our Matter 2 Hearing Statement, it should be noted that the proposed new settlements are a key component of the overarching development strategy. If the new settlements cannot be delivered according to their anticipated timetable then the overall development strategy will be undermined, and the provision of housing and affordable housing and the delivery and funding of key infrastructure items will be delayed. It is simply not acceptable to continue reducing the affordable housing requirements at new settlements, when there is a substantial need for affordable housing in Cambridge and South Cambridgeshire. .

- 2.12 As set out in the Bidwells’ Report, there are no viability issues that prevent affordable housing or infrastructure being delivered at urban extension sites on the edge of Cambridge. The over-reliance on new settlements is a flawed and high risk strategy. As far as we are aware no other authority is proposing a strategy that relies on the successful and timely delivery of three new settlements within a plan area during a fifteen year plan period.

**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?**

- 2.13 The monitoring targets are set out in the following policies of the Local Plans:
- CLP2014: Appendix M
  - SCLP: Policy S/12
- 2.14 We commented on Policy S/12 in Section 9 of our Draft SCLP Representations Reports – see Paragraphs 9.35 to 9.43.
- 2.15 As set out above, we have significant concerns about the successful and timely delivery of the proposed new settlements, which are related to the unrealistic assumptions on annual housing delivery rates and the costs associated with infrastructure and planning obligations.
- 2.16 There have been two recent housing appeal decisions in South Cambridgeshire (both in Waterbeach), which concluded that the Council cannot demonstrate a five year housing land supply. The appeal decisions – Land north of Bannold Road, Waterbeach (Ref: APP/W0530/A/13/2209166) and Land to the west of Cody Road, Waterbeach (Ref: APP/W0530/A/13/2207961). In summary, the Inspector concluded that South Cambridgeshire has either 3.51 years supply (see Paragraph 42 of Manor Oak appeal) or 3.9 years supply (Paragraph 44 of Persimmon appeal). It was also concluded that the Council has a record of persistent under delivery of housing, and, as such, a 20% buffer should be applied. The assessment of housing supply was based on the housing requirement contained in Draft SCLP i.e. 19,000 dwellings (950 dwellings per annum) between 2011 and 2031.
- 2.17 The inability to demonstrate a five year housing land supply is a soundness issue for the Draft SCLP Examination. SCDC will clearly need to identify additional sites (which are deliverable in the five year period) to meet the housing shortfall; either by granting planning permission for suitable sites or allocating additional sites through Draft SCLP.
- 2.18 The outcome of these appeal decisions clearly indicates that Policy S/12 and the supporting text will need to be rewritten.
- 2.19 The use of windfalls to meet the buffer allowance is not appropriate, and there is no evidence that past trends on windfall rates will continue into the future, at past rates. The purpose of the buffer is to ensure choice and competition in the market, and to address a shortfall in the housing land supply where one exists. It would be inappropriate to rely on unidentified sites, where delivery and the timing of development are uncertain, to meet the requirement for a housing land supply buffer. The assumptions about future windfall delivery rates are unlikely to have taken into account the policy change removing garden land from the definition of previously developed land or the limited scope for further infill and redevelopment opportunities in villages. It cannot be considered positive to rely on uncertain windfall sites to meet a housing land supply shortfall.
- 2.20 The over-reliance on a few large sites to deliver the majority of the new housing has contributed to the current housing land supply shortfall. The development strategy proposed

in Draft SCLP seeks to repeat the failures of the current strategy. We predict that it too, will lead to a land supply shortfall; both in the short term because the proposed strategy does not seek to resolve the current shortfall, and in the long term because the delivery of the proposed new settlements are likely to be delayed until the required highway and infrastructure improvements are in place. We request that a thorough review of delivery of the proposed new settlements is undertaken because we consider they will be subject to delays, and a delay of even just one or two years would have a significant impact on future housing land supply.

- 2.21 It is not clear what action will be taken if monitoring targets are not met. Appendix M in Draft CLP2104 frequently proposes the following action, where monitoring demonstrates that a policy is not delivered: *‘discuss with stakeholders to identify issues and seek to resolve to bring forward development’*. Criterion 3 of Policy S/12 in Draft SCLP identifies a series of mechanisms if housing is not delivered in accordance with the housing trajectory. The proposed actions are vague, and the timeframe for taking such action is unclear. We have no confidence that any decisions to address the under-delivery of housing will be taken quickly. It is likely that the appeal process will continue to determine how any future housing shortfall is met, particularly in South Cambridgeshire.
- 2.22 We intend to explore the deliverability of sites included within the housing trajectory in more detail when these issues are due to be discussed in the second block of hearing sessions.