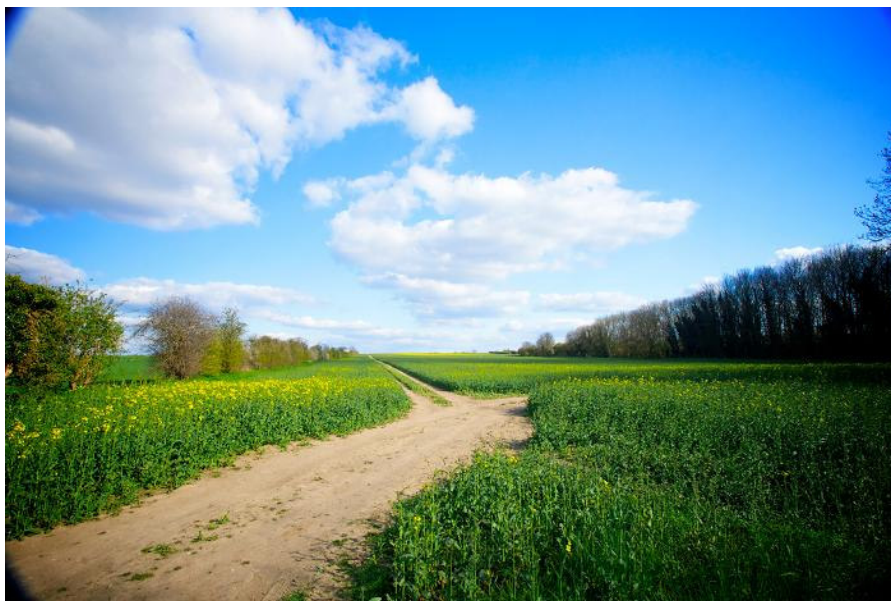


Cambridgeshire Horizons & Cambridgeshire Local Authorities

Eco-towns: Living a greener future
Response to consultation paper

Hanley Grange Eco-town

June 2008



FOREWORD

1 The Cambridgeshire Eco-town Consultation Response

- 1.1 This response to the Eco-towns consultation is a joint response on behalf of Cambridgeshire Horizons and the six Cambridgeshire local authorities.
- 1.2 The Cambridgeshire response is divided into two parts:
 - a “Joint Consultation Response” highlighting the key issues (this document), and;
 - a more detailed statement that provides technical information to support the case for the deletion of Hanley Grange from the Eco-towns shortlist.
- 1.3 Individual letters from local authorities will also be submitted to the Department of Communities & Local Government (CLG) consistent with the conclusions of this joint consultation response.
- 1.4 Our comments are based mainly on the information contained within the Eco-towns consultation document, as some more recent statements from the promoters are of uncertain status and have been subject to change.
- 1.5 The consultation document provides little detail on what is actually proposed for Hanley Grange, and no assessment of potential alternative options. This means that the Hanley Grange proposition would not be acceptable through statutory plan-led decision-making processes, nor would it be considered as a suitable basis for public consultation.

The Nature of the Hanley Grange Proposal

- 1.6 Promoters of Eco-town bids are expected by CLG to refine their proposals before the Government’s decision in October, including a response to the assessment and review process led by the Eco-towns Challenge Panel.
- 1.7 Representatives from Cambridgeshire Horizons and local authorities attended the initial meeting of the Challenge Panel, which considered updated ideas for Hanley Grange (19.05.08). Copies of the follow-up letters sent to the Challenge Panel on behalf of Cambridgeshire Horizons and the Cambridgeshire Authorities are included within the technical statement.

- 1.8 On Monday 23 June, CLG published the notes and recommendations of the Challenge Panel. While not part of the formal assessment process, it is interesting that in respect of Hanley Grange, the Panel have identified many of the concerns and issues highlighted in our own consultation response. In addition, the promoters have made a number of differing presentations to groups of Councillors and to public meetings and have published additional material on their website.
- 1.9 Since the consultation began, the nature of the proposals has been amended in various key particulars. These changes appear to go beyond simple refinement and have affected site area, number of homes to be accommodated and supporting infrastructure to be provided.
- 1.10 Moreover, it has emerged that the proposed development may not be capable of being developed as envisaged in the Eco-towns consultation document because the promoter does not control key parts of the site. In particular, the Wellcome Trust, whose involvement was cited in the Challenge Panel report, has stated that they are yet to reach a final decision regarding the Hanley Grange proposals. Other landowners have also stated that their land would not be available.
- 1.11 For the avoidance of doubt, this statement is based on the expectation that Hanley Grange would reach an upper limit of 8,000 new dwellings, as set out in the consultation document. In addition, regard has been given to the promoter's claim that the ultimate size of the development could reach 11,000 dwellings (although figures as high as 12,800 have also been mentioned).

JOINT CONSULTATION RESPONSE

2 THE CAMBRIDGE SUB-REGION

- 2.1 The Cambridge sub-region is engaged in one of the most ambitious growth programmes in the UK. The core growth strategy set out in the Structure Plan to 2016, and confirmed in the Regional Spatial Strategy (RSS) to 2021, will see a minimum of around 60,000 new homes coming forward in the sub-region, with over 73,000 for the county of Cambridgeshire as a whole.
- 2.2 This is a huge increase over the baseline position, and will result in a population increase of some 33% for Cambridge City and South Cambridgeshire over the RSS period.¹ The infrastructure requirements to make this growth a success have been estimated to be in the region of £4 billion², and the requirements to achieve low or zero-carbon growth are likely to add at least an additional £1.5 billion to that total, whilst the costs of providing affordable housing are estimated as a further £1 billion.
- 2.3 Notwithstanding the scale of this challenge, and understandable concerns from the public about how such increases can be delivered sustainably, and in a way that enhances rather than detracts from the quality of life for the people of Cambridgeshire, the local authorities across the County have embraced this agenda. They have set up Cambridgeshire Horizons as their local delivery vehicle for sustainable growth, and have maintained an effective cross-party and cross-authority growth partnership, commented on by Iain Wright MP as being the best he had seen in his time as a Housing Minister.
- 2.3 This has come about largely because local authorities in the Cambridge sub-region have been able to shape the growth agenda for their area themselves – accepting the role that Cambridge, its environs and the market towns, should play in meeting a wider national need – and working within the plan-led system so enthusiastically espoused by Government. The Cambridge sub-region is one of the best examples in the country of progressing the concepts of plan-making, place-shaping and joined-up delivery.

3 THE GROWTH STRATEGY

- 3.1 The current Cambridge Sub-Regional growth strategy has been carefully devised through successive stages of preparation of the Structure Plan, the RSS and early adoption of the Districts' local plans.

¹ Compared to an East of England figure of 11%

² Long Term Delivery Plan – Deloitte, 2007

It is widely supported as the basis for a step change in the delivery of sustainable new homes and affordable housing and for bolstering the dynamic local economy of the area.

- 3.2 The strategy was fully confirmed in the recently-published RSS, itself the subject of an exhaustive process which considered all the alternatives for growth, including a proposal which was essentially the same as the current Hanley Grange proposal, and which was not taken forward. Hanley Grange is also inconsistent with the key findings of a wide range of studies and independent examinations that underpin the growth strategy.
- 3.3 Our strategy is based on a sequential approach to growth, focussed on densification of the city of Cambridge, growth of its urban fringes, the development of one new town linked to Cambridge by a planned, high quality, frequent public transport system, and extensions to the market towns. The strategy takes full account of best practice in land-use planning, and of the need to put new houses in the most sustainable location, close to employment and leisure locations, which will reduce the negative environmental impacts associated with car travel.
- 3.4 At its core, the strategy pursues a policy of concentrated higher density development. This is important as it provides real opportunities for growth at the lowest levels of associated carbon dioxide emissions, allows for links to existing social networks and community facilities, makes sustainable transport options more viable, and aligns the location of new housing with the needs of employers.
- 3.5 The policy of growing Cambridge, subject to preserving its character and maintaining the quality of its setting, aligned with transport innovations and behavioural change, is probably the most environmentally sustainable approach of all.
- 3.6 Bringing forward Hanley Grange through the eco-towns process would cut across and undermine this clear strategy at a critical point in its implementation, particularly for Northstowe, and be contrary to the Government's own RSS.

4 NORTHSTOWE

- 4.1 Whilst a new town, Northstowe, has been agreed as a necessary component of the strategy, this only emerged after a detailed consideration of feasible alternatives, weighing the environmental and economic benefits of all of these in the balance. Critically, Northstowe makes sense as a location for sustainable growth in large part because it will be connected to central Cambridge, other surrounding towns, and the main employment centres by the Cambridgeshire Guided Busway, which will attract many people who would otherwise choose to drive to and from the new town.

- 4.2 The first phase of the Busway will cost well over £100m, money which has been made available up-front, thanks to significant investment from the Department for Transport and the County Council, and will be operational before the first houses are occupied at Northstowe.
- 4.3 It is crucial for the Government's wider policy objectives that Northstowe is given the support it needs to succeed. This is being jeopardised by Hanley Grange, which has already diverted resources away from Northstowe. Public and political support for the wider growth agenda is also being eroded all the time the Hanley Grange proposal remains on the table.
- 4.4 Cambridgeshire Horizons and all the local authorities in Cambridgeshire acknowledge the need for additional growth beyond 2021, and beyond that already allowed for in our existing plans. But all are also in agreement that this should be considered through the proper democratic processes offered by the forthcoming RSS review.
- 4.5 New town settlements will not normally be the most sustainable option for meeting growth needs in the East of England. Should any be taken forward, they may need to be much bigger than Hanley Grange in order to be sufficiently self-contained in terms of employment and transport activities, as well as being linked in more effectively to existing public transport networks.
- 4.6 These are complex issues. The current process has looked at a relatively narrow sub-set of eco-town sites, put forward by landowners and developers, many of which have already been considered through the recent RSS process. To arrive at the best, and legally safe, policy conclusions about new towns (or alternative growth locations) surely requires a fuller consideration of all the reasonable alternatives, and would be best dealt with through the RSS review, which, in the East of England, is already underway and due to be completed in late 2010 or early 2011.

5 RISKS TO THE EXISTING GROWTH AGENDA

- 5.1 Cambridgeshire Horizons and the local authorities in Cambridgeshire are stretched in delivering growth targets, and Hanley Grange would be a step too far in terms of collective capacity. For South Cambridgeshire in particular, the scale of work needed for the known growth sites threatens the needs of existing communities.
- 5.2 Additional growth pressures caused by Hanley Grange would make the delivery of the planned growth agenda unmanageable in terms of timescales, infrastructure provision and housing quality. The pressure on planning staff and Members (who make up the key development control and planning policy committees) is already intense given the volume of planned development proposals. Bringing forward an additional development of the scale of Hanley Grange risks stretching

this beyond breaking point, and significant investment would be required to fund the necessary additional posts in Cambridgeshire Horizons, the local authorities and their partners. Hanley Grange would also further erode South Cambridgeshire's financial position, with regard to the demand for services against the authority's ability to raise council tax to fund them.

- 5.3 Hanley Grange contradicts the principles that underpin Cambridgeshire's growth strategy and will threaten the delivery of planned housing numbers through taking up officer time and diverting construction resources. It therefore risks slowing the delivery of housing numbers on the Cambridge City urban fringes and the market towns. Indeed, Cambridgeshire's market towns have been amongst the most successful sites in delivering RSS targets, demonstrating the successful consensus upon which the growth agenda has been built. Imposing an additional settlement on the local authorities that sits outside the plans agreed through the RSS will undermine the partnership approach that has underpinned the success of the growth agenda so far.
- 5.4 Hanley Grange could also threaten the delivery of houses through potential market over-supply, and over-stretch the capacity of the construction industry in the County, already at risk from the construction needs of the 2012 London Olympics. Finally the cross-party political support for growth in the Cambridge Sub-Region could fracture if Hanley Grange is pushed through against the wishes of all six local authorities.

6. TRANSPORT

- 6.1 Hanley Grange is in a very poor strategic location for a sustainable development of this nature. The site has key weaknesses with no credible public transport link with Cambridge (9.5 miles away) or with other settlements in the M11 corridor. It is adjacent to the major road network, including the M11, A11, A505, and the A1301, which would only serve to encourage car-based journeys.
- 6.2 The location is also remote from the main employment and leisure facilities in the sub-region, and is thus susceptible to the production of high "off site" carbon emissions from car borne commuters using the M11, which already suffers peak hour congestion, to travel south towards Stansted and London or using local roads north to Cambridge.
- 6.3 There are two railway stations, Whittlesford Parkway and Great Chesterford, around 1.5 and 4 miles from the site respectively. However, access to them would be difficult by non-car modes, particularly as passengers for Whittlesford Parkway would need to cross the A1301 and A505, and for Great Chesterford would need to cross the M11/A11 interchange. The train service is also overstretched currently (although there are plans to upgrade), and does not provide

direct access to the main employment sites in Cambridge, which the Guided Busway does.

- 6.4 Local bus provision is an unacceptable solution, not least as it would still contribute to and suffer from the road congestion issues in the area and particularly in central Cambridge. Congestion would also result in unacceptable journey times which would not then attract people away from their cars. Rather, a high-quality, dedicated fixed-link solution, equivalent to or better than the Guided Busway would be essential.
- 6.5 The promoters have speculated that the Guided Busway network could be linked to Hanley Grange but have made no firm proposals in this area, focusing instead on traditional road-based solutions. However even if a Guided Busway extension were to go ahead, this poses a number of questions: How is the land needed for this to be secured? How long would it take to get it approved through the Transport and Works Act? This will be a hugely expensive enterprise on its own, and would take many years to conclude. The current proposals provide no information even of indicative costs for such an endeavour. The overall scale of the transport investment bill will be massive, far more than will be required for Northstowe. We see no figures from the promoters to show that they understand the scale of the challenge, whether it would be deliverable or that they can afford to pay.
- 6.6 Some of the restrictions suggested by the promoters to encourage sustainable behaviour – such as a tariff on those leaving the settlement by car, or some homes being retained for occupants of the research parks would impact on sale prices of new homes and depress potential uplift in land values needed to fund new infrastructure.
- 6.7 Hanley Grange is also poorly located in terms of maximising walking and cycling opportunities for key activities.
- 6.8 The promoters' suggestion that they could achieve 25% to 30% total modal share by car is simply not credible.³ The expectations for Northstowe, a settlement that is closer to Cambridge, and will benefit from the Guided Busway and dedicated cycle provision, is around 50% of modal share by car. Even at Cambridge East, a sizeable settlement on the eastern edge of the city, which therefore can expect higher levels of walking and cycling, the traffic modelling suggests a 40% modal share by car.
- 6.9 Indeed, no major settlement in the UK has achieved anything like 25% to 30%, and the inherent locational drawbacks to Hanley Grange make this target untenable. And, despite the promoters' claims about low levels of car journeys, they have already acknowledged that the

³ This is an estimate of what a 40%/10% external/internal split would amount to for total modal share

congested A505 would need dualling in order to cope with the additional traffic generated.

- 6.10 Furthermore, the particular locational difficulties presented by Hanley Grange would seem to exemplify the dangers set out in the Government's recent publication, "Towards a Sustainable Transport System", which states:

*"The DfT and colleagues in Communities and Local Government are working together to ensure that the additional 240,000 houses a year proposed in the recent housing Green Paper are located as close as possible to workplaces or to existing transport (preferably public transport) links. It is obvious that the climate change benefits of the new Eco-Towns, for example, will be eroded or negated if the people who live there have no alternative but to travel long distances to work by car."*⁴

7 ENERGY, ENVIRONMENT & WATER ISSUES

- 7.1 There is lack of substance or credibility to the claims being advanced in favour of Hanley Grange in respect of it being "zero carbon", "energy provider" and "water neutral". These are aspects in which excellence is required for its eco-town status.
- 7.2 There are strong concerns over the potential environmental impact of the scheme in respect of water supply, ecology, landscape and the historic environment. These are detailed in the accompanying technical statement. However we must draw attention here to the critical issue of water.
- 7.3 There is currently no evidence to suggest that the promoters of Hanley Grange have assessed the environmental impacts in a meaningful way. The site is located above a ground water protection zone, a factor that will restrict the nature and location of particular land uses. The Environment Agency defines the site as being an area of serious water stress, and both the EA and the Cambridge Water Company have stated that no water abstraction is likely to be permitted in this location, raising serious doubts about the sustainability and cost of supplying water to the development.
- 7.4 Cambridge Water Company also have significant concerns about the impact that the development may have on the existing public water supply abstraction point that lies within the proposed development boundary. The company has a duty to protect its licensed resources and has expressed concerns that development on the catchment will affect existing abstraction and further present pollution risk within the protection zone.

⁴ Department for Transport " Towards a Sustainable Transport System" - published Oct 07, A9, p. 82

- 7.5 The promoters have yet to consider fully the potential flood risk posed by the development; the site will drain into the River Cam, and there is currently no evidence to explain how the potentially increased flood risk will be mitigated. Furthermore, the Environment Agency has indicated that as existing Sewage Water Treatment Works are inadequate to cope with a development on the scale of Hanley Grange, a new treatment site would need to be provided. However the promoters have given no clear indication as to the feasibility of this, although various experimental ideas have been alluded to in their presentations.
- 7.6 When the scheme was submitted as part of the 2005 RSS, no information was provided as to the site's impact on the ecological and historical environment. There are particular concerns over the scheme's impacts on groundwater and spring flows to nearby wetland SSSIs and nature reserves, and no consideration appears to have been given to the importance of the EU Habitats Directive and the consequences of not undertaking Appropriate Assessment. There are also a number of listed buildings and ancient monuments within or bordering onto the site that would be protected under the present designation legislation.

8 EMPLOYMENT

- 8.1 We would strongly challenge the strength of employment links claimed with the high tech/biotech research sector. These are clearly insignificant in comparison with the overall size of the town. There is no evidence to suggest that this will help to achieve a better jobs to homes balance in the sub-region.
- 8.2 Indeed, there is recent evidence of some potential negative effects on some parts of the sector locally, with opposition from the same institutions which are said by the promoters to benefit.
- 8.3 The evidence put forward by the promoters of Hanley Grange is flawed and based on inaccurate data. Research undertaken on behalf of the local authorities (and detailed in the technical appendices) suggests that the figures used by the promoters of Hanley Grange are inaccurate, and that job growth in the area is likely to be significantly lower than suggested, because they relate to the performance of the entire economy and not to hypothetical job increases.
- 8.4 The figures used by the promoters point to significantly higher job growth than our evidence suggests will actually occur. Housing need for workers on the research parks near Hanley Grange is advanced as a major attraction of the development, however evidence suggests that the majority of these workers are young, recently qualified staff, many of whom are on short-term contracts, who for convenience and lifestyle reasons choose to live in privately rented accommodation in

Cambridge city. There is no evidence to suggest that Hanley Grange will change this situation.

- 8.5 Recent experience suggests that labour supply and demand are likely to continue to be in balance by 2021, as appears to be the case in 2006. The predicted balance of job growth in the Cambridge Sub-Region is likely to be weighted towards sites in and around Cambridge, especially given the expansion of Addenbrookes Biomedical Campus. Hence delivering housing to meet expected employment needs will be far better achieved through the current growth plans which put the major housing growth sites close to the areas of expected employment growth.
- 8.6 Furthermore, a survey carried out by Cambridge Healthcare and Biotech Ltd of the companies based at the Granta Park, the Babraham Research Campus and the Chesterford Research Park has highlighted a number of significant concerns held by the local employers. The companies surveyed did not feel that a lack of housing is a major issue in terms of recruiting staff, with many suggesting that a new settlement could increase congestion, and therefore make the area less attractive to future employees and clients.

9 ECO-TOWN PROCESS

- 9.1 The process for selecting eco-towns as set out in the consultation document appears to bypass the plan-led system that Government and local authority partners have been working on for many years now.
- 9.2 The most appropriate route to bring forward any eco-town should be through the Development Plan process. This would allow for all viable alternatives to be tested fully, and would allow local people and accountable bodies to assess this proposal, and any others, for sustainable growth.
- 9.3 It is acknowledged that any proposals would still have to go through a planning application process. However, were the Government's proposed Planning Policy Statement to create a situation where refusal of planning permission would in effect be almost certain to be overturned on appeal, this would destroy public support for the planning system and growth generally, and would fly in the face of the Government's own support for the place-shaping agenda that is encapsulated most clearly through the Local Development Plan process.

10 CONCLUSION: An Alternative Approach To Deliver Eco-town Objectives in Cambridgeshire

- 10.1 The Government's twin policy objectives for eco-towns are to deliver additional housing numbers to meet identified need, and to demonstrate how growth can be delivered in environmentally

sustainable ways. However, the unanimous view of Cambridgeshire Horizons and the local authorities is that within Cambridgeshire both these aims within Cambridgeshire would be frustrated by Hanley Grange, with delivery likely to slow down and the quality of outcomes likely to be compromised. We therefore believe that the site should be removed from the eco-towns list as soon as possible.

- 10.2 Cambridgeshire Horizons and the Cambridgeshire Local Authorities propose an alternative approach to meeting Eco-town objectives in Cambridgeshire.
- 10.3 This would be more capable of delivery in a short timescale and would produce a more sustainable outcome in local circumstances. It is based on the following 4 action points:
 - Removing Hanley Grange from the current Eco-towns Programme.
 - Promoting Northstowe. This would see Government fully throwing its weight behind making Northstowe a success. Given the progress already made towards outline planning permission, we would need to stop short of requiring full compliance with all the elements within the “Living a Greener Future” document, as to do so would risk delay, by changing what the joint promoters are expected to deliver in the early phases. However, with Government support we can deliver excellence and a truly exemplar settlement in terms of environmental performance, community development, and overall quality.
 - Encouraging sustainable growth and eco-extensions at key market towns, properly tested through RSS/LDF processes.
 - Enabling the promoters of Hanley Grange to submit their site for scrutiny within the RSS review process if they so wish, where their proposals can be properly tested against all reasonable alternatives in the East of England.