

### Matter SC9.1 Land North of A428, Cambourne (SHLAA Site 265)

*Is the Plan unsound without the allocation of this site for development, as proposed in the relevant representations, and if so why?*

#### Introduction

1.0 Martin Grant Homes and Harcourt Developments Ltd (MGH/Harcourt) submitted representations in response to consultation on the South Cambs Submission Local Plan (SCLP) in February, July and October 2013; and January 2016. As part of these representations, MGH/Harcourt raised issues relating to the process and evidence base for the SCLP and identified flaws in both, particularly in relation to the evidence produced in relation to the comparative analysis of sites along the A428 corridor. These representations concluded that the plan was not sound with reference to the tests of soundness contained in the Framework at paragraph 182.

1.1 MGH/Harcourt has addressed some of these same matters in written statements submitted in relation to Matters 1 and 2 of this examination, particularly in relation to the Sustainability Appraisal (SA) and the legal requirement to undertake analysis of 'reasonable alternatives'. This statement does not replicate MGH/Harcourt's response to previous Matters, but provides more detail about concerns with the analysis that has been carried out in relation to the omission site (and its comparison with the site at Bourn Airfield).

1.2 In relation to the requirements of the Framework at paragraph 183, MGH/Harcourt submits that the Local Plan is not sound without the allocation of land north of the A428 at Cambourne (identified in Appendix 1) because it is: -

- **Not Justified** – the plan does not identify the most appropriate strategy when considered against the reasonable alternatives: -
  - The omission of land north of Cambourne / A428 has given rise to the allocation of other less sustainable sites, due to flaws in the SA process;
  - The identification of Bourn new village as a 'reasonable alternative' ignores the advantages of an allocation of land north of Cambourne / A428, because the comparative SA has not been carried out correctly;
- **Not Effective** – because the plan fails to allocate land north of Cambourne / A428, the delivery of a key element of the Local Plan, the Park and Ride associated with the A428 corridor, remains uncertain. The Local Plan includes an allocation for housing at Bourn Airfield for 3,500 homes, but the promoters confirmed in the Hearing session SC6C (4<sup>th</sup> April 2017) that the site does not have capacity for the proposed 3,500 homes.
- **Not Consistent with national policy** – due to the flaws in omitting land north of the A428, which MGH/Harcourt show to be a more sustainable alternative to the existing Local Plan, the Local Plan fails to enable the delivery of sustainable development in accordance with the policies in the Framework.

#### Background

1.3 The omission sites was originally appraised at Site 265 as part of the SHLAA process. MGH/Harcourt set out their response in to the SHLAA analysis in February 2013, identifying discrepancies in the way that the omission site had been assessed (particularly in relation to factual matters, where identical parameters led to a different assessment of land at Bourn Airfield).

1.4 In October 2013 MGH/Harcourt provided further evidence on the assessment of the omission site, in the form of: -

- 'Vision document', Savills, October 2013;
- 'Transport Report', WSP, October 2013;
- 'Ecological Report', Hyder, October 2013;
- 'Landscape and Visual Assessment', Cooper Partnership, October 2013; and
- Accompanying representations to the Proposed Submission Local Plan.

1.5 Following the Inspector's letter of May 2015, the Council updated its Sustainability Appraisal, and published this in December 2015 (the SA Addendum Report (SAA), November 2015, ref: RD/MC/020). This provided an opportunity to re-assess the sites in light of all the evidence available to the Council, including the updated site area and evidence submitted by MGH/Harcourt. Unfortunately, the Council did not undertake an assessment based on the evidence then available and so the deficiencies in the legal process persist and the Local Plan is consequently not sound.

1.6 MGH/Harcourt commented on the SAA in January 2016. In paragraphs 2.5 to 2.22 of their submission, MGH/Harcourt commented on numerous areas where the SAA, although revised in some areas, still contained flaws which rendered the document inaccurate. The revisions to the November 2015 SAA (RD/MC/020) provided by the subsequent version dated March (RD/MC/021) do nothing to remedy the identified deficiencies.

1.7 The SHLAA site appraisal, and subsequent sustainability appraisals (relating to the wider Site 265 identified by MGH/Harcourt), which have been carried out by the Council have therefore, at every stage, been flawed. The flaws identified by MGH/Harcourt are not simply those of value judgements. For example, where the omission site should be appraised on the same basis as Bourn Airfield due to its comparable location in the A428 corridor, completely different conclusions have been drawn. The conclusions drawn in these documents wholly undermine the credibility of the sustainability appraisal process and the conclusions that the Council has drawn from it. Instead the sustainability appraisal has the appearance of a post-hoc justification of the site selection that the Council had committed to at an early stage. The Local Plan as assessed is therefore not 'justified'.

1.8 Since the MGA / Harcourt representations were made in January 2016, it has become clear that in addition to the issues raised in those representations the Bourn Airfield site assessment should be undertaken again, not least due to the important information disclosed at the hearing session on 4<sup>th</sup> April 2016 relating to matter SC6C (Bourn Airfield new village). In this session, the promoters of Bourn Airfield new village indicated that the area of the allocated site is not sufficient to accommodate 3,500 dwellings. This is no small matter as it has implications for the wider sustainability of the site, and would impact on the sustainability assessment as currently carried out. The provision of less than 3,500 homes will impact on the ability to establish a genuinely sustainable new settlement in terms of: -

- the delivery and utility of a secondary school (meaning that secondary age children may need to travel, probably by car, to an expanded provision at Cambourne, which is about 3km from the centre of the site);
- the ability to support local services and shops that can operate viably;
- the ability to support improved bus / public transport provision.

1.9 All previous sustainability appraisals for the Bourn Airfield have been made on the basis that the site is delivering a Park and Ride. Provision of Park and Ride (not necessarily on-site) is a requirement of the Infrastructure Delivery Study November 2015 (ref: RD/MC/080). At the hearing on 4<sup>th</sup> April, it was confirmed that Bourn Airfield is not suitable for a Park and Ride in the A428 corridor such that it is no longer being considered by the County Council in its ongoing studies. In contrast, the assessment of the omission site has not made any reference to delivery of Park and Ride even though this has been a consistent element of the MGH/Harcourt proposal and continues to be an option in the County Council's appraisal of Park and Ride options. This change in circumstances has yet to be reflected in the sustainability appraisal work of the Council.

1.10 For clarity, MGH/Harcourt set out their summary conclusions on the assessment for the omission site and the alternative at Bourn Airfield, below. The comparison provided is based on the findings of the March 2016 update of the November 2015 SA Addendum Report (ref: RD/MC/021). For brevity, only areas of the assessment with which we disagree have been set out below. The assessment for the Bourn Airfield site is drawn from the analysis of sites SC057 & 238, and that for the omission site is based on site SC265 (as proposed by MGH/Harcourt – slightly larger than the SC265 site originally appraised). The headings below are the same as those used in the SAA, and the assessment ratings shown reflect the current rating in the March update of the November SAA (ref: RD/MC/021).

**Analysis of SAA, Update March 2016 (ref: RD/MC/021)**

<b>SITE</b>	<b>SC057 &amp; 238</b>	<b>SC 265</b>
<b>POLLUTION</b>		
Pollution	AMBER	RED

1.13 The Council's updated appraisal acknowledges that the assessment of the omission site should be amended to Amber, as the potential effects of the motocross activity can be mitigated.

<b>BIODIVERSITY</b>		
Green Infrastructure	GREEN	GREEN

1.14 The assessment criterion is based on the ability of the site to improve access to wildlife and green spaces. The amount of green infrastructure proposed in relation to Bourn Airfield is unknown, but likely to be very small due to the capacity issues identified at the hearing session in April 2017, and the size of the site. The omission site is some 270ha in total compared to the Bourn Airfield area of 151ha. The vision document submitted with MGH/Harcourt representations in October 2013 identifies significant opportunities to provide access to the countryside. As set out in the vision document, the proposals are based around significant green infrastructure, including opportunities for many new footpaths and cycleways. The appraisal of the omission site should therefore be amended to dark green.

**LANDSCAPE, TOWNSCAPE AND CULTURAL HERITAGE**

Landscape	GREEN	RED
-----------	-------	-----

1.15 The landscape assessment and mitigation measures submitted with the evidence provided by MGH/Harcourt (see particularly pages 13-14 Cooper Partnership Landscape and Visual Appraisal, October 2013) indicate how the proposals for a garden village at the omission site would mitigate the potential impacts of the proposals, on the wider landscape including significant planting, green infrastructure and a green setting. The appraisal of the omission site should therefore be amended to amber.

**CLIMATE CHANGE**

Renewables GREEN AMBER

1.16 No criteria have been defined to assess the potential for renewable energy resources in relation to the omission site or Bourn Airfield site. Both would have opportunities to create opportunities for the generation of renewable energy and therefore both should be rated the same. It is unclear why the assessment for the omission site concludes an amber rating. This should be amended to be consistent with Bourn Airfield i.e. green. In contrast, it is uncertain whether there is significant potential for renewable energy at Bourn Airfield given the limited capacity of the site to accommodate the prescribed land uses.

**HUMAN HEALTH AND WELL BEING**

Open Space GREEN GREEN

1.17 The criterion for this part of the assessment is the potential to increase the quantity and quality of publically accessible open space. The vision document for the omission site (October 2013) clearly sets out how large amounts of open space, greater than the policy requirement, would be an intrinsic part of the proposals, and the site should therefore rate better than green (which assumes minimum policy provision). The omission site should therefore be rated as dark green. The capacity issues relating to the Bourn Airfield site mean that it is uncertain whether this site will deliver all necessary infrastructure, land uses and landscape mitigation measures whilst also providing sufficient open space.

Integration GREEN RED

1.18 The assessment criterion indicates that a green score should be given where a proposal has sufficient scale to create a new community in itself. Bourn Airfield is therefore given a green rating. Given that the omission site would create a larger community than can be accommodated at the airfield site it should rate a better score. In addition, the omission site also integrates better with Cambourne through shared road access as well as cycle/pedestrian links. This analysis should therefore be amended in the Council's assessment.

**ECONOMY**

Employment land DARK GREEN GREEN

1.20 A rating of Dark Green is given where a site can create significant employment opportunities. The proposals for the omission site vision document identifies the inclusion of an area of mixed use development that would provide up to 10ha of employment, to complement the employment provided nearby at Cambourne. The omission site should, therefore, be rated as Dark Green. The proposition for Bourn Airfield is less clear and should be rated green.

Distance: secondary school GREEN GREEN

1.21 The assessment for Bourn Airfield relies on the ability of the site to deliver a secondary school on the site, otherwise the distance to the existing secondary school in Cambourne would indicate a rating of amber (1 to 3km away). The developers have confirmed that the airfield site can only deliver up to 3,100 homes, which is unlikely to justify a new secondary school. In contrast, the omission site would deliver a secondary school and has the scale to ensure delivery. Furthermore, the omission site is closer to the Cambourne secondary school and so would provide genuine choice for residents.

## TRANSPORT

Public transport journey time GREEN AMBER

1.22 The Council's assessment refers to improvements in journey time from Cambourne to Cambridge city centre identified in the A428 Cambourne to Cambridge Corridor Study. These improvements would apply to both sites, although with greater benefits provided by the omission site as it has better access directly from the A428. The omission site should therefore also be rated as green.

Access AMBER AMBER

1.23 The assessment does not recognise that the proposals for the omission site include provision of a Park and Ride (see more detailed analysis below in paragraphs 1.26 to 1.27). This represents a significant opportunity to remove traffic from the A428 heading to and from the city centre. In addition, it provides an opportunity for a bus interchange hub, which could assist in modal shift of existing residents in Cambourne, particularly as the Park and Ride is within cycling and walking distance of much of the existing town (see p20, Chapter 5, WSP Preliminary Transport Assessment, 11 October 2013). The impacts from the omission site are therefore capable of mitigation and this should be reflected in the assessment, with a change in the rating to Green.

Non-Car facilities GREEN AMBER

1.24 The criterion for this assessment applies equally to the omission site as it does for Bourn Airfield. It is unclear why different assessments have been made: the omission site should therefore be updated to Green.

## Conclusions on updated SAA

1.25 It is clear from the above assessment that the current SA has not correctly been undertaken and so the site selection undertaken by the Council is not justified.

## Infrastructure: Park and Ride

1.26 The delivery of Park and Ride in relation to the A428 corridor is a very important consideration, necessary for the sustainable delivery of development to the west of Cambridge. The work carried out by SQW and Cambridge Economics for the County Council (ref: RD/CR/144) for prioritised infrastructure investment identifies the Park and Ride as 'critical' to both housing and employment development at Bourn Airfield / Cambourne West (p12 and 13) (i.e. the A428 corridor), and ranks delivery of the Park and Ride as 3rd and 4th out of a total 23 proposed strategic transport schemes in the 'prioritisation' tables 1 and 2 on pages v and vi.

1.27 The hearing on 4<sup>th</sup> April confirmed that the County Council has widened its area of search for a Park and Ride site, and the developer for Bourn Airfield confirmed that Park and Ride would not be provided on the airfield site (this is contrary to the description given in the sustainability assessments). The delivery of Park and Ride is set out in Table 15.2 (p81) of the Infrastructure Delivery Study November 2015 (ref: RD/MC/080) as a requirement for the Bourn Airfield new village, and yet to date its delivery has not been secured.

1.28 In contrast, the omissions site would deliver this key piece of infrastructure, in an appropriate location with direct access from the A428. The County Council has expressed support for this solution, stating in their summary note in relation to the omission site proposals for Park and Ride:

*This is a positive aspect of the development and will also assist with taking existing car trips off the local road network, potentially freeing up some capacity for the new trips generated as part of the proposed development. Locating this with access directly off the old A428 will help intercept traffic from the strategic network before it reaches the existing Madingley Road Park and Ride site and, being located close to the exit junction on the A428, should further encourage use. This may also be used by existing residents of Cambourne who may choose to walk/cycle to the site and then catch the bus, although this is heavily dependent on attractive cycle links across the A428 being provided. [see Note dated 3<sup>rd</sup> October 2013 Appendix 3 of MGH/Harcourt representations dated October 2013].*

1.29 These important considerations have not fed into the appraisal process, and need to be considered to ensure that the site selection process leads to a sound (justified) Local Plan. Currently this is not the case.

### **Conclusion**

1.30 Due to the large number of errors in the assessment process, the Local Plan is not currently sound, as the strategic site selection is clearly unjustified. The deletion of the site at Bourn Airfield and inclusion of the omission site would remedy these matters. However, it may be appropriate at this stage to re-assess the sites in relation to the identified flaws in a more comprehensive manner. This could be carried out through the allocation of a development area close to Cambourne and the A428 corridor, to be determined through an AAP.