



Examination into the soundness of the South Cambridgeshire Local Plan

Response to Inspectors' Questions for Matter SC6 – New Settlements SC6C – Policy SS/6 New Village at Bourn Airfield

on behalf of

Countryside Properties (UK) Limited
and
The Taylor Family

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Matters and Issues for South Cambridgeshire Local Plan specific hearing sessions

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

South Cambridgeshire Local Plan, Chapter 3, Strategic Sites, Policy SS/6

Issues:

1 General Policy

- i. Does the site represent a sustainable location in respect of the proximity and accessibility to key centres of employment?
 - a. *Yes. The issue of sustainability is addressed by SCDC in responding to Matters 2, 6 and 7 of the Examination. The proposed spatial strategy for growth is incorporated into the SA. This identifies “ the importance of balancing the accessibility aspects of sustainable development and the environmental and social benefits it brings, with the significant harm to the landscape and setting environmental aspects of sustainability that development of land in the Green Belt would have, with the resulting irreversible impacts on the special character and setting of Cambridge as a compact historic city and the risks that could have to the economic success of the Cambridge area, which is in part built on its attractiveness as a place to live and work”. (Final SA and paragraph 15 Council’s Statement – Matter 2).*
 - b. *‘Accessibility’ is underlined as more relevant than ‘proximity’, in identifying a sustainable location, given the circumstances of the historic centre of Cambridge, surrounded by Green Belt. This is a good place for new housing because people will have access to jobs.*
 - c. *Sustainability is demonstrated in the audit trail for sites allocated in the Plan (Annex A – SA.*
 - d. *The working masterplan for Bourn Airfield identifies proposed employment development on the site (Appendix 1) as well as plan “Functional Relationships with Cambourne and nearby villages” (Appendix 2). Appendix 3 comprises Employment data: if the economic profile of Cambourne is applied to Bourn Airfield, 10% of the economically active would work from home and 10% within the development.*
- 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?
 - a. *S/8: Rural Centres identifies Cambourne as a Rural Centre, the highest classification of the four identified rural settlement groupings, to reflect that it is one of the largest and most sustainable villages in the district. Such centres have good access to a variety of services and facilities and good public transport services to Cambridge or a market town (paragraphs 2.51 – 2.54 of LP). Policy SS/6, paragraph 1 states that Bourn Airfield will be classified as a Rural Centre once built, and the policy requirements will ensure that sufficient services and facilities, including a secondary school, will be required to create a*



sustainable community. The scale of development proposed is sufficient to support a secondary school, which is also important for community cohesion (LP paragraphs 3.46, 3.47). The masterplan (Appendix 1) demonstrates the emerging proposals for the new village that encompass the Council's requirements within Policy SS/6. A similar approach was employed at Cambourne which is a successful settlement, providing a wide range of services.

- b. Proposed new settlements in the LP are intended to be of a scale and nature to enable significant transport improvements to be focused on key corridors to deliver high quality public transport links to Cambridge, along with the community services and facilities needed to support development (SCDC statement, Matter 2, paragraph 16).
 - c. The focus on new settlements in the LP is intended to provide a degree of self-containment, through opportunities to live and work in the same place and can deliver higher modal share by public transport, internalisation of trips, coordinated infrastructure on key routes in the form of public transport, and highway measures. The new village at Bourn Airfield, together with Cambourne West will help to create a new High Quality Public Transport route along the A428. This critical mass of people commuting on the A428 corridor into Cambridge will prove vital when aiming to establish long term, commercially viable passenger transport options. (SCDC statement, Matter 2, paragraph 19).
 - d. Development of Bourn Airfield for approximately 3,500 dwellings, together with the existing and committed development at Cambourne of 4,250 homes, plus 2,350 homes at Cambourne West will create separate but linked communities of some 10,100 total homes.
 - e. The Government's proposals for locally-led Garden Villages, Towns and Cities (March 2016) invited expressions of interest for new 'garden villages' of between 1,500 to 10,000 homes. The Government consider that settlements of the lower scale can meet the objectives of sustainable development.
 - f. The population forecast for Bourn Airfield is 9,660 people based on Cambourne occupancy rates of 2.76 persons per household. Advice in "Shaping Neighbourhoods" (Appendix 4) indicates the types of facilities and services that can be supported by such a population. The proposed City Deal and bus link and cycle/pedestrian links to Cambourne will allow connectivity to a wider range of complementary facilities.
- iii. Does the area of land identified on Inset I of the Policies Map provide sufficient capacity to achieve the quantum of development associated with the new village?
- a. Policy SS/6 proposes "**approximately 3,500 dwellings**". The 2016 Further Proposed Modifications clarify that "**The final number of dwellings will be determined through a design-led approach and spatial framework diagram included in the SPD**" (RD/FM/010 page 27)
 - b. The Major Development Area (MDA) as originally submitted does not allow for a full 3,500 new homes.
 - c. The 2016 modifications extend the MDA by land parcels 1, 2, 4 and 5. These allow for the proposed capacity of approximately 3,500 homes through a range of densities, together with the provision of the required services and facilitates. Appendix 6 compares the



MDA in the Submitted LP with that now proposed to be modified by SCDC plus those by Countryside Properties. It demonstrates the importance of defining the MDA sufficiently flexibly to allow for all the necessary requirements to be met to achieve a new community comprising approximately 3,500 homes at Bourn Airfield. (Refer also to RD/FM/013 Parts 1 & 8)

- d. *Area 3, shown in Appendix 6, is proposed to provide flexibility for good master planning, urban design and place-making purposes, including creating an attractive gateway into the development and to allow for the major multi-modal access including the City Deal infrastructure.*

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

RPS's report (Appendix 7) analyses previously developed land within the MDA boundary (as proposed by SCDC). All the MDA lies within the curtilage of the former military airfield and is PDL based on the NPPF definition. Of the 172.59ha approximately 38.1 (22%) currently comprises existing development. In addition approximately 24.4ha (11%) was formerly developed. Although restored to agriculture the quality is very poor.

- 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?

- a. *No, "ribbon development" traditionally means unplanned linear speculative development alongside major arterial roads, leading to the Restriction of Ribbon Development Act 1935. Policy SS/6 will make best use of PDL. The resulting settlement form and character, as well as pattern of development created, are characteristic of the local area as to both "intersection' and 'linear' forms. Villages to the south of the site in the Bourn Valley show 'linearity' in an east/west direction, following the River Bourn. Later linear village settlements grew from the connection between a primary village and its secondary settlement. Bourn Airfield remains the most logical location for a new settlement to continue the pattern of organic settlement growth in this area. This pattern of growth is explained in RD/FM/013 Part 2, pages 11-26.*

- b. *The SA - Audit Trail Annex A, confirms in respect of Bourn Airfield that "Landscape impacts are capable of mitigation including avoiding creating the appearance of a ribbon of development south of the A428, and ensuring effective landscaped separation from Highfields Caldecote,"*

- c. *Policy SS/6 proposes Bourn Airfield to be classified as a 'Rural Centre' once built. Over time it will form its own identity and community but will also be part of a larger 'place' together with Cambourne and Cambourne West. This larger 'place' will comprise some 10,100 homes and a wide range of complementary facilities - 'Three Communities, One Place'.*

- d. *The new village will be a separate settlement that is complementary but distinct. Connectivity with Cambourne, the surrounding villages and the wider transport network will be achieved by connected cycle and pedestrian links, local bus connections, City Deal fast bus to Cambridge and other strategic connections. Coalescence will be avoided*



with adjoining settlements by the final form of the settlement, visual and physical means of separation including landscaping and structural planting. (RD/FM/013 Part 2 page 26).

- 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/I) is accepted, whilst not putting at risk the overall viability of the development?
- a. *NPPF paragraph 177 states that 'It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion', but is not prescriptive that all planned infrastructure is delivered in the early stages of a development coming forward when the impacts are small.*
 - b. *The Bourn Airfield proposals will be built out over a number of years (approximately 200 in the period through to 2021 and 1000 by 2026 – SOCG March 2015) and that provides considerable time for stages of the City Deal Infrastructure on the A428 Corridor to be implemented. From consideration of vehicle trip rates from the existing Cambourne Development, an initial phase of 200 units would add in the peak direction about 1 car a minute to the network.*
 - c. *For the 1st phases of development which may come forward before the City Deal Infrastructure is completed, there are measures which can mitigate against any highway impacts, in-particular the Travel Plan proposals which would include financial incentives to make journeys by bus, on foot and by cycle together with clear information to encourage journeys by non-car means.*
 - d. *The implementation of the Bus Link from Cambourne to Broadway, which forms a requirement of the resolution for Cambourne West, allows for a potential section of the City Deal Infrastructure to be brought forward through the Bourn Airfield masterplan. This will provide a clear benefit for those making journeys by bus, both existing Cambourne residents and future residents of Bourn Airfield and Cambourne West. A journey using the No 4 Bus will become considerably quicker, in advance of any of the City Deal corridor infrastructure being delivered, through the delivery of the direct Cambourne and Bourn Airfield infrastructure.*
 - e. *In terms of viability, as set out in the resolution for Cambourne West, both CCC and SCDC would seek contributions towards the City Deal Infrastructure which could be used for alternative or interim measures if there were to be a delay to the implementation of any part of the City Deal Infrastructure.*
 - f. *The agreement of the S106 transport package for Cambourne West demonstrates that the obligations are proportionate, viable and deliverable.*



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

RPS's assessment (Appendix 7) shows that the majority of agricultural land within the MDA proposed by SCDC is Grade 3b:

Grade 2	14.85	9%
Grade 3a	49.70	28%
Grade 3b	69.94	41%
Non-agricultural	<u>38.10</u>	<u>22%</u>
	172.59	100%

There would be no unacceptable loss of good quality agricultural land.

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

- a. *The masterplan highlights the proposed retail facilities to be provided as part of the new village. It is planned to cater for its own needs.*
- b. *Appendix 8 comprises a table of retail (and other services and facilities) at Beaulieu in Chelmsford, a development of 3,600 new homes by Countryside Properties which provides an appropriate comparator.*

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

- a. *No. Infrastructure Requirements in Policy SS/6 already stipulate the needs for foul drainage and sewerage disposal as well as for surface water drainage management.*
- b. *An Outline Water Cycle Study has been produced for Bourn Airfield in consultation with the Environment Agency (EA) and Anglian Water (AWS) to inform the masterplan. This includes an initial strategy for storm water management (including attenuation requirements) and foul drainage disposal (Summary at Appendix 12.)*
- c. *Surface water management strategy and foul drainage strategy for the development will be produced as part of the masterplan refinement and planning application documents. Significant progress has already been made, including consultations with CCC (LLFA), AWS, SCDC and EA.*

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

The flying club based at Bourn Airfield has 45 members. 1 part-time instructor and no other employees and is largely run by volunteers. The club moved to a smaller runway in recent years, resulting in a reduction from 25 to 14 aircraft parked in the hangars. There are numerous local alternatives including flying strips at Croydon, Gransden, Connington and Fowlmere, as well as a larger facility at Cambridge Airport.



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.

For reasons explained in paragraphs 7-9 of RD/FM/010, an AAP is not an appropriate mechanism and SCDC's further proposed modifications to prepare SPD rectify that issue.

- 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?

- a. *Policy E/12 does not 'restrict' employment uses to B1, B2 and B8, it 'will allow' these uses where these are in keeping with the category and scale of the village and in character and scale with the location.*
- b. *Policy E/12 does not envisage a balance of homes and jobs nor does it specify a proposed level of employment. Appendix 3 provides information on Cambourne, as a typical example of employment provision/travel to work patterns in the local area.*

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

- a. *Yes. The SA confirms that in terms of green Infrastructure the site is awarded a Green score and that "development could deliver significant new green infrastructure within the AAP area".*
- b. *RD/FM/013 Part 1 pages 20 and 21 demonstrate the potential that exists to extend existing designated county wildlife corridors to and from the site, shown on Appendix 1.*

- 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?

- a. *The effect of the development on ecology and biodiversity can be adequately mitigated on site. (Appendix 9, by Thomson Ecology Ltd).*
- b. *Extensive ecology surveys have been undertaken, to enable the effect of the development on ecology to be understood at this stage. The results have influenced the masterplan and detailed layout from the outset, to ensure that mitigation is embedded into the design and that sensitive areas can be suitably protected and enhanced.*
- c. *The location of the proposed development within the site is largely on PDL and arable land which has limited suitability for many protected species. A large area to the south of the site will be used to provide receptor sites and further ecological enhancements for biodiversity (in combination with the plans for SUDS).*



- d. *Habitat connectivity for species will be maintained through the on-site habitat buffers, additional woodland belt planting and enhancement of waterways and creation of SUDS.*
- 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?
- a. *A Park and Ride on the A428/A1303 Corridor has been identified as part of the City Package and proportional contributions have been sought through the Cambourne West S106 towards this measure. It would remove trips from the corridor and discussions with the Highways Authority might seek early delivery of the Park and Ride through contributions obtained from Cambourne West and Bourn Airfield to remove trips from the corridor, in advance of the full City Deal delivery.*
- b. *It is not critical to the delivery of Bourn Airfield, but is a discrete scheme which could come forward in isolation from the rest of the City Deal proposals and remove a quantum of trips from the corridor. The early stages of development are likely to lead to a small change in trips on the network, so the delivery of the Park and Ride within a 5 to 10 year period is likely to provide a betterment, which is clearly above the requirement of NPPF paragraph 32.*
- 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?
- a. *Given that the major infrastructure coming forward is the City Deal Corridor Improvements, it is not necessary for the Policy to identify specific transport schemes. Site specific requirements/contributions can be negotiated through the planning application process, similar to the example of Cambourne West.*
- b. *In addition, as set out in the resolution for Cambourne West, if there was a significant delay to the City Deal measures being implemented then the contributions could be used for bus priority measures along the A428/A1303 corridor based on the contribution in the draft S106.*
- 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?
- a. *A second vehicle access point has been accepted by both CCC and SCDC as a desirable part of the proposals since if all vehicles were to use an eastern access that would restrict the space available to provide high quality provision for buses, cyclists and pedestrians. For example, in accordance with an estimate of car trips, they would split broadly 60% east and 40% west and there would be less trips and more identifiable space for bus priority and cycle priority with the reduced vehicles as a result of two access points (illustration Appendix 10).*
- b. *Priority for buses and cyclists would be provided within the masterplan, to ensure they are the most desirable modes; sending vehicle trips from the west of the development to*



an access at the east encourages unnecessary vehicle trips through the development.

- c. *In terms of the access onto Broadway, this can be designed to orientate traffic to the north, to the old A428 and a combination of traffic calming measures and on-going monitoring would restrict any vehicles heading south towards Bourn Village. The Highways England programmed improvements for the A428 Corridor, including the Caxton Gibbett roundabout improvements, would mitigate against wishing to head south along the Broadway unless that was the intended destination.*
- viii. **Paragraph 6cc:** Should there be a cross reference to Policy TI/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?
- a. *No; Policy TI/8 would be applied in the determination of an application.*
- 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?
- a. *Flood Risk Assessment and Surface Water Drainage Strategy Reports will consider the impacts of climate change in line with latest EA and NPPF guidance, as well as SCDC Local Plan Policies.*
- b. *The High Level Outline Water Cycle Study prepared by Hyder (Appendix 12) concludes that the Bourn Airfield development presents an ideal opportunity to reduce existing flood risk issues downstream of its catchment area by taking an innovative and sustainable approach to surface water management, which has the potential to deliver wider environmental and water quality benefits. This site has sufficient capacity to reduce runoff rates and flows by 60% through effective masterplanning and integration of SUDS.*
- xi. **Paragraph 6ff:** Should reference also be made to the creation of appropriate community governance arrangements to assist the development of the new community?
- This is unnecessary.*
- 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?

The Taylor Family have farmed the land since the War following its decommissioning. BAE Systems have undertaken a Contaminated Land Desk Study in 2013. This concluded that the potential sources of contamination associated with the RAF's use during WW2 were assessed to range between 'very low' and 'moderate' (Appendix 11).



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

Yes. RPS on behalf of Countryside Properties commissioned a geo-physical survey of the site and there has been liaison with CCC Historic Environment Team, who indicated that they expect to see some pre-determination evaluation. This is likely to involve a 1% evaluation representing in the region of 248 trenches at 50m x 1.8m. These will inform the EIA.

3 Council's Further proposed modifications November 2016

- i. Are these modifications necessary to ensure the soundness of the Plan?
 - a. *The Further Proposed Modifications in RD/FM/010 are considered to be necessary and appropriate to ensure the soundness of the Plan. These are agreed by Countryside Properties, with the exception that Area 3 should also be included within the MDA boundary for reasons given under Question 1(iii), particularly to provide flexibility for masterplanning, urban design and placemaking and transport infrastructure provision.*
 - b. *Retention of the AAP requirement would not be sound for the reasons set out in RD/FM/010 paragraphs 7-9.*
 - c. *Policy SS/6 refers to a MDA to accommodate the built development of the proposed new village. This was proposed to be planned through the AAP. If the new village is instead to be progressed via SPD, the flexibility to change the MDA is lost. SPD cannot amend the MDA boundary, thus the importance of establishing an appropriate boundary now, which is sufficiently flexible to deal with change whilst respecting the original objectives for establishing the designation.*

SC6C Taylor Family/Countryside Properties (19841)
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Appendices

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- 1 Current working masterplan, Option 9A, Rummey Design.
- 2 Plan – “Functional relationships with Cambourne and nearby villages”, Rummey Design.
- 3 Employment Data, QUOD.
- 4 “Shaping Neighbourhoods” 2010. Table – Accessibility Criteria, Page 121.
- 5 “Bourn Airfield - Social Infrastructure”, QUOD.
- 6 Rummey Design – “Representations in respect of the proposed MDA boundary”, February 2017
- 7 “Bourn Airfield Agricultural Characteristics” Report by RPS February 2017.
- 8 Table of proposed retail and other community services and facilities proposed to serve 3,600 new homes at Beaulieu, Chelmsford – Countryside Properties (UK) Ltd.
- 9 “Ecology Summary” and “Proposed Ecology Mitigation Plan”, Thomson Ecology Ltd, February 2017.
- 10 Plan showing vehicle flows with two access points to the site, Mayer Brown.
- 11 Confirmation of Contaminated Land Desk Study. BAE Systems, May 2013.
- 12 Bourn Airfield - High Level Outline Water Cycle Study – summary. Hyder July 2015.

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