

Matter SC6C: Policy SS/6 New Village at Bourn Airfield

North Barton Road Land Owners Group

South Cambridgeshire District Council Id. 21302

Rep Id Nos. 59598

Local Plan Examinations

Cambridge and South Cambridgeshire

6-8 Hills Road
Cambridge
CB2 1NH

February 2017

TABLE OF CONTENTS

INTRODUCTION	1
GENERAL POLICY	2
FUTURE AREA ACTION PLAN DEVELOPMENT PLAN DOCUMENTS	7
COUNCIL'S FURTHER PROPOSED MODIFICATIONS NOVEMBER 2016	9

1. MATTER SC6C – POLICY SS/6

Introduction

- 1.1 This Hearing Statement has been prepared by Carter Jonas LLP on behalf of the North Barton Road Land Owners Group (North BRLOG) for Matter SC6C: Policy SS/6 New Village at Bourn Airfield. North BRLOG comprises four landowners, as follows: Corpus Christi College, Downing College, Jesus College, and University of Cambridge. North BRLOG owns land to the North of Barton Road which is on the south western built-up edge of Cambridge.
- 1.2 In respect of Policy SS/6, we submitted representations to the Draft South Cambridgeshire Local Plan (Draft SCLP) in October 2013 (Rep Id: 59598).
- 1.3 There are representations to other policies and responses to other examination matters which are also relevant to Policy SS/6 New Village at Bourn Airfield. In October 2013 we submitted representations to draft SCLP on the delivery of new settlements (Policy S/6: Development Strategy), including Bourn Airfield - see Paragraphs 9.27 to 9.34 of the Representation Report to Draft SCLP. In January 2016 we submitted representations to the Proposed Modifications on the delivery of new settlements and Bourn Airfield (PM/SC/2/N: Policy S/6 and PM/SC/3/I: Policy SS/6). Highway infrastructure and housing delivery matters at Bourn Airfield were dealt with in the North BRLOG Hearing Statements for Matter 7A: Strategic Transport Issues, Matter 2: Overall Spatial Vision & General Issues, and Matter 8A: Housing Trajectory.
- 1.4 In summary, we do not support the new settlement option at Bourn Airfield. The delivery of a new settlement is complex, and tends to take much longer than expected because of the need for a substantial amount of primary infrastructure to be provided up front. The upfront infrastructure costs and planning obligation requirements would affect the viability of the new settlement at Bourn Airfield, and we doubt that it will deliver policy compliant levels of affordable housing. We have significant concerns about the costs associated with the proposed highway improvements required for the new settlement at Bourn Airfield, and whether the highway improvements required within and on the edge of Cambridge to make this development acceptable in terms of traffic and congestion are actually deliverable. In addition, the location of the proposed Bourn Airfield new settlement and the distances to Cambridge are unlikely to make a significant difference to means of travel for journeys to work; the car is still likely to be the main mode of transport for future residents. There are other much more sustainable and logical development locations that should be given priority over Bourn Airfield.

- 1.5 We request that the proposed new settlement at Bourn Airfield is deleted from draft SCLP.

1 General Policy

i. Does the site represent a sustainable location in respect of the proximity and accessibility to key centres of employment?

- 1.6 The proposed new settlement at Bourn Airfield is within close proximity of employment opportunities at Cambourne, West Cambridge and in Cambridge City. As such, Bourn Airfield is not fundamentally an unsustainable location in terms of proximity to key centres of employment. However, we consider that far more sustainable options exist for new strategic development on the edge of Cambridge that are closer to those key employment locations and are more accessible by non-car modes of transport. Paragraph 2.11 of the North BRLOG Hearing Statement for Matter 7A shows the modes of travel derived from 2011 Census data for Newnham, Barton and Bourn Wards - for ease of reference the table is provided below.

	Barton Ward		Newnham Ward		Bourn Ward	
	No.	%	No.	%	No.	%
Car Driver	628	57%	430	23%	3,974	77%
Car Passenger	35	3%	24	1%	214	4%
Rail	48	4%	166	9%	222	4%
Bus	48	4%	61	3%	280	5%
Walk	67	6%	412	22%	293	6%
Cycle	242	22%	768	41%	122	2%
Other	26	2%	31	2%	81	2%
Total people	1,094	100%	1,892	100%	5,186	100%

- 1.7 The 2011 Census data clearly show the wards located adjacent to the existing built up area of Cambridge (Barton and Newnham) have residents using a range of sustainable modes to travel to and from work, when compared with wards outside Cambridge (Bourn). The location of the proposed Bourn Airfield new settlement and the distances to Cambridge are unlikely to make a significant difference to means of travel for journeys to work, and the car is still likely to be the main mode of transport for future residents. In comparison, development on the edge of Cambridge would be more sustainable in transport terms, and future residents would have the opportunity to travel to employment centres by walking, cycling and public transport. Paragraph 30 of the NPPF states: *“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and*

reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport". Paragraph 34 states: "Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas". We consider that the proposed new settlement at Bourn Airfield does not comply with this national guidance, and will fail to encourage travel by sustainable modes of transport for journeys to work.

- 1.8 The proposed new settlement at Bourn Airfield is reliant on the delivery of highway and transport infrastructure improvements i.e. Cambourne to Cambridge Better Bus Journeys project, to make it more sustainable in transport terms. However, as set out below in our response to Qu 1(v) and Qu 2(v), the timing and delivery of projects through City Deal Tranche 1 is uncertain, and it is unknown whether the costs associated with other transport infrastructure improvements can be provided from development along the A428 corridor without impacting on the delivery of community infrastructure or policy compliant levels of affordable housing.

ii. Would the proposed size of the new village be sufficient to make it sustainable in terms of its ability to support local services and facilities?

- 1.9 Policy SS/6 allows for town centre uses appropriate to a Rural Centre to be provided within the proposed new settlement at Bourn Airfield, with smaller local centres provided within the residential areas. It is likely that the number of new dwellings within Bourn Airfield new settlement would be sufficient to support local services and facilities to serve day to day needs, but main/weekly shopping trips and the majority of other shopping and leisure trips would be undertaken at the larger centres of Cambourne and Cambridge. This implies more car journeys than would apply if major development was located in a more sustainable location, when viewed in the round.

iii. Does the area of land identified on Inset 1 of the Policies Map provide sufficient capacity to achieve the quantum of development associated with the new village?

- 1.10 Policy SS/6 requires the proposed new settlement at Bourn Airfield to accommodate employment and other commercial uses, schools, community uses, open space and recreation areas, transport infrastructure, drainage and utilities infrastructure, in addition to strategic landscaping. It will be for the promoter to demonstrate that sufficient land exists within the area identified for the proposed allocation to accommodate 3,500 dwellings.

iv. In respect of paragraph 3.40, what proportion of the site as a whole can be classified as previously developed land?

- 1.11 This is a question for the promoters. The definition of previously developed land in the NPPF states: *“Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure”*. The assessment of the site in the Sustainability Appraisal Screening Report – see Appendix 1 [Doc Ref. RD/FM/012] concluded that one third of the site was previously developed land. On this basis the majority of the site is clearly not previously developed. That is an interesting observation when one of the reasons for selecting Bourn Airfield over other alternatives is that it involves the re-use of previously developed land.

v. Would the new village result in an over intensification of relatively closely knit settlements south of the A428 creating a form of ribbon development which would be uncharacteristic of this part of South Cambridgeshire?

- 1.12 No comment.

vi. The policy and reasoned justification refer to the need for extensive off-site transport infrastructure provision in order to mitigate the transport impacts associated with creation of the new village, along with the Cambourne West development which has been granted planning permission. Bearing in mind the requirements of paragraph 177 of the National Planning Policy Framework, is there a reasonable prospect that the provision of such infrastructure, and the services and facilities referred to in the policy and justification, could be achieved in a timely fashion, particularly if the proposed modification to remove any phasing of development (PM/SC/3/1) is accepted, whilst not putting at risk the overall viability of the development?

- 1.13 The proposed development at Cambourne West (App Ref. S/2903/14/OL) has not yet been granted planning permission; on 11th January 2017 Planning Committee resolved to grant planning permission subject to conditions and completion of a S106 Agreement. A draft schedule of S106 Heads of Terms was provided with the report to Planning Committee. The link to the Committee Report and draft schedule of S106 Heads of Terms are provided in the letter from South Cambridgeshire District Council to the Inspectors dated 13th January 2017 [Doc Ref. RD/GEN/380]. Items 9 and 10 of the draft schedule Heads of Terms identify the contributions associated with key highway infrastructure improvements for bus services and bus priority. Paragraph 289 of the Cambourne West Planning Committee Report, in the context of strategic bus priority infrastructure along the

A428 corridor, states:

“289. However, it is agreed with the City Deal team and the applicant that the cost of the works that would have been carried out to mitigate the development would be better utilised as a contribution towards the wider scheme. A contribution of £8.7m towards both tranches of the City Deal proposals and a new park and ride site is included in the draft S106, the final route and location of which would be agreed by the City Deal Board. A similar pro-rata contribution would be sought from any development at Bourn Airfield. If City Deal scheme were not to progress further then a contribution would still be required to mitigate the impact of the development through the enhancement of public transport routes between Cambourne and Cambridge. However, if this were the case, then the applicant would not be able to deliver such a comprehensive scheme as City Deal would. The S106 would need to be drafted to ensure that should City Deal not progress further then the applicant would deliver bus priority measures along the A428/A1303 corridor based on the contribution in the draft S106.” [our emphasis]

- 1.14 The public transport improvements - comprising improvements towards bus services, bus priority measures along the A428/A1303 Corridor, and a new Park & Ride site between Cambourne and Cambridge - were identified as critical to make the proposed development at Cambourne West acceptable in transport terms. The cost and timing of the contributions for the Cambourne West development have not yet been confirmed or agreed, as evidenced in the draft 106 schedule.
- 1.15 The timing and delivery of the City Deal project for the A428/A1303 corridor are also uncertain at this stage e.g. no preferred route has been agreed.
- 1.16 The expectation from the Planning Committee Report for the Cambourne West application is that the proposed new settlement at Bourn Airfield would also contribute towards the same public transport improvements. The promoters of Bourn Airfield new settlement should be asked to confirm that proportionate contributions towards these public transport improvement projects can also be made, and provide evidence that those contributions can be made without a significant detrimental effect on viability and the delivery of affordable housing and community infrastructure.
- 1.17 We raised concerns about deliverability and viability at the new settlements in our hearing statements for Matter 2 and Matter 8A, which were supported by the Bidwells' Report - Assessment of the Deliverability of Sites from the Housing Trajectory that assessed housing delivery including at new settlements and at strategic sites on the edge of Cambridge. In summary, the findings of the Bidwells' Report that are relevant to the proposed new settlement at Bourn Airfield are as follows:

- there will be significant delays in the delivery of the new settlements;
- the upfront infrastructure costs and planning obligation requirements would affect the viability of the new settlements; and,
- new settlements will inevitably deliver lower proportions of affordable housing in the initial phases of development, which are then subsequently unlikely to be met in later phases.

1.18 It is for these reasons that the promoters of the proposed new settlement at Bourn Airfield should demonstrate that it can fully contribute towards the required public transport improvements on the A428/A1303 Corridor while remaining viable and delivering policy compliant levels of affordable housing.

1.19 The evidence in the Bidwells' Report demonstrates that, unlike new settlements, the urban extensions to Cambridge are delivered quickly, remain viable, and do provide policy compliant levels of affordable housing.

1.20 We consider that, in the absence of evidence, the delivery of the public transport improvements on the A428/A1303 Corridor is uncertain because of the uncertainty surrounding the funding available from City Deal, the delivery of City Deal projects, and the contributions that would be provided by the proposed development at Cambourne West. The promoters of the new settlement at Bourn Airfield have provided no detail of the contribution it would make to those public transport improvements.

vii. Would the proposed new village result in an unacceptable loss of good quality agricultural land?

1.21 We have no comment on whether the loss of good quality agricultural land is unacceptable or not. As defined in the NPPF, it is Grades 1, 2 and 3a which represents best and most versatile agricultural land. The Agricultural Land Classification indicates that the majority of Bourn Airfield is Grade 2 and some Grade 3 land. The Sustainability Appraisal Report states that the site contains mostly Grade 2 land and scored 'red' for this topic because it involved a significant loss of agricultural land - see Appendix 1 [Doc Ref Ref. RD/FM/012]. There is an alternative strategic development site on the edge of Cambridge which does not involve the loss off the best and most versatile agricultural land.

viii. Would the provision of town centre uses be detrimental to the existing convenience retail offer in the neighbouring villages?

1.22 No comment.

ix. Should the policy specifically require a storm water attenuation strategy and a foul drainage strategy for the development?

1.23 Yes.

x. Could the loss of the existing aviation related employment uses be accommodated elsewhere?

1.24 No comment.

2 Future Area Action Plan Development Plan Document (AAP)

i. Paragraph 6: Does the preparation and subsequent adoption of an AAP represent an appropriate mechanism in planning terms for the implementation of this development? If this is not a sound approach, would the Council's further proposed modification to prepare SPD rectify that issue.

1.25 The principle of preparing an AAP or SPD is an appropriate mechanism to provide further guidance to policy. The reason that the SPD route has been selected appears to be to avoid the detailed scrutiny of policy that would be necessary with an AAP document and the additional time it would take to complete an examination for the AAP.

ii. Paragraph 6b: Would the proposed level of employment on the site be consistent with the proposed number of dwellings? In this regard, should the paragraph be consistent with Policy E/12: New Employment Development in Villages which restricts employment uses to B1, B2 and B8?

1.26 At this stage, it is not clear what level of employment is included within the proposed new settlement at Bourn Airfield. The Sustainability Appraisal Report [Doc Ref. RD/FM/012] scored the site as 'dark green' for the employment land topic because the proposed new settlement would include a significant element of employment. Whatever aspirations exist to provide consistency between levels of employment and housing, we doubt whether this will materialise for the following reasons. Cambridge will continue to be the key focus for jobs and the economy; whatever efforts are made to encourage employers to relocate outside Cambridge, research facilities and high technology companies want to locate within or as close to the City as possible in order to be connected to one another and to maintain existing relationships. There is no interest from such facilities or businesses to relocate far beyond the edge of Cambridge, and certainly not to locations elsewhere in Cambridgeshire or to the new settlements. We note that Cambourne has struggled to attract employers to allocated employment land within the settlement. There are plans to provide additional employment

opportunities within the proposed Cambourne West Development and at Northstowe new town, all of which would compete with any employment uses included at the proposed new settlement at Bourn Airfield.

iii. Paragraph 6m: Should there be a reference to the provision of a high degree of connectivity between existing green corridors and ecological networks?

1.27 No comment.

iv. Paragraph 6q: Is there a reasonable prospect that the effect of the development on the ecology and biodiversity of the site could be adequately mitigated?

1.28 No comment.

v. Paragraph 6u: Would the Park and Ride facility for the A428 corridor be critical to the sustainability of the location of the new village in transport terms? Would it have to be funded through a planning obligation as referred to above?

1.29 Yes the park and ride facility is critical to sustainability in transport terms, and the expectation is that it would be funded through a planning obligation from strategic sites, including the proposed new settlement at Bourn Airfield. Our response to Qu.1vi is relevant.

vi. Paragraph 6y: The criterion makes reference to highway improvements. Should the proposed schemes therefore be set out in the policy if they critical to the implementation of the policy?

1.30 Yes. We request that a list of highway improvement schemes should be provided for this examination hearing session. We consider that the detail of the proposed highway improvement schemes should be identified in policy because they are critical to delivery and sustainability. The details provided in policy would avoid uncertainty when the SPD is prepared and at the planning application stage, and it would ensure that the promoted complies with commitments made to support the allocation of the proposed new settlement at Bourn Airfield.

vii. Paragraph 6aa: Should there be a direct access for private motor vehicles to the Broadway provided that the appropriate measures are put in place to mitigate the traffic impacts in terms of highway safety?

1.31 No comments.

viii. Paragraph 6cc: Should there be a cross reference to Policy T1/8: Infrastructure and New Developments as the policy indicates that planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make a scheme acceptable in planning terms?

- 1.32 The general principle is that it is not necessary to cross-reference policies because the development plan should be read as a whole. If necessary, reference to Policy T1/8 could be included within the supporting text.

ix. Paragraph 6ee: Would the flood risk reduction measures be sufficiently resilient to the effect of climate change over the lifetime of the new village? Would this form part of the flood risk assessment for the site?

- 1.33 No comment.

x. Paragraph 6ff: Should reference also be made to the creation of appropriate community governance arrangements to assist the development of the new community?

- 1.34 No comment.

xi. Paragraphs 6gg and 6hh: Given the previous use of the site for military purposes, is there a reasonable prospect that the de-contamination of the site could be achieved satisfactorily so as to enable residential occupation whilst not prejudicing the viability of the proposed development?

- 1.35 No comment.

xii. Site Preparation: Should the policy require a pre-development archaeological evaluation?

- 1.36 No comment.

3 Council's Further proposed modifications November 2016

i. Are these modifications necessary to ensure the soundness of the Plan?

- 1.37 The scope and content of the questions for this Matter is an indication that there are a substantial amount of uncertainties relating to the strategy for the proposed new settlement at Bourn Airfield, and the delivery of the associated highway and public transport infrastructure required to make it acceptable in transport terms. We consider that all of these matters should have been resolved before the

decision was made to allocate the site. The further proposed modifications do not address our fundamental concerns that the development strategy contained in Draft SCLP – dispersed pattern of development and an overreliance on three new settlements and an extension to an existing new settlement – is unsound.