

## Appendix 3

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Date 27 February 2015  
Our ref 13577/MS/NB/8459304v3  
Your ref S/2903/14/OL

Dear Mr Durrant

### **Outline Planning Application for up to 2350 Residential Units, etc. on Land West of Cambourne (Taylor Wimpey and Bovis Homes) Representation by Commercial Estates Group**

We write on behalf of Commercial Estates Group ("CEG"), the promoter of a comprehensive masterplan for land South East of Cambridge and a current participant in the independent examination of the Council's emerging Local Plan.

CEG and its professional team have undertaken an initial review of the above application ("the CW application") and have identified a number of fundamental initial objections, as set out below. In summary, this is a proposal which threatens the delivery of sustainable development in the Greater Cambridge area and the emerging Local Plan's objectives and which should therefore be refused permission.

### **The Emerging South Cambridgeshire Local Plan**

As you know, the emerging South Cambridgeshire Local Plan (Proposed Submission, July 2013) is currently the subject of a joint examination (alongside the Cambridge City Local Plan, Proposed Submission July 2013). There are a number of substantial and as yet unresolved objections to the plans, including from CEG, which relate to strategic as well as detailed matters and raise questions of soundness. Not least of these is the question of whether it is appropriate for the two Cambridge Local Authorities to release land for new settlements beyond the Green Belt in the context of a Plan development sequence that seeks to focus development in or on the edge of Cambridge City itself. It would be premature not to refuse permission for this application in advance of, at the very least, receipt of the Inspector's report. We note that the applicant recognises in the Planning Statement (Section 2 'Background to the Cambourne Development') that previous applications for Cambourne have been refused (and dismissed on appeal) for reasons related to prematurity, and past decisions to allow expansion have only been permitted in parallel with the adoption of the local plan (then LDF).



It is clear that this latest proposal is so substantial that to grant permission would undermine the plan-making process by pre-determining decisions about the scale, location and phasing of new development which are central to the emerging Local Plan. The Plan is currently under Examination and consequently should be regarded as at an advanced stage, and the issues set out in this letter clearly indicate how the grant of permission would prejudice the outcome of the plan-making process (PPG Reference ID: 21b-014-20140306 refers).

The CW site is the subject of draft policy SS/8 which sets out a number of detailed considerations and criteria which a proposal for the expansion of Cambourne is required to address. The proposed development does not accord with the emerging plan a number of important respects.

In particular:

- 1 The level of housing proposed, at up to 2,350 units, is almost double that expected in the Plan period.
- 2 The proposal does not provide residential and care homes which are important if Cambourne is to meet a range of housing needs and function as a sustainable community..
- 3 There is limited evidence of effective integration with the rest of Cambourne, including the Business Park.
- 4 The level of employment land proposed appears to be less than the draft policy (SS/8(7)) requires, the consequences of which will be a greater reliance on out-commuting by new residents for employment opportunities (as well as a failure to provide new local jobs for existing residents).
- 5 Compliance with important access and green infrastructure considerations has not been demonstrated.

For these draft policy based reasons, permission should be refused on grounds of prematurity.

### **Failure to Deliver Sustainable Development**

We agree with the applicant that SCDC cannot demonstrate a five-year housing land supply. It is however important to recognise that the presumption in favour of sustainable development (NPPF paras 14 and 49 refer) relied upon by the applicant does not apply where any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole.

The City and District Councils have established a clear development strategy (within SCDC LP Policy S/6) which sets out a sequential approach to meeting the need for new jobs and homes in and around Cambridge. This sequence sets development at new settlements below development in locations within or on the edge of Cambridge for good reasons which reflect the principles of sustainable development.

The available evidence, such as Census data, traffic counts, elements of the Local Plan evidence base and information about current vacancies at Cambourne Business Park, demonstrates that Cambourne is not a self-contained settlement, but instead functions as a dormitory town to meet Cambridge's housing needs, with a significant reliance on commuting and other trips by private car. There is no reason to conclude that providing an additional 2,350 homes in this location will



address these existing unsustainable travel patterns. Consequently, we conclude that there are significant adverse transport and associated environmental impacts which would significantly and demonstrably outweigh the benefit of providing more homes in this location. The proposal should not therefore benefit from the presumption in favour of sustainable development.

It is also important to note the very significant scale of development proposed (2,350 dwellings), which is representative of substantially more than five years of supply in this location. Given the inevitable long lead-in times associated with large-scale proposals of the sort proposed (including the need to discharge pre-commencement conditions, secure detailed approvals, start on site etc), it would deliver comparatively few new homes if any within the next five years. It would therefore make little or no contribution to meeting the Council's five year housing land supply and this reduces the weight that should be attached to the provision of housing in this application. Precisely this issue was covered by the Secretary of State in a very recent appeal decision (Appeal Ref: APP/H0738/A/14/2214781) in which he dismissed proposals for 550 homes in part because uncertainty as to the number of dwellings which would be built in the initial five year period reduced the benefit of the scheme's contribution to meeting the five year housing land supply.

### **Failure to Encourage Travel by Sustainable Modes**

It is noteworthy that, in relation to access, the applicant describes the location as well placed (only) in terms of access to the major highway network. Other locations are capable of providing a range of sustainable and active travel choices, but this choice cannot be claimed for West Cambourne.

Generally, there is a complete failure in the planning application and the Transport Assessment to consider the majority of transport measures listed in Policy SS/8 and the need for "extensive off-site transport infrastructure provision required to mitigate transport impacts" (ref 3.59 of SCLP). Specifically, the TA does not even assess the heavily congested Madingley Road corridor.

A number of important strategic transport matters have been raised in objections to the Local Plan. Some of these were discussed at the recent EiP session on Wednesday 18 February 2015. In particular, it is clear that there is no clear and detailed strategic plan and programme for improvements to the A428 corridor. Until such a plan and programme is in place, and the nature and extent of the works needed to address traffic congestion and bus movement are clear, the CW site should not come forward. In addition to poor provision for public transport provision through the site, the extended development area will remove an option for the location of a Park & Ride (P&R) facility on the A428 in a location where it may be found to be relatively more effective.

The Council must maintain maximum flexibility to provide these essential sustainable transport measures until a clear strategic plan is in place. This must include land in close proximity to the Caxton Gibbet junction as a possible P&R site.

Within the site itself, the illustrative layout (fixed to some extent by the access details) repeats the established layout patterns in Cambourne which fail to provide a structure and grain necessary to maximise the permeability of public transport and encourage active travel choices.

### **Failure to Provide for Essential Infrastructure**

The Government has recently announced funding for the off-line improvement of the A428 between the Black Cat (A1(M)) and Caxton Gibbet junctions. The extended CW site proposed in



this application extends to the Caxton Gibbet roundabout and consequently constrains the works which could be undertaken on the approaches to this important junction. Until the precise alignment of this route is known, development around the Caxton Gibbet roundabout should not be permitted, so as to ensure that the optimum infrastructure solution is deliverable.

These highway considerations are important at this stage because details of access are provided within this outline application for determination now.

## **Conclusion**

Based on this initial review, CEG concludes that this proposal does not represent sustainable development and objects to this poorly justified application, which does not make adequate provision for public transport and highway infrastructure, and which would prejudice the consideration of the emerging Local Plan.

There are deficiencies in the application proposals and further clarification should be sought by officers. However, the application is fundamentally flawed and should be refused (or the applicant invited to withdraw).

CEG reserves the right to expand this representation following any further technical analysis of the application material, including the submission of further information.

We should be grateful if you would keep us informed of the progress of the application, and in particular notify us if any additional information is submitted.

Yours sincerely

A large black rectangular box redacting the signature of Matthew Spry.

**Matthew Spry**  
Senior Director