

**SOUTH CAMBRIDGESHIRE LOCAL PLAN**

**RESPONSE TO INSPECTOR'S QUESTIONS FOR**

**MATTER 5- INFRASTRUCTURE, MONITORING**

**AND VIABILITY**

**ON BEHALF OF BLOOR HOMES (EASTERN REGION) 16420**

**REPRESENTATION NUMBER 61918**

**Pegasus Group**

3 Pioneer Court | Chivers Way | Histon | Cambridge | CB24 9PT

**T** 01223 202100 | **F** 01223 237202 | **W** [www.pegasuspg.co.uk](http://www.pegasuspg.co.uk)

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## **1. INTRODUCTION**

- 1.1 This Statement has been prepared on behalf of Bloor Homes Eastern Region (my client) in response to the Main Matters and Issues for the joint examination of the draft Local Plan for South Cambridgeshire District Council and Cambridge City.
- 1.2 This response reiterates and references the representations made in October 2011 in relation to the Issues & Options draft and expands upon concerns submitted in September 2012 to the Proposed Submission of the South Cambridgeshire Local Plan.
- 1.3 For the avoidance of doubt, the interest of Bloor Homes Eastern is focused on two particular omission sites located within the rural area of South Cambridgeshire District in the villages of Swavesey and Over. Unless otherwise stated, references to the “local plan” and its policies relate to the South Cambridgeshire Local Plan.

## 2. Response to 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 overarching development strategy for the SCDC Local Plan is to direct 86% of new development to large sites, which are either on the edge of Cambridge or new settlements. In respect of new allocations made within the Local Plan, rather than those carried forward, the majority of development will come from new settlements such as Waterbeach, Northstowe, Cambourne/Bourn Airfield extension.
- 2.2 The Long Term Transport Strategy (RD/T/092) sets out that major transport investment is needed to support growth, maintain the competitive advantage of Greater Cambridge and maintain a high quality of life. However, the plan also acknowledges that high house prices and a lack of affordable housing has led more people travelling further to work, with the commute recorded as 20% higher than the national average in 2001.
- 2.3 The road network in the local area creates a merging of local trips, such as those for work and leisure purposes, with strategic movements of freight and other goods. This issue is particularly acute around the A14, A428 and A10 corridors which are all interlinked. Whilst recent Government funding through the 'pinch point' initiative has seen work begun on addressing capacity constraints on junctions 31-32 of the A14. The Long Term Transport Plan acknowledges that such improvements are 'critical' to the on-going economic success of Cambridgeshire and notes that there is currently no firm commitment to secure 'vital' improvements to the A428 and other roads within the wider region such as the A47 and A1.
- 2.4 The Transport Strategy for Cambridge and South Cambridgeshire (RD/T/092) identifies a number of infrastructure requirements associated with the new settlements.
- 2.5 For example, Bourn Airfield and West Cambourne are expected to deliver:
- Busway between West Cambourne site and the junction of the A1303 / A428.
  - Segregated bus links between the A428 and the M11.
  - A1303 / A428 outer Park & Ride capacity.

- Direct, segregated high quality pedestrian/cycle links to west Cambridge, Papworth Everard, Highfields, Hardwick, Caxton, Bourn, Caldecote, Comberton, Bar Hill and Dry Drayton.
- Any mitigation measures needed at the junctions of the A428 with the A1303 and A1198.
- Delivery of funding of any measures required to mitigate the traffic impact of the developments on Bourn, Caldecote, Toft, Comberton and Barton.
- A smarter choices package including residential school and workplace travel planning.

2.6 However, it is noted that for each of the new settlements, the transport plan states that "*Development will be subject to sufficient highway capacity being available at all stages of the development, including on the adjacent strategic road network.*" (H-9). This implies that, should highway capacity not be available, then development will be prevented in coming forward (RD/T/092).

2.7 The Framework highlights that transport policies have an important role to play in facilitating sustainable development. As highlighted in my Client's response to Matter 2, encouragement should be given to solutions which support a pattern of development, where reasonable to do so, facilitates the use of sustainable modes of transport. It is therefore questioned why sustainable development in the villages of Swavesey and Over has not been considered fully, given the villages' proximity to the guided bus route.

**(b). How will these be funded and delivered in a coordinated manner?**

2.8 South Cambridgeshire District Council places significant emphasis on the City Deal as a mechanism for funding infrastructure, with the majority of schemes identified as being jointly funded by the City Deal and S106/ CiL contributions. However, whilst the Deal is estimated to be worth £500m, it is payable in three tranches, with the second and third based on the achievement of specific outcomes (RD/CR/140). The Scrutiny Paper sets out that the first tranche covering 2015-19 would be for £100m, the second (2019-2024) for £200m with specific triggers likely to include housing completions and an assessment of infrastructure projects and the final tranche of £200m at a later date dependant on economic growth.

2.9 Given the risks involved in delivering large schemes, and the acknowledgement within the 2014 AMR (RD/AD/270) that sites have been slow

to deliver due to the economic circumstances, there appears to be a significant risk to future funding if South Cambridgeshire cannot deliver the required number of new homes over the next five years. It therefore seems illogical that the council has not sought to identify sustainable rural locations that are deliverable, achievable and less reliant on major infrastructure improvements to ensure that the targets are delivered, thus releasing future funding. Such an approach is considered to be entirely reasonable and in accordance with the Framework which promotes making best-use of existing infrastructure.

- 2.10 The current strategy is therefore not effective as it may not deliver the required number of homes to release future infrastructure funding.

**(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?**

- 2.11 Yes-The monitoring framework for the plan is set out in policy S/12.

- 2.12 No- the action to be taken if targets are not met is unclear. The following issues are identified with the proposed arrangements:

- On the grounds of persistent under-delivery, my client has previously objected to the use of a 5% buffer as part of the Housing Land Supply (see Matter 3). We have contended that this should be 20%, consistent with the Inspector's decision in the recent Waterbeach appeals (RD/Strat/330; RD/Strat/340). Without a 20% buffer, sufficient flexibility within the overall land supply for the five year periods will not exist.
- The monitoring framework will not address the housing shortfall accumulated between 2011-2014. The novel approach of the MoU between the City and South Cambridgeshire seeks to aggregate supply to allow South Cambridgeshire to demonstrate a five year land supply. This mechanism is simply hiding from the issues of a failure of the strategy to deliver the required number of homes, rather than addressing weaknesses in the current planned approach.
- The monitoring framework does not identify a robust 'plan b'. When taken together with the rigid hierarchy (S/8) and criteria C and E of policy S/2 sites within the rural area are unlikely to be brought forward through the development management process. This will significant implications for the future funding of infrastructure through the City Growth Deal, in addition to worsening the issues of under-supply across the district.

Summary:

- 2.13 As submitted Policy S/12 is unsound as it conflicts with the advice of national guidance through advocating a 5% buffer, rather than the 20% required by National Policy and supported by the Inspector for the Waterbeach Appeals.
- 2.14 Policy S/12 is ineffective as, should the large sites fail to deliver, there is not sufficient flexibility to bring forward sites within the rural area to meet the housing requirements. Due to the critical nature of the Growth Deal for infrastructure funding, a failure to deliver homes will inevitably lead to a loss of funding for the critical infrastructure required to deliver the new settlements. At present, it is not clear what action will be taken should the council continue to fail to deliver.