

Cambridgeshire Horizons & Cambridgeshire Local Authorities

Technical Statement of Issues

Hanley Grange Eco-town

June 2008



Hanley Grange: The Main Findings (1)

a) The Hanley Grange Proposal (See Section 3):

- There is little detail about what is actually proposed and no assessment of potential alternative options.
- Hanley Grange 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, including the Wellcome Trust land.

b) The Scale Of The Challenge (See Section 4):

- Cambridgeshire has embraced the growth agenda. Planned growth in the Cambridge Sub Region provides for the highest concentration of house building in the Eastern Region.

c) The Impact Of Hanley Grange On The Delivery Of Growth (See Section 5):

- The current Cambridge Sub Regional strategy has been carefully devised through successive stages of preparation of the Structure Plan and the Regional Spatial Strategy. 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.
- Hanley Grange would cut across and undermine this clear strategy at a critical point in its implementation, particularly for Northstowe.
- Hanley Grange is also inconsistent with the key findings of the studies and independent examinations that underpin the development strategy.

d) Location (See Section 6):

- Hanley Grange is 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.
- Hanley Grange has no previously developed land present within the site and would involve a significant loss of high-grade agricultural land (Grade 2).
- Hanley Grange is not well located in terms of maximising walking and cycling opportunities.
- The location is susceptible to the production of high “off site” carbon emissions from car borne commuters using the M11 to travel south towards Stansted and London or using local roads north to Cambridge.

Hanley Grange: The Main Findings (2)

e) Transportation (See Section 7):

- There are major drawbacks to the transport options put forward which are primarily road based and contribute to existing congestion problems. There are no firm proposals for a fixed link public transport solution equivalent to the Guided Busway.
- 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 to fund new infrastructure.

f) Employment (See Section 8):

- The strength of employment links and the case made for additional housing to support the high tech/biotech research sector are strongly challenged and clearly insignificant in comparison with the overall size of the town.
- Recent evidence has emerged that Hanley Grange may cause negative effects on some parts of the sector locally, with opposition from the same institutions which are said by the promoters to benefit.

g) Meeting Housing Needs (See Section 9)

- Strategic arrangements are now in place to further boost affordable housing levels through the growth strategy and the Cambridge Challenge initiative.
- The main need for affordable housing is focussed in and close to Cambridge City rather than at Hanley Grange.

h) Managing Water (See Section 10)

- Hanley Grange is located in a significant Groundwater Protection Zone that will restrict the nature and location of particular land uses.
- 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.
- There is a lack of information on potential flood risk downstream. There is a lack of sewage treatment capacity available locally and a new sewage works would need to be constructed on site, although the feasibility of this is not yet proven.
- The proposals for black and grey water recycling appear to be untested on a large scale and may pose an unnecessary risk to local water resources.

i) Ecology & Other Environmental Impacts (See Section 11)

- There are concerns over the environmental impact of the scheme, particularly regarding impacts on groundwater and spring flows to nearby wetland SSSIs.

Hanley Grange: The Main Findings (3)

- There is no evidence at this stage to suggest that the promoter has assessed potential environmental impacts in a meaningful way.
- No consideration appears to have been given to the importance of the EU Habitat Directive and the consequences of not undertaking Appropriate Assessment.

j) Landscape (See Section 12)

- Hanley Grange would have a significant adverse impact on local landscape character and on views from the countryside beyond the site in an area of particularly highly valued landscape.
- The landscape impact of Hanley Grange would be clearly visible in valued and much-enjoyed views from the Cambridge Green Belt – particularly from Magog Down.

k) Historic Environment (See Section 13)

- Hanley Grange would be likely to have a significant impact on the historic environment including sites and monuments protected under the present designation legislation.

l) Hanley Grange & Eco-town Criteria (See Section 14)

- 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.

m) Unanimous Opposition (See Section 15)

- There is unanimous opposition to the proposal from the Cambridgeshire local authorities, Cambridgeshire Horizons and local communities.
- The Imperial War Museum at Duxford has raised strong concerns about the negative impacts of Hanley Grange upon its standing as a centre of historic aviation.

n) Eco-towns Planning Process & RSS Review (See Section 16)

- The Eco-towns Programme does not provide an adequate evidential basis on which Hanley Grange could be selected as a suitable site for development.
- The right approach is for Hanley Grange to be removed as an unsuitable location in principle, or alternatively to be considered in the review of the Regional Spatial Strategy for the East of England, which has already begun.

o) Cambridgeshire’s Alternative Eco-town Approach (See Section 17)

- Cambridgeshire Horizons and the Cambridgeshire Local Authorities are proposing an alternative approach to meeting Eco town Objectives in Cambridgeshire. This would be more capable of delivery in a short timescale and would produce a more sustainable outcome in local circumstances (see Text Box 1 below).

Box 1: Hanley Grange

Cambridgeshire's Alternative Eco-town Approach

Cambridgeshire Horizons and the Cambridgeshire Local Authorities propose an alternative approach to meeting Eco-town objectives in Cambridgeshire.

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:

1. Removing Hanley Grange from the current Eco-towns Programme.
2. 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.
3. Encouraging sustainable growth and eco-extensions at key market towns, properly tested through RSS/LDF processes.
4. 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.

Cambridgeshire Horizons & Cambridgeshire Local Authorities

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Appendices:

Appendix A: Letters to the Challenge Panel sent on behalf of Cambridgeshire Horizons/Cambridgeshire Authorities together with an extract from CLG's notes and recommendations from the Challenge Panel for Hanley Grange.

Appendix B: Plans (Site Location, Site Constraints & Aerial Photograph).

Appendix C: Key strategic growth sites in the Cambridge sub region.

Appendix D: RSS Housing Targets (and Structure Plan/Draft RSS).

Appendix E: Cambridgeshire & Peterborough Biological Records Centre search

Appendix F: Hanley Grange & TCPA Assessment Sheets

Topic Papers:

Topic Paper 1: Progress on Delivery.

Topic Paper 2: New Settlement Assessment of Hanley Grange.

Topic Paper 3: Transport.

Topic Paper 4: Employment.

Topic Paper 5: Water.

Topic Paper 6: Landscape.

1.0 Introduction

- 1.1 Hanley Grange near Hinxton in Cambridgeshire has been identified by the Government as one of fifteen shortlisted locations considered potentially suitable for an Eco-town. Three other sites in the East of England region have been proposed at: Elsenham in Essex, Marston Vale in Bedfordshire and Coltishall in Norfolk.
- 1.2 A final list of up to 10 locations will be subject to a more detailed assessment through the forthcoming consultation on the Sustainability Appraisal (SA) and draft Planning Policy Statement (PPS) on Eco-towns planned for later this year.
- 1.3 Cambridgeshire has positively engaged in the growth agenda and has actively helped to shape the plans for delivering many thousands of additional homes and the necessary associated infrastructure in a sustainable way. But, the Cambridgeshire local authorities and Cambridgeshire Horizons are joining together to express unified concern about the shortlisting of Hanley Grange.
- 1.4 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, as things stand, both these aims within Cambridgeshire would be frustrated by Hanley Grange.
- 1.5 Instead, our response calls for a refocusing of collective efforts on Northstowe to maximise the opportunities and the committed public investment in infrastructure already made there. In a difficult economic climate, this would deliver quicker and more certain benefits at a national, regional and local level. This could be coupled with a stronger emphasis on sustainable growth at key market towns in the Cambridge Sub Region to be tested through the RSS review.
- 1.6 Hanley Grange is an unproven strategic location for a new settlement.
- 1.7 Key disadvantages include:
 - Being relatively remote from Cambridge (at 9.5 miles) and from the economic, social, and leisure opportunities that the city provides,
 - Unsupported by a deliverable Guided Busway (or other rapid transit opportunity),
 - Susceptible to high levels of out commuting by car to Cambridge, Stansted and other locations along the M11 corridor,
 - No previously developed land present within the site,
 - Significant loss of high grade agricultural land,
 - Unresolved questions about how to avoid harm to the underlying aquifer and how to secure sustainable water supplies in this area of water stress;
 - Other major environmental and landscape impacts;
 - Absence of information about potential alternative options; and

- Doubts about whether the promoters control sufficient land to deliver either their short term or long-term aspirations.
- 1.8 These disadvantages mean there can be no case for selecting Hanley Grange as an Eco-town. Moreover, the lack of credible worked up details about the proposals would frustrate the possibility of planning approval or the commencement of delivery in the shorter term as currently envisaged by the Government.
- 1.9 The RSS review is the right process for considering the long-term development options for Cambridgeshire including the potential suitability of Hanley Grange as a new settlement option.
- 1.10 This statement has been prepared by Cambridgeshire Horizons and the Cambridgeshire Local Authorities to provide the technical basis for the case being made to the Housing Minister for the removal of Hanley Grange as a location for an Eco-town. The consultation on the Eco-towns document closes on 30 June 2008.
- 1.11 The statement makes reference to the following sources:
- A submission to the Regional Examination In Public on behalf of Jarrow Investments Ltd (March 2005)
 - Bone Wells Report for Jarrow Investments on Socio-economic context for Hanley Grange Final Report (May 2006)
 - Letter from Bob Sellwood of Sellwood Planning forming part Eco-towns submission to CLG dated 29th October 2007.
 - Supplemental letter from Bob Sellwood of Sellwood Planning to Henry Cleary of CLG dated 4th December 2007
 - Presentation to Eco-towns Challenge Panel (May 2008)
 - Hanley Grange – Strategic Transport Overview
 - Hanley Grange website (www.hanleygrange.co.uk)

2.0 **Background: The Eco-town Programme**

Eco-town Prospectus

- 2.1 The Prime Minister Gordon Brown first announced that Northstowe would be one of the new eco-towns during the election to succeed Tony Blair as leader of the Labour Party in Spring 2007.
- 2.2 The Government launched the “Eco-towns Prospectus”, alongside the Housing Green Paper, in July 2007. Eco-towns are identified as a response to three drivers:
- The need for zero carbon growth and more sustainable ways of living.
 - Increasing the supply of affordable housing.
 - Exploring the potential of new settlements to work alongside growth in existing towns and cities.

2.3 The Eco-towns Prospectus also sets out certain key criteria for Eco-towns. These are:

- New settlements of at least 5000 homes with a separate and distinct identity but good links to surrounding towns and cities in terms of jobs transport and services.
- The overall development should reach zero-carbon standards and be an exemplar in at least one aspect of environmental sustainability.
- The development should have a good mix of retail, business, leisure and education facilities.
- Affordable housing will comprise between 30 – 50% of the total dwellings.
- A delivery organisation will support and manage the development of the town.

2.4 Contrary to earlier statements, Northstowe is described in the Prospectus as a “prototype” Eco-town. This apparent demotion was later confirmed formally to Cambridgeshire Horizons and the Cambridgeshire local authorities by the then Housing Minister Yvette Cooper in November 2007. This change in position was attributed to Northstowe having been already identified through the plan process.

“Eco-towns Living A Greener Future”

2.5 “Eco-towns Living A Greener Future” was published by the Department of Communities & Local Government (CLG) in April of this year. CLG has outlined in the consultation document a 4-stage process for the Eco-town programme as follows:

Stage 1: This consultation paper-seeking preliminary views on Eco-town benefits and the 15 shortlisted locations (April – June 08).

Stage 2: A more detailed assessment of the locations through a *Sustainability Appraisal and draft Planning Policy Statement on Eco-towns* (July/August to Sept/Oct 08).

Stage 3: Final list of locations with potential to be an Eco-town together with final *Planning Policy Statement on Eco-towns* (Nov/Dec 08 to Jan/Feb 09).

(Stage 4): Consideration of planning applications for individual schemes. Although the consultation document suggests this could be an ongoing activity overlapping with Stages 1 to 3.

2.6 CLG suggests that some of the first Eco-town schemes could be underway by 2010.

- 2.7 The Eco-towns consultation invites comments on the following issues:
- The way in which the Eco-towns concept is being developed and the different potential benefits that an Eco-town could deliver;
 - How particular features such as greenspace or innovative approaches to housing can best be developed in an eco-town;
 - Preliminary views on the 15 locations going forward for further assessment.

3.0 Hanley Grange Eco-town Proposal

3.1 The Eco-towns consultation document describes Hanley Grange as a potential Eco-town location for 8000 homes on 500 hectares of land close to the Cambridge high technology employment cluster and nearby villages of Hinxtton and Duxford. A site plan, constraints map and aerial photograph for Hanley Grange is provided in Appendix B.

3.2 The consultation document lists CLG's views of the following potential benefits for Hanley Grange. These are:

- Respond to the severe housing/jobs imbalance in the Cambridge Sub Region (CSR).
- Locate new development close to employment.
- Provide scope for good links with science and engineering industries.
- Increase affordable housing levels.

3.3 Challenges and constraints for Hanley Grange identified by CLG include:

- Environment: Impact particularly water supply, drainage and water quality.
- Transport: Impacts on local network and bus/rail capacity.
- Employment: Locating housing nearby to employment is more sustainable and will improve growth potential. Need to achieve homes/jobs balance rather than long distance commuting.
- Conservation & Historic Constraints: Need to safeguard conservation & historic environment.

3.4 With respect to Hanley Grange, the Eco-towns consultation document also specifically invites comments on the Hanley Grange location. The questions raised by CLG are:

- Do you have views on the inclusion of this location in the Eco-towns programme?
- Are there other potential benefits or challenges which would wish to see addressed for this location?
- Are there particular issues which you would like to see the proposals for this location address?

- 3.5 Before considering these location specific points, it is important to understand the distinctive planning policy framework that applies to the Cambridge area, as well as the “step change” in housing growth that is already embedded within that growth strategy.

4.0 The Scale Of The Challenge

The Cambridgeshire Growth Strategy

- 4.1 Strategic planning policies from the 1950s through to the 1990s sought to restrain development in Cambridge with the objectives of protecting the city’s historic character and maintaining tight Green Belt boundaries around the city. Housing growth was directed to surrounding “necklace” villages or villages with significant local services. From the 1970s this approach was overlain with a strategy of dispersing employment and to a lesser extent housing to less economically strong parts of the county.
- 4.2 However, it became increasingly apparent that economic dispersal was having limited effect. Cambridge was the main focus of job growth. Commuting from towns and villages was growing on an ever-larger scale, resulting in unsustainable patterns of travel and significant congestion in and around the city.
- The Cambridgeshire & Peterborough Structure Plan 2003
- 4.3 Following the introduction of new regional planning policies in 2000, the 2003 Cambridgeshire & Peterborough Structure Plan reversed the “dispersal” strategy in favour of more concentrated patterns of development. Housing growth in particular is to be concentrated close to Cambridge, helping to support its dynamic knowledge based economy. Housing and economic growth are encouraged in other main centres and large towns in preference to the smaller towns and villages. The aim is to create more sustainable high quality communities throughout the County, which meet social, economic and environmental objectives.
- 4.4 The Structure Plan strategy supported the location of a much higher proportion of Cambridgeshire’s overall growth within the Cambridge Sub-Region (CSR) and in particular in and on the edge of Cambridge than previously was the case. A cornerstone of the strategy for the CSR is a strong sequential approach to making the most of the development potential of land in the following order of preference:
- i) within the built up areas of Cambridge subject to considerations of environmental capacity,
 - ii) on the edge of the built up area of Cambridge using land released from the Green Belt in the 2003 Structure Plan,
 - iii) at the new settlement of Northstowe and,
 - iv) on land within or on the edge of the market towns.

- 4.5 A map showing the location of the key strategic sites released from the Green Belt around Cambridge and the new settlement of Northstowe is shown in Appendix C.
- 4.6 Another key element of the strategy is to deliver a significant increase in the overall supply and rate of housing growth. This is a positive response to the success of Cambridgeshire's economy.
- 4.7 The County has subsequently been designated by the Government as part of the London Stansted Cambridge Peterborough (LSCP) Growth Area. This is one of four growth areas identified nationally.
- 4.8 The Structure Plan set a target of 57,400 new dwellings to be constructed in Cambridgeshire between 1999 and 2016. 47,500 new dwellings of the total requirement are to be provided in the CSR by 2016. Consequently, annual rates of house building in the CSR were planned through the Structure Plan to rise sharply from historic rates of around 2,000 new dwellings per annum to 2,800. This is the equivalent of a 40% increase in annual housing completions (although this rate rises further under the finalised RSS). Most of this growth is concentrated in Cambridge City and South Cambridgeshire.
- 4.9 Increasing the supply of affordable homes is another important element of the Structure Plan strategy for the CSR. Need is high throughout the CSR and is particularly great in the Cambridge area. The Structure Plan introduced a requirement for at least 40% of new housing in the CSR to be affordable.
- The Regional Spatial Strategy for the East of England
- 4.10 The Structure Plan has been replaced by the Regional Spatial Strategy (RSS) known as the East of England Plan. This was approved by the Government in May 2008. The RSS incorporates key elements of the Structure Plan strategy for the CSR and rolls this strategy forward from 2016 to 2021. But, there are some important differences.
- 4.11 The 2003 Structure Plan had already set unprecedented levels of housing growth for Cambridgeshire to plan for and to absorb. The finalised RSS has further increased housing provision setting a minimum of 98,300 new dwellings in Cambridgeshire and Peterborough by 2021. This is an increase of 33% on the existing housing stock compared to an average of 22% across the East of England region¹.
- 4.12 South Cambridgeshire and Cambridge City alone are planning to provide a minimum of 42,500 dwellings to 2021. This represents an increase of 44% in the existing housing stock and a population increase of 33%.

¹ This is based upon estimates from Chelmer model (by-product of CLG household estimates) - ARU/R Jones 2.1.07. It is assumed that 2500 dwellings from Harlow expansion are in E Herts (EERA 2.1.07).

- 4.13 Equivalent annual rates of housing delivery required by the RSS for the CSR are 3120² are now set at more than 55% above historical rates of housing supply. This is a very substantial increase on top of the already high levels of annual growth in the Structure Plan.
- 4.14 Furthermore, the strategy that originated in the Structure Plan and carried forward into the RSS provides capacity for regional growth beyond 2021 within the LDDs and their 15-year timescales.
- 4.15 To put planned housing growth further in context, the Long Term Delivery Plan estimates that a very significant programme of investment would be needed totalling £3.9 billion over the next 20-year period. A further £1 billion would be needed on top of this to fund affordable housing, and the requirements to achieve low or zero-carbon growth are likely to add at least an additional £1.5 billion to that total. This investment programme is not just about substantial sums of money but the capacity of service and infrastructure providers to plan and deliver a step change in provision across a number of development sites at the same time.
- 4.16 Cambridgeshire Horizons and the Cambridgeshire Local Authorities have also prepared the Cambridgeshire Programme of Development (PoD) which sets out a shared vision to deliver the required housing targets and achieve a sustainable low carbon future.

Progress on Delivery

- 4.17 Delivery was always expected in the Structure Plan to be “back loaded” over the plan period reflecting the longer lead in times needed for the key strategic sites around Cambridge, including Northstowe. Nevertheless, since 1999, completions have risen steadily towards the Structure Plan rate for the sub region. At 2800 per annum this is a 40% increase on historic rates, with completions exceeding the 2800 indicator for the first time in 2005/06 and close to it in 2006/07. Levels of affordable housing provision have also risen steadily in recent years. Although more progress is required to reach 40% of all new homes, it is anticipated this will be achieved when the major developments at Northstowe and on the edge of Cambridge come fully on-stream.
- 4.18 Good progress is therefore being made in delivering the growth strategy. Partners are confident that sufficient provision is now being advanced through the Local Development Framework processes to meet both the quantitative and locational elements of the strategy. Furthermore, stretch targets for growth in Cambridgeshire (NI 154 Housing supply/NI 155 Affordable housing) have also been set for the

² This figure is based upon the housing provision figure given in policy CSR2 of the Draft RSS published in December 2004 together with the additional 4,300 homes proposed for Cambridge City in the approved RSS. It assumes that housing delivery is constant over the plan period. Therefore 3,120 dwellings would be delivered each year

next three years through the Local Area Agreement in excess of annualised RSS rates.

- 4.19 South Cambridgeshire's initial programme of plan preparation for its Local Development Framework is now substantially complete and includes an adopted Core Strategy and Area Action Plans for Northstowe and the Cambridge East urban extension (prepared jointly with the City Council).
- 4.20 The Partners consider there is no need for Hanley Grange to be identified outside of the RSS or Local Development Framework (LDF) processes in terms of housing supply. The difficult economic conditions now being experienced in the housing market increase the challenge in the immediate years ahead and weaken further any case for Hanley Grange to be introduced as a competing development in the short term.

Conclusion

- 4.21 Cambridgeshire can demonstrate a track record of welcoming and planning for growth. Local stakeholders are working together to provide additional homes in sustainable communities meeting current and future needs.
- 4.22 The basis for delivery is the Cambridge Sub Regional Strategy, which has been carefully devised through successive stages of development planning. It is widely supported. Hanley Grange would cut across this clear framework at a critical stage in its implementation. There is no need to identify Hanley Grange in terms of housing supply.

Further Information

- 4.23 A more detailed overview on the progress made on delivery is provided in Topic Paper 1.
- 4.24 Appendix C identifies the key strategic growth sites in the Cambridge Sub Region.
- 4.25 Appendix D provides a summary of the housing targets for Cambridgeshire in the RSS (and Structure Plan/Draft RSS).
- 4.26 The Cambridge Sub Region Long Term Delivery Plan (August 2007) can be viewed on the Cambridgeshire Horizons website at:

http://www.cambridgeshirehorizons.co.uk/doclib/Cambridgeshire_Horizons_LTDP_FINAL.pdf

- 4.27 Programme of Development for Housing Growth Funding (2008 – 2011) can be viewed on the Cambridgeshire Horizons website at:

http://www.cambridgeshirehorizons.co.uk/doclib/Cambs_PoD_to_print.pdf

Box 2 – The Scale of the Challenge

Summary of Key Points

- Cambridgeshire has embraced the growth agenda.
- Planned growth in the Cambridge Sub Region provides for the highest concentration of house building in the Eastern Region.
- Annual housing rates for the Cambridge Sub Region are the equivalent of 55% above historical rates of housing supply.
- The agreed strategy has been carefully devised and enjoys widespread support.
- Good progress is being made on delivery – despite the uncertainty arising from the current economic downturn.
- Hanley Grange would cut across the agreed strategy at a critical point, particularly for Northstowe.

5.0 The Impact Of Hanley Grange On The Delivery Of Growth

5.1 Cambridgeshire Horizons and Cambridgeshire local authorities are confident that the strategy for Cambridgeshire and the CSR can be delivered. Hanley Grange would introduce an unnecessary risk to the delivery programme.

5.2 Major challenges in delivering the planned growth strategy are being proactively managed by partners as follows:

- Sustaining and strengthening increases in housing supply, particularly in and around Cambridge, whilst ensuring developments achieve high levels of sustainability that take account of and are responsive to climate change.
- Securing the infrastructure funding to cover the costs of key investments for public transport schemes, affordable housing, education, health and green infrastructure.
- Achieving timely delivery of funded infrastructure to ensure housing growth being delivered is truly sustainable.
- Making a thorough assessment and robust determination of the Northstowe planning application.
- Relocating Marshall's Aerospace business to release Cambridge East.

5.3 This location has already been considered and rejected as inconsistent with the development strategy for the Cambridge Sub-Region. Introducing an unplanned new settlement at this critical stage would

divert stretched resources in both the public and private sector away from the key challenges. This would hinder the delivery of homes at the current planned sites at the quality levels and timescales desired. Local planning and technical resources are already severely stretched by the complexity and ambition of the current growth programme.

- 5.4 South Cambridgeshire has the highest growth target of any District Council in the Eastern Region. In just 4 years from 2004 to 2008, the annual housing target for South Cambridgeshire has almost doubled from 750 dwellings per annum to 1,330 dwellings per annum.
- 5.5 South Cambridgeshire is not a well-resourced local authority. After many years of setting a zero Council Tax, the Council Tax for 2008/09 is just £107.27 for a band 'D' property which is the 13th lowest in England. The Council's annual budget is only £13,925,000 comprising £7,711,00 in Government grant and £6,214,000 in Council Tax. The Council employs 353 staff in its Cambourne offices.
- 5.6 The Growth Agenda is driven by the growth of the local high technology economy, underpinned by high levels of in-migration for which provision has already been made in the growth strategy. Migration is occurring because jobs are forecast to outgrow the natural increase of the local population – from 2006 to 2021 the population of South Cambridgeshire is set to grow by 32,500 people of which 82% are forecast to be in-migrants (26,700 people). This represents a major challenge for the District. Nevertheless, the District Council has embraced and taken full ownership of the planned Growth Agenda for the Cambridge Sub-Region.
- 5.7 Development of 750 dwellings per annum has seen the population of South Cambridgeshire grow by an annual average of nearly 2,000 people for many years. This alone has placed a burden on the Council to maintain and grow its service provision at a rate of approximately 2% per annum. This has for example manifested itself in high numbers of planning applications averaging 2,552 per annum over the last 5 years.
- 5.8 The Growth Agenda has added substantially to those demands. In order to make a success of the planned developments at Northstowe (9,500 dwellings), Cambridge East (7,000 dwellings), Cambridge Southern Fringe (600 dwellings), Cambridge North West (900 dwellings) and Cambourne (950 dwellings), at the last count South Cambridgeshire had 50 staff wholly or substantially deployed on delivering the growth agenda (50% or more of their time) comprising:
 - Planning: 13 FT (DC), 8 PT (Policy)
 - Conservation & Urban Design: 5 PT
 - Environmental Health and Drainage: 9 PT
 - Community, Recreation & Arts: 8FT
 - Housing: 1FT, 1PT
 - Finance: 1 PT
 - Legal: 2 PT

- Sustainability & Energy: 1 PT
 - Project Management: 2 FT
- 5.9 Other staff including its Directors and Corporate Managers also commits considerable time to the Council's Growth Agenda. The Council and other local authorities (Cambridge City and Cambridgeshire County Council) have also employed a dedicated Joint Planning Director for the Northstowe and Cambridge Growth Areas.
- 5.10 The capacity of the Council's democratic processes is also fully stretched despite the creation of special purpose decision-making bodies for plan-making (S29 Committee) and planning applications (S101 Committees) to supplement its existing Cabinet and Committee structure.
- 5.11 The Council has had to employ a number of consultants to assist with specialist areas of work required for these significant planning applications, for example, retail impact assessment, viability modelling, facilities planning, legal advice, and business planning.
- 5.12 South Cambridgeshire does have experienced, dedicated resources focussed on growth. For example, it has had a dedicated Major Developments team within the planning service focussing on the growth sites for almost ten years and the Council is in the process of re-organising itself to create a multi disciplinary New Communities Service.
- 5.13 To maximise the resources the council does have, it works in innovative ways and has embraced technology to carry out consultations for both plan making and planning applications. It makes good use of partnership arrangements, not least the close working relationship that has been developed between Cambridgeshire Horizons and the local authorities. Furthermore, South Cambridgeshire is in the process of establishing a Joint Urban Design Team with Cambridge City Council to provide specialist design advice across to two authorities to raise the quality of design within new communities and to address the difficulties of recruitment. Were Hanley Grange to be advanced resources at Cambridgeshire Horizons, the County Council and South Cambridgeshire in particular would be significantly overstretched.
- 5.14 However, even with these substantial resource and process commitments, the Council with its partners are working at full stretch to plan and deliver the Growth Agenda. The outline application for Northstowe is probably one of the largest applications currently being considered by any local authority. The application was accompanied by 29 technical documents and strategies and necessitating over consultation with over 4000 parties. The application was the subject of several years of pre-application consultation with a wide range of stakeholders and engagement with local communities. All parties are working to a challenging timetable.

- 5.15 Adding another new town from scratch at this stage would require a proportionate increase in staffing resource of approximately one third. Moreover these would need to be in place work in advance of any formal submission to deal with extensive pre-application discussions. It is likely to make the whole Growth Agenda unmanageable for what is essentially still a small rural authority as in addition to planning and delivering its services to the major growth areas, the Council must provide its services to its existing population of 139,000 people and the 4,500 additional dwellings which are planned to be provided in its villages by 2021
- 5.16 Recruitment in a number of specialist areas has been difficult for the Council. After 16 months it has yet to fill a number of key post including urban design and planning lawyers. Recruitment of experienced planners continues to be difficult and often requires several rounds of adverts. This is also an issue for many of the councils locally.
- 5.17 Partner organisations and consultees who are critical to the planning process are also working at capacity. They find themselves unable to respond in a timely manner or to engage as fully in the planning process as is necessary.
- 5.18 Local communities within South Cambridgeshire are aware of, and to an extent, have accepted the growth planned to date. They have been involved within the plan making process and are continuing to be engaged with its implementation. South Cambridgeshire and its partners are in the process of establishing a Community Engagement Strategy. The Council has a dedicated officer working with local communities to understand their concerns and work with them to address them. It is important work, which assists build confidence in the Council, and the processes that deliver growth including the planning system. In a District that has accommodated significant levels of growth to date, it is crucial that this important work is not put at risk by either diverting resources from existing planned developments, or by imposing schemes and processes which have not allowed active participation.
- 5.19 South Cambridgeshire would also require additional financial resources to allow the necessary consultancy work to be completed, and based on completed work relating to Northstowe, this could exceed £150k per year. The additional provision of homes would erode the authority's own financial position, with regard to the demand for services and the authority's ability to raise council tax to fund them – the authority sets the 13th lowest Council Tax in England which together with Government Grant raises less income per dwelling than the cost of providing its services.
- 5.20 There is also a specific risk to Cambridgeshire's 'prototype eco-town' Northstowe. Northstowe is expected to be a flagship development for future sustainable growth. A new competing Eco town in the same area coming forward on similar timelines will undermine this.

Funding For Northstowe And Other Major Developments

- 5.21 The promoters of Hanley Grange suggest that the uplift in value of the site will cover all public costs of development. However no figures have been produced to demonstrate what the uplift in value will be or that the scale of public sector investment has been understood. It can hardly be less than £500 million bearing in mind comparable costs elsewhere and the relatively isolated position of Hanley Grange. It is likely to be substantially more. Claims that the development would be largely self-financing were made by the main promoters of Northstowe at the time of the Cambridgeshire Structure Plan EIP in 2002 but the costs have proven to require public investment in services, facilities and infrastructure on a substantial scale.
- 5.22 CLG will be investing £1.7bn across the Growth Areas, the Thames Gateway, Growth Points and Eco-towns during the CSR07 period. If Hanley Grange were to go-ahead, the need for additional strategic infrastructure would inevitably reduce the amount of money available to support developments such as Northstowe or the Cambridge urban extensions. There would also be increased competition for other types of funding, for example the Community Infrastructure Fund. This means Cambridgeshire would need to draw more heavily on the national pot or delivery will be held back by delays in essential infrastructure investment.
- 5.23 The current economic climate has impacted upon the availability of commercial credit. This will affect both the willingness and ability of house-builders to embark on new projects. An early start at Hanley Grange is therefore unlikely but if it was achieved it would inevitably slow potential house building at Northstowe and at recently approved developments on Cambridge Southern Fringe.

House Building

- 5.24 The current programme for Northstowe will see the occupation of the first houses in 2010. The promoters of Hanley Grange have indicated they would expect to submit a planning application in 2009 with development commencing in 2012. Although this timescale is extremely optimistic given the current state of unpreparedness at Hanley Grange, it is clear there could be two large streams of houses in new settlement locations (in addition to Cambourne) coming onto the market in the next few years. There is no reason to expect a sudden growth of demand in the local housing market on this type of scale, especially as large-scale new developments on the Cambridge Southern Fringe and at North West Cambridge will also be well under way.

5.25 Hanley Grange would therefore lead to:

- An oversupply of housing in the market within embryonic new settlement locations.
- A slow down in the delivery of housing. For example, were Hanley Grange to reduce Northstowe's delivery rate by just 30%, housing delivery would slip by approximately 200 homes per year, leading to delays of up to 8 years in the final date of completion - currently anticipated to be 2028.
- A shortage in capacity of the house building industry, as well as in the capacity of service and infrastructure providers which could also affect the delivery of Northstowe and other planned developments.

Construction Skills

5.26 The construction of Northstowe and urban extensions around Cambridge will inevitably require specialist-building skills to create new sustainable communities. There is only a limited pool of labourers specialising in the required techniques for modern methods of construction. The Smart Life Project has been developed in partnership with the Cambridge Regional College as one way of building up the local skills base in sustainable construction techniques. This is a good start but there is a huge challenge ahead. Allied to the predicted growth in competition for skilled labourers caused by the Olympics and Thames Gateway developments, there is a significant risk that a shortage of skilled labourers will affect the delivery and quality of Northstowe. An additional development of c. 8,000 homes at Hanley Grange would further compound this risk.

Commercial Viability

5.27 Additional retail units and commercial properties are already planned for Northstowe and are now proposed at Hanley Grange. Both developments coming on line at the same are likely to cause oversupply of premises outside Cambridge. Cambourne has already experienced sluggish demand for commercial property, with completed employment and town centre buildings sitting empty and land allocations remaining undeveloped for long periods of time.

Infrastructure costs

5.28 Outline section 106 costs for Northstowe look likely to exceed £300 million, not counting the benefit of c. £100 million of upfront public investment in the Cambridgeshire Guided Bus and the planned improvements to the A14. Given the higher environmental aspirations for Hanley Grange, it seems inevitable that public infrastructure costs would be in the region of £500 million at least and probably much more than this. Whatever the uplift in land values at Hanley Grange, it is unrealistic to proceed on the premise that Hanley Grange would provide all the funding for the required infrastructure and still provide developers with a satisfactory return on their investments, especially if

land owners not already committed to the scheme were to seek 'ransom' sums for their holdings were Hanley Grange to be included in the Eco-towns programme going forward. Such an assumption would be especially rash at a time when there is a deteriorating housing market and uncertainty about the immediate future of the economy.

Conclusion

- 5.29 The scale of the growth planned for Cambridgeshire is unprecedented. Hanley Grange is an unnecessary addition to the strategy which will already deliver the uplift in housing required to sustain the forecasted high levels of growth in the local economy and a harmful distraction from its successful implementation, particularly for Northstowe.
- 5.30 Government objectives for the Eco-town Programme would be better served, particularly in the current difficult economic climate, by maximising opportunities at Northstowe (and the committed public investment in the Guided Busway) with clear benefits at a national, regional and local level. Focusing resources and efforts on delivering Northstowe would be the best way of achieving the Government's goals in this instance.

Box 3: Summary Of Key Points

Delivery of Growth

- The scale of growth planned in Cambridgeshire is unprecedented.
- The sites and locations have already been identified to meet these targets.
- A £5 billion programme of investment in infrastructure is needed to support the deliver the growth strategy over a 20-year implementation period.
- Hanley Grange would be an unnecessary threat and distraction at a critical point in the delivery of the planned growth strategy.
- Northstowe is likely to require a planning obligation contribution of around £300 million to deliver (excluding the Guided Bus way and A14 improvements).
- Hanley Grange would need to provide at least £500 million to cover public infrastructure investment and probably significantly in excess of that figure
- Hanley Grange is ill-prepared, uncostered and unproven as a scheme.

- No evidence has been provided to demonstrate that Hanley Grange would make a material difference to housing delivery in the CSR before 2021. And there is a significant risk that it would have a major negative impact on existing proposals.
- Government objectives in a difficult housing market would be better-served by maximising opportunities for affordable homes and eco-investments at Northstowe.

6.0 Location

6.1 This section considers the advantages and disadvantages of Hanley Grange as a strategic location for an Eco-town new settlement.

- Structure Plan Assessment of New Settlement Options

6.2 All the competing new settlement locations were tested against the following policy criteria through the 2003 Structure Plan process:

- proximity to Cambridge;
- location on or facilitating the provision of high quality public transport;
- the avoidance of national nature and historic environment designations;
- the avoidance of major groundwater protection areas and floodplain;
- making maximum use of previously developed land; and
- the avoidance of loss of high quality agricultural land as far as possible.

6.3 A further set of 34-detailed evaluation criteria (reflecting these policy considerations) were also applied to a long list of candidate sites as a special test for new town proposals in November 2001 (see Cambridgeshire Strategic Planning Service Development Group Report below). This assessment was in addition to the Cambridge Sub Region Study published in September 2001.

6.4 Locations similar to Hanley Grange (though not Hanley Grange itself) such as Duxford/Great Chesterford were assessed as part of this process. There are also similarities in terms of location between Hanley Grange and Great Abington.

6.5 Northstowe performed best overall against the criteria in all tests. All of the comparable locations to Hanley Grange were considered to have decisive weaknesses and therefore they were eliminated from the

selection process that identified Northstowe as the best performing location.

A Comparative Assessment of Hanley Grange

6.6 Officers have re-run the Structure Plan selection process to undertake a direct comparative assessment between Hanley Grange (not included first time round) and the selected new settlement option of Northstowe. Exactly the same new settlement criteria were applied as under the Structure Plan to ensure a consistency of approach. During the Structure Plan process, the importance of different criteria were categorised as follows:

- Fundamental,
- High,
- Less Critical.

6.7 Northstowe consistently outperforms Hanley Grange against key criteria. Out of a total of 34 criteria Northstowe scored best against 25 criteria. Hanley Grange rated higher than Northstowe against 2 lower order criteria with the remaining 7 being equal between the two.

6.8 Significantly, Northstowe performed consistently better than Hanley Grange in terms of "fundamental" criteria (12 out of 15). These are:

- Accessibility to all employment areas in Sub Region.
- Effect on sites with key natural and historic designations - within the area.
- Capability of landscape to accept development.
- Proximity to Cambridge Centre (Public Transport).
- Proximity to Cambridge City Centre (by Road and Cycling).
- Facilitating the provision of High Quality Public Transport.
- Contribution to planned or existing transport infrastructure.
- Improvements needed to roads other than those planned.
- Improvements needed to public transport other than those planned. Effect on setting of Cambridge and Green Belt.
- Meeting housing needs of Cambridge and potential for out-commuting.
- Fitting in with overall Sub-Regional Strategy.

6.9 Hanley Grange does not perform better than Northstowe against any of the "fundamental" criteria. Remaining "fundamental" criteria are equal between the two. These are:

- Ease of Surface Water Drainage.
- Location in relation to flood risk areas and mitigation measures.
- Location has capacity for 6,000 dwellings.

6.10 Hanley Grange rates better than Northstowe in respect of the following lower order criteria:

- Access to existing and potential rail service (High) [*although Northstowe will be connected by the Guided Busway to Chesterton and Cambridge railways stations*].
 - Avoidance of contaminated land (Less critical).
- 6.11 Much is made by the promoter of the Hanley Grange of its proximity to local research parks. Hanley Grange adjoins the high tech campuses at Granta Park and the Genome Campus. But, unlike Northstowe, is not well located to the wider high tech employment locations in the CSR, such as Addenbrookes and those planned at Northstowe and Cambridge East.
- 6.12 Proximity to the high tech campuses was recognised potentially as an important but not fundamental advantage as part of the Structure Plan process. Great Abington (a location similar to Hanley Grange) was considered to have an advantage in this respect. But the Structure Plan EiP Panel did not consider this factor had sufficient substance to outweigh the decisive weaknesses. See Section 8 for a closer examination of employment issues. All of these Research Parks have highly successful 'green travel plans' which mitigate the impact of their locations including free bus services, car sharing clubs, cycling and walking facilities as well as being located on the main inter-urban bus routes with the greatest frequencies connecting Cambridge to Haverhill and Saffron Walden.
- 6.13 Access to existing and potential rail services is another potential advantage for Hanley Grange that requires closer examination. It is unclear whether there is capacity on the rail network to accommodate the development or whether sustainable travel to and from the stations can be provided to avoid use of the car. See Section 7 for an assessment of transportation issues.
- 6.14 Overall, the analysis indicates that Northstowe has overwhelming advantages as a location for a sustainable new town compared with Hanley Grange.
- 6.15 Southern locations were also rejected because of the high potential for out-of-county commuting southwards.

Regional Spatial Strategy

- 6.16 Hanley Grange was subsequently promoted through the draft East of England Plan EiP in 2006. The County Council, in its submission to the RSS EiP, identified key weaknesses with the Hanley Grange location. These were summarised as follows:
- 15 kilometres from the centre of Cambridge;
 - Relative remoteness from Cambridge;
 - Traffic impact on A1301/A1307 into Cambridge;

- Poor sub-regional access;
- Potential to attract commuters to London and Stansted;
- Potential flood risks and Ground Protection Zones; and
- Low landscape suitability.

6.17 Again, Northstowe was confirmed through the RSS process as the most suitable new settlement option for the Cambridge Sub Region. Based on the evidence submitted, including submissions from the promoters of Hanley Grange, the Panel concluded that there was no case at this stage to identify a second new settlement. This is a view the Secretary of State has recently reiterated through the publication of the finalised RSS.

RSS Review

6.18 The forthcoming RSS review will need to undertake an updated technical comparative appraisal of future major spatial options (including new settlement options) for the Cambridge area. Developers are to be invited to submit their proposals as part of this process starting later this summer.

6.19 It is important not to prejudge the nature of the criteria for the RSS review or draw any firm conclusions as to how any location might perform as a strategic location as part of the RSS review process.

6.20 However, to the extent that new circumstances can be identified, they are likely to weigh even more strongly against an isolated road-based location such as Hanley Grange situated on good quality farmland (agricultural Grade 2) above an aquifer close to important SSSIs.

6.21 Examples of some of the key changes that have occurred include:

- Climate Change (New Supplement to Planning Policy Statement 1 on Climate Change - December 2007).
- Increased weight given to the importance of water issues.
- Move towards a low carbon economy.
- Growing awareness of food security as a global issue and the need to protect high-grade agricultural land wherever possible.
- Habitats Assessment/Sustainability Appraisal.

Consideration of Alternatives

6.22 The forthcoming Planning Policy Statement on Eco-towns is proposed as a substitute for established regional and local planning frameworks. However, it seems unlikely this purpose could be fulfilled.

6.23 The Eco-towns consultation document refers to the necessary consideration of alternatives through the Sustainability Appraisal. But, it is unclear how this will be achieved. It could also leave the process

open to legal challenge. At the very least this would result in extensive delay and possibly in the overturning of the eco-town selection process.

- 6.24 Alternatively, channelling the Eco-town bids through the “early focussed” review of the RSS would provide greater certainty for all parties concerned (including the development industry), deliver more robust outcomes and, ultimately, provide a greater chance of achieving the Government’s objective of higher levels of housing growth in sustainable locations than would otherwise be the case. For Cambridgeshire the current development strategy provides for the uplift in house building necessary to meet the forecast demand for labour and there is therefore no particular need to circumvent the RSS review process.

Conclusion

- 6.25 Northstowe was selected as the new settlement location for the Cambridge Sub Region following an exhaustive assessment of alternative new settlement options through the Structure Plan and RSS processes.
- 6.26 Northstowe and the other major developments for the Cambridge Sub Region are close to delivery as well as being legitimised through the detailed studies/comparative assessments undertaken as part of the Structure Plan preparation process (including the Cambridge Sub Regional study), the conclusions of the Structure Plan Panel and, more recently, the RSS Panel.
- 6.27 Identifying Hanley Grange through the national Eco-towns Programme, bypassing the normal regional/sub regional planning processes, would be inconsistent not only with the Plan led strategy for the Sub Region but also the key findings of the studies and independent examinations that provide its foundation.
- 6.28 Hanley Grange is unproven and would appear to have key disadvantages as a location for a new settlement.
- 6.29 The right approach to deliver sustainable and affordable homes in the immediate future is to focus on Northstowe’s advantages as a strategic location for a new settlement whilst allowing for Hanley Grange and other long-term spatial options to be assessed through the East of England RSS review.

Further Information

- 6.30 Further details of the comparative assessment can be found in the attached Topic Paper 2: A Comparative Assessment of Hanley Grange and Northstowe.

- 6.31 The Cambridge Sub Regional Study and the relevant committee reports can be viewed on the Cambridgeshire County Council website at:

<http://www.cambridgeshire.gov.uk/environment/planning/projects/supporting/cambridge+sub+region+study.htm>

Cambridge Sub Region Assessment of New Settlement locations (CCC, Strategic Planning Service Development Group 27/11/0

<http://cccs086.cambridgeshire.gov.uk/db/reprack.nsf/af8076762df199c580256b14003ef043/67493864ab79b57f80256b0d003395a7?OpenDocument8>)

Box 4 - Summary of Key Points

Location

- Hanley Grange is unproven as a strategic location for major new development.
- Hanley Grange is likely to be found unsuitable as a location for a new settlement in any objective evaluation. Key disadvantages include:
 - 1) Being relatively remote at 9.5 miles from Cambridge and from the economic, social and leisure opportunities that the city provides.
 - 2) Unsupported by a deliverable Guided Busway (or other rapid transport opportunity).
 - 3) Susceptible to high levels of out commuting by car to Cambridge, Stansted and other locations along the M11 corridor.
 - 4) No previously developed land present within the site.
 - 5) Significant loss of high-grade agricultural land (Grade 2).
 - 6) Unresolved questions about how to avoid harm to the underlying aquifer and how to secure sustainable water supplies in this area of water stress.
 - 7) Other major environmental and landscape impacts.
- Hanley Grange was unsuccessfully promoted at the last RSS Examination in Public.
- Failing to consider sub regional alternative sites/spatial options to Hanley Grange could leave the process open to challenge and delay.

7.0 Transportation

7.1 Although Hanley Grange has been short listed as a potential location for one of the Governments proposed Eco-Towns, there is almost no information on the transportation implications or strategy associated with the potential development. Several months into the consultation, a transport document was produced entitled “*Hanley Grange – Strategic Transport Overview*” and is the only examination of the transportation aspects of the proposal.

Strategic & Local Highway Network

7.2 The surrounding highway network already experiences high levels of demand and regularly suffers from delays and congestion. Hanley Grange will increase delay and congestion on the strategic and local highway network over and above planned growth, particularly on those routes mentioned below, but also within Cambridge City itself.

7.3 Key network issues and constraints include:

- M11 – Delays due to congestion are currently experienced during peak periods
 - Between J10 & J11 in the AM Peak northbound and PM Peak southbound;
 - Between J11 & J14/A14 south and northbound in both the AM and PM Peak periods; and
 - J9 in PM Peak southbound.

7.4 Technical modelling work for the County Council’s Transport Innovation Fund (TIF) bid indicates that with planned growth (excluding Hanley Grange) there will be 18-23% growth peak hour traffic on the M11 by 2021. This would suggest that this section of the M11 would potentially require upgrading to dual three lane from the existing dual two lane.

- A14: Congestion and delay are experienced throughout the day in both directions, with the greatest levels of delay experienced during the peak periods. The A14 is currently subject of plans by the Highways Agency to upgrade the section between Huntingdon and Cambridge to create a Dual Four Lane with local distributor roads.
- A505 (Between M11 and A1301) – Experiences delays with long queues developing from its junction with the A1301 eastbound during the AM Peak, and westbound in the PM Peak. Modelling work has shown that the A505 16hr combined flows will increase by 23% by 2021. The queuing back in the AM Peak reaches the running lanes of the M11 and can cause delay on the M11 southbound (not every day). The A505 would benefit from being Dual Two Lane in both directions.

7.5 The development of Hanley Grange will require the dualling of the section of the A505 over the railway and river between the A505 /

A1301 junction and Junction 10 of the M11. Access from the A1301 and the A505 / A1301 junction will also be required.

- A11 – Traffic modelling shows that the A11 will see a 16hr increase in combined directional flow of 25% by 2021.
- A1307 and A1301 (A11 to Cambridge) – Both routes experience high demands entering Cambridge in the AM Peak and leaving in the PM Peak. The A1307 experiences significant queuing traffic from the Queen Edith’s Way/Addenbrookes roundabout in the AM Peak. Queuing is particularly bad on the A1301 at its northern most junction within Trumpington High Street/Hauxton Road.

7.6 The A1307 also experiences high demand throughout the day from the A11 towards Haverhill with queuing occurring in the AM Peak northbound at the junction with the A11.

7.7 In addition to these more strategic routes into Cambridge there are also the local roads that connect into these routes and can at times act as alternative rat-runs avoiding congestion. Most notable is the route from the A11 through Fulbourn connecting to the east of the City.

Rail Infrastructure:

7.8 Hanley Grange is located in close proximity to the London Liverpool Street to Cambridge railway line, with a spur to Stansted Airport. There are two stations that are within close proximity of the proposed site, namely Whittlesford to the northwest and Great Chesterford to the south. Both stations are small intermediate stops on the line with a two trains an hour to Cambridge and London during the peak periods, but this reduces to one train an hour during the inter-peak for Great Chesterford.

7.9 Services into and out of Cambridge during the peak periods to/from these stations experience high demand with trains experiencing passenger congestion and cramming. In the reverse directions demand is lower. This could be because journey times into London are lengthy from these stations, particularly in comparison to rail journeys into London from Royston, a short drive westwards along the A505.

7.10 The current Hanley Grange transport proposals involve:³

- Vehicular access to the development from the
 - Roundabout of A1301/A505;
 - A1301 x 2;
 - A505; and,
 - A11.
- New bus services passing through the site connecting to high-tech clusters and railway stations;

³ Source – ‘Hanley Grange Proposal’ taken from Hanley Grange website 12MAY2008.

- Enhancement to the Citi 7, Route 32, and Route 32A bus services (Note: the last two have been replaced by a Sunday-only, 132 service).
- Use of existing rail stations of Whittleford and Great Chesterford and potential for Birmingham/Stansted service to stop at either/both stations.

Obstacles to Public Transport Improvements

7.11 It would appear that there has been no investigation or commentary on the potential transportation impacts of the development proposal by the proponents. However, based upon information available, the following is a summary of the likely impacts:

- Increased delay and congestion on the strategic and local highway network, particularly those routes mentioned above, but also within Cambridge City itself. In addition given the comparatively short journey times into London via rail from Royston it is likely that there will be increased demand on the A505 westward from the M11.
- The TIF Traffic modelling in the area has shown that certain routes have reached their design capacities and require upgrading with other routes set to experience increased demand. With an additional 8,000 dwellings in this location this can only place further pressure upon these and other routes.
- Increased congestion and delays on Strategic Routes will have a detrimental impact on any improvements that are made to the bus services. Without significant improvements to road capacities the improved bus services will not be effective and will therefore inhibit any mode change that is being proposed in any future travel plans resulting in very high levels of car driver trips that are not accepted as an 'Eco Town' (i.e. 25% modal share for cars³). It is understood that the proposers are aiming for around 30% modal share for cars (10% internal and 40% external) but even this seems to be based on hope rather than objective analysis.
- Increased congestion on the existing and "enhanced" bus services into Cambridge and at the Trumpington and Babraham Road Park & Ride sites.
- Increased congestion on rail services into Cambridge and potentially impacts upon services into London from Royston.

Commentary on Transport Proposal and Issues

7.12 Of particular concern are the public transport connections to Cambridge. The proposed enhancements for these bus services have not demonstrated how they would accommodate the large number of

passengers necessary to avoid unacceptable impacts of additional traffic and also necessary to achieve the modal share of an Eco-Town⁴. The public transport strategy has not demonstrated how it will achieve high frequency, reliable and fast services between the settlement and key destinations.

- 7.13 The Strategic Transport Overview has put forward an extension to the Cambridgeshire Guided Busway as a possible solution for sustainable inter-urban travel between the site and Cambridge. This would be an essential component of sustainable travel infrastructure at Hanley Grange. However, the strategy has failed to identify an alignment on the ground and this is a fundamental flaw in the proposal. There is no obvious route that can be used, such as a continuous and direct disused railway line as utilised by the current CGB project. Northstowe takes advantage of the recently disused St Ives railway line, which was in a single ownership (Network Rail) prior to acquisition by the County Council as a transport route. There is no similar route south of Cambridge, the equivalent redundant railway line (to Haverhill) having been redundant for many years has been sold off, structures dismantled and in parts it has been built on. Even then it does not provide access to the Hanley Grange site. Therefore, delivery will present a significant challenge, as it will require the completion of a Transport and Works Act Order and the acquisition of a corridor of land across open countryside. In addition to the TWA and land processes a lack of technical and environmental feasibility work into any potential alignment means that there is a serious risk of such a project being undeliverable as there may be sensitive and protected wildlife/ecological sites and other unknown factors that would threaten the risk of deliverability.
- 7.14 The lack of information on the land uses and services to be provided within the town, other than dwelling numbers, means that there is no certainty that the proposal will be able to support all its social and economic needs leading to very high levels of out-commuting not just within the peak hours, but also throughout the day. Conversely, there is also a concern that the development may over provide some services and land uses (such as retail) and for these purposes attract a significant number of trips from the surrounding area. This issue is not dealt within the transport information that accompanies the bid.
- 7.15 The transport suggestions appear to be based on untested and unjustified modal, trip generation and assignment assumptions. Firstly, there are the modal assumptions that the promoters are seeking to achieve (around 30%). Survey results from Cambourne show that there is still a dominance of the private motor car as the main mode of travel with some 80% travelling to work by car⁵. Without a credible and

⁴ TCPA/CLG Guidance on Transport in Eco-Towns sets a modal share for cars at 25%.

⁵ Cambourne Survey 2006

<http://www.cambridgeshire.gov.uk/council/involved/findings/cambourneresidentsurvey2006results.htm>

deliverable transport strategy there is a serious risk this level of modal share will not be improved upon, let alone the shares expected of an Eco-Town (25%).

- 7.16 There is also uncertainty with regards to the level of trip generation arising from the site and the assignment to destinations for external trips. The transport picture that is emerging from the promoter suggests that out commuting will be 25% to the nearby employment sites, such as the Genome Campus, 45% towards Cambridge or London with 30% of trips being internal. However, these assumptions have not been tested and agreed with the various Local Authorities or Highway Authorities and there is a significant risk that when properly and fully tested there will need to be a fundamental shift in the trip generation and assignment characteristics of the site. This would have knock on effects on infrastructure requirements and costings. It is noted that the promoter has suggested a charge to be levied on every car trip out of Hanley Grange. In practice this would be difficult to collect. The legal mechanism to be used is unclear. However, the most significant impact would be on the sale price of homes in the settlement, which would be depressed by the prospect of the charge. The overall effect may outweigh the benefits of income from the charge.
- 7.17 The ability of the site to achieve a degree of self-containment will be affected by the scale of the land uses and services to be provided within the settlement. However only outline information has been provided, with no commercial business case, which leads to further uncertainty over the appropriate transport strategy.
- 7.18 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 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-town, 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".

Conclusion

- 7.18 The surrounding highway network already experiences high levels of demand and regularly suffers from significant amounts of delay and congestion. This can also be said for the rail network and the limited bus network. Demand is set to increase as a result of planned and natural growth without the addition of Hanley Grange. The broad transport outline so far produced lacks any convincing detail and leads to a strong concern that it will be;

- **inadequate** to cope with the demands of an additional 8,000 dwellings in this location; and,
- **undeliverable**, both in terms of the measures and infrastructure required and the very ambitious modal targets and travel characteristics that are required to be achieved.

7.19 The Hanley Grange bid has not identified existing issues in the area and has not to any credible level developed a transport strategy that addresses the impacts of its own trip generation. From the bid documentation there can be little confidence that the requirements of the Highway and Planning Authorities can be met or that the principles and targets for sustainable travel expected from an ‘Eco-town’ could be achieved.

Further Information

7.20 Further details of the transport impacts can be found in the attached Topic Paper 3: Transportation.

Box 5 - Summary of Key Points

Transportation

- At 9.5 miles from Cambridge the site is comparatively remote from Cambridge and the key employment centres.
- There is no Guided Busway (or other rapid transit links) connecting Hanley Grange with surrounding Cambridge, neighbouring communities or other settlements in the M11 corridor.
- The surrounding highway network already experiences high levels of demand and regularly suffers from delays and congestion. Traffic flows are forecast to rise substantially even without Hanley Grange.
- No credible transportation strategy has been put forward with the bid.
- Hanley Grange is susceptible to becoming a dormitory settlement with high levels of out commuting by car via the M11 incompatible with the delivery of low carbon growth and Eco-town sustainability objectives.
- Government’s own guidance states that the environmental benefits of Eco-towns will be negated if they are not located close to existing public transport links. Currently, Hanley Grange will exemplify this risk.

8.0 Employment

- 8.1 “Eco-towns – Living a greener future” says that proposed benefits of a scheme in the Hanley Grange location are as follows:
- it would respond to the severe homes/jobs imbalance in and around Cambridge;
 - it would locate new development close to employment; and
 - there would be scope for good links with science and engineering to drive environmental innovation and application to business.

Bone Wells Associates: Report for Hanley Grange

- 8.2 The promoters of Hanley Grange commissioned Bone Wells Associates (BWA) to prepare a briefing document to support their contribution to the Examination in Public (EIP) of the Draft Regional Plan in 2005/06. The Bone Wells Report (BWR) provides:

- Recent regional and sub-regional projections of population and employment.
- Analysis of the projected balance of jobs and population in the east, north, west and south sectors of the sub-region around Cambridge.
- Analysis of key employment centres and the development pipeline in the southern sector.
- Information on local employers and interviews with local employers.

- 8.3 The BWR also suggested that population pressures may be higher in the Cambridge area than envisaged in the East of England Plan, that major employers at the science parks situated close to Hanley Grange have capacity to expand and that a new settlement will have potential to contribute to local affordable and rental housing and reduce travel distances to work.

- 8.4 Cambridgeshire Horizons and the Cambridgeshire local authorities have commissioned a leading socio economic consultancy SQW Consulting to review the BWR and the assertion made by the bidders that there is a large surplus of jobs in the vicinity of Hanley Grange. The outcome of this review is summarised below:

Forecasts

- 8.5 Revised job forecasts for South Cambridgeshire up to 2021 have recently been produced, drawing on the most up-to-date information available on employment and population and incorporating the approved East of England Plan dwellings targets. They imply significantly lower job growth than the BWA report suggests. This is because they relate to the entire economy – not hypothetical job increases on land identified for B1 to B8 use. Also, Job forecasts used by BWA are higher than the related ‘workplace population’ forecasts as they do not take into account the fact that a proportion of the workforce has more than one job.

B1 – B8 Capacity

- 8.6 BWA have made a number of errors in producing their estimates of the recent and potential job capacity of B1 to B8 employment land in each of the four defined Sectors (North, South, East and West). These include:
- Claiming that employment land development occurring in the 6 years 1999 to 2005 actually took place in the 4 years 2001 to 2005;
 - Failing to take account of gross losses of B1 employment land in this period; and
 - Calculating employment to floorspace densities as 20 square metres per job when the local research and science parks state the actual density is a nearer to 30 sq m per job.
- 8.7 Collectively these 3 factors combine to mean that BWA are assuming significantly higher job growth on employment land than the revised assumptions suggest is possible. This is a serious flaw in the BWA methodology. BWA assume that all job change in a Sector arises from a net change in employment on B1 to B8 land and apply worker to floorspace densities that the local Science parks consider to be too high.
- 8.8 A key point to bear in mind is that employment land allocations may not all be taken up and when they are developed may be providing replacement jobs rather than completely new jobs. The total capacity of the B1 to B8 employment land in South Cambridgeshire is likely to support (on its own) a further 35,000 jobs net, 2007 to 2021, (Cambridgeshire County Council's estimates). However, Oxford Economics forecast that total job increase in the district to be only around 14,000 over this period. (The workplace population growth will be even lower). This is because there will be significant job losses on other sites and in other industry sectors, as manufacturing and primary sector job losses occur e.g. Bayer Crop Science at Hauxton which is being redeveloped for housing.

Annual Business Inquiry and the South Sector

- 8.9 This concern is particularly relevant in the context of the Hanley Grange location. The Annual Business inquiry (ABI), broken down by the BWA geographic sectors to show employee job trends for the period December 2000 to 2005, suggests that there has been only a marginal job increase in the 'South' sector over these five years – just 200 in total. This shows that job increases on the four research parks appear to have been counter-balanced by job losses elsewhere. The South sector experienced lower job growth than any of the other 3 sectors defined by BWA. It is accepted that this data is indicative, being a sample survey and relying on modelling estimates for some industry sectors below regional level.

- 8.10 One factor that is not in doubt, however, is that since the BWA study was produced there have been a number of major changes to employment in the South sector (as defined by BWA) and two major losses were not taken into account. Bayer Crop Science have closed their manufacturing plant at Hauxton and Dickinson's (the paper manufacturer) have given notice that a large element of their workforce (approximately 40 jobs) will be relocated to Red Lodge, north east of Newmarket.

Survey areas and Sector definitions

- 8.11 BWA have omitted a significant number of wards in South Cambridgeshire to the south west of the City from their analysis. The wards selected by BWA for their geographic sectors are also somewhat arbitrary. The sectors exclude some parishes that are very close to the site but outside Cambridgeshire (e.g. Great and Little Chesterford). The Sectors exclude nearby market towns, even though there are commuting flows of some size with adjoining wards. Alternative approaches to defining the sectors, using actual commuting or distance of travel, show different results (even using the flawed BWA methodology).

On-site employment provision

- 8.12 Development of Hanley Grange might provide a further 60,000 sq m of 'hi-tech' space, considered by the promoters capable of supporting 2,000 jobs. It should be noted that the Oxford Economics employment forecasts are not in any way 'constrained' to limit the expansion of hi-tech employment. We should therefore expect this "new" space to represent over-supply, possibly disadvantaging Research and Science Parks to the north of Cambridge. The Hanley Grange prospectus also suggests that there will be further 20,000 sq m of 'office' development. Again, the 1,000 jobs this could support will represent over-supply in the Cambridge Sub Region. The Hanley Grange development could threaten the viability of planned commercial growth elsewhere – particularly at Northstowe.

Employment at the nearby research parks

- 8.13 The case for Hanley Grange argues that around 20% to 25% (different figures have been quoted at different times) of the new settlement's employed residents would work on the research/science parks. This suggests that the lessons of current employment and commuting flows at the research parks are not well understood. Significant numbers of professional scientists and professional workers at these Parks are relatively young – recently qualified, post-graduate and post-doctoral staff. They are not particularly well paid. A high percentage is on short, fixed-term employment contracts. For life-style and housing availability reasons, many live in Cambridge, sharing houses in the large privately rented sector. For those workers requiring larger family properties, homes in existing villages and small town communities will be preferable for many. There is no evidence to suggest that over 2,000 of

the Science Park staff will actually live in Hanley Grange as the developers claim, (20% of the new town's 10,000 employed residents, based on 8,000 dwellings).

- 8.14 Cambridge Healthcare and Biotech consultancy has recently published a survey of the views of a number of the companies based at Granta Park, Babraham Research Campus, Chesterford Research Park and in the immediate vicinity of the proposed development. A total of 20 respondents responded to survey the majority of whom were senior employees of the companies e.g. Chief Executive.
- 8.15 The main findings of the survey were that housing was not a major issue for any of the companies based at the 4 high tech campuses cited by Jarrow Investments and that it was considered very few of the staff based at the sites would wish to live at Hanley Grange (estimated at 400). This differs from the finding of the survey in 2006 undertaken by Bone Wells Associates in 2006. The companies also had serious concerns about the detrimental effect of additional traffic congestion and the likelihood that Hanley Grange would make the existing high tech campuses less attractive to incoming companies.

Hanley Grange effect on existing strategy

- 8.16 Looking at the implications of the up-to-date jobs information, the corrected assessment of the employment potential of B1 to B8 land and revised employment forecasts for South Cambridgeshire and also the Research Parks included as the 'core' employment base for Hanley Grange, we can draw quite different conclusions to those stated in the BWA study.
- 8.17 Rather than concluding that there will be a severe excess of jobs over numbers of 'employed residents', recent experience suggests that labour supply and demand may remain in balance by 2021, as it appears to be in 2006. Consequently there is no need for a large new town. In fact, the building of a new town could detract from job growth already provided for elsewhere in the Cambridge/South Cambridgeshire area. Any additional employment land could draw hi-tech jobs away from other locations, especially Northstowe, Cambourne, the edge of Cambridge and possibly Addenbrookes. A new settlement at Hanley Grange will not, of itself, generate new hi-tech jobs.

Conclusions

- 8.18 The case made in support of Hanley Grange is that additional housing is required to support those living in the high-tech sector and to avoid for the need for workers in this sector to commute into this area. However the study undertaken by BWA has assumed that changes in the number of jobs are primarily as a result of changes in the employment land and has not fully considered wider issues relating to employment. There are also a number of errors within the methodology

used by BWA, which would suggest that the job growth predicted within the Hanley Grange area is unrealistic.

- 8.19 The assumption that 20% of employed residents within Hanley Grange would work on the research/science parks has not been substantiated and is not consistent with the views expressed in the recent survey of companies within the high-tech sector. By using up-to-date and corrected information it is likely that the existing labour supply and demand would continue to be in balance by 2021. In conclusion there is no need for the Hanley Grange development to support the high tech cluster or to provide a balance of jobs and homes.

Further Information

- 8.20 Further details can be found in the attached Topic Paper 4: Employment.

Box 6: Summary of Key Points

Employment

- The Bone Wells approach to employment issues and the case made to provide housing to support the high-tech cluster is both flawed and simplistic.
- The Structure Plan Panel did not consider that links to the local research parks should override factors such as proximity to Cambridge and accessibility to all employment areas in the CSR.
- Census information shows that the highest single concentration of workers at these campuses are residents of Cambridge, which is a natural home base for research workers.
- Other housing opportunities are available in local settlements such as Sawston and Duxford.
- If necessary, alternative options to provide more localised housing opportunities, commensurate with the scale of demand at these campuses, can be considered through the RSS review and/or forthcoming LDF documents from South Cambs DC.

9.0 Meeting Housing Need

- 9.1 Delivering additional affordable housing in the Cambridge Sub Region is seen by the Eco-towns consultation as a key opportunity that Hanley Grange can assist with.

- 9.2 The Eco-towns consultation states that the Hanley Grange proposal will deliver 3,000 affordable dwellings which is 37.5% of the total number of dwellings proposed. However subsequent statements have suggested that 40% affordable housing could potentially be provided. The proportion of social rented housing is not addressed. Therefore, the nature and level of contribution being offered by the promoter of Hanley Grange as a contribution to meeting affordable housing needs remains unclear at this stage. It would no doubt be affected by viability considerations should the project proceed.
- 9.3 Reference is made to number of people on housing waiting lists in both Cambridge City (5,214) and South Cambridgeshire District (4,661). This is based upon figures provided by the City Council and South Cambridgeshire DC which appear on CLG's website (See Housing Strategy Statistical Appendix - 1st April 2007).
- 9.4 Reference is also made to annual affordable housing delivery within these local authorities, which is given as 240 and 150 respectively. However it is unclear what is the source for these figures as they are not consistent with total number of affordable dwellings which have been delivered within South Cambridgeshire and Cambridge City as shown in the HSSA as at 1st April 2007 (247 and 123) or the monitoring of planning applications undertaken by Cambridgeshire County Council (245 and 131).
- 9.5 In addition, the analysis of housing need is over-simplistic. Housing affordability is described as being "extreme" in that the value of lower quartile home prices is said to be greater than ten times that of lower quartile earnings. This is not strictly correct for Hanley Grange. The ratio of average earnings to house prices in Cambridgeshire during the 1st quarter of 2007 is 7.95 as set out in the East of England Regional Assembly's Annual Monitoring Report. The figure for South Cambridgeshire during the same period is 9.27. However, the ratio for Cambridge City is 11.06 and it is Cambridge where the greatest concentration of housing need in terms of numbers is also located.

Need for Affordable Housing

- 9.6 It is accepted that there is a pressing need to increase delivery of affordable housing within Cambridge, as a Key Centre for Development & Change (KCDC), and the wider Cambridge Sub Region. This has been recognised as part of the approved policies of the RSS and the Local Plan/LDDs.
- 9.7 Cambridge City is a regionally significant centre of employment and is therefore a key driver for the level of housing need within the surrounding South Cambridgeshire District. For example the 2001 Census shows that the workplace of 20,725 South Cambridgeshire residents was within the Cambridge City administrative area.
- 9.8 The recently published Strategic Housing Market Assessment for Cambridge Sub Region identifies the need to address an existing

backlog in the amount of affordable housing being provided, with the greatest need being within Cambridge City. It should also be borne in mind that the needs identified within South Cambridgeshire are dispersed across a wide area on all sides of the City.

- 9.9 Annual affordable housing requirement between 2006 and 2011:
- Cambridge City: 1,509 dwellings
 - South Cambridgeshire District: 1,424 dwellings
- 9.10 The estimated level of affordable housing need between 2006 and 2021 is as follows:
- Cambridge City: 10,865 dwellings or 65% of the total housing target in the Regional Spatial Strategy (RSS)
 - South Cambridgeshire District: 12, 470 dwellings or 62% of the RSS target.
- 9.11 Within the Cambridge Sub Region between 1999 and 2007 a total of 3,459 affordable dwellings have been completed. Of which approximately 65% have been delivered in Cambridge City (1049) and South Cambridgeshire District (1223).
- 9.12 The expectation is that 40% of all housing delivered within the Cambridge City and South Cambridgeshire will be affordable as set out in the adopted Local Plan and Development Control Policies DPD. In more recent statements, however, the promoters have indicated that the scheme will achieve 40%.
- 9.13 A significant proportion of the affordable housing will be provided through the urban extensions to Cambridge as well as the new town of Northstowe. Recently progress has been made with the approval of the planning applications for Trumpington Meadows (480 affordable dwellings), Clay Farm (920 affordable dwellings), Bell School (138 affordable dwellings) and NIAB frontage (58 affordable dwellings).
- 9.14 Similarly the developments of North West Cambridge, (2000 to 2,500 dwellings) land between Huntingdon Road and Histon Road (up to 1780 dwellings), Cambridge East (10,000-12,000 dwellings) and Northstowe (9500 dwellings) will also provide substantial amounts of affordable housing.

Funding of Affordable Housing

- 9.15 The Housing Corporation has recently selected Cambridgeshire Partnerships Ltd to deliver affordable housing on three strategic sites namely - Northstowe, Southern Fringe and North West Cambridge. On these and other sites in Cambridge City and South Cambridgeshire and the Housing Corporation is basing its programme of affordable housing delivered through the development plan system, and therefore the Corporation may find such a large proposal that has not been a part of

the LDF process will be more difficult to fund.

- 9.16 Provision of affordable homes will require significant financial provision by the developers and will therefore impact on the potential uplift in site value that would arise from designation for development. The promoter has also suggested that occupancy of some homes will need to be tied to employment in the local research parks. This will have a further negative effect on the overall value to be derived from residential sales.

Conclusions

- 9.17 It is accepted that there is a pressing need to increase delivery of affordable housing in the Cambridge Sub Region. Strategic arrangements are now in place to boost affordable housing levels through the growth strategy (including the policy requirement of 40% or more) and the Cambridge Challenge initiative. Levels of affordable housing provision have risen steadily in recent years but more needs to be done.
- 9.18 The viability of Hanley Grange providing 40% of affordable housing, on top of other infrastructure costs, has not been proven. Furthermore, the main need for affordable housing is focussed in and close to the City of Cambridge rather than at Hanley Grange (some 9.5 miles away).

Further Information

- 9.19 Further details of the transport impacts can be found in the Strategic Housing Market Assessment attached. This can be viewed at the following web link:

http://www.cambridgeshirehorizons.co.uk/programme_det.asp?id=3678

Box 7- Summary of Key Points

Meeting Housing Need

- South Cambridgeshire and Cambridge City have adopted affordable housing targets of 40% or more.
- This level of provision would make a significant addition to the financial costs to be borne by the development.
- Affordable housing completions have risen from around 9% in the late 1990s to around 23% in 06/07 in the CSR.
- Strategic arrangements are now in place to further boost affordable housing levels through the growth strategy and the Cambridge

Challenge initiative.

- The main need for affordable housing is focussed in and close to Cambridge City rather than at Hanley Grange.

10.0 Managing Water

- 10.1 The location of Hanley Grange poses a number of significant issues relating to flooding and water supply. The Environment Agency defines the Cambridge Water Company Area as an area of serious water stress, and any threat to existing water supplies in this area must be carefully assessed.
- 10.2 The site lies over the Granta Chalk Aquifer and the impact of development over a source of groundwater, which is an important consideration for new development. More precisely Hanley Grange is located in a Source Protection Zones (SPZ) designated by the Environment Agency. The centre of the site is part of an inner zone, the zone subject to the greatest level of protection.
- 10.3 The SPZ is a key factor that will restrict both the type and location of uses that can be permitted on the site, and the drainage regimes that are appropriate. Some types of uses will be limited where there could be a risk to water quality in the aquifer, e.g. Industrial development, petrol stations, particularly in the inner zone.
- 10.4 Without further evidence there are a considerable number of uncertainties about the effect on the Hanley Grange the proposal: What restrictions would be placed on development and how it would impact on the master planning and delivery of a town? What would be the impact on a strategic flood management scheme, and the ability to restrict run-off to undeveloped rates? Would there still be any residual risk to water supplies from pollution? Could the recharge rates of the aquifer be maintained if infiltration had to be restricted due to risk of pollution?
- 10.5 The current proposals for Hanley Grange do not adequately address the risk to future water supplies, and the Eco-towns Consultation Document acknowledges that more work is needed on this aspect. This has been confirmed by the Environment Agency.
- 10.6 Hanley Grange would increase local demand for water significantly. Even at the code 6 level of the Code for Sustainable Homes of 80 litres per person per day the increase in demand on local water supplies will be large. In recent statements the promoters have claimed that they can intercept and store precipitation falling on the site and use it in the new town. They would then seek to recycle both “grey water” and “black water “ (including sewage). It would be treated to a standard, which would allow it eventually to be re-charged to the aquifer. But until there is proven large-scale technology to ensure the conservation

of the valuable potable water resources beneath Hanley Grange, a precautionary approach must surely be taken. It would not seem sensible to commit ourselves to a large-scale trial over an essential source of drinking water for the area.

- 10.7 The site lies within the Cambridge Water Company supply area, which is identified as an area of serious water stress by the Environment Agency. The Cam and Ely Ouse Catchment Area Management Strategy classifies most of the area from which the water supply is drawn is either 'over-licensed', 'over-abstracted' or 'no water available'.
- 10.8 Cambridge Water Company resources are detailed in their Draft Water Resources Management Plan, which has been published for consultation in May 2008. Higher development rates may impact on future capacity of the area to accommodate development, these impacts have not been modelled. The plan does not model the potential impact of Hanley Grange, or the uplift in development that is now planned. Therefore, development of the site would mean the target headroom is overshot earlier than currently anticipated in the Cambridge Water supply area. This would require additional water resources to be developed.
- 10.9 The promoters of Hanley Grange have yet to consider the full flood risk implications of development. A site specific Flood Risk Assessment would be required for the site as part of a planning application, but at this stage it is unclear how Hanley Grange is likely to perform. The Environment Agency has confirmed that they have received no such information from the promoters. The site will drain into the catchment of the River Cam. It has not been demonstrated that increased flood risk to properties and areas downstream can be avoided. Any assessment will need to take account of the cumulative impact of other developments already planned in the catchment, as well as Hanley Grange itself.
- 10.10 A Water Cycle Strategy will also need to be developed in order for the proposal to satisfy planning requirements and to meet Eco-Town status in terms of the required water efficiency benefits. It is also needed in order to identify water supply and drainage solutions and new infrastructure requirements. The lack of a water cycle strategy has been identified as a significant issue by the Environment Agency. The impacts of an additional new town and the associated foul water treatment and drainage regime have not been investigated adequately at this stage.
- 10.11 The Environment Agency has indicated that the existing Sewage Treatment Works are not adequate for the planned growth. In addition, the rural watercourses may not be able to facilitate additional flows (from existing Sewage Treatment Works) as a result of the growth. It is now understood the promoters of Hanley Grange are proposing a new sewage treatment works as part of the development. It has not been adequately demonstrated at this stage that this is a feasible option in this location. Reference has also been made to aquifer recharge from

“black water”, as noted earlier in this statement, but again this has not been demonstrated to be technically feasible or desirable at this particular location.

Conclusion

- 10.12 The location of Hanley Grange raises a number of significant issues relating to flooding and water supply. Currently, there are a number of unresolved questions about how Hanley Grange would be designed to avoid harm to the underlying aquifer and how it would to secure sustainable water supplies in this area of water stress. Other areas of concern and uncertainty relate to the potential increased flood risk downstream and the lack of sewage capacity available locally.

Further Information

- 10.13 Further details can be found in the attached Topic Paper 5: Managing Water.

Box 8 - Summary of Key Points

Managing Water

- Hanley Grange is located in a significant Groundwater Protection Zone that will restrict the nature and location of particular land uses.
- The Environment Agency states 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.
- There is a lack of information on potential flood risk downstream.
- There is a lack of sewage treatment capacity available locally and a new sewage works would need to be constructed on site, although the feasibility of this is not yet proven.

11. Ecology & Other Environmental Impacts

- 11.1 Policy ENV3 of the finalised RSS states that internationally and nationally designated sites are to be given the strongest level of protection as well as giving proper consideration to the region’s wider biodiversity.

- 11.2 The Eco-towns consultation identified the potential ecological impact of the development, direct and indirect, as a key challenge and constraint for Hanley Grange. Specifically, it states,

“The Scheme [Hanley Grange] will need to safeguard several protected/notable species issues as site is adjacent to the River Cam, a county wildlife site and important chalk river for biodiversity, and the arable land supports diverse flora and fauna. Potential impacts on groundwater and spring flows to nearby wetland SSSI would need further investigation, as would surface run-off and pollution into the River Cam which could impact on water quality.”

- 11.3 Further information relating to these concerns can be found in the initial high-level assessments of each of the Eco-town bids undertaken by CLG earlier this year. It involved technical input from the relevant national statutory bodies such as Natural England, Environment Agency and DEFRA. This work is recorded in a document called “Eco Towns Proposals Review Assessment Summary” (March 2008) which was published publicly on CLG’s website in June.

- 11.4 For Hanley Grange, the assessment summaries the environmental concerns as follows:

“ Concerns on hydrological and protected/notable species issues as site is adjacent to the River Cam, a county wildlife site and important chalk river for biodiversity, and the arable land supports diverse flora and fauna.

Potential impacts:

- Groundwater and spring flows to nearby wetland SSSI e.g. Sawston Hall Meadows, Dernford Fen, Thriplow Peat Holes, Thriplow Meadows, Fowlmere Watercress Beds. Development will place additional pressure on an overstretched system. The river has faced reduced flows in recent summer droughts.*
- Surface run-off and pollution into the River Cam would reduce water quality, and provide pathways for eutrophication of aquatic and riparian habitats as well as SSSI.*
- The river and surrounding land supports a wide range of protected species and it is likely that the standard suite of Cambridgeshire protected species will be present (great crested newts/bats/badger/water vole/otter/reptiles). The chalk substrate in the area is quite a hot-spot for scarce arable plants, and a prime location for enhancement to encourage stone curlew back to Cambridgeshire.”*

- 11.5 To complement the high level work undertaken by CLG, the Cambridgeshire & Peterborough Biological Records Centre (CPBRC) at Cambourne has undertaken a search on behalf of the Cambridgeshire local authorities. This search provides a basic level of information available on statutory and non-statutory designated sites

(within 2 kilometres), protected species records and national/local biodiversity records.

The Hanley Grange Site

- 11.6 Hanley Grange lies within an area characterised by its large open fields, low hedges and small copses. Most of the site is within agricultural use with an area of mature woodland present (Hinxtton Grange). The area is likely to be rich in wildlife due to the variety of habitats present.
- 11.7 The CPBRC search reveals that the “White-letter Hairstreak” (Butterfly) is known to be present on site. But, until such time as a detailed ecological assessment work has been undertaken, it is impossible to assess precisely what impact the development would have on other protected species or biodiversity within the site. Detailed studies need to be undertaken at an appropriate time of the year for the particular species concerned (e.g. Great Crested Newts in April/May) and require access to be given first by the various landowners concerned. There are no nationally designated sites present within the site’s boundary itself.

Sites Within 2KM Area of Hanley Grange

- 11.8 A number of protected species have been recorded within the surrounding area including Great Crested Newts, otters and different types of protected bats. National and local BAP species are also recorded locally in abundance.
- 11.9 Key biodiversity assets in the locality that need to be protected from direct and indirect impacts of the Hanley Grange proposal include:
- Sawston Hall Meadows SSSI (Situated 1.2 kilometres to the north of the site at closest point).
 - The River Cam CWS (Situated between 1.3 kilometres and 0.35 kilometres of the western boundary of the site).
 - Shelford-Haverhill Disused Railway - Pampisford/Great Abington CWSs (Situated at 0.3 kilometres and 1.4 kilometres respectively).
 - Bush Park CWS (Situated 0.7 kilometres).
- 11.10 There are also potential effects at more distant sites, such as the Thriplow Meadows (5km to the west) and Fowlmere Watercress Beds (8 Km to the west)

Appropriate Assessment/Habitats Directive

- 11.11 The Cambridge Water Company indicates that increases in demand for additional water supply from planned growth would be met by increasing water abstraction at the Thetford boreholes. These boreholes are already under pressure from high levels of abstraction and are situated close to biodiversity assets of European Importance

(notably, the Thetford Special Area of Conservation/Special Preservation Area).

- 11.12 No consideration has been given, to date, to the additional unplanned impact upon abstraction rates at Thetford that could be generated by Hanley Grange. There is a legal duty to undertake an Appropriate Assessment of any significant environmental consequences on a site of European Importance under the Habitats Directive. This could have potential implications for the design and mitigation measures for the Hanley Grange scheme as well as the expected programme for delivery of the scheme.

Conclusions

- 11.13 No environmental information was submitted to CLG by the bidder as part of the Eco-town bid or to the RSS EiP in 2005. It is unclear whether the promoter has begun to consider any of these ecological issues and concerns. Certainly, the policy test set out at the beginning of this section could not be demonstrated at this stage. Consideration also needs to be given to legal duties and responsibilities under the EU Habitats Directive.

Further Information

- 11.14 A copy of the search undertaken by Cambridgeshire & Peterborough Biological records Centre is attached as Appendix E.

Box 9 - Summary of Key Points

Ecology and Environment

- There are strong concerns over the potential environmental impact of the scheme, particularly in respect of impacts on groundwater and spring flows to nearby wetland SSSI.
- There is no evidence at this stage to suggest that the promoter has assessed potential environmental impacts in a meaningful way.
- No consideration appears to have been given to the importance of the EU Habitat Directive and the consequences of not undertaking Appropriate Assessment.

12. Landscape

- 12.1 The local authorities and Cambridgeshire Horizons have commissioned David Brown Landscape design and Richard Morrish to produce a preliminary assessment of the landscape character and impact of an 8,000 dwelling development in this location. The following represents a summary of their findings.

The Chalk Landscape

- 12.2 The proposal lies within the Chalklands landscape character area as defined by the *Cambridgeshire Landscape Guidelines* (1991). Nationally, the chalk forms a series of north-east to south-west trending ridges. The East Anglian Heights, as the chalk escarpment running from the Chilterns to Newmarket is known, have been an open landscape dating back to prehistoric times. The principal pre-Roman routes ran from east to west and amongst the most important of these was the Icknield Way that follows the dry and open scarp face of the chalk. The Icknield Way describes a number of parallel routes and these cross the River Cam corridor between Sawston and Hinxtton. This is a historically significant landscape.
- 12.3 The chalk geology also defines settlement patterns in the area and a series of 'spring line villages' run from Royston to Newmarket on the lower ground at the foot of the chalk scarp. Where the river valley cuts through the chalk, settlements arose at the crossing places, such as those at the Shelfords, Sawston, Pampisford, Duxford, Ickleton and Hinxtton. The chalk scarp itself is characteristically devoid of settlement with the exception of the sequence of isolated monastic Granges. Following Dissolution, many Granges became gentrified farms and Hinxtton Grange is of this type, having a small ornamental park-like enclosure around it.

Village settlement pattern

- 12.4 Because the local settlements are located on the more wooded lower river valley and spring line they have little visibility beyond the occasional roof, spire or Church tower. More recent large-scale developments such as those at Hinxtton Hall, Babraham and on the industrial units on the edge of Sawston, have caused an erosion of local character and are urbanising and discordant elements in this landscape. However, the landscape character remains overwhelmingly rural.

Visibility and views

- 12.5 The location of the site on the rising land of the chalk scarp limits visibility from the south and east but presents views to the north and west. The nature of the chalklands topography to the north and west is of rolling hills that form the southern Cambridge Green Belt. This area includes popular recreational sites such as Wandlebury and Magog Down and is the most highly valued sector of the Cambridge Green Belt for its attractive character, views north over the historic City of Cambridge and views south over the rural chalklands. Despite the distances involved, the scale of a new town will result in significant visibility from the Whittlesford Ridge and from Magog Down, one of Cambridge's most popular rural recreation sites. Here, the designed landscape view through a deliberate gap in woodland focuses on the site.

- 12.6 The fact that a number of these views are from important Green Belt locations means that adverse impact on the Cambridge Green Belt needs to be considered as an additional factor. In this context the views from Magog Down are considered to be particularly harmful.
- 12.7 The historic significance of the isolated Grange at Hinxton would be lost and this is also a landscape character impact. The setting of the Registered Park at Pampisford Hall, adjoining the site, would be compromised and this is another defining aspect of local landscape character that would be lost. The tall conifers for which the Park is noted are a landmark feature for some distance.

Conclusion

- 12.8 The development of a new town of 8000 or more homes in this location would have a significantly adverse impact on local landscape character and on views from the countryside beyond the site due to its prominent location on the rising ground of the chalk escarpment and due to the harmful and inappropriate urban character that would damage this area of particularly cherished landscape. The impact of this urbanisation would be clearly visible in valued and much-enjoyed views from the Cambridge Green Belt – particularly at Magog Down.

Further Information

- 12.9 A preliminary assessment of the landscape impact is included as Topic Paper 6: Landscape.

Box 10 - Summary of Key Points

Landscape

- Hanley Grange would have a significant adverse impact on local landscape character and on views from the countryside beyond the site in an historic and highly valued landscape.
- The landscape impact of Hanley Grange would be clearly visible in valued and much-enjoyed views from the Cambridge Green Belt – particularly at Magog Down.

13. Historic Environment

- 13.1 The historic environment is another key challenge and constraint identified by CLG for Hanley Grange.
- 13.2 Key impacts for main site include:

- Hinxtan Grange, located in the centre of the proposed development, was built around 1835. Listed buildings include the house, coach house and stables (Grade II), which are set within a small park which includes access from the west and plantation to the east.
- Cropmarks indicate the location of numerous areas of probable prehistoric and Roman settlement throughout the area, and ring ditch traces of Bronze Age burial mounds are also present. Roman use of the area is also apparent in the position of the line of a Roman road, forming the eastern boundary of the site, running from the Roman town at Great Chesterford to the south.

13.3 Key impacts for a possible extended site include:

- The proposed area of Hanley Grange includes a part of the nationally important Brent Ditch. This is one of a series of linear boundaries in Cambridgeshire including the Devil's Dyke, Fleam Dyke and Bran Ditch, acting as barriers across the chalkland between the Fen to the north west and the higher Boulder Clay to the south west. These monumental barriers were originally constructed in the Anglo-Saxon period, although there is some evidence of Roman precursors. The Brent Ditch is a Scheduled Monument and benefits from statutory protection.
- The proposed Eco-town borders Pampisford Hall, and encroaches on the gardens where these follow the line of the Brent Ditch. Pampisford Hall was built in 1830 and the grounds, including an arboretum and formal garden were laid out from 1840 to original designs by R Marnock. The house and grounds are listed Grade II*.

13.4 No historic environment information was submitted to CLG by the bidder as part of the Eco-town bid or to the RSS EiP in 2005. It is unclear whether the promoter has begun to consider any of these important issues and concerns at this stage.

13.5 Hanley Grange development would appear likely to result in a significant impact on the historic environment, as part of the initial 8,000 home development and also any long-term expansion. This would include sites and monuments protected under the present designation legislation (Listed Buildings, Parks and Gardens and Scheduled Monuments). Furthermore there are likely to be other impacts on other known sites, the significance of which has not been clearly established.

Box 11 Summary of Key Points

Historic Environment

- The development would be likely to have a significant impact on the historic environment including sites and monuments protected under the present designation legislation.



14 Hanley Grange & Eco-town Criteria

- 14.1 The Eco-town Prospectus published in July 2007 included a set of requirements that each proposal should meet together with a series of outcomes, which the Government are seeking to achieve. More recently the CLG and the TCPA have published a series of worksheets relating to transport, water and community. It is assumed by Government that the principles set out in these documents will be incorporated into the applications for each of the Eco-towns (Foreword by Caroline Flint MP).
- 14.2 It is considered that there is a lack of evidence available at this stage to demonstrate that Hanley Grange could meet the minimum requirements in terms of zero carbon standards, water use and the necessary mix of facilities to minimize the need for residents/workers to travel elsewhere. Significantly the Hanley Grange proposal has not demonstrated excellence in one particular aspect of sustainability, which is one of the key outcomes of the Eco-town Prospectus (page 13).

Environment and Carbon

- 14.3 It is proposed that the Hanley Grange proposal be a zero carbon development and in doing so will meet Code for Sustainable Homes Level 6 (Hanley Grange website www.hanleygrange.org.uk). However the preliminary proposals for Hanley Grange do not inspire any confidence that the new settlement will deliver its net zero carbon commitment. The four energy-related presentation slides presented to the Eco-towns Challenge Panel in May 2008 could have been assembled to cover any theoretical exercise for any location – they do not appear to be grounded in tangible real-world data relating to either the extent of the development or the geography of this locality in South Cambridgeshire.
- 14.4 In order to instil confidence one would expect, even at this early stage, to at least find aggregated data on anticipated occupancy and electrical/heating/cooling demand. This is a key factor in the choice of renewable energy technology.
- 14.5 Notwithstanding this crucial omission, the three principle suggestions for renewable energy generation included in the presentation seem flawed:

i.) *Level 6 Home*: The graphic, with data borrowed from the Kingspan Lighthouse literature, is for a single unit and is thus inappropriate and ill-conceived for a major residential development of thousands of homes where zero-carbon solutions should be driven by site-wide opportunities and economies of scale.

ii.) *Anaerobic Digestion*: this is a positive technology with many benefits. The information supplied to date, however, does nothing to indicate that the development parameters and implications have been worked up, even in a very outline form, for the Hanley Grange bid. The key factors that should be addressed, for at least a preliminary proposal for this technology, to illustrate potential viability within the local area are: a.) supply of feedstock (quantity, quality, security); b.) sustainable outlets for fertiliser; c.) definition of heat and electricity loads; d.) impacts, cost and logistics for transport of feedstock and fertiliser.

iii.) *Wind*: the wind resource at the proposed Hanley Grange site is far from optimal, especially for the lower level building mounted units which worryingly appear in profusion on the 'Overall Vision' images and are included on the 'Passive and Active Technology' graphic. Even at the largest scale of turbine (and passing over very likely significant problems with the aviation authorities) viability will be a probable issue and there are other locations within South Cambridgeshire where the wind resource is markedly more positive.

- 14.6 An indication of management supply options through an Energy Services Company, or otherwise (to cover operation, maintenance, billing and stakeholder involvement) for the area-wide solutions presented is also a serious omission.
- 14.7 South Cambridgeshire District Council has gained, and is continuing to gain, significant experience in bringing forward area-wide renewable energy solutions for major developments (especially via Northstowe as a prototype eco-town), and the Hanley Grange proposals appear to fall well short of what is required in terms of a well-considered and appropriate strategic response.
- 14.8 In summary, the outline renewable energy proposals for Hanley Grange simply cannot be depended upon to deliver the required zero-carbon standard. To proffer such a designation, based on the content of the current bid, would be a very high risk/unsafe option - especially in the context of the Eco-towns initiative and the gravity of what it is seeking to achieve.
- 14.9 Reference is made in the 2005 submission to a Combined Heat and Power system being provided as part of the Hanley Grange Proposal. However there is a lack of evidence e.g. energy strategy to demonstrate what energy efficiency improvements are proposed.

- 14.10 The Eco-town should not just 'aspire' to water neutrality as proposed by the applicants but should aim to 'achieve' water neutrality in cooperation with surrounding settlements. This highlights the importance of the Eco-town location being integrated and compatible with Regional Spatial Strategies. In order to truly achieve water neutrality the wider regional area will need to be included. As the East of England is seriously water stressed it is important that all Eco-towns in the region achieve water neutrality. It is also important that an Eco-town goes beyond water neutrality (where total water use post-development is equal to or less than total water use prior to the development taking place) and actually achieves 'sustainable' use of water through water efficiency approaches and technologies.
- 14.11 It is disappointing to see that the standard set for water efficiency in Eco-towns is to achieve level 3 – 4 of the water element of the Code for Sustainable Homes before 2016 and level 5 – 6 after 2016 (TCPA Water Worksheet). Water efficiency should be a vital element of an Eco-town proposal. Level 3 is a minimum standard that is already achievable with a range of fitting and fixtures at a minimal cost. Furthermore all housing financed with public money and some privately built housing is already built to Level 3. Setting a basic minimum standard and then increasing that standard to a higher standard that will, by 2016, be a basic requirement, does not follow the concept of an Eco-town as a ground for testing and innovation of new approaches and technologies. Furthermore setting such standards will require retrofitting post 2016, this does not seem to be a sustainable way of introducing water efficiency policy, as it is commonly known that retrofitting is more expensive than implementing water efficiency fixtures and fittings to new buildings.
- 14.12 Reference is made to the issue of water efficiency both in the 2005 submission and the Challenge Panel presentation. However to date no evidence has been provided demonstrated that Hanley Grange will meet the requirements set out in Eco-towns Water Cycle Worksheet or achieve the aspiration of water neutrality. Therefore it is unclear that Hanley Grange could be considered to be an exemplar in water efficiency.
- 14.13 It is important to note to date neither a Flood Risk Assessment or a Water Cycle Study has not been prepared for Hanley Grange. These are essential for any reliable judgement to be made on the suitability of the proposals.
- 14.14 Reference is made to the minimisation of construction waste and the provision for composting and a recycling centre both in the RSS Submission and the more recent presentation. However there is a lack of evidence to demonstrate how the minimisation of construction waste will be achieved or any further detail on the provision for waste management will be made to serve the development.
- 14.15 The Hanley Grange proposal makes reference to open spaces being generously provided throughout the development (P18 of the 2005

RSS Submission). However there are no further details about the form and purpose of the open space and how it relates to wider green infrastructure network both within South Cambridgeshire District and the Cambridge Sub Region as a whole.

Design

- 14.16 In the absence of a Masterplan it is impossible at this stage to assess whether a high standard of architecture and design will be provided and that Hanley Grange will encourage continuous improvement over time in relation to sustainability.

Transport

- 14.17 As noted above there is a lack of detailed transport strategy to support the Hanley Grange proposal including the provision of a travel plan(s), which is one of, the outcomes identified for Eco-towns.
- 14.18 Given the location of Hanley Grange commuting out of the settlement in close proximity to major routes in particular the M11 it is highly likely and therefore minimisation of private vehicular traffic will be difficult to achieve.
- 14.19 In addition it has not been demonstrated that high quality public transport links can be provided through the suggested enhancement of existing bus services. It is also uncertain that an extension to the existing Guided Busway could be delivered (please see para 7.13). This it is contrary to the objective of Eco-towns being well linked (by public transport) to existing settlements.
- 14.20 As highlighted above it has also not been demonstrated that it is possible to achieve the modal share of no more than 25% of journeys being undertaken by private car as suggested in the Transport Worksheet (para 2.2.1).

Community

- 14.21 Enabling greater community ownership and management of assets e.g. creation of a community development trust is one of the outcomes that the Government are seeking as set out the Eco-towns Prospectus (page 16). No reference was made as part of the original submission to the formation of a community trust although this issue has been subsequently been recognised by the applicants (Presentation to Eco-towns Challenge Panel May 2008). Their commitment to the Trust would need to be fully demonstrated.

Jobs as well as Homes

- 14.22 The promoter's case in relation to employment is considered to be flawed and simplistic. It is reliant upon providing housing in close proximity to existing employment sites rather than providing a new settlement, which is sustainable in transport terms. Detailed comments

relating to transport are set out in Section 8 of this document and the related topic paper.

Health

- 14.23 In the absence of more detailed information being available it is difficult to assess whether the proposal will make a positive contribution towards health provision or ameliorating existing health inequalities.

Land Use

- 14.24 The Hanley Grange site is a predominantly greenfield site and is not a sustainable location which is well related to the existing network of surrounding towns and villages for the reasons outlined above.

TCPA Worksheets

- 14.25 CLG and the TCPA have also published a series of worksheets relating to transport, water and community. It is currently unclear as to what is the status of these documents and the way in which these will be used as part of the Eco-towns process. Nevertheless, a brief assessment has been made of the Hanley Grange bid against these worksheets as good practice.

Conclusion

- 14.26 Insufficient information is available to demonstrate that Hanley Grange could meet the minimum requirements of Eco-town criteria. Certainly, 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 and which have not been demonstrated by Hanley Grange.

Further Information

- 14.27 Appendix F provides an assessment of Hanley Grange and the TCPA worksheets.

Box 12 - Summary of Key Points

Eco-town Criteria

- Insufficient information is available to demonstrate that Hanley Grange could meet the minimum requirements of Eco-town criteria.
- There is a 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.

- It has not been shown that Hanley Grange has demonstrated excellence in one particular aspect of sustainability.

15. Imperial War Museum Duxford

- 15.1 The section highlights the broad concerns that the Imperial War Museum (IWM) Duxford have expressed about the Hanley Grange proposal in their response to the Eco-towns consultation. It is based on their formal consultation response to the consultation (dated 13 June 2008).
- 15.2 In making their response, IWM Duxford makes no comments about Government policy, in particular the principle of eco-towns.

Background

- 15.2 Duxford is one of six branches of the Imperial War Museum, all of which are integral elements of the Museum. At its closest point, Hanley Grange would be 2.5km from Duxford Airfield.
- 15.4 The key remit of the IWM Duxford is learning and community access. The site is a major tourist attraction. It is also a world leader in aviation heritage conservation and hosts many air shows. The site is home to a number of third party complementary businesses and historic flying partners.
- 15.5 IWM Duxford estimate that it contributes over £13M GVA in the region and provides more than 200 full time jobs between the Museum and its on-site partner organisations.
- 15.6 The Development Control Policies DPD adopted by South Cambridgeshire District Council in July 2007 recognises the national significance of the site within Policy CH/11 Duxford Imperial War Museum.

Main IWM Duxford Concerns

- 15.7 The airfield is licensed for 365 days per year and is administered jointly by the Imperial War Museum and Cambridgeshire County Council, as owners of the land.
- 15.8 As a condition of the permit to fly, historic aircraft are restricted to flying over populated areas unless taking off or landing. Thus, any development at Hanley Grange may lead to complaints of noise disturbance from potential occupants of the dwellings proposed for Hanley Grange.

- 15.9 The fast military jets which participate in the air shows have a fixed pre determined route, passing east of Duxford village. Flying zones are issued through the National Aeronautical Information Service.
- 15.10 IWM Duxford also raises concerns about the impact upon the strategic road network. On the busiest days, between 14 000 and 20 000 visitors in a short space of time. The latest building on the site "AirSpace" relies upon a gas supply underneath the M11 due to concerns over shortfalls in the local electricity supply grid.

Conclusion

- 15.11 The IWM Duxford has reservations about the Hanley Grange proposals. It is considered to have direct impacts upon its standing as a centre of historic aviation operation by virtue of the existing restrictions relating to flying operations. Also, the ability to sustain IWM Duxford in the longer term would be compromised.

16. Eco-towns Planning Process & RSS Review

The Democratic Deficit

- 16.1 CLG indicates that Eco-town schemes would be required to be the subject of a planning application. The Government expects the Regional Spatial Strategy (RSS) reviews to test the longer-term issues that arise from the Eco-town proposals such as the ultimate size of new settlements. But, there will be no requirement for the principle of Eco-towns to first be tested through the RSS process. National policy guidance will be provided through a Planning Policy Statement on Eco-towns.
- 16.2 A key weakness of the Eco-towns concept, particularly in respect of Hanley Grange, is the failure to follow established regional and local plan-led processes only recently established by the Government.
- 16.3 Major developments of this nature would normally be brought forward through the forthcoming review of the Regional Spatial Strategy. This would allow for full democratic input and public comment, and would enable an assessment of whether an Eco-town could have a useful role to play in the overall strategy for the area. The proposed preparation of a national Planning Policy Statement on Eco-Towns would be no substitute for the Regional Spatial Strategy. It may be legally flawed if individual locations for eco-towns are identified in national policy, before thorough assessments have been undertaken at regional or local level.
- 16.4 The growth strategy for the County has been agreed with the involvement of the local planning authorities and key stakeholders in Cambridgeshire, and good progress is now being made in delivering the strategy. There is no need for new strategic locations to be identified outside of the RSS or Local Development Framework (LDF)

processes in terms of housing supply. Partners are confident that sufficient provision is now being advanced through the Local Development Framework processes to meet both the quantitative and locational elements of the strategy.

- 16.5 Ignoring that strategy and imposing an Eco-town outside of the RSS/LDF processes could also undermine public support locally in the growth agenda generally and make the delivery of sustainable growth more difficult. This would increase the risk and scope for legal challenges. .
- 16.6 It is vital that local communities are fully engaged and involved in the decision making process (and the consideration of alternatives) at a sub regional and local level. It is also essential that this process be based on a robust evidence base.

17. Conclusion: An Alternative Approach To Deliver Eco-town Objectives in Cambridgeshire

- 17.1 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, both these aims would be frustrated by Hanley Grange.
- 17.2 Cambridgeshire Horizons and the Cambridgeshire Local Authorities propose an alternative approach to meeting Eco-town objectives in Cambridgeshire. 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 point.

Action Point 1: Removing Hanley Grange from the current Eco-towns Programme

- 17.3 Hanley Grange has key weaknesses as a strategic location for a new settlement and has been rejected previously through the Structure Plan (in terms of general location) and RSS processes. There is therefore a strong case for removing Hanley Grange as a location for an Eco-town at this initial stage.

Action Point 2: Promoting Northstowe

- 17.4 In making the case to remove Hanley Grange the Cambridgeshire authorities are not, however, seeking to challenge the Eco-town objectives themselves. The Government is urged to take a more practical approach tailored to suit the particular circumstances in Cambridgeshire.
- 17.5 A refocusing of collective efforts and public investment is needed to maximise the achievement of eco-town objectives. 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.

Action Point 3: Encouraging Sustainable Growth And Eco-Extensions At Key Market Towns, Properly Tested Through RSS/LDF Processes

- 17.6 This could be coupled with a stronger role for flagship eco-extensions at key market towns in the Cambridge Sub Region. District partners through their LDF processes are already proposing major developments in Cambridgeshire. Key schemes include:
- Urban Extension at St Neots East: Huntingdonshire District Council’s Preferred Options Core Strategy includes a major sustainable extension to the east of St Neots on green field land situated close to the railway station. A large mixed use development incorporating 2,600 dwellings, 9000 m2 retail and 25 hectares of employment will be brought forward during the first phase of the development. A masterplan will be developed to provide a framework for subsequent planning applications. This project has already been recognised as a potential eco-extension.
 - Ely Masterplan: East Cambs District Council is developing a masterplan to explore opportunities for further growth at Ely. It is intended that this will be coupled with the early provision of the Ely Southern Bypass and a Country Park.

Action Point 4: RSS Review

- 17.7 The Cambridgeshire authorities do not believe Hanley Grange is a suitable location for a new town and should certainly not be identified for development in the near future. However, if removed from the Eco-town programme as we recommend, there would still be an opportunity for the promoters to switch Hanley Grange to the East of England RSS review process for consideration as a potential longer term development option.
- 17.8 The Examination in Public (EiP) Panel Report listed the following long-term development options for the CSR as possible candidates for consideration as part of the RSS review:
- Major expansion of Huntingdon as a new “key centre for growth” possibly to include expansion onto brownfield land at Alconbury Airfield and/or Wyton Airfield.
 - Further growth at Northstowe.
 - Further growth at Cambourne (subject to much better levels of public transport accessibility).

- Further new or expanded settlements along the line of the guided busway or future extensions to it.
- An expanded settlement somewhere to the south of Cambridge associated with the railway and/or extensions to the guided busway.

17.9 An early “focussed review” of the RSS, looking particularly at housing and employment issues, has already begun. Affordability of housing will be a key consideration, taking into account recommendations of the National Housing and Planning Advisory Unit published on Friday 27 June 2008. The East of England Regional Assembly (EERA) has produced a Business Plan, agreed by CLG, which maps out an 18-month programme for publishing a Submission Draft RSS by December 2009.

17.10 The development industry is to be given a much earlier opportunity to contribute to the RSS review than was the case for the last RSS. Submissions for major urban extensions and new settlement options are to be invited from July of this year. Therefore there would be no material time delay if the promoters of Hanley Grange were invited to switch from the Eco-towns Programme to the RSS review.

Guided Busway trial- providing a segregated public transport link to Northstowe.

