

BOURN PARISH COUNCIL

On behalf of the Coalition of Parish Council

CONSULTATION ON THE MODIFIED LOCAL PLAN

25th January 2016

Preamble

1. This note is submitted by Bourn Parish Council on behalf of the Coalition of Parish Councils, which was formed to oppose unsustainable housing developments in the A428 corridor. The Coalition of Parish Councils comprises 16 parish councils¹.

Suspension of the EIP

2. The Planning Inspectors commenced the Examination in Public (EIP) of the Local Plan in 2014 but suspended it in May 2015 to give Cambridge City and South Cambridgeshire District Councils ('the Councils') time to address three areas of weakness. Our comments on the Modified Local Plan relate to the first of these areas of weakness identified by the Inspectors: the **Overall Development Strategy**.

3. The Inspectors' were concerned that:

- the Local Plan focusses on 'new settlements', located miles away from main employment centres and which are therefore less sustainable than the alternative of building on the edge of Cambridge; and
- the emphasis on new settlements is inconsistent with the 2012 Cambridge and South Cambridgeshire Development Strategy review (DSR), which guides development in the Cambridge Sub-region. The DSR states that: *the aim of the existing strategy is to enable genuinely sustainable development, that balances economic, social and environmental needs.*

4. The emphasis on new settlements is also inconsistent with key objectives of the Local Plan:

Objective 3: To provide land for housing in sustainable locations

Objective 6: To maximise potential for journeys to be undertaken by sustainable modes of transport, including walking cycling, bus and trains.

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

5. Additionally, the National planning and Policy Framework (NPPF) states that Councils should assess all additional developments (e.g., those in a new Local Plan) on how well they contribute to the achievement of the Council's strategic planning goals.

6. Since the aim of the DSR is to enable genuinely sustainable development, the Inspectors were surprised to find that, under the Cambridge and South Cambridgeshire Local Plans, 48% of the proposed new housing would be concentrated in new settlements and only 6% on the edge of an urban area (see Table 1).

Table 1. New housing allocations

Sites located:	%
In urban areas	36
On the edge of an urban area	6
New settlements	48
Villages	10
All sites	100

7. The Inspectors point out that the Councils appear to focus on new settlements because they consider protecting the Green Belt around Cambridge to be their most important planning objective and this outweighs all other considerations. If this is the case, the Inspectors state that the Councils should:

- explain how they reached this conclusion on the over-riding importance of the Green Belt; and
- update the overall Cambridge and South Cambridgeshire Development Strategy Review (DSR) accordingly.

This was not done in the 2014 Local Plan.

8. The Inspectors also noted that the investments in infrastructure, needed to make new settlements sustainable, could not be guaranteed – there was a large funding gap.

9. In suspending the EIP, the Planning Inspectors recommended that:

the Councils should revisit the sustainability appraisals and appraise all reasonable alternatives (including sites on the urban edge) to the same level as the preferred option (i.e., new settlements) and suggest modifications to the Local Plan based on that work.

The Inspectors envisaged the modifications proposed would:

- *either align with the overall development strategy or, if not, the Councils would explain fully the reasons for departing from the Strategy;*
- *include a clearer and more fully evidenced explanation of how the challenges of delivering sustainable development in the proposed new settlements.*

10. The Councils' published their responses to the Inspectors' letter in the draft Modified Local Plans on 2nd December 2015. The Councils have rejected most of the Inspector's criticisms. They propose to make very few changes to the draft Local Plan

11. The Coalition of Parish Councils has analysed the draft Modified Local Plan. **In our view, the Councils' response to the Inspectors' letter is inadequate.** We will explain why in this note.

Review of the Modified Local Plan

12. In our review of the Modified Local Plan, we will focus on three questions, asked by the Inspectors:

1. *Does the Modified Local Plan consider all reasonable alternatives (including sites on the urban edge), does it analyse them to the same level as the preferred option (i.e., new settlements) and are modifications to the Local Plan suggested based on that work?*
2. *Do proposed modifications in the Modified Local Plan align with the DSR and, if not, is a full justification given for deviating from the Strategy?*
3. *Does the Modified Local Plan include a fully evidenced explanation of how the challenges of delivering sustainable development in the proposed new settlements will be tackled?*

Q1: Does the Modified Local Plan consider all reasonable alternatives (including sites on the urban edge), does it analyse them to the same level as the preferred option (i.e., new settlements) and are modifications to the Local Plan suggested based on that work? [PM/SC/3/I]

13. In the Modified Local Plan an attempt is made to consider all reasonable alternatives and compares the advantages and disadvantages of 'new settlements' versus 'edge of Cambridge' developments, using similar types of information for each option. Although there is more information on new settlements (e.g., Waterbeach, West Cambourne and Bourn Airfield) than edge of city sites in the Local Plan, the Councils have compared the two options by analysing them to the same level.

14. Despite this, in our view, the Modified Local Plan appraisal is inadequate. This is for two reasons:

- it is not rigorous and is based mainly on qualitative information. In our view, the Councils should have undertaken a more in-depth and quantitative appraisal of the two options; and
- the appraisal is only able to compare 'new settlements' and 'edge of city' sites in general terms. Although there is lots of information in the 2014 Local Plan on the specific new settlements proposed (West Cambourne, Bourn Airfield and Waterbeach), the Modified Local plan does not identify specific edge of Cambridge

sites and therefore detailed comparisons of specific development options cannot be made.

15. In our opinion, the Modified Local Plan should have compared the proposed new settlements (e.g., West Cambourne, Bourn Airfield and Waterbeach) with specific examples of similar sized developments on the 'edge of Cambridge'. A number of proposals have been made by developers for such sites, which could have been used. If they had done this, the Councils could have compared two options of developing new settlements or edge of Cambridge sites qualitatively and quantitatively using specific examples. This would have enabled specific comparisons to be made of:

- the number of trips and trip-miles by car, bus, cycle and pedestrians, and their costs, which each option would generate;
- the resulting vehicular carbon emissions for each option;
- the cost of providing services as part of the development and the ease with which residents would be able to access services of different kinds; and
- the cost of additional transport and other infrastructure needed to make each option sustainable.

16. If the Councils had carried out quantitative analyses like this, they would be able to estimate the cost of their decision to protect the Green Belt. For example, the Councils could estimate the cost² of providing 3,500 houses at Bourn Airfield and compare this to doing the same at a more sustainable location, on the edge of Cambridge. They could then decide, based on evidence, whether the cost of protecting the specific piece of the green belt is worth it. At the moment, the Councils cannot do this and instead fall back on their mantra that the green belt must not be developed at any cost. The *Green Belt Review*³ identified a few sites where small portions of green belt could be released but argued that the majority of the Green Belt should not be touched.

17. **Green Belt Review [PM/CC/2/E and PM/SC/2/C]**. Although the Inspectors asked the Councils to explain the 'reasons why the protection of the Green Belt should outweigh all other considerations', the Green Belt Review does not attempt to do this.

18. In order to respond to the Inspectors' challenge the authors of the review would have needed to assess the cost of the current policy and demonstrate that the benefits of keeping the policy clearly outweigh the costs of doing so. They might, for example, have:

- critically assessed the relative importance of the 16 Green Belt qualities used in the Green Belt Review (which of these are most important?). They could also have asked whether additional criteria should be used, since the current list of qualities used concern preservation not sustainable development;
- critically assessed the relative importance of the 15 different areas of Green Belt, which they consider cannot be touched without irreparable damage to the concept

² To Councils, businesses, individuals and the national economy.

³ Cambridge Inner Green Belt Boundary Study (2015)

of the Green Belt. It is hard to believe that all 15 areas are equally important. This would have helped them to identify potential edge of Cambridge development sites;

- estimated the cost of the Green Belt policy by comparing the costs of developing sites within the Green Belt with the cost of developing new settlements; and
- analysed adverse impacts of developing new settlements on the Green Belt (e.g., construction of transport infrastructure in the Green Belt and associated vehicle movements through the Green Belt).

19. None of these analyses were done. The Green Belt Review reads like a defence of Green Belt policy rather than an explanation of why Green Belt considerations should outweigh all others.

20. While preservation of the Green Belt is a laudable objective it has significant cost implications for Councils, businesses and the sub-regional and national economies. The Councils should have done a comprehensive cost-benefit analysis to justify their decision on the Green Belt.

21. **Analysis of options. [PM/SC/3/I] and [MM/CC/2/A].** In the Modified Local Plan, development options are compared in two places:

- the Development Policy Update (pages 35 to 41), which summarises the arguments for and against new settlements and edge of city locations; and
- the Sustainability Assessment (Chapter 7, Strategic Development Options), which compares 7 options (combinations of different new settlement with edge of city and village focus locations) against 14 sustainable development criteria.

22. The Sustainability assessment is useful in showing how different options score on the sustainable development criteria but no attempt is made to weight the criteria or come up with a composite 'score' for each, or quantify likely impacts. It is, essentially, a qualitative analysis.

23. In Table 2, we have extracted key information from the Sustainability Analysis on two of the options to illustrate how much more sustainable edge of city sites are than new settlements. The two options used are:

- **Option 2: Bourn Airfield New Settlement and Village Focus** – completion of a new settlement at Bourn Airfield with approximately 3,500 houses and limited development at Rural Centre and Minor Rural Centre villages; and
- **Option 6: Edge of Cambridge and Village Focus** – completion of 2-3 urban extensions, with 4,000 houses, on land currently in the Green Belt, supported by selected development at Rural Centre and Minor Rural Centre villages.

24. We included some additional information on traffic flows through villages, which the Coalition of Parish Councils submitted to Hearing 7A on transport earlier in the year.

25. We only included those Sustainable Assessment objectives where there was a significant difference between the scores for Option 2 and Option 6

26. The scores shown in Table 2 are taken from the Sustainability Assessment and use its scoring system. This is as follows:

Symbol	Likely effect against the Sustainability Assessment Objective
+++	Potentially significant beneficial impact, option support the objective
+	Option supports this objective but it may have only a minor beneficial impact
0	Option has no impact or is neutral
-	Option appears to conflict with the objective and may result in adverse impacts
---	Potentially significant adverse impact, conflicts with the objective.

27. Table 2 shows clearly, using the Councils own information, that edge of city sites are more sustainable and cost-effective than new settlements. Despite these advantages, the Councils have decided to focus on new settlements in order to preserve the Green Belt.

28. In our view, the case for edge of city sites is even stronger than shown in Table 2. In the Council's Sustainability Assessment, Bourn Airfield's score on Sustainable Transport was:

(+) – Option supports the objective but may have only minor beneficial impact.

In our view this score is incorrect. Given that two-thirds of commuters from Bourn Airfield would have to travel to work by car and drive 20-30 miles a day, it cannot be argued that a new settlement at Bourn Airfield supports the Council's Sustainable Transport objective. We think Bourn Airfield should be scored:

(- - -) – Potentially significant adverse impact which conflicts with the objective.

Table 2. Comparison of options demonstrating that Edge of City developments are more sustainable than New Settlements

Sustainability Assessment Decision Making Criteria	Option 2 : New settlement at Bourn Airfield	Option 6: Edge of Cambridge development
1. Land Will it use land which has been previously developed?	+	+
	<i>Only 15% of Bourn Airfield is a brown field site - 85% is high quality agricultural land</i>	<i>Currently over 95% high quality agricultural land</i>
7. Landscape and townscape character Will it recognise the role of the Green Belt in maintaining the character of the City and the quality of its historical setting?	0	---
	<i>Low impacts on Green Belt</i> <i>Land located outside the Green Belt. No loss of Green Belt land but some adverse environmental impacts on the Green Belt from the segregated busway and increased traffic.</i>	<i>Adverse impacts on Green Belt.</i> <i>Land located inside the Green Belt. Would involve loss of Green Belt land and adverse impacts on landscape and townscape</i>
17. Services and Facilities Will it provide accessibility to and improve the quality of key local services, including health, education and leisure (shops, post offices, pubs etc)	+	+++
	<i>Less able to provide services/facilities.</i> <i>Less able to pay for necessary improved services and facilities because of lower land values. External subsidies (e.g., City Deal) imperative, Bourn is a relatively small new settlement, meaning that less can be provided at Bourn in terms of services and facilities.</i>	<i>Better able to provide services/facilities.</i> <i>Better able to pay for services and facilities because land values higher. Fewer subsidies required. Good high level services easily available in Cambridge</i>

Sustainability Assessment Decision Making Criteria	Option 2 : New settlement at Bourn Airfield	Option 6: Edge of Cambridge development
<p>20. Access to work Will it contribute to providing a range of employment opportunities in accessible locations?</p>	+	+++
	<p>Few local jobs <i>The vast majority of employed people living in Bourn Airfield will have to commute long distances to work Cambourne has failed to attract businesses to locate there (Wessex Economics, 2014 – Cambourne Employment Site Study) and Papworth Hospital, with 2,000 staff, will move to Addenbroses in 2019.</i></p>	<p>Many jobs nearby. <i>Edge of Cambridge developments would be within easy reach of central Cambridge and could be sited close to new jobs south of the city. People will be able to commute to work easily by public transport, cycling or walking.</i></p>
<p>21. Infrastructure Will it improve the level of investment in key community services and infrastructure, including communications infrastructure and broadband?</p>	+	+++
	<p>Infrastructure projects less viable. <i>Lower property values mean that facilities and infrastructure are less viable and more difficult to provide. Given the transport infrastructure needed for such sites it is unlikely that infrastructure and substantial services could be delivered with CIL alone – external funding will also be needed. Bourn Airfield is especially problematic because of its small size and less can be provided in terms of facilities and services.</i></p>	<p>Infrastructure projects more viable. <i>Higher property values means that facilities and infrastructure are more viable.</i></p>

Sustainability Assessment Decision Making Criteria	Option 2 : New settlement at Bourn Airfield	Option 6: Edge of Cambridge development
22 Sustainable transport	+	++
	<p>High dependence on cars with long commutes to work <i>High dependence on cars to commute to work. People will have long journeys to work (c 20-30 miles each day), mainly by car The CSRM Transport Study notes that because of greater distance from Cambridge and job opportunities car use will be higher than at Edge of City sites.</i></p>	<p>Low dependence on cars - short commutes mainly by sustainable modes <i>Less dependence on commuting by car. Shorter journeys to work mainly by public transport, cycling or walking</i></p>
	<p>Rat-running through local villages <i>Significant increase in rush hour rat-running through villages by commuters from Bourn Airfield wanting to get to the areas of employment growth south of Cambridge. Adverse impacts on local communities in South Cambridgeshire.</i></p>	<p>No rat running through local villages <i>No increase in rat-running through villages. No adverse impacts on local communities in South Cambridgeshire.</i></p>

Q2: Do proposed modifications to the Modified Local Plan align with the DSR and, if not, is a full justification given for deviating from the Strategy? [PM/SC/3/I]

29. As was noted above (para. 9), the Councils propose making only small changes to the Local Plan. The spatial pattern of development in the Cambridge Sub-region will remain largely unchanged in the Modified Local Plan, with the focus remaining on new settlements rather than more sustainable edge of city locations.

30. Although the Modified Local Plan clearly does not align with the 2012 Cambridge and South Cambridgeshire Development Strategy Review, the Councils do not:

- explain adequately why they intend to deviate from the sub-regional development strategy; or
- discuss the need to update the DSR in order to better align the Councils' policies and its proposed practices (the Modified Local plan).

31. The Councils argue in the Development Policy Update (p.43) that the Modified Local Plan continues 'the emphasis on Cambridge focused development contained in the 2003 Structure Plan'. This is not the case, the focus on new settlements represents a significant departure from the 2003 Structure Plan and the 2012 Cambridge and South Cambridgeshire Development Strategy Review.

Q3: Does the Modified Local Plan include a fully evidenced explanation of how the challenges of delivering sustainable development in the proposed new settlements will be tackled? [MM/CC/2/A]

32. As was noted above, delivering sustainable development in new settlements faces significant challenges. These include providing the infrastructure, facilities and services needed to make them viable. The challenges are especially significant in smaller new settlements, like Bourn Airfield.

33. Although the Modified Local Plan recognises these challenges it does not estimate the costs of providing infrastructure, facilities and services or explain how much external financing will be required, where it will come from or for how long it will be needed to make these settlements viable. We will illustrate these difficulties by looking at the issue of sustainable transport.

34. **Sustainable Transport.** One of the key points, which the Councils must demonstrate for new settlements to be considered a viable option, is that the sustainable transport options needed can be financed and operated in ways that are sustainable over the long-term.

35. Although the Modified Local Plan states confidently that new settlements offer great opportunities for sustainable transport, it offers little new evidence, over and above what was already in the 2014 draft Local Plan to demonstrate this.

36. In the case of the A428 corridor new settlements (West Cambourne and Bourn Airfield) the Modified Local Plan argues that these new settlements will be made 'sustainable' by the addition of a segregated busway from Cambourne to Cambridge. A first tranche of £22 million of City-Deal funding has been secured to part-finance the scheme.

37. We have a number of concerns about the viability of the Councils' proposals:

1.. A segregated busway will not make the new settlements sustainable. because most will still travel to work by car. Few people in Cambourne (a good proxy for future West Cambourne and Bourn Airfield populations) currently work in the centre of Cambridge. Most people work in scattered locations across the sub-region, often 10-20 miles away from their homes. For these commuters, travelling to work by public transport would mean changing buses at least once and slower overall journey times than going by car. In some cases, offices are located in villages, which have no bus service. In Cambourne, according to the 2011 Census, 70% of people commute by car and only 6% by bus. Even if the proportion of people travelling to work by bus tripled to 20%, most people would still travel by car.

But this is an overly optimistic assumption. Local and national experience clearly demonstrates that improved bus services are unlikely to result in a significant modal shift away from cars.

West Cambourne and Bourn Airfield are unsustainable because they are located too far away from where people work. Investing in a busway will do little to address this fundamental problem.

2. The busway plans are at an early stage and the case is not proven. Although a first tranche of City-Deal finance has been secured, the alignment of the busway has yet to be agreed. Also, as yet, a business case has not been developed, which demonstrates that a segregated busway (with necessary additional investments like the Western Orbital) could be operated viably and would provide High Quality Public Transport, without the need for long-term subsidies. For example, to cater to shift workers at Addenbokes/New Papworth hospitals frequent bus services would be needed from 0600 to 2400 each day, otherwise these workers will continue to travel to work by car.

3. The importance of an all-ways interchange at Girton/Madingley. A major reason for not building more houses in the A428 corridor is the difficult road network. The main problem is that drivers from Cambourne cannot turn from the A428 eastbound onto the M11 southbound and vice versa. This makes it difficult for commuters to travel by car from Cambourne to the new jobs at the biomedical park and biotech companies south of Cambridge, without rat-running on country roads through local villages. An all-ways interchange is urgently needed at Girton/Madingley. The Modified Local Plan does not discuss this.

38. In our view, the Councils have not proved the case that a segregated busway would be a sound use of public money or offer value for money.

Local Plans CSRM Transport Report

39. Although we read the *CSRM - Cambridge and South Cambridgeshire District Council Local Plans Transport Report*, we did not analyse it in any detail. This is because we have not yet had answers from the Councils to the questions we and others raised in Spring 2015 on the methodologies, data and assumptions used in the transport models. Until we understand how the models work, it is not possible to make useful comments on the new results.

40. These questions were raised during discussions between the Councils and others to identify areas of common/uncommon ground on the transport modelling and analysis, which underpins the Local Plan. Although good progress was being made in these discussions, the Councils unilaterally halted the process when the Inspectors suspended the examination in May 2015. In our opinion, the Councils missed an opportunity to understand fully the concerns of the Coalition of Parish Councils and others before embarking on further transport modelling and analysis.