Response by Martin Grant Homes and Harcourt Ltd



Response by Martin Grant Homes and Harcourt Ltd



Contents

1.	Introduction	1	
2.	Issues and Options	2	
3.	Sustainability Appraisal Scoping Report	14	
4.	Sustainability Appraisal of Issues and Options	20	
Appendices			
Appendix 1 North Cambourne: self-contained and modal shift			

Response by Martin Grant Homes and Harcourt Ltd



1. Introduction

- 1.1. Savills is instructed to act on behalf of Martin Grant Homes and Harcourt Developments Ltd (MGH). MGH controls a substantial area of land to the north of (and adjoining) Cambourne (referred to as Cambourne North).
- 1.2. These representations are structured in such a way that they respond to relevant sections of the Regulation 18 Issues and Options consultation 'The first conversation' in the order in which they appear. We then comment on the Sustainability Appraisal and other relevant technical documents.
- 1.3. This report is accompanied by a vision document (under separate cover), setting out the key strategies for Cambourne North. The vision explains how new employment could be delivered together with new infrastructure, facilities and housing, creating a new sustainable community as well as providing improvements for existing Cambourne residents. Development at Cambourne North is a highly sustainable option for accommodating both new housing and new jobs in the Greater Cambridgeshire area, particularly in minimising carbon impacts compared to other development options and thereby addressing the Climate Emergency that the Cambridgeshire local authorities have recognised.
- 1.4. The Government has identified the Oxford-Cambridge Arc as a key corridor for growth in the country. This identifies the fact that the fundamentals of the economy in Cambridge are strong, with certain key sectors clustered in the area including Life Sciences and Bio-Medical sectors. The Arc therefore represents one of, if not the best, opportunity for delivering growth where the economy can sustain it, where productivity is high, and where there are huge opportunities to improve equality and sustainability¹.
- 1.5. The narrative as a whole indicates MGH's general views, as well as indicating areas of support or objection.
- 1.6. MGH has already consulted widely among local communities on its proposals for North Cambourne and will continue to participate in the discussion about where growth should take place in Greater Cambridgeshire in order to appreciate and fully embed all of the benefits that development at Cambourne can deliver as well as understand and respond to local concerns. A further round of consultation to inform the development of the vision for Cambourne North will begin in the Spring, following initial discussions with the Council in response to their emerging evidence base.

¹ <u>The Oxford-Cambridge Innovation Arc, Savills, 2019</u>

Response by Martin Grant Homes and Harcourt Ltd



2. Issues and Options

Section 2 – Involving our communities

- 2.1. MGH agrees that the consultation needs to be widespread and seek the views of those who may not be able to respond themselves. Cambridge is one of the most unequal cities in the UK² and those desperately seeking housing whilst house price to wages ratios increase year-on-year, need to be properly represented. Local Plan consultations are nearly always successful in engaging those who oppose development: but rarely connect with those who want to see new employment opportunities (except for the development industry itself), and those in housing need.
- 2.2. We advocate the use of social media, in order to reach those who might otherwise not be engaged in the development of the Local Plan. Greater consultation at early stages of Plan making has been endorsed by the Building Better, Building Beautiful Commission, in their final report 'Living with Beauty'³. It is particularly important to engage those who are likely to live in new communities, and take up new jobs in the area.

Question 1. How do you think we should involve our communities and stakeholders in developing the Plan?

- 2.3. The Councils should review the demographics of those who have been consulted previously, to understand from which parts of the community most responses are received, and which parts of the community are poorly represented. Those who have previously been poorly represented should be targeted through social media, other channels and events, designed to suit their needs.
- 2.4. The monitoring information used to determine whether the equalities policy has been effective should not therefore simply be related to the number of responses (as identified in Section B2 of the previous South Cambridgeshire SCI equality impact assessment⁴). This would not identify any equality issues as the information is not sufficient to identify them i.e. the exercise is pointless. Demographic data must therefore be collected to ensure that a wide range of responses, from a wide range of participants, is gathered. The data needs to be monitored across both Cambridge City and South Cambridgeshire, as the Local Plan affects both areas equally.

Question 2. Please submit any sites for employment and housing you wish to suggest for allocation in the Local Plan

2.5. MGH has already submitted a response to the 'Call for Sites' in spring 2019, signed up to by the various landowners who are represented to the north of Cambourne. Cambourne is a location where existing housing and employment already exist and where there is supporting community infrastructure in terms of shops, schools and other services. There is significant potential to add to the range of uses located at Cambourne in a highly sustainable way, including new leisure, employment and homes enabling more residents to both live and work there and thereby increasing self-containment. Our evidence shows that,

² Cambridge most unequal city population; Cambridge tackles poverty

³ Living with Beauty p3

⁴ Equalities policy for community engagement

Response by Martin Grant Homes and Harcourt Ltd



by increasing self-containment and extending existing and proposed public transport, there is the opportunity to add significant levels of employment and housing to the north of Cambourne without impacting on overall levels of car-based journeys⁵.

Question 3. Please submit any sites for green space and wildlife habitats you wish to suggest for consideration through the Local Plan.

- 2.6. The vision for an urban extension at North Cambourne includes the delivery of large amounts of open space, including the protection of existing open spaces and valuable habitats. There are a range of opportunities associated with the land at North Cambourne including existing habitats and the potential to expand these as well as create new habitat, to establish a net biodiversity gain as a result of these proposals.
- 2.7. Uban extensions such as the proposal at North Cambourne are much better able to provide strategic green infrastructure than smaller individual sites, where often local requirements for green open space are not triggered, or are not possible due to site constraints. The area of land promoted at North Cambourne provides significant opportunities for biodiversity net gain, which MGH is exploring with stakeholders.

Section 3 – About the plan

Question 4. Do you agree that planning to 2040 is an appropriate date in the future to plan for?

2.8. The timescale for the Plan i.e. to 2040is a sensible one. Within this timescale there This length of time is necessary both to meet the requirements of the NPPF and to properly consider how strategic growth can take place in a coordinated way alongside the substantial investment in infrastructure that is planned. The recent 'Building Better Building Beautiful Commission' report endorses the Council's approach informed by the 2050 regional (Peterborough and Cambridgeshire) plan: the Commission envisage a strategic plan of some 30 years as the necessary requirement to deliver place stewardship⁶.

Question 5. Do you think we have identified the right cross-boundary issues and initiatives that affect ourselves and neighbouring areas?

- 2.9. It is essential not just for the prosperity of those living in the area, but also for the wider region within the Oxford-Cambridge Arc and the UK in general, that Greater Cambridge plays its part in delivering economic growth. MGH endorses the approach to consultation with wider partnerships, and places particular emphasis on the need to deliver the growth associated with the Oxford Cambridge Arc. This will require co-ordination with the combined Cambridgeshire and Peterborough Authority together with the County Council, neighbouring authorities and others in the Arc.
- 2.10. A number of key issues are set out in the issues and Options report in relation to the aspirations of each local authority (p18). This includes the need to help businesses to grow. The report also recognises the need for an evidence base relating to employment and the duty to co-operate in relation to the Oxford

⁵ See calculations in the accompanying vision document on potential transport movements, improved selfcontainment, and modal shift.

⁶ Living with Beauty p40

Response by Martin Grant Homes and Harcourt Ltd



Cambridge Arc. We endorse that emphasis, with Savills recent research document emphasising both the existing strength of the local economy and the ability for that to continue to growth and diversify in the future⁷

Section 4 – The big themes

Questions 6 and 7. Do you agree with the potential big themes for the Local Plan? How do you think we should prioritise these big themes?

2.11. The big themes are an excellent way to progress the underpinning principles for growth in Greater Cambridge. Care needs to be used in prioritising each of these themes. A balanced approach should be used. Each policy of the new Plan, and each potential site for employment or housing (or both) will have different impacts that are considerably nuanced depending on proposals and site locations. The Sustainability Appraisal is the key to understanding relative impacts on the four big themes. However, it is clear that the location of development will play a key part in achieving key principles of sustainability, including minimising the effects of movements, which relate to climate change, wellbeing, social inclusion and place making.

Question 8. How should the Local Plan help us achieve net zero carbon by 2050?

- 2.12. The Issues and Options report correctly recognises that a key impact of reaching net zero carbon targets is the minimisation of vehicular movements. Section 4.1 identifies that we need to plan for alternatives to private car use. Public transport is not only more efficient, it reduces traffic queues (and therefore impacts positively on productivity), it is better for health and wellbeing⁸, and is socially inclusive as it allows equal mobility for those without access to a car (and for those who do not wish to own a car).
- 2.13. There are two key factors that can assist in reducing car travel and increasing public transport: placing jobs, leisure facilities and shopping in close proximity to housing thereby reducing the need to travel and increasing 'self-containment'; and providing new development in locations that provide alternatives to the private car in particular good public transport services.
- 2.14. A further requirement to reduce on the risk of Climate Change is to minimise the energy used to construct new development, and to power its running costs with over 40% of UK emissions arising from built property⁹. Whilst costs of achieving more sustainable buildings will be similar regardless of the location of development, there will be greater opportunity for carbon reduction to be achieved where development is at sufficient scale to allow for the efficient operation of combined heat and power and similar shared energy networks.

Question 9. How do you think we should be reducing our impact on the climate? Have we missed any key actions?

2.15. A number of the issues correctly raised in relation to reducing impacts on the climate are applicable to all

⁷.'The Oxford-Cambridge Innovation Arc', Savills, 2019

⁸ Transport planning for healthier lifestyles, see section 1.2

⁹ UK Green Building Council, 2019.



policies and developments. The preparation of the Local Plan should therefore focus on those issues that have the most impact on the decision-making for the Local Plan, including:

- promoting patterns of development that reduce the need to travel; and
- locating development where a choice of travel options exist other than the private car.

2.16. We would add: -

- encouraging transport choices that have less impact on the climate, such as walking, cycling and public transport;
- promoting self-containment and sustainable settlements, where public transport can easily be supported and a wide range of facilities and services are within walking and cycling distance;
- allocating development where public transport infrastructure already exists, is planned, or can be provided, to encourage sustainable travel.

Question 10 and 11: Do you think we should require extra climate adaption and resilience features to the new developments? Are there any other things we should be doing to adapt to climate change?

- 2.17. The key aspect of adapting to climate change will be in the location of new development. This must be carefully considered in the Local Plan. For example, regardless of emerging measures for energy efficiency and better building fabric, if development is allocated in settlements with few services or facilities then this will result in the need for more travel compared to development in towns where more facilities are available that are within walking / cycling distance, or connected by public transport.
- 2.18. Paragraph 4.1.3 correctly recognises that, as this winter has demonstrated, flooding has become a key issue as events predicted as 1 in 100 year floods are happening more frequently. Caution should therefore be used in allocating sites that are close to existing modelled flood plains, particularly where topographic contours are shallow.

Questions 12: How should the Local Plan help us improve the natural environment? How do you think we should improve the green space network?

2.19. New development provides significant opportunities for improvements to the natural environment, particularly with strategic development sites. Often, farmland provides little in terms of biodiversity except for in the field margins, whereas new developments are able to target specific biodiversity issues, and provide well planned green infrastructure that relates to existing natural features. The Local Plan should require net biodiversity gains to be fully explored and provided. Urban extensions will allow green infrastructure to reach into urban areas, providing an extended green space network for both existing and new employees and residents.

Question 13: How do you think we should improve the green space network?

2.20. Green Infrastructure is intrinsic to good design and should be planned as part of all new developments. Evidence shows that small green spaces provided throughout development increase the amounts of physical activity that residents carry out and, and that these spaces are helpful to mental health and



wellbeing. MGH is aware of these benefits and propose new green infrastructure as part of the proposals at North Cambourne, where significant areas of the site will be used for open space in conjunction with sport, recreation, natural habitats and biodiversity offsetting. MGH therefore agrees with the key issues raised in the Issues and Options report.

2.21. MGH endorses the challenges and opportunities identified by the Council in the accompanying table at paragraph 2.5.2.

Question 14. How do we achieve biodiversity net gain through new developments?

- 2.22. The Issues and Options report correctly identifies that net gains can be achieved at building design level through to strategic landscape management level. Net gain can also be achieved through off-site measures, although it would seem appropriate that mitigation is carried out on site where applicable. In this context, larger scale sites will be more favourable because of their ability to provide green infrastructure alongside built development and other infrastructure.
- 2.23. In carrying out biodiversity assessments, value should be placed on the longevity of new communities and new natural habitats associated with them. These habitats are designed to be retained in perpetuity. Existing trees and hedgerows may be given high biodiversity value because of their longevity, but it should also be recognised that older trees will eventually die. New environmental features and natural habitats can have significant ecological value as they mature over a period of decades following construction.

Question 15. Do you agree that we should aim to increase tree cover across the area?

2.24. It would seem beneficial to increase tree cover across the area, but care should be used in determining how net biodiversity gains are maximised. For example, it is known that peat bog, bramble scrub and lowland meadows have a greater value in biodiversity than blanket tree cover¹⁰. A mosaic of habitat creation is therefore preferred over blanket tree cover with the range of habitats determined by a clear understanding of the existing habitat value and potential of the location. Given the importance of the specific context we neither agree nor disagree that this particular measure should be included in the Local Plan, but instead will review specific evidence once that has been presented.

Question 16. How should the Local Plan help us achieve 'good growth' that promotes wellbeing and social inclusion?

2.25. The promotion of social inclusion in Cambridgeshire is an important consideration. We note the disparities in quality of life and life expectancy in the most deprived areas of the county compared to the least deprived areas¹¹. These disparities are not easy to resolve even over one Local plan period because they are influenced by underlying socio demographics including aspirations and wages. The creation of new employment opportunities, where a wide mix of housing types can be provided, and where open spaces, leisure and cultural activities are available to all, will helps to improve the life chances of all residents and improve social inclusion.

¹⁰ Biodiversity Net Gain Research – Savills Rural

¹¹ Greater Cambridge Local Plan Scoping Report p39

Response by Martin Grant Homes and Harcourt Ltd



2.26. Access to public transport is a key measure of social inclusion. In less affluent households, a second car is often not available, limiting the ability of the household to access employment opportunities. The creation of truly mixed-use communities where access to jobs and facilities is maximised for all residents is therefore a key measure in assessing which sites should come forward for development.

Question 17. How do you think our plan could help enable communities to shape new development proposals?

2.27. Consultation with existing communities is key to establishing a legitimate plan to guide future development, both in terms of location and design. Design Charrettes or other similar processes, carried out at the right time and involving community members, politicians and technical advisors can help to gain buy-in from the community. MGH is committed to consultation in relation to its proposals at North Cambourne and has already been in discussion with relevant stakeholders for some time. Discussions will be ongoing, and would include opportunities for local residents of Cambourne and other communities as well as, new residents, employers and other stakeholders to inform the design of the proposals.

Question 18. How do you think we can make sure that we achieve safe and inclusive communities when planning new development?

- 2.28. MGH agrees with the key issues raised in section 4.3.3 of the Issues and Options report. These issues all lead towards a conclusion that larger sites are preferred as they can better provide: -
 - homes for all parts of the community;
 - a wider range of accessible jobs;
 - support the delivery of low carbon transport infrastructure;
 - ensure that infrastructure, services and facilities are provided alongside new employment and homes; and
 - support arts and culture.

Question 19. How do you think new developments should support healthy lifestyles?

- 2.29. There is a significant body of evidence emerging¹² that shows healthy lifestyles are best supported by developments that are able to provide: -
 - 'gentle density' that is only achievable in more urban areas;
 - where public transport is available;
 - mixed use development, supported by larger local populations;
 - walkable neighbourhoods;
 - shops, services and places to meet; and are
 - leafy with regular green spaces.
- 2.30. The best way of achieving these aims is in the allocation of larger sites that are capable of accommodating

¹² Spatial Planning for Health – an evidence resource for planning and designing healthier places, Public Health England, 2017

Response by Martin Grant Homes and Harcourt Ltd



a mix of uses.

Question 20: How do you think we should achieve improvements in air quality?

2.31. Air quality issues are created primarily by vehicular traffic. Reductions in vehicle emissions and provision for electric cars will slowly improve air quality. The key area where the Local Plan can improve air quality is through the allocation of sites for new development that will reduce the need for travel in vehicles *per se*; and will encourage travel by more sustainable modes. This needs to be carefully considered when the Council allocates sites for development in the next stages of the Local Plan process.

Question 21: How should the Local Plan protect our heritage and ensure new development is well-designed?

2.32. Cambridgeshire already has a great track record in delivering well-designed new neighbourhoods. Emerging guidance in the form of the national design guide and updates to the PPG has re-enforced this process, and the implications of the work carried out by the Building Better, Building Beautiful Commission will inform revisions to the NPPF. The Greater Cambridge authority will need to ensure that resources are in place to ensure that proposals that come forwards are well considered, maximising the benefits that new development can bring, including those delivered by high quality design that relate to all aspects of health, social inclusion and wellbeing.

Question 23: How do you think we could ensure that new development is as well-designed as possible?

2.33. Developments on key sites should be prepared in accordance with a development brief or design code. The recent changes to the national planning policy guidance and the introduction of a national design guide envisage that development will be led by local 'design codes' which are informed by the traditions of an area, assisting in creating identity and distinctiveness. MGH endorse this approach to design as well as the involvement of local residents and other stakeholders via an open and transparent consultation process.

Question 24: How important do you think continuing economic growth is for the next Local Plan?

- 2.34. The Issues and Options report identifies that the Greater Cambridge economy is of national importance. MGH agrees with this assessment. Continuing economic growth is vital for the nation, the region, and for Greater Cambridgeshire.
- 2.35. The importance of the Cambridge economy extends across the region, but there are also multiple benefits that arise locally. The international reputation of Cambridge powers a local economy that is much more than global high tech businesses. This international reputation has been a spring-board for diverse local business across a wide range of types, including start-ups, studios, workshops, manufacturing, leisure, retail and logistics businesses. This process needs to be encouraged and facilitated to ensure a diverse local economy is created that ensures that the benefits of growth are spread across the population rather than being focussed solely in one sector or location. This ongoing economic diversification will help to balance social and economic differences and social inequalities across the Greater Cambridge area.

Response by Martin Grant Homes and Harcourt Ltd



2.36. The ongoing ability of Greater Cambridge to provide economic growth, and therefore improvements in standards of living for the area as a whole, are highlighted in the Cambridgeshire and Peterborough Independent Economic Review (CPIER), September 2018¹³. The CPIER indicates that employment growth to date has been faster than envisaged. The Councils should look to draw on this opportunity to deliver better lifestyles for all those living and working in the wider region, and in particular to deliver benefits across the communities of Greater Cambridge.

Question 25, 26 and 27: What kind of business and industrial space do you think is most needed in the area? Do you think we should be protecting existing business and industrial space? How should we balance supporting our knowledge-intensive sectors, with creating a wide range of different jobs? What kind of jobs would you like to see created in the area?

2.37. MGH will await the further evidence base and technical studies that are to be provided as part of the Local Plan consultation process. Research to date in the CPIER and elsewhere¹⁴ shows that there is a very large demand for employment in the area and a great opportunity for Greater Cambridge to diversify the range of employment offered in order to deliver a robust economy that is beneficial to all elements of society not just those in a particular location or employed in a specific sector.

Question 28: In providing for a range of employment space, are there particular locations we should be focusing on? Are there specific locations important for different types of business or industry? How important do you think continuing economic growth is for the next Local Plan?

2.38. Economic growth in the area is currently focussed on Cambridge, but the 'Cambridge Effect' extends beyond the city boundaries and increasingly has the potential to extend across the Oxford Cambridge Arc. There is limited potential for development in the city of Cambridge, which should be explored as a priority. Subsequently, the best locations are those that can areas accommodate clusters of economic activity, with self-sustaining residential communities linked to them in the areas surrounding the city and well linked to it by public transport options. A good example is to the north of Cambridge where the Cambridge Research Park is supported by a new community at Waterbeach. New infrastructure is now proposed to be delivered at Cambourne to the west of Cambridge, to include East West Rail and the Cambridge Autonomous Metro (CAM), This confluence of infrastructure support and opportunity can support further employment development at Cambourne in a way that is linked to the city in a highly sustainable way.

Question 31 and 32: How should the Local Plan help to meet our needs for the amount and types of new homes? Do you think we should plan for a higher number of homes than the minimum required by government, to provide flexibility to support the growing economy?

2.39. Delivering significant numbers of new homes in the Local Plan is vital for the continuing prosperity of the area. The CPIER economic report identifies that without sufficient homes to accompany new employment, employers will look elsewhere, including potentially outside of the UK. The steadily increasing house prices in Cambridge and the surrounding region make it one of the most unaffordable locations to live in the country (*ibid*). A continuation of the trajectory of increasing house prices will see inequality increase as

¹³ Cambridgeshire and Peterborough Independent Economic Review, September 2018

¹⁴ Cambridge, A city state of mind, Savills, 2018 and The Oxford-Cambridge Innovation Arc, Savills, 2019



those on lower earnings are priced out of the area.

- 2.40. MGH agrees with the issues raised by the Issues and Options report, that if insufficient housing is built to meet local need this will result in: -
 - worsening affordability;
 - damage to the local economy;
 - damage to equality and social inclusion;
 - adverse implications arising from climate change; and
 - adverse impacts on the ability of people to live healthy lives.
- 2.41. The government has been clear that the Oxford Cambridge Arc should support economic growth. To do so will require housing to support the growing local work force. The Cambridgeshire and Peterborough Growth Deal¹⁵ is predicated on the delivery of increased employment growth. The CPIER indicates that in order to realise the growth that could be delivered, a total of some <u>2,900 homes per year</u> will be needed. If such levels cannot be reached, the Local Plan will fail in its ambitions to deliver other key objectives in terms of social and environmental improvements. MGH strongly agrees that the Local Plan should provide for higher levels of housing growth to support a strong economy, in accordance with government policy.

Question 33: What kind of housing do you think we should provide?

2.42. There is a need to provide for a wide range of housing in the Local Plan, including a diverse range of tenures, with rented accommodation, retirement living, market housing, and affordable housing together with some custom and self-build homes. A diversity of typologies will improve the ability of the market to deliver enhanced levels of delivery through provide a range of options to access housing whether rent or buy or a combination of these types. Such diversity is best achieved on larger sites which can adapt to market trends as demand changes in order to create robust communities with a range of socio-economic groups.

Question 35: How should we ensure a high standard of housing is built in our area?

2.43. High standards of housing can be achieved through use of the preparation of development briefs or design codes. The recent changes to the national planning policy guidance and the introduction of a national design guide prescribe that local 'design codes' be produced which are informed by the traditions of an area, assisting in creating identity and distinctiveness. MGH endorses this approach to design.

Question 36: How should the Local Plan ensure the right infrastructure is provided in line with development?

2.44. The Issues and Options report identifies that significant infrastructure is being brought forwards in the Greater Cambridge area including East West Rail. Park and Ride is also planned, together with the CAM. New development should be located appropriately to maximise the benefits of investment in this new strategic infrastructure, which has the ability to increase the availability and use of more sustainable modes

¹⁵ Cambridgeshire and Peterborough Devolution Deal



of transport and thereby address the environment and on quality of life impacts of car use.

2.45. Local infrastructure such as schools, health facilities and leisure facilities should be key elements of new development if it is to be sustainable and contribute to the creation of robust, mixed-use communities. Such infrastructure is best delivered where its effectiveness is maximised across both existing and new communities. The MGH proposals at North Cambourne would deliver new infrastructure that serves the new community, but also serves the existing community at Cambourne. New residents would benefit from the existing services and facilities provided at Cambourne, with new infrastructure broadening choices. The extension of Cambourne will deliver new options for education, additional community facilities with opportunities for cultural facilities, and a broader leisure offer that could include for example a swimming pool or local cinema. Smaller developments, for example in the surrounding villages, are not able to deliver such opportunities because neither the existing community or the new development provide sufficient critical mass to support them.

Question 37: How should we encourage a shift away from car use and towards more sustainable modes of transport such as public transport, cycling and walking?

2.46. The Issues and Options report identifies the ability for national infrastructure such as East West Rail to deliver improvements to road congestion. The announcement of the route for East West Rail, with a proposed rail station at Cambourne, means that there is huge potential to reduce traffic on the local road network. Initial work that MGH has carried out shows that, by growing Cambourne to a size that supports additional community infrastructure and employment, the number of out-commuting trips by car to nearby locations including Cambridge can be substantially reduced. If trips by car are reduced further through the provision of both East West Rail and the CAM, there is potential to deliver more than 5,000 homes at North Cambourne without any increase in road traffic¹⁶.

Question 38. What do you think the priorities are for new infrastructure?

2.47. Utilities will need to be carefully considered alongside new development proposals. As the move to electric cars takes place, the burden on the electricity grid (for vehicle charging) becomes much greater. New developments will need to consider new ways of generating electricity to enhance grid supply. Options currently include geo-thermal heating and photovoltaic cells. Such an investment in new infrastructure can best be achieved on larger, mixed use developments that allow heat to be used efficiently by transfer from employment buildings, which need heat during the day, and homes that require maximum heating during the evenings.

Section 5 – Where to build

Question 39: Should we look to remove land from the Green Belt if evidence shows it provides a more sustainable development option by reducing travel distances, helping us reduce our climate impacts
2.48. This option is likely to provide some sustainable options close to Cambridge where jobs services and other facilities are concentrated. However, the potential of the Green Belt to accommodate further growth will be

¹⁶ See calculations shown in the MGH Vision for North Cambourne, submitted under separate cover.



determined by site=-specific considerations including environmental constraints, access to public transport and the ability to integrate with the city. These issues need to be weighed against the impact on the functions of the Green Belt, and a comparison with other options that avoid development of Green Belt land.

Question 42. Where should we site new development?

- 2.49. There needs to be a balanced approach to the location for new development, favouring the most sustainable locations, but also delivering some growth in the villages in order to support existing communities. The most sustainable location for new development is in the centre of Cambridge, on brownfield land. There are however limited opportunities for such development given the scarcity of suitable sites and the existence of constraints such as heritage factors. There may be some opportunity for further sustainable sites to deliver development on the edge of Cambridge, however, the scope for this is limited by Green Belt considerations and environmental constraints. An option that has substantial scope for delivering sustainable growth is locations that are accessible by good public transport, where existing communities and associated services and facilities already exist and where additional growth would provide opportunities to reduce out-commuting.
- 2.50. Question 42 asks for a number of locational options to be ranked, but inevitably some sites will have benefits associated with more than one option. Whilst there is an option for 'Dispersal: New Settlements', there is no option for the expansion of existing settlements. The MGH proposition is not that North Cambourne is a new settlement; rather it is that North Cambourne is an extension to an existing large settlement. Expansion of an existing settlement of the scale and nature of Cambourne has important potential sustainable benefits including enhancing the choice and range of local services and facilities and thereby reducing the need to travel to surrounding locations to access those services and facilities. The North Cambourne option also offers the sustainability advantages arising from access to public transport options, including: -
 - East West Rail
 - Cambridge Autonomous Metro; and
 - existing bus services with the potential for local Park and Ride.
- 2.51. The combination of new and planned public transport infrastructure at Cambourne, and the opportunities to increase self-containment for the existing town, make North Cambourne the most sustainable option for growth during the Plan period.
- 2.52. MGH proposes a refinement to the development location options that introduces differentiation in the category of new settlements. The proposed refinement is to identify a preference for new settlements where they represent an expansion of an existing community, either existing settlements e.g. Cambourne or other established settlements e.g. Waterbeach. This amendment to the sequence ensures account is taken of the availability of already established infrastructure and facilities in the existing neighbouring community and the advantage that this gives in terms of sustainability when compared with the creation of a wholly new and free-standing community.

Question 48: What do you think about siting development along transport corridors?

2.53. The answer to this question depends entirely on the nature of the transport corridor and particularly the



range of options that exist for sustainable travel within them. In this context the location of North Cambourne is exceptional in terms of the range of sustainable transport options that exist and are planned. The announcement of the favoured route for East West rail to pass by Cambourne means that the town will be able to benefit from a modal shift in journeys from road (by car) to rail. Cambourne will therefore become a more sustainable location both for existing residents and for new development.

2.54. Cambourne is also to benefit from the proposed Cambridge Autonomous Metro, which could be provided initially as a Park and Ride site, linked to the rail station (by cycle routes and local bus). MGH proposes that the location of Park and Ride in the A428 corridor should now be subject to review to ensure that the selected option reflects the very significant change in circumstances that have arisen since the Scotland Farm location was first selected in 2017. It appears that this option no longer provides maximum benefit in terms of the potential for interchange between public transport services and a location near to Cambourne is to be preferred on this basis.

Response by Martin Grant Homes and Harcourt Ltd



3. Sustainability Appraisal Scoping Report

The current adopted Local Plans and relationship with other plans and programmes

- 3.1. This sections of the scoping report refers to some key documents, all of which support growth, not just in relation to the needs of Cambridge and South Cambridgeshire, but the wider region.
- 3.2. The MHCLG document of March 2019 titled 'Oxford-Cambridge Arc'¹⁷ is a joint declaration of ambition entered into by the Government and local partners envisages substantial growth in the Arc. It establishes a target of building up to 1 million homes by 2050. These homes are necessary to deliver the Governments industrial strategy, which envisages increased productivity in order to boost economic growth and prosperity, and to deliver higher incomes (p14, *ibid*). To date, no local authority within the Arc has provided for any additional growth in their local plans above the standard housing requirement that would assist in reaching this target. The Greater Cambridge Plan should recognise and accommodate part of this wider growth. If it does not do so, it will set a precedent for other local authorities within the Arc (such as the highly productive city of Milton Keynes) to lower their ambitions, and the Government's strategy for increased growth will fail.
- 3.3. Housing affordability is a key issue for equality both nationally and more significantly, within Greater Cambridge. It is also an international issue. International companies able to offer better living standards with a smaller portion of wages needed to pay for living accommodation can tempt workers from the UK to other destinations across the globe. The government and local authorities recognise in the Oxford-Cambridge Arc document that median house price to median income ratio has been increasing across the UK, and increasing more significantly across the Arc.
- 3.4. Savills estimates that for its economic potential to be reached, 9.6 million sqft of business floor spaces is needed across the Arc, with 680,000 homes beyond the existing pipeline.¹⁸ If the Arc is to deliver its employment potential, housing affordability must be addressed through the building of significant numbers of homes.
- 3.5. It is noted that connectivity is a key theme of the government-local authority declaration on the Arc. Transport connections are key to the allocation of new development in sustainable locations.
- 3.6. Protection of the environment is a key theme running though all legislation relating to development planning. A requirement for net-gain in biodiversity does much to ensure that delivering growth is not at the cost of the environment.
- 3.7. The Cambridgeshire and Peterborough Strategic Spatial Framework (CPSF) and the Cambridgeshire Local Transport Plan (CLTP) are referenced as a key development plan document in the Scoping Report. This document has considerable overlap with the preparation of the Greater Cambridge Local Plan. The Sustainability Appraisal should prefer policies and allocations that ensure links are made between the ambitions of the CPSF and the proposed transportation projects in the CLTP. Transportation matters and traffic generation should be key issues for the SA to consider, and to inform the Greater Cambridge Local Plan.



Population, Health and Wellbeing

- 3.8. The scoping report correctly notes that the delivery of services and facilities (and access to them without recourse to a car) is an issue of health and equality. This should favour larger sites able to deliver access to such infrastructure when the sustainability appraisal of sites is carried out.
- 3.9. One of the key issues for the delivery of housing in Greater Cambridge is the need to deliver large numbers of homes as quickly as possible, as set out in the Greater Cambridge Housing Strategy 2019-2023, which notes the key priority to 'increase the delivery of homes, along with sustainable transport and other infrastructure ...'. Consideration should be given to the ability of existing sites to deliver additional homes quickly, when considering options for densification, or additional delivery at locations already committed for development.
- 3.10. Table 3.1 in this section provides an interesting comparison of development locations, identifying that the majority of growth in current Local Plans is to be provided on the edge of Cambridge, with a significant number being delivered in the Cambridge Urban Area, and the total number of completions, commitment and new sites in the rural areas amounting to more development than that proposed for new settlements or at Cambourne (an urban extension). The Sustainability Appraisal should consider this balance of locations very carefully. In order to maximise sustainability and reduce carbon emissions, new development should be located where: -
 - There are good public transport links;
 - Where there is employment within walkable distance;
 - Where leisure and retail facilities are within walking distance;
 - Where existing facilities and services can be complemented with new facilities.

Health

3.11. Guidance from the NHS and wider international research indicates that the provision of green open spaces has a linear relationship with activity levels, and a direct correlation with health. Larger sites able to deliver both incidental open spaces and good access to strategic formal sports and parkland will therefore offer better outcomes for population health. This should be factored into the Sustainability Appraisal of potential development sites.

Air and Noise Pollution

3.12. The Scoping Report correctly identifies that air and noise pollution are key health issues for many groups in Greater Cambridge. Whilst there is a reflection that noise can to some extent be mitigated by traffic reductions and other measures in paragraph 3.68, there is no similar mitigation recognised for air pollution. Table 3.3 outlining the key sustainability issues for the Local Plan should strongly reflect the impacts of traffic on health and inequality outcomes in the SA objectives.

¹⁷ Oxford Cambridge Arc, MHCLG, March 2019

¹⁸ The Oxford Cambridge Innovation Arc, Savills, 2019 p3

Response by Martin Grant Homes and Harcourt Ltd



Employment

3.13. Section 2 of the Scoping Report notes the high level policy requirements introduced by the Government for the part that the Oxford Cambridge Arc is to play in the prosperity of the region (that is briefly mentioned in paragraph 4.24). 'Partnering for Prosperity', the new deal for the Cambridge-Milton Keynes-Oxford Arc is briefly referenced at paragraph 4.9. These documents together identify the high levels of employment growth that the Government expects across the Arc. The SA scoping should be clear that proposals that seek to deliver integrated employment growth at the higher levels expected from Government in relation to the Oxford Cambridge Arc will be favoured in the assessment. This criterion needs to be factored into SA objectives 14 or 15.

Transport and Air Quality

- 3.14. The national policy guidance listed generally contains policies that are aimed at reducing emissions from vehicles, or making emissions les noxious. These documents give very little prominence to the reduction of vehicle movements, in contrast to the reduction of vehicle emissions. The former aim is much better in all respects: reducing vehicle movements (and encouraging active travel) are both good for the environment and our health due to better air quality, but also improve health through activity.
- 3.15. The Air Quality Action Plan identifies (on page 18) that modal shift from private car to public transport and active travel will impact positively on air quality. Table 2.3 of the Action Plan identifies monitoring targets relating to increases in bus patronage, cycling trips, journeys to school by means other than car, and traffic congestion. The ability to meet these measures should form a part of the SA objectives: i.e. policies and potential site allocations are rated as higher / better the more likely they are to achieve these modal shifts. This should be considered in answering the Appraisal questions under SA Objective 13.
- 3.16. Local Transport Plan 2 contains targets to restrict any increase of transport within Cambridge city centre. The ability of policies, and sites, to reduce or limit traffic congestion should be a measure of how sustainable they are, and included in the SA objectives. Table 5.1 notes that the existing policies in the adopted Local Plans that promote sustainable and active transport based on sufficient population densities. The ability of new development to support public transport and active travel should be a key part of the Sustainability Appraisal assessment,

Climate Change Adaption and Mitigation

3.17. Page 97 and Table 7.1 of the Scoping Report identify that transport makes the largest contribution to carbon emissions (over 34%) in South Cambridgeshire. Whilst it is correct that the peat fens create significant mitigation, the reduction of vehicular traffic and emissions from traffic is likely to have significant impacts on climate change adaption. This lends weight to the criteria that include the ability to reduce vehicular traffic as key assessment elements for the Sustainability Appraisal.

Response by Martin Grant Homes and Harcourt Ltd



SA Framework

3.18. Table 11 sets to the SA Framework for the Greater Cambridge Local Plan. Paragraph 1.5 of the Scoping Report seeks views on any additional SA criteria that should be included. MGH comments below on each of the SA Objectives, and additional objectives that should be included to ensure a robust assessment. Commentary is also provided on the appraisal questions associated with each objective.

SA 1: Housing

3.19. The Scoping Report identifies (as set out in the sections above) a larger number of policy documents, from government to local level, that indicate housing is needed to support economic development; and that high levels of economic development are required. The SA objectives (including SA objectives 14 and 15) do not include this link between housing and employment. There are two alternatives: an objective is added, or an existing objective is amended to include an objective: *To deliver sufficient housing to support employment growth, locating new jobs near to new homes, and balancing jobs with homes.* The Appraisal questions should include: *Does the Plan support increased employment delivery with sufficient homes to support employment growth? Have homes been provided where they are accessibility to jobs, particularly by public transport, is maximised?*

SA 4: Public health

3.20. Appraisal question 4.2 touches on the issue of transport choices, but neglects any specific reference to public transport. Studies show that increased public transport has clear benefits to activity patterns¹⁹, in addition the removal of harmful emissions from vehicles, the increase in equality provided by public transport, and the benefits to mental health (and productivity) in reducing commuting times. This is set out in the Scoping Report, see *inter alia* paragraphs 3.14 to 3.16 above. A separate Appraisal Question should be added: *Does the Plan promote increased levels of public transport use, and better public transport density*?

SA 12: Minimising climate change

3.21. SA 12.4 relates to public transport provision, but simply asks whether the Plan supports access to public transport. As set out above, public transport is a key element relevant to multiple factors affecting sustainability. SA 12.4 should therefore be strengthened to read: *Does the Plan support the growth of public transport networks, modal shift away from private cars and onto public transport, and access to public transport options?*

SA 14: Facilitating the economy

3.22. The Appraisal questions included do not reflect the importance of economic growth that is highlighted in the Scoping Report itself, and referenced above in paragraph 3.13. SA14.1 asks whether the Plan provides for an adequate supply of land to meet Greater Cambridge's economic and employment needs. SA 14.5 asks whether the Plan supports stronger links to the wider economy of the Oxford Cambridge Arc. The Scoping Report indicates a much greater requirement. Greater Cambridge is within the Arc, and new infrastructure, including East West Rail has already been announced on the basis of higher levels of economic growth. Government expects Greater Cambridge to deliver higher levels of employment to support additional growth within the Oxford Cambridge Arc; and the economic reports accompanying the evidence base produced to date (in addition to other independent research) show that substantial growth can be achieved in the area.

Response by Martin Grant Homes and Harcourt Ltd



3.23. SA14.1 should therefore be amended to read: *Does the Plan provide for a supply of land and the delivery of infrastructure that will meet the enhanced level of growth envisaged across the Oxford Cambridge Arc?* SA 14.5 is therefore no longer needed, but could be used as a separate question to relate the SA and provision of employment to infrastructure. SA 14.5 should therefore be amended to: *Does the Plan provide adequate infrastructure in the right places to support enhanced levels of economic growth?*

Appendix 1

Assumptions regarding distances

3.24. The assumptions regarding distances are broadly appropriate, assuming that they are applied equally to all sites. It would be helpful to also assess sites in relation to their accessibility by bicycle, journeys which are increasing, particularly with the rise in use of micro-transport²⁰ including e-bikes and scooters.

SA Objective 1

- 3.25. MGH propose that this objective should include a requirement *To deliver sufficient housing to support employment growth, locating new jobs near to new homes, and balancing jobs with homes.* The criteria for the assessment of this objective should not be based simply on housing need, or the proposed small 10% increase in housing need, but should instead be predicated on meeting the housing need for employment aspirations. Without such a requirement the Plan cannot provide sufficient housing for everyone to live in a decent home, whilst also meeting the Governments aspirations for economic growth.
- 3.26. The criteria should therefore be: sites that fail to provide sufficient land for total housing need to support the highest economic forecasts will have negative effects (-). Sites that deliver sufficient land to support the full economic projections for the area will have significant positive effects (++).

SA Objective 3

- 3.27. The criteria and assumptions in the Scoping Report suggest that public transport implications are considered elsewhere and therefore do not need to be considered in relation to social inclusion and the equality act. This approach is incorrect. Public transport is a vital element of many of the sustainability objectives, and should therefore be considered in relation to each objective, ensuring that the weight given to support for public transport (and modal shift away from private car usage) is equal to its importance.
- 3.28. MGH propose that two criteria are added to the assessment assumptions. 1. If a site is within walking distance of regular public transport (1 journey every 15 minutes at peak hours) it will have a neutral effect. If a site is within walking distance of two or more bus routes with regular public transport, it will have a positive (+) effect. If a site is within walking or cycling distance of strategic transport, such as rail, guided bus, park and ride or proposed Cambridge Autonomous Metro, it will have a significant positive effect.2. If a site is able to support additional public transport provision it will have a minor or significant positive effect, depending on the quality and quantum of public transport improvements that can be supported.

¹⁹ Physical activity in relation to urban environments, the Lancet, May 2016

²⁰ Forbes article and source data on micro mobility uptake, February 2019

Response by Martin Grant Homes and Harcourt Ltd



SA Objective 4

3.29. This objective includes a criteria that relates to the beneficial proximity of development to healthcare facilities. A further criterion should be added to include that: Sites that are able to deliver new healthcare facilities within walking distance of employees or residents, will have a significant positive effect.

SA Objective 5

3.30. MGH disagrees that sites within 400m of locally designated sites will have an uncertain negative effect. This will depend on the site's size and ability to offer mitigation, or its ability to offer biodiversity gains in relation to the designated site. The assumption should therefore be amended so that the uncertain negative effects apply only to *sites where development is proposed within 400m of locally designated sites*.

SA Objective 12

3.31. MGH broadly agrees with this methodology. The importance of transport options on climate changes should not be underestimated, and to reflect this it would be beneficial to split the assessment into two sections relating to proximity to public transport and opportunities for cycling and walking. Transport studies show that people are willing to cycle more than 1.8km to a train station, and a 2 mile cycle ride is only 10 minutes. MGH therefore proposes that this criteria is extended to 2.5km for access to a rail station. The assessment also includes the beneficial effects of proximity to a Cambridge Busway stop. This should be extended to include similar proximity to a Park and Ride, or Cambridge Autonomous Metro stop.

SA Objective 13

3.32. The ability of public transport, and modal shift away from private vehicles has an impact on this objective. A new assessment criteria should therefore be introduced to state: *Proposals that will lead to an increased take up in public transport, or a modal shift from car use to active modes of transport or public transport, will have a positive effect.*

SA Objective 14

3.33. This objective and the associated criteria do not consider the overall level of employment to be provided in the Local Plan. There is a significant need for uplifts in employment provision, as set out in the main body of the Scoping Report. A new criteria should therefore be added to state: *Reduced employment provision at levels that match housing need will significantly undermine government objectives to deliver uplifts in the economy and will result in significant negative effects. Matching the highest levels of potential growth will have significant positive effects.*





4. Sustainability Appraisal of Issues and Options

- 4.1. MGH comment on the text and results of the Sustainability Appraisal (SA) of the Issues and Options Report in light of the comments made above relating to the Scoping Report.
- 4.2. In relation to Table 2.1, see comments above in Section 3 of this document relating to the SA Objectives.
- 4.3. MGH notes and agrees with the comment in paragraph 2.12 advising that the Councils recognise that the best overall scenario will involve some growth in all of the locational types identified, but in different proportions depending on the prioritisation of the themes in the Plan. It is also noted that, in order to refine these options, more detailed SA work will need to be carried out for potential sites themselves, rather than the high level strategies. This seems to be correctly reflected in paragraph 2.17 that notes at this stage potential effects remain uncertain.
- 4.4. Further comments on the unpredictability of assessing high level strategies are set out in paragraphs 2.18 to 2.22 of the SA. We note that one uncertainty relates to the emissions from private vehicles, which could change over the course of the Plan period. Whilst this is true, the other negative effects of increased commuting and car trips, on congestion, time, productivity and mental health amongst other criteria, will remain. Reducing trip lengths and vehicle journeys will also inevitably have an overall positive impact on climate change reductions, as there are links between carbon emissions and the power generated for all types of vehicles, including electric vehicles.

Commentary on 'big themes'

- 4.5. MGH welcomes the conclusions in paragraph 3.5 that reducing the need to travel by car and reducing carbon emission from vehicles is a key way in which carbon emissions can be reduced.
- 4.6. The inclusion of tree cover as an assessment criteria in paragraph 3.7 is noted. MGH has commented on this in relation to the Scoping Report.
- 4.7. Paragraphs 3.15 to 3.18 relate to the provision of jobs on the Local Plan. MGH has commented on this in relation to the Scoping Report. In order to match the SA with specific potential outcomes it is in our view more helpful if the criteria refer to the levels of employment that are sought by Government in the region.
- 4.8. The Government's aspirations for employment across the Oxford Cambridge Arc are high, and the initial work that has been carried out in the Cambridgeshire and Peterborough Independent Economic Review show that there is great potential to deliver high levels of employment in Greater Cambridge. The Plan and its assessment should be focussed on delivering these levels of growth as positive outcomes that are in accordance with Government strategy.
- 4.9. MGH's commentary on new homes can be found in the previous section of these representations. In summary, the Plan should focus on the delivery of the Government's economic strategy, and the housing requirement for the Plan should support this strategy. A failure to provide sufficient housing to support required employment growth should be assessed as a negative outcome.



Spatial distribution options

4.10. MGH note the Councils' comments that a blended approach of options is likely. It is still important to consider the potential for the expansion of existing settlements, such as the MGH proposal at North Cambourne. This proposal has specific benefits that relate to the existing town centre, facilities and services available at Cambourne, together with the benefits of a new settlement. The assessment of some sites, such as North Cambourne, will also have elements form other categories – for instance, the expansion of Cambourne to the north would draw on the existing transportation credentials of the site, which would add the benefits of Option 6 – development in public transport corridors. The individual site assessment and sustainability appraisal will provide an opportunity as the Local Plan progresses, to carry out the more detailed assessment necessary to determine the most sustainable options for the Local Plan.

SA Objective 2

4.11. The appraisal states that Option 2 (effectively, Cambridge airport) is of a sufficient scale to be able to provide a mixed development incorporating a range of services and facilities with good accessibility to the city and nearby suburbs. The assessment of Option 4 notes that the creation of new settlements would require supporting infrastructure. This is why MGH consider that the expansion of Cambourne does not fit neatly into the categories provided. North Cambourne would have access to existing facilities, services and infrastructure, and would additionally provide further facilities, services and infrastructure, benefitting thousands of existing residents. It would therefore be likely to have significant positive effects greater than those of stand-alone new settlements.

SA Objective 3

4.12. It is unclear why Option 2 is scored differently from Options 3 and 4. The assessment concludes that the Cambridge Airport site would be of sufficient scale to create a new cohesive community. This is also the case with Cambourne, already a cohesive community, and where north Cambourne would further add to the existing community. The report suggests that new settlements (Option 4) could take many years to deliver a critical mass necessary for a new community. This is not true of North Cambourne, which would grow the existing community.

SA Objective 5

- 4.13. It is not yet clear how this objective will relate to the requirement for biodiversity offsetting. If a policy is introduced that relates to all of the environmental quality issues considered in Objective 5, and the policy requires net biodiversity gain, there will be NO impacts: in fact, the positive (net gain) impacts will depend on the level of net gain that the proposals achieve.
- 4.14. In relation to the north Cambourne site, there are numerous opportunities for net biodiversity gain, including not just retention of existing habitats, but the provision of new habitats, and potential for habitat gains through biodiversity enhancements. MGH would be pleased to discuss these issues in more detail in order to ensure that the next stages of the SA are as accurate as possible, and reflect the most detailed survey and analysis work that has been carried out. It is likely that this assessment will show a positive effect for development at north Cambourne, rather than the mixed impacts currently shown.

Response by Martin Grant Homes and Harcourt Ltd



SA Objective 6

4.15. The impact of development at North Cambourne is difficult to categorise in relation to this objective, as it is not specifically related to a new settlement, and therefore does not have the potential negative impacts that relate to development Option 4. MGH await the detailed SA of sites in order to comment more fully, but would welcome the opportunity to discuss potential impacts on the distinctiveness of Greater Cambridge's landscapes and townscapes in more detail. There is an opportunity at North Cambourne to add to the distinctiveness of Cambourne, building on the existing identity of the town and creating a strong sense of place.

SA Objective 7

4.16. MGH strongly disagrees that North Cambourne would be likely to have a detrimental effect on the qualities, fabric, setting and accessibility of Greater Cambridge's historic environment. There are very few heritage assets related to the site, and impacts on them through development would be limited. This issues can be explored in more detail during the SA of specific development sites.

SA Objective 11

4.17. The SA concludes at paragraphs 3.86 and 3.87 that because development is likely to lead to a reduction in permeable surfaces flood risk will increase. This is not accurate. All development is required to deliver surface water drainage in a sustainable way, including measures that mitigate against climate change. In other words, new development will normally mitigate flood risk by providing storm water attenuation that slows water run-off to rates based on increased rainfall. This offers flood mitigation, contrary to the initial findings of the SA. This would be the approach adopted at North Cambourne, which lies outside of any designated flood zones. MGH therefore expects that the detailed SA for the site will conclude that it can provide benefits to flood risk minimisation, and adaptability to climate change.

SA Objective 12

- 4.18. Assessment against this objective is particularly sensitive to the provision of public transport and the ability of development proposals to limit the impacts of vehicular traffic, as recognised in paragraph 3.92. Option 2 (the Cambridge Airport) is assessed as being of sufficient scale to be able to deliver a range of homes, jobs, services and facilities, which could reduce the need for people to travel elsewhere. MGH has carried out an assessment of the potential increase in self-containment that could be achieved at Cambourne, together with a shift away from car usage and onto public transport. The evidence to support this approach is set out in Appendix 1, together with the assumptions made about what could realistically be achieved. Our evidence shows that there is potential to deliver a large number of homes at North Cambourne with a net zero (or minimal) effect on car journeys to Cambridge.
- 4.19. It is clear that, should new settlements (or expansions of existing settlements such as North Cambourne), also be located on public transport corridors, they will not necessarily have the balanced positive and negative effects of new settlements as shown in the table on p39. It is more likely that they would have the significant positive effects associated with development Option 6.

SA Objective 13

4.20. Objective 13, similar to Objective 12, is influenced strongly by patterns of commuting and car usage. The comments made above in relation to Objective 12 are also relevant to this objective, with likely positive effects from development at North Cambourne.

Response by Martin Grant Homes and Harcourt Ltd



SA Objectives 14 and 15

4.21. The assessment of this objective would be similar for Cambridge Airport and North Cambourne; or for public transport corridors and North Cambourne. The North Cambourne proposals are of sufficient size suitable to create a strong and vibrant community, well-connected to Cambridge with public transport, which would be attractive to global and local employers. The provision of a mixed-use community at North Cambourne, including a variety of employment types, would be likely to generate significant positive effects to the economy.

Conclusions

4.22. MGH are mindful that this is a high level initial appraisal of options. It is clear that the MGH site, unlike Cambridge Airport, does not fit neatly into any one of the broad development options. However, it does benefit from the positive effects of new settlements, and the positive effects of development on public transport corridors. MGH looks forward to the conclusions of the individual site sustainability appraisals, and would welcome the opportunity to engage with the Councils in this process.

Response by Martin Grant Homes and Harcourt Ltd



Appendices



Appendix 1 North Cambourne: self-containment and modal shift



Settlement Size and Travel Self-containment

- A1.1. Figure 1 (and figures in Table 1) below identifies the self-containment of various settlements in Cambridgeshire. The 'self-containment' is the percentage of the resident workforce in a settlement that also works in the same settlement. This data is taken from 2011 Census data from the Office for National Statistics, and is now slightly out-of-date, particularly in relation to Cambourne that we know has seen significant new homes built and occupied since 2011. We estimate that the self-containment of Cambourne is currently about 25%.
- A1.2. The statistics show that self-containment broadly increases as settlement size increases. This is intuitively what would be expected, as larger towns are better able to support a range of more strategic facilities that are the primary generators of trips. In particular, the key generators of journeys are for leisure, for work and for shopping. Settlements that support large amounts of leisure uses, employment and retail will therefore have better self-containment.
- A1.3. The data shows that Huntingdon, Haverhill and Newmarket have particularly high self-containment, at between 45-50%. Cambridge has self-containment of between 55-60%²¹. We estimate that with a sufficiently large population, Cambourne could reach a self-containment of 50%.



Figure 1: Self-containment as a measure of population size.

²¹ <u>https://www.nomisweb.co.uk/census/2011/rf04aew</u>



		All	0/	Detained	N. G	0/
		People	%	Retained	No fixed	%
	Population	Working	working	in Town	Workplace	Retained
Cambourne	7185	3878	54%	758	204	21%
St Neots	29268	15477	53%	5907	1169	41%
Huntingdon	23732	12402	52%	5429	730	47%
St Ives	16384	8887	54%	2919	556	35%
Saffron Walden	12102	6229	51%	2294	506	40%
Ely	20256	10473	52%	3573	602	36%
Newmarket	18575	10535	57%	4635	772	47%
Royston	15781	8684	55%	2941	617	36%
Haverhill	27041	13896	51%	6030	1030	47%
Great Shelford	6104	3026	50%	619	145	21%
Soham	11699	6570	56%	1840	603	31%
Chatteris	10453	5175	50%	1465	474	31%
Histon	10600	5669	53%	1151	342	22%
Sawston	7145	3885	54%	900	308	25%
Papworth						
Everard	8037	4364	54%	1139	265	28%
Cottenham	6543	3498	53%	838	245	26%
Willingham	6887	3815	55%	833	261	23%

Table 1: data supporting Figure 1, ONS / WSP

Assessment of Journeys to Work by Car From Cambourne

- A1.4. WSP have undertaken an assessment of the potential car mode share of people who live in but work outside Cambourne if the settlement is expanded. This assessment is based on the potential for self-containment of trips if Cambourne is expanded to a population of around 31,000 and with a significant increase in the availability of Public Transport in the form of both a Cambourne Station on the East-West rail line and a connection to the CAM network.
- A1.5. For drivers that would have otherwise driven to Cambridge from Cambourne, we estimate that 75% could transfer to EW-rail or CAM. This is considered reasonable given that the proportion of commuters from Ely who worked in central Cambridge and commute by train was about 58% in 2011 and this was prior to the opening of Cambridge North station and the proposed Cambourne south station. Once both Cambridge North and South Stations are implemented the rail mode share could rise to around 65% 70% especially with future restraint on cars entering Cambridge. Ely is a good comparison with Cambourne, although it is slightly further away. With good connections to the proposed Cambourne train station, similar levels of commuting by train could be achieved, or perhaps greater, particularly for the existing population, which is within easy walking distance of the proposed station for East-West Rail.



- A1.6. It is likely that large numbers of commuters to Cambridge would also transfer to the Cambridge Autonomous Metro (CAM). The report to the GCP Executive Board of 19 February 2020 that considered the proposed segregated busway from Cambourne to Cambridge proposed a bus service capacity of 1500 passengers during the AM peak hour. CAM is likely to have an even greater capacity.
- A1.7. Given the levels of rail use from Ely to Cambridge and the additional potential of the C2C segregated busway/CAM a 75% shift from car to public transport for journeys between Cambourne and Cambridge via train or CAM therefore seems not just desirable, but achievable.
- A1.8. For drivers to all other destinations not in Cambridge, we have assumed only asmall shift in transport mode, of 10%. East-West rail will connect Cambourne not just to Cambridge, but to other destinations including St Neots, Bedford and Milton Keynes.
- A1.9. The assessment of Cambourne resident's journeys to work by car external to Cambourne with an increase in population to 31,000 (and hence increase in self-containment) together with a significant increase in public transport availability is set out in the table 2 below.

	Census Data	Existing	With EWRail and CAM	
Year	2011	2018	2030	
Number Homes	2734	4240	12000	Pro-rata
Population	7185	11200	31500	Pro-rata
Total Workers	3874	6000	17000	Pro-rata
Percentage living and working in Cambourne	20%	25%	50%	From Census Data Self Containment Graph
Total Working outside Cambourne	3116	4500	8500	As above
Car Drivers with destination not in Cambridge	1031	1486	2500	Assumes 10% Car Drivers with destination outside Cambridge (300) transfer to EW Rail or CAM
Car Drivers with destination in Cambridge	1467	2114	1000	Assumes 75% Car Drivers with destination in Cambridge (3000) transfer to EW Rail or CAM
Car Drivers working outside	0.400	00000	0500	
Cambourne	2498	3600	3500	
% Car Driver mode share working outside Cambourne	80%	80%	41%	

Table 2: Travel to Work data, ONS and WSP



Conclusions on traffic generation

A1.10. Census data from 2011 (see Table 2 below) shows that in 2011 some 2,500 Cambourne residents drove to work to employment destinations outside of the town, which is estimated to have risen to about 3,600 in 2018 given the population increase. Assuming the increase in self-containment set out above as Cambourne expands further, and the modal shifts away from car use arising from E-W Rail and CAM, a population of some 31,000 residents at Cambourne would generate no greater volume of car trips arriving at or departing from Cambourne than the existing (2018) situation.

David Jackson National Head of Planning

+44 (0) 207 4206371 DJackson@savills.com Andrew Raven Director of Urban Design

+44 (0) 1865 269045 ARaven@savills.com

