

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 1 (Legal Process and Requirements).

Matter 1: Issue (b) – Have the plans been prepared in accordance with the relevant Statement of Community Involvement?

In our opinion, this has not been done. South Cambridgeshire District Council (SCDC)'s Statement of Community Involvement states that it will:

'communicate effectively by making it clear in the information provided what is being proposed and how and when people can get involved.'

The council has patently failed to meet this promise. The early stages of the consultation process in 2012 and before were ineffective in engaging the general public. The numbers of parish councils and members of the general public responding to the draft consultation on the Local plan in 2012 were low because SCDC did not adequately publicise the importance of the process. The consequences of this failure were felt in 2013 and 2014 by local communities as they tried to make sense of the proposals and understand the jargon and confusing terminology in the Local Plan and the SCDC's consultation materials. While there has been more publicity and far greater community and media awareness of the Local Plan in the last year this does not make up for the earlier poor communication, which meant that the general public did not get involved early enough – before key aspects of the Plan had been effectively 'set in concrete'.

'make it easy for people to get involved. Helping and supporting groups and individuals with little or no knowledge of the planning process and encouraging involvement from groups that have traditionally not been involved in the planning process'.

Where is the evidence for this? There has been no attempt to engage with people, or organisations not traditionally involved with planning. The council's over-reliance on their online consultation has excluded large parts of the population and it's process of summarising and filtering online objections has led to a lack of transparency.

The council's claim that they used appropriate consultation methods in order to maximise opportunity for involvement is clearly not true. The reaction of communities affected by the local plan at the latter stage of the process clearly demonstrates that the Council failed in its duty to listen to and involve the local communities. The online consultation was, in effect, a paperless exercise in box

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

ticking rather than a genuine attempt to engage with the communities the Council represents.

South Cambridgeshire's claim that they would '*make sure involvement is effective by listening to the community at an early stage in the planning process*' is a hollow claim that needs to be challenged forcefully by the Inspector.

http://www.scaobtusembs.gov.uk/sites/www.scambs.gov.uk/files/documents/Statement_of_Community_Involvement_%28Jan_2010%29_0.pdf

Further, **in developing the Local Plan, the Council failed to ensure local people were empowered to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.** (NPPF Core Principles) In 2012-13, SCDC discouraged parish councils from developing neighbourhood plans, as provided for in the Localism Act, 2011, because – we were told – our interests would be well safeguarded and represented in the Local Plan². The 14 parish councils who have formed the 'Coalition of Parish Councils' do not consider that the Local Plan has done this.

Matter 1: Issue (g) – Have the Councils submitted robust evidence to demonstrate that they have met the duty to cooperate?

In our opinion the document SCDC has published (*Statement of Compliance with the 'Duty to Cooperate'*, March 2014) shows that they have not. **The Local plan is this not compliant with the Localism Act, 2011.** This is for the following reasons:

SCDC did not cooperate strategically with key other councils, as it should have done. While it did work closely with Cambridge City Council, other district councils in the county, Peterborough and neighbouring district councils in Suffolk, **SCDC did not consult adequately with districts councils in contiguous districts of Essex, Herfordshire and Mid-Bedfordshire**, where 9% of South Cambridgeshire's workers live. Many of parts of north Essex and north Hertfordshire are closer to the expected major areas of employment growth south of the City of Cambridge (e.g., the biomedical campus) than other parts of South Cambridgeshire and other parts of Cambridgeshire.

All SCDC did was to write to these neighbouring district councils in September 2012 (see *Statement of Compliance with the 'Duty to Cooperate'*, Appendix A) asking them to respond to the 2012 South Cambridgeshire Issues and Options Report and comment on any other cross-boundary issues for SCDC to consider in preparing the draft Local Plan. In our view, this is totally inadequate. **The Duty to Cooperate surely means more than just writing a letter?** We would have expected to SCDC to have set up a joint working group with these councils to discuss the key opportunities and constraints facing each council faces and to identify possible ways of working together to address them in the interests of sustainable development of the sub-region, as a whole. **SCDC's interpretation of the Duty to Cooperate was too parochial and unambitious.**

The Cambridge Sub-Regional Housing Board, who prepared the Strategic

² See, for example, see SCDC, *Statement of Compliance with the 'Duty to Cooperate'*, March 2014, which states that: *...the purpose of these workshops was to explore how the Local Plan can deliver parish aspirations, potentially as an alternative to Neighbourhood Development Plans.* In the workshops, SCDC staff actively discouraged parish councils from developing such neighbourhood plans.

Housing Market Assessment (SHMA), on which the SHLAA is based, also did not consider neighbouring areas of Essex, Hertfordshire or Mid-Bedfordshire. Thus, in our view, the SHLAA housing forecasts, which the Local Plan repeatedly refers to as 'objective' are nothing of the sort. **The Cambridge SHMA failed adequately to take into account the extent to which the housing and employment markets of south Cambridgeshire are integrated with those in neighbouring parts of other counties.**