

**Response to**

**South Cambridgeshire**

**Local Plan**

**Dr Tumi Hawkins**

**Disclaimer**

The content of this document is solely my personal opinion based on the evidence that South Cambridgeshire District Council has placed in the public domain

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## **Introduction**

The proposed submission local plan for South Cambridgeshire contains a number of proposals for housing growth in the district.

I wish to recognize the work that has gone into producing this draft plan, which contains a lot of good and acceptable policies.

It would seem that not all the input data that went into producing the plan are in the public domain, and there are some policies that seem to indicate that the data being use may be flawed or inadequate, or perhaps the wrong conclusions have been drawn.

The following sections outline my concerns about the proposed plan, based on the evidence that is currently in the public domain that I have seen.

## **S/5 Provision of New Jobs and Homes**

This policy claims “development will meet the objectively assessed needs of the district”, 22,000 additional jobs and 19,000 new homes.

Based on the evidence in the public domain, it does not appear that the needs have been assessed objectively. There is growth in the region, but this is linked specifically to Cambridge City and the University. The level of jobs being planned for is on the high side, as are the number of homes estimated to be required. The Strategic Housing Market Assessment was based on outdated census data.

Whilst it is accepted view that more homes are needed in the district for those who already live and work here, this proposal is directed largely at provision for new jobs, which will bring even more people into the district.

Homes that are at a more affordable level are required. This can be achieved by using the existing affordable housing policy on exception sites, or strengthening the policy H/10 in a way that will enable land for such housing to be brought forward.

### **Conclusion**

It is very doubtful that the 22,000 jobs and 19,000 new homes are needed in this area. The policy should focus on creating homes that are more affordable for those who already live and work in the district.

## **S/6 The Development Strategy to 2031**

Three (3) new strategic scale allocations are proposed for housing-led development with associated employment and supporting services and facilities to meet the majority of the additional development needs to 2031 and beyond:

- A new town north of Waterbeach for 8,000 to 9,000 homes, 1,400 of which by 2031
- A new village based on Bourn Airfield for 3,500 homes, 1,700 of which by 2031;
- A major expansion of Cambourne for a fourth linked village of 1,200 homes, all of which by 2031

SCDC claim that this strategy was based on the majority response received from the previous Issues and Options Consultation 1 carried out in July/August 2012. It is worth taking a closer look at the consultation question to which this strategy relates, as the wording was rather phrased in a manner to obtain the desired outcome.

This policy states that the need for homes will be met with allocations in the order of preference (a) edge of Cambridge (b) new settlements and (c) Rural centres and minor rural centres. This accords with the Sustainable Development Sequence statement in the document "Cambridge and South Cambridgeshire Sustainable Development Strategy Review (November 2012)", and the sequence matrix contained in it.

However, it would seem that SCDC has not followed its own guidelines and principles in relation to the sequence, and has instead gone for expediency by overlooking sites that are potentially more sustainable and selecting sites which its own analyses showed were not sustainable or would require a lot of mitigation to make them suitable for development.

### **Conclusion**

The authority should revisit this policy and take into account its own strategy. There are other locations that are more sustainable and closer to the edge of Cambridge that have been overlooked.

## **SS/5 New Village at Bourn Airfield**

The LDP states that “Land at Bourn Airfield is allocated for the creation of a sustainable new village of approximately 3,500 dwellings. It provides another opportunity for the reuse of previously developed land to meet the housing and employment needs of the Cambridge area.”

I object to this statement because the airfield is not previously developed land. The runways and the industrial buildings currently standing on it form a small percentage of the site, 30% at the most.

The rest of the airfield is agricultural land which is currently still being farmed. A small aircraft club also runs on the site, using some of the existing runways.

The selection of Bourn Airfield is against the principle of the National Planning Policy Framework (NPPF) which has as its core principle of presumption in favour of sustainable development. Whilst the order of preference contained in S/6-1 is correct, this selection seems to have contradicted that order and overlooked a number of negative factors for which the plan has not provided adequate mitigation methods.

Creation of a new village at this location is not sustainable for a number of reasons:

1. Inadequate transport infrastructure
2. Potential increase in carbon emissions and carbon footprint due to (1)
3. Coalescence of villages resulting in the creation of a new town by stealth - location is next to the existing village of Cambourne, and Policy SS/8 proposes an extension of Cambourne West.
4. Drainage and Sewerage problems
5. Flooding of Bourn Brook, and villages lying in the Bourn Valley

**Transport:** According to its own SHLAA document at [http://www.scams.gov.uk/sites/www.scams.gov.uk/files/documents/Appendix%2007i%20-%20New%20Settlement%20Sites\\_0.pdf](http://www.scams.gov.uk/sites/www.scams.gov.uk/files/documents/Appendix%2007i%20-%20New%20Settlement%20Sites_0.pdf), under the infrastructure section, the Highways Authority (HA) comments that “*Transport Assessment and modeling requirements – Potential for around 29,750 daily trips (based on SCATP trip rates). Requirement for transport modelling using the Cambridge Sub-Regional Model (CSRM) to consider wider strategic impact. Full Transport Assessment (TA) and Travel Plans (TP) for residential, schools and employment sites required*” . The document also highlights some strategic and local transport issues.

Evidence in the Cambridgeshire County Councils transport consultation document (Transport Strategy for Cambridge and South Cambridgeshire TSCSC), shows that

it has not properly carried out the full transport assessment, nor has it considered the wider impact of such a high level of car trips on the local roads. The relevant section of the document can be found in pages 5-21 to 5-23 at <http://www.cambridgeshire.gov.uk/NR/rdonlyres/EB08D121-811E-4DB9-B83D-6987D67F3E31/0/20130721TSCSCv20WebConsultationDraftMain.pdf>.

The proposed solution contained in the TSCSC comprises exclusively of providing a High Quality Public Transport bus infrastructure which is nothing but a segregated bus lane through the developments to Cambridge, and cycle paths. There is no railway line along this corridor.

The current problem pinchpoints at the A428/A1198 Caxton Gibbett roundabout and the stretch of the A1303 from the A14 West to Jn 13 of M11 have been ignored. Commuters into Cambridge now spend upwards of 45minutes to 1 hour just on that stretch of the A1303, and those who want to avoid it leave their homes at around 7am just to get to work in Cambridge without the stress of traffic jams. This has direct impact on health and wellbeing, and on family time, which is not sustainable for any length of time.

The recent plans by the Highways Agency to upgrade the A14 and include a toll section, will increase traffic along the A428 corridor which has been designated as the alternative route to the tolled route.

There is no space along the A1303 to put a segregated bus lane. This is a single carriageway with houses close to the road on some sections of it, therefore, creating a segregated bus lane is not a viable or realistic option.

Even if the dedicated bus lane could be created, and everyone could be convinced to use it, buses would have to run at 2 minute intervals from 6am to 10pm just to cope with the demand. This would no doubt create congestion of its own!

The issue of the local road capacity has not been addressed as no extra road capacity has been planned or included in the local development plan or the traffic plan. The traffic generated from the estimated 29,750 car trips from the proposed new village will run through the local roads for Bourn, Caldecote, Hardwick to get to the B1046 through Toft, Comberton and Barton, to be able to access the M11 and on their destinations in and around Cambridge. This amenity and well-being of the residents of these villages will be seriously compromised.

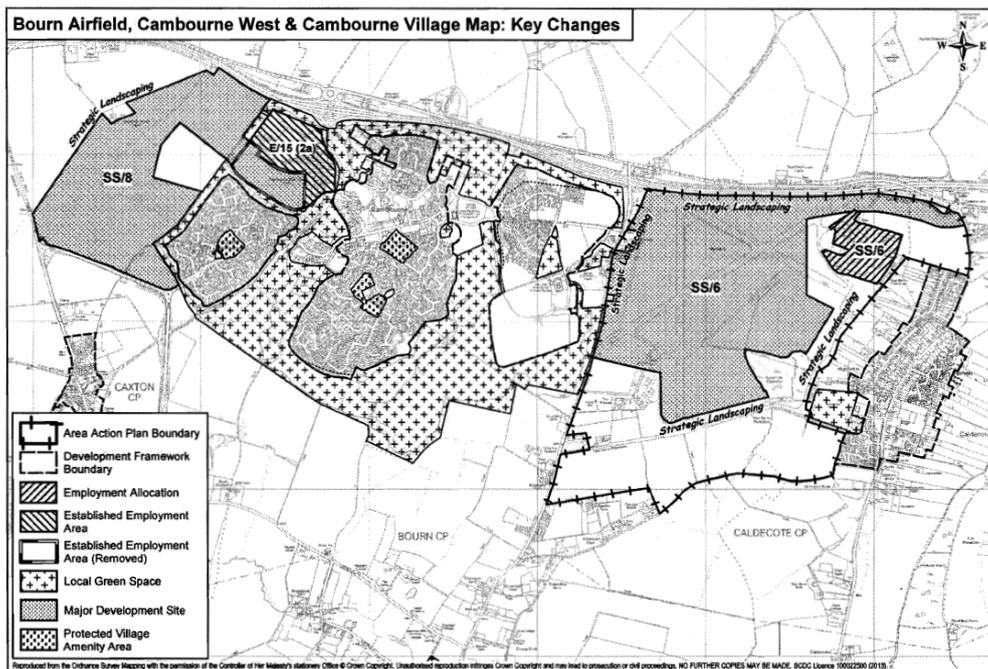
#### **Increase in emissions and carbon footprint:**

This is directly related to the transport issue above. Those travelling for education, employment or leisure using their own cars will have to travel fairly long distances, which creates more carbon emissions.

If buses were running as frequently as has been calculated, that in itself is also not sustainable.

## Coalescence of villages

The diagram below was provided by SCDC and shows the outcome of the proposals SS/6 and SS/8, located on either side of the existing settlement of Cambourne.



This plan goes against national planning guidelines as it will create a ribbon of development along what is currently an open rural area. The proposal when looked at as a whole will create a stealth-town that is just over 4 miles wide when viewed along the A428. The village of Cambourne is already visible to vehicles travelling along the A428.

Some of the area included for the strategic landscaping is not in the ownership of the landowners of Bourn Airfield, and are currently active farmlands.

Furthermore, SCDC has not been able to provide a satisfactory explanation of what it means by "strategic landscaping" for the proposed new village. The answers given range from "open land", to "green landscaping", to "fields for schools, parks etc".

The entire character of the area will be significantly harmed by the proposal SS/6, in conjunction with SS/8, in that the ribbon of development will extend from the

Caxton Gibbett roundabout all the way to Hardwick. This sort of development directly **contradicts the vision set out in Policy S/1** – this area will no longer be the best place to live and work, and residents will not have a superb quality of life as the rural and green environment in which they currently live will be destroyed.

### **Harm to Village Character for Highfields Caldecote**

The settlement of Highfields Caldecote, which is currently designated a group village in a rural setting is in danger of being swamped and swallowed up by the proposed new development.

The proposals make mention of providing green separation of about 300m. This is nowhere near sufficient to protect the rural character of Highfields Caldecote. Experience elsewhere has shown that the creep effect can very quickly erode planned separation.

Building a new settlement so close will result in harm to the rural character of the village, and contradicts the Council's own aims of protecting village character. Policies NH/13 and NH/14 are relevant considerations.

### **Drainage and Sewerage:**

The villages in the local area, in particular Caldecote, already have serious capacity issues as the pumping stations are not fit for purpose and regularly jam/flood especially during the wet season. This has often resulted in Anglian Water sending in tankers to pump out the station sometimes 24/7 for several days at a time.

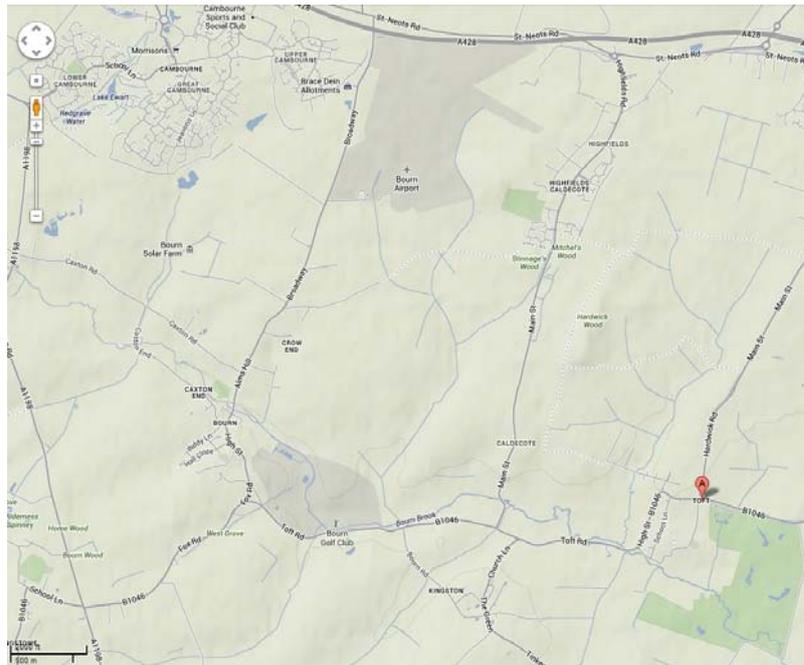
Sewage is pumped from Caldecote to Bourn Water and Sewerage Station, which is already working at full capacity. The proposal for dealing with this new development is to pump its sewage to Papworth works. Papworth is also growing, with more housing being built, and therefore requires the capacity that currently exists in its own pumping station.

The draft submission does not make any proposals to address this issue.

### **Flooding**

The airfield lies at about 60-70m AOD, but to the south, the land falls away to Bourn and the valley of Bourne Brook which is at about 35m AOD.

If Bourn Airfield is built on, surface water run off from the proposed new development will flow naturally downstream into the brook, which in turn will result in additional flooding particularly in Toft which lies South East of the airfield. See the attached map.



Flooding of the Bourne Brook is an ongoing issue, which got worse after Cambourne was built. The incidents of flooding has increased in Toft in particular on the land south of B1046 and Brookside.

Furthermore, the brook crosses the B1046 as it approaches the junction with Brookside, and when there is heavy rainfall, the road floods and becomes impassable. The result is road closures which means that traffic on the road needs to be diverted for several miles up to the A428 or Old St Neots Road, and back down again to the B1046.

The draft submission does not make any proposals to mitigate the impact of surface water run-off on Bourn Brook. Experience from Cambourne should have been taken into account, and this is a glaring omission. There is no surface water drainage management assessment or proposal in the documentation for this policy. Even if there is one in place, evidence from Cambourne is that it cannot be completely mitigated, and the result will be flooding in other communities, those having a negative impact on the amenity of those communities.

## **Loss of Agricultural Land**

The NPPF requires local authorities to take into account the benefits of good quality agricultural land. Bourn Airfield comprises predominantly of such versatile and fertile agricultural land. Moreover, the farmland has a number of habitats, which contribute to the biodiversity of the countryside.

The proposal to take this land out of agricultural use will harm the character of this part of the district irreparably. Furthermore, it is against the council's own policies NH/3 and NH/4.

## **Housing Density and Site Capacity**

Current evidence indicates that the capacity of the site is not as high as SCDC claims. Initial documentation stated a site capacity of 141.7 Hectares, and when challenged about the requirement for the building density to exceed 60 dwellings per hectare, the authority was forced to revise its numbers.

Even with the revised number stating an Area Action Plan of 282 Hectares, there are indications that the site may need to be developed at a density higher than 40 dwellings per hectare.

In its own policy H/7, SCDC indicates that high densities should be used in the most sustainable locations on the Cambridge Fringes and new settlement. It goes on to say that that local character and other circumstances can justify developments at lower or higher densities.

The rural nature of this area requires building at lower densities, which also supports the assertion that the site is not big enough to support 3,500 houses and will result in a cramped, low quality development.

## **Conclusion**

The draft submission has not addressed the major negative factors that were identified in the Site Assessment. It is a site that is not suitable for residential development in planning policy terms, as there are major drawbacks for which mitigation measures have not been specified. Even where mitigation is possible, it is expected to be prohibitively expensive.

On the basis of the current evidence, Bourn Airfield is not suitable for sustainable development and policy SS/6 should be deleted from the plan.

## **SS/8 Cambourne West**

The proposal for this site states that:

Land at Cambourne West is allocated for the creation of a new fourth sustainable linked village of approximately 1,200 dwellings. ... The development must also ensure that it will remain physically separate from Caxton.

A key issue is the integration of the fourth linked village with the rest of Cambourne. The original Masterplan creates some challenges for integrating additional development .....

The Landscape Strategy will avoid creating the appearance of a ribbon of urban development south of the A428 and extending down the A1198, demonstrate how landscape and biodiversity enhancements will be achieved in the area, ensure substantial landscaped separation between settlements and maintain the rural character of the A1198.

Comments:

As in the case of Policy SS/6, creation of a new village, or extension to Cambourne at this location is not sustainable for a number of reasons:

1. Inadequate transport infrastructure
2. Potential increase in carbon emissions and carbon footprint due to (1)
3. Coalescence of villages resulting in the creation of a new town by stealth - location is next to the existing village of Cambourne, and Policy SS/6 proposes a new village at Bourn Airfield.
4. Drainage and Sewerage problems
5. Flooding of Bourn Brook, and villages lying in the Bourn Valley

Each of these points has been discussed in more detail in the previous section.

The comments in 3.50 to 3.52 indicates that the detrimental impact of this proposal on the landscape and rural character of the area has been recognized, in particular the statement on creating landscaping to avoid the appearance of a ribbon of development.

The village of Cambourne has not delivered the idealistic objective of creating a sustainable development where people can live, work and enjoy leisure facilities. Transport facilities are woefully inadequate, and this extension will only make it worse. The masterplan for Cambourne did not include creation of a fourth village.

Health facilities are overstretched, as the Doctor's surgery cannot cope with existing demand. School facilities have also been inadequate, and even with four primary schools, there are children from Cambourne attending schools in other villages in surrounding area. The secondary school has only just been completed this year, with the first intake of Year 7 pupils. It is estimated that the planned capacity is not sufficient to take pupils from 4 primary schools.

The distance of Cambourne from Cambridge and the difficulty of access has made it unattractive to businesses, which has resulted in the land set aside for employment use not being taken up.

### **Conclusion**

The masterplan for Cambourn was for a settlement that would be self contained in terms of work, home and leisure. That has proven not to be the case, with majority of residents commuting to work, including London.

The masterplan did not include creation of a "fourth village". Residents want to see the current problems of shortage of infrastructure in Cambourne solved rather than

On the basis of the current evidence, Cambourne West is not suitable for sustainable development and policy SS/8 should be deleted from the plan.

## **SS/7 Northstowe Extension**

The authority is already committed to Northstowe. The infrastructure costs envisaged for this development are substantial. It is evident that some of the aspirations for Northstowe are being watered down due to the costs involved.

It would seem prudent therefore that rather than spreading infrastructure costs across the district, the development could benefit from additional funds, which could be generated from an extension to the plan.

### **Conclusion**

The authority should therefore consider moving some of the 5000 allocation from SS/6 and SS/8 to Northstowe, so that infrastructure costs are not spread but concentrated in one area, giving Northstowe a better chance at being sustainable and viable.

## **H/1:h Land at Bennell Farm, Comberton (Toft Parish)**

This policy proposes to build up to 90 dwellings on the site. It accepts the need to provide housing to meet local needs, and facilities that helps to build a strong community.

The requirement that affordable housing provision to meets the affordable housing needs of Toft and Comberton proportionate to the level of need in each village is welcome. This is a strategy that should be followed for small scale developments in the district. Current strategy of allocating such housing only a needs basis district wide often leads to resentment by local people who are in need but have no automatic right to allocation of such affordable housing.

The site is located on the edge of the village, in the countryside. The landscape is one of mature trees, and a green outlook.

The B1046 is a very busy road in the mornings and afternoons due to the presence of Comberton Village College (opposite the proposed site), and commuters travelling into Cambridge.

Building 90 houses on this site will create a lot more traffic, and in view of the current traffic density, effort needs to be made to minimize the impact of the new development on traffic and on the character of the area, by reducing the number of planned dwellings from 90 to 60.

### **Conclusion**

Although meeting local needs, it is important to preserve the character of the area, and reduce traffic impact therefore, the number of planned dwellings should be no more than 60.

## **H/9 Affordable Housing**

This policy requires all developments which increase the net number of homes on a site by 3 or more to provide 40% of the dwellings as affordable housing.

The district has suffered and continues to suffer from lack of more realistically priced homes because smaller sites of between 2 and 10 dwellings rarely come forward for development due to the need to provide 40% as affordable housing.

Small developers do not have the same level of margin as the big developers, and when such sites come up, the built properties are often priced very high to recoup the cost of providing affordable housing.

Increasing the threshold from 2 to 3 net dwellings will not address this problem, and the figure should be set higher to at least 6.

### **Conclusion:**

The strategy should be amended such that affordable housing provision is required when the net number of homes on a site is 6 or more.

## **Conclusions**

The following conclusions are based on the evidence in the consultation documents provided by South Cambridgeshire District Council to date. These conclusions are open to revision if more compelling evidence is provided:

1. **Policy S/1:** It is very doubtful that the 22,000 jobs and 19,000 new homes are needed in this area. The policy should focus on creating homes that are more affordable for those who already live and work in the district.
2. **Policy S/6:** The authority should revisit this policy and take into account its own defined strategy for sustainable development sequence which it chose to ignore in new settlement allocations. There are other locations that are more sustainable and closer to the edge of Cambridge that have been overlooked.
3. **Policy SS/6:** should be removed from the plan because the proposed development is not sustainable and would severely harm the rural character of the area with the creation of a new town by stealth, and negatively impact on the amenity of the surrounding villages.
4. **Policy SS/8:** should be removed from the plan because the proposed development is not sustainable and would severely harm the rural character of the area with the creation of a new town by stealth, and negatively impact on the amenity of the surrounding villages
5. **Policy SS/7:** The projected 3,500 houses should be added to Northstowe, so that infrastructure costs can be aggregated in one location and therefore maximized to create a more sustainable development.
6. **Policy H/1:h:** Although meeting local needs, the policy should be amended so that number of planned dwellings should be no more than 60.
7. **Policy H/9:** The strategy should be amended such that affordable housing provision is required when the net number of homes on a site is 6 or more.

I would like my views to be considered by an inspector at an independent examination by appearance in person.