

SC6/SCDC



Examination into the Soundness of the
South Cambridgeshire Local Plan

Matter SC6 – New Settlements

South Cambridgeshire District Council

February 2017

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Introduction

1. This statement sets out the Council's response in relation to the Inspectors' Matter SC6 relating to new settlements.
2. All the documents referred to in this statement are listed in Appendix 1, and examination library document reference numbers are used throughout the statement for convenience.

New Settlements as part of the Overall Development Strategy

3. The proposed new settlements at Northstowe, Waterbeach and Bourn Airfield are a central part of the sustainable development strategy contained in the submitted Local Plans for Cambridge and South Cambridgeshire.
4. The Inspectors wrote to the Councils in May 2015¹ setting out their preliminary conclusions on a number of matters, including the overall development strategy. They invited the Councils to undertake further work to respond to the issues they raised, including that if development is to be directed to new settlements, the challenges of making such development as sustainable as possible need to have been addressed, in particular infrastructure requirements and sustainable transport options. The Inspectors commented that lack of evidence available at that stage did not provide reassurance that the Plans will deliver sustainable development.
5. The Councils' Development Strategy Update² provides a narrative setting out the approach the Councils have taken to the assessment process for both preparing the original submission plans and the additional work in response to the Inspectors' letter, and how the preferred strategy was chosen.
6. It captures the range of additional evidence undertaken by the Councils in response to the Inspectors' letter and reviews whether the submitted Local Plans include a sound strategy for meeting the development needs of Greater Cambridge for the plan period to 2031 and beyond. An update to the Sustainability Appraisal was also prepared³. The additional evidence looks at the potential to deliver sustainable new settlements as an alternative to sites on the edge of Cambridge with studies looking at Green Belt, transport, infrastructure and viability to ensure the decision on the preferred strategy is based on a full understanding of the implications of the different strategy options.
7. The Councils concluded that the evidence demonstrates that new settlements, with their focus on realising sustainable opportunities to utilise brownfield land, are capable of providing viable and deliverable developments that will be able to contribute to strategic infrastructure, on and off site, as well as providing and

¹ Letter from the Inspectors to the Councils dated 20 May 2015 regarding Preliminary Conclusions (RD/Gen/170)

² November 2015, RD/MC/060

³ Cambridge and South Cambridgeshire Local Plans SA Addendum Report (November 2015) (Revised 2016) (RD/MC/021)

contributing towards, high quality public transport links to Cambridge and elsewhere, that will attract significant levels of patronage and provide wider benefits to existing communities. The City Deal provides a significant opportunity to deliver sustainable transport to serve the wider area and, with its focus on the delivery of the development strategy, is an important fund intended to assist with any funding shortfalls that might arise.

8. Having weighed all those factors, and as a result of the further work carried out following the Inspectors' interim letter, the Councils maintained their view that the development strategy in the submitted plans, with limited modifications, provides the right balance for this plan period. The Councils submitted the proposed modifications and additional evidence to the examination in March 2016.
9. The Local Plan was prepared in a parallel with the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC)⁴. This ensured that comprehensive transport measures were considered and developed, as the plan strategy was developed. Through plan making the Councils considered strategy options available, and identified that new settlements, including the sites at Waterbeach and Bourn Airfield, would make an effective contribution to a sustainable development strategy for the Cambridge area. The TSCSC identified a range of sustainable transport measures which support the development strategy, and these have been reflected as appropriate as policy requirements in the Local Plan.
10. The recently published Housing White Paper February 2017⁵ contains a number of proposals that in the Council's view support the development strategy in the submitted Local Plans. These include the government's aim to maximise the contribution to housing supply from brownfield and surplus public land. The White Paper indicates that the National Planning Policy Framework will be amended to encourage a more proactive approach by authorities to bringing forward new settlements in their plans. It says that we need to make the most of the potential for new settlements alongside developing existing areas and that well-planned, well-designed, new communities have an important part to play in meeting our long-term housing needs. It highlights the need for new settlements to be supported by the necessary infrastructure.
11. The White Paper also makes clear that government intends maintaining the existing strong protection for the Green Belt, and clarifies that Green Belt boundaries should be amended only in exceptional circumstances. Government proposes to amend and add to national policy to make clear that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, this includes making effective use of suitable brownfield sites and the potential offered by land which is currently underused, including surplus public sector land where appropriate.

⁴ Transport Strategy for Cambridge and South Cambridgeshire 2014 (RD/T/120)

⁵ Housing White Paper: Fixing our broken housing market (RD/Gov/300)

12. The support in the White Paper for new settlements as a positive means of delivering housing, taken together with the emphasis on protecting the Green Belt and that exceptional circumstances must be identified for changing the status of existing Green Belt, is consistent with the approach taken for Greater Cambridge in the submitted Local Plans.

SC6A – Policy SS/5: Waterbeach New Town

General Policy

1.i

Does the figure of 9,000 dwellings in paragraph 1 represent the maximum number of houses that would be developed on the site in accordance with this policy?

13. A new town north of Waterbeach is a key part of a sustainable development strategy for the Greater Cambridge area. It provides an opportunity to deliver sustainable development to help meet the housing needs of the district over the plan period. It is capable of achieving an appropriate element of self-containment with high quality services and facilities to provide for the needs of its residents together with some local employment, and will provide connectivity with jobs and higher order services and facilities in and around Cambridge via high quality sustainable transport links.
14. The submitted Local Plan Policy SS/5 refers to the provision of a new town of 8,000 to 9,000 dwellings with the final number of dwellings being determined in an Area Action Plan having regard to the location and distribution of development in the town and maintaining an appropriate setting for Denny Abbey. This capacity was derived from the Strategic Housing Land Availability Assessment (SHLAA)⁶. As a high level assessment of capacity, the Council's approach for large sites over 50 hectares identified in the SHLAA was used. This applies a gross to net residential area of 40%, which allows for all non-residential uses and substantial strategic landscaping in the remaining 60%. On this basis the formula was applied to the wider Area Action Plan (AAP) area included in the submitted Local Plan as follows:

Area Action Plan area	578 ha
Net developable area (i.e. net residential area)	231 ha
Total dwellings @ 35 dwellings per hectare (net)	8,085
Total dwellings @ 40 dwellings per hectare (net)	9,248

15. The high level nature of this assessment, together with the original intention to refine it through an AAP process are indications of the Council's view that the figure of 9,000 dwellings should not, and was not, intended to represent a maximum number but one which would be refined through ongoing planning work. Since submission of the Local Plan in March 2014, further work by both promoters to support their joint representation, has suggested that the overall figure may be in the order of 10,000 dwellings. Whilst the Council does not consider that there has been a sufficiently clear demonstration of a higher capacity to change the indicative capacity in the Local Plan, it is important to ensure that there is best use made of this brownfield focused site

⁶ RD/Strat/120 Appendix 7i site 231a page 144

and hence the Council has proposed modifications⁷ to include the word 'approximately' before the 8,000 to 9,000 dwelling reference to provide this necessary flexibility.

16. Clearly at the strategic allocation stage ahead of masterplanning it is difficult to be specific on development capacity and it would not be appropriate to imply a specificity at this stage in the planning process. Neither would it be sound to limit the capacity of the site if a higher figure, arrived at through detailed masterplanning, would make best use of this largely previously developed site, which is sustainably located. As such, it is appropriate that the actual dwelling numbers to be provided on all residential allocations in the Local Plan are determined through a design-led approach. This is the policy approach is contained in submitted Policy H/1 in respect of residential allocations at villages. Modifications are proposed to the new settlement policies to similarly require a design-led approach to determine actual dwelling capacity.
17. The NPPF⁸ at paragraph 17 encourages the effective use of previously developed land (bullet 8), and states that planning should actively manage patterns of growth to make the fullest use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable (bullet 11). Paragraph 58 also states that planning policies should aim to ensure that developments optimise site potential to accommodate development. The modification proposed by the Council in November 2016 to Policy SS/5 paragraph 1 will assist to implement these by ensuring a design led approach to make best use of the site and provide flexibility in the dwelling numbers to be provided at the new town to make best use of this brownfield focused site.
18. Whilst the Council no longer intends to prepare an AAP for the site (see matter 2.i below), it is proposed to prepare a Supplementary Planning Document that will help to refine the likely capacity of the site, and inform and set appropriate principles for the masterplanning exercise that will take place as part of the planning application process. It is acknowledged that the ultimate capacity of such a large strategic site, which will be developed over the whole plan period and beyond, cannot be exactly fixed at this time. It is also relevant to note that the use of word approximately in regard to site capacity would be consistent with the wording used in submitted Policy SS/6 for Bourn Airfield.

⁷ Further Modifications to the South Cambridgeshire Local Plan (RD/FM/010) (November 2016) policy SS/5 section 1

⁸ National Planning Policy Framework (NPPF) (RD/NP/010)

1.ii

Would the proposed level of employment on the site be consistent with the proposed number of dwellings?

19. The policy does not specify a particular level of employment. The new town is not expected to be self contained in terms of employment, reflecting its primary role in the development strategy to provide a source of housing to meet needs in the area, including from new jobs arising from the successful Cambridge economy. However, the new town is expected to provide for some local employment to ensure it is not simply a dormitory town and that it has a vibrant character with activity during the day.
20. The Council has proposed a modification to Policy SS/5 paragraph 6g as submitted, related to the change from producing an AAP to an SPD to ensure a clear policy requirement. The modified policy requires employment development, of a quantum, type and mix to meet the needs of the new town to be established through an Economic Development Strategy prepared in partnership with the local authority and key stakeholders. An Economic Development Strategy has provided an effective mechanism at Northstowe, helping to identify and refine the employment role of a new settlement. The appropriate level and type of employment at Waterbeach new town will be considered through the proposed SPD.
21. The new town adjoins the Cambridge Research Park to the west of the A10, which already has 30,000 sq m of employment floorspace and consent for another 47,000 sq m⁹. It also lies close to the Science Parks¹⁰ on the northern edge of Cambridge. Cambridge Science Park alone has 145,540 sq m of floorspace or more than 1.5 million sq feet and around 5,000 jobs, with plans for this to increase through densification. The Cambridge Northern Fringe area will also be easily accessible from the new town. Proposed transport improvements to provide high quality public transport connections to Cambridge both through a new busway and a relocated railway station, along with a proposed cycle route, will provide high quality access to a significant scale of employment. The role of employment within the new town itself is primarily about place making and community building.
22. The local planning authority will expect, and the promoters intend, that there will be a number of smaller employment areas in the new town, in addition to employment in retail, leisure, schools and other services. Although the number of local jobs will be detailed in the SPD based on an Economic Development Strategy, it can be expected that the new town will provide an element of B use class jobs to help place making, including the town centre and around the new station. It should also be noted that the promoters' current view is that an appropriate level of provision would be in the order of 7,600 to 8,500 jobs, although whether this is an appropriate level of employment is clearly a matter to be considered through the processes referred to above.

⁹ <http://www.cambridgeresearchpark.com/future-development/>

¹⁰ <http://www.cambridgesciencepark.co.uk/about/faq/>

1.iii

Given the direct rail link and the new station, does the new town have the potential to become an attractive location for people who work beyond the Cambridge Sub Region e.g. in London? If so, could this factor cause local people to be priced out of the housing market in this location?

23. The NPPF¹¹ at paragraph 17 states that planning should actively manage patterns of growth to make the fullest use of public transport, walking and cycling and focus significant development in locations which are or can be made sustainable (bullet 11). Waterbeach is a sustainable location for growth, not least because of the opportunity to relocate and upgrade the existing railway station, which will provide fast and reliable access from the new town to the existing and planned jobs in Cambridge via the existing station, the new Cambridge North Station, and potentially a further new station at the Cambridge Biomedical Campus.
24. The 2011 Census¹² indicates that commuting by train to London only accounts for 2.3% of all local commuting trips (Waterbeach Ward), a lower figure than for South Cambridgeshire as a whole (2.9%), and Cambridge (3.8%).¹³ It also shows that the majority of rail journeys to work were to Cambridge or elsewhere in South Cambridgeshire (62%) compared with 29% to London. The table in Appendix 2 provides census information on commuting patterns, and shows that for the district as a whole in 2011, only 1,438 residents worked in London, representing 1.8% of employed residents¹⁴.
25. In regard to local housing affordability, the provision of a considerably increased supply of housing, 40% of which will be required to be 'affordable' housing' as defined by the NPPF subject to viability, should be seen as a significant benefit to local housing availability and affordability, which is not undermined by the fact that a small percentage may work in London. .

1.iv

Would the proposed new town result in an unacceptable loss of good quality agricultural land?

26. The need to identify and maintain a large supply of land for development in the district means there is pressure for the development of agricultural land. The Map of Agricultural Land Classification¹⁵ for the district demonstrates that the vast majority of the district comprises grades 1, 2, and 3 agricultural land, with only small isolated areas of grade 4 or 5.

¹¹ National Planning Policy Framework (NPPF) (RD/NP/010)

¹² Census 2011 (RD/NP/150)

¹³

<http://www.nomisweb.co.uk/query/construct/summary.asp?mode=construct&version=0&dataset=1208>

¹⁴ There are a number of railway stations in or close to the district including at Cambridge, Royston, Meldreth, Foxton, Great Shelford, Whittlesford, Great Chesterford, Waterbeach, St Neots, and Huntingdon).

¹⁵ RD/Sub/SC/060 Draft Final Sustainability Report Part 2 Annex 1 chapter 10 figure 5 Page 2A-8

27. The site includes over 200ha of good quality agricultural land (mostly grade 2 with some grade 3) out of a total site area of around 560 hectares (the airfield and barracks which form the majority of the site as PDL are unclassified). The Draft Final Sustainability Appraisal¹⁶ at page B1116 records a significant negative impact from the loss of productive agricultural land, above the 20 hectare threshold above which Natural England have to be consulted on planning applications for the development of such land. The National Planning Policy Framework (NPPF) requires that Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land.
28. South Cambridgeshire has a significant resource of good quality agricultural land. Agricultural land classification provides a uniform method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. The most productive and flexible land falls into Grades 1 and 2 and Subgrade 3a and collectively comprises about one third of the agricultural land in England and Wales. Within South Cambridgeshire district there are significant areas of this higher quality agricultural land, meaning that development needs cannot be met without the use of such land. This was highlighted by the Sustainability Appraisal, which identified that all development strategy options would have negative impacts on agricultural land¹⁷.
29. The development of the new town will take place partly on one of the largest areas of PDL in the district. The benefits of reusing previously developed land were identified in the Sustainability Appraisal. The strategy options which could utilise significant areas of previously developed land included either or both of two new settlement options, at Waterbeach and Bourn Airfield, which scored more highly against the 'land' theme, and the sustainability objective to minimise the irreversible loss of undeveloped land¹⁸. If development were to take place elsewhere there would be a greater loss of agricultural land.
30. Finally it can be noted that Natural England has generally supported the allocation at Waterbeach and the provisions of Policy SS/5 (representation 59947).

1.v

The policy and reasoned justification makes reference to the significant amount of new infrastructure which will be required as a consequence of the development. 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/H) is accepted, whilst not putting at risk the overall viability of the development?

¹⁶ RD/Sub/SC/060 Annex B SHLAA site 231

¹⁷ Supplement to Sustainability Appraisal Addendum Report (November 2015) (Revised March 2016) (RD/MC/021) Chapter 7 Strategic Development Alternatives Table 7.2 (page 99).

¹⁸ Supplement to Sustainability Appraisal Addendum Report (November 2015) (Revised March 2016) (RD/MC/021) Chapter 7 Strategic Development Alternatives Table 7.2 (page 99)

31. As required by the NPPF paragraph 177 there is a reasonable prospect of planned infrastructure being made available, and in a timely manner to support development.
32. The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC)¹⁹, which was prepared in parallel with the Local Plans, identifies infrastructure that would be needed to support the new settlements, including Waterbeach new town. The TSCSC proposes to create a new High Quality Public Transport (HQPT) route on the A10 corridor serving Waterbeach New Town, a new park and ride, and a relocated Waterbeach Railway Station. It includes measures to develop highly accessible pedestrian and cycling infrastructure.
33. The transport infrastructure requirements for the Waterbeach new town, including in the wider A10 corridor, are reflected in Policy SS/5. The policy also identifies a range of services and facilities and infrastructure that will be required to serve a settlement of this scale.
34. Significant additional work was undertaken by the Councils in 2015 in response to the Inspectors' letter of May 2015²⁰, which included a suite of updated evidence documents reviewing the appropriateness and deliverability of the development strategy contained in the submitted local plans.
35. The Development Strategy Update November 2015²¹, concludes that new settlements provide an opportunity to focus growth on key radial routes into Cambridge and bring with them significant improvements to deliver high quality public transport and cycling access into Cambridge, connecting with key destinations. This has the potential to deliver significant improvements to existing settlements along these corridors, both within and beyond the Greater Cambridge area. In the case of the A10 corridor, it currently experiences congestion, and the transport improvements to be delivered through the proposed development strategy offer the opportunity to provide high quality and reliable sustainable travel choices to both residents of the proposed new community as well as existing residents.
36. The new settlement north of Waterbeach will create a need for new infrastructure, but will also create significant development value with opportunities to provide and fund new infrastructure to meet the needs generated. There are also other sources of funding, including the City Deal, which can support the delivery of a sustainable new settlement.
37. The transport measures identified in the TSCSC were reviewed and confirmed by a new Local Plan Transport Report²². An A10 Corridor Constraints Study²³ was also

¹⁹ Transport Strategy for Cambridge and South Cambridgeshire (RD/T/120)

²⁰ Letter from the Inspectors to the Councils dated 20 May 2015 regarding Preliminary Conclusions (RD/Gen/170)

²¹ Cambridge and South Cambridgeshire Development Strategy Update (November 2015) (RD/MC/060)

²² Local Plans CSR – Cambridge and South Cambridgeshire Local Plans Transport Report, (November 2015) (RD/MC/070)

prepared, which demonstrated that the measures identified in the TSCSC are capable of being delivered.

38. The Cambridge and South Cambridgeshire Infrastructure Delivery Study 2012, was updated in November 2015²⁴ and included specific consideration of the infrastructure requirements and deliverability of Waterbeach new settlement. The Cambridge and South Cambridgeshire Local Plans Viability Update²⁵ also in November 2015 provides a strategic viability assessment appropriate to this stage of the planning process. The Viability Update informed the Infrastructure Delivery Study Update, which considered the delivery and funding of infrastructure.
39. The Infrastructure Delivery Study Update²⁶ in identifying the infrastructure needs of the new town, considered potential funding opportunities, in particular developer funding. It also took account of development viability. It concluded that there are sufficient funding opportunities to deliver the site specific infrastructure requirements, as well as potential to make an appropriate contribution to off-site transport infrastructure (see chapter 15).
40. The major infrastructure development proposals identified in the Local Plan as necessary to support the new settlement are not the sole purpose of many of these improvements. As such, it is intended that the development will make an appropriate contribution towards the funding of the schemes identified in the relevant Local Plan policies, via Section 106 or CIL.
41. The City Deal for Greater Cambridge will make a significant contribution to funding, and provide added certainty regarding commitment to delivery. The City Deal has secured a commitment for up to a total of £500 million of Government funding. The £100 million that has already been secured as the first tranche of funding, with two further five-year tranches with up to £200m each. The City Deal has already been considered at the examination at a number of matters including Matter 2: Strategy, Matter 5: Infrastructure, and Matter 7: Transport. In particular Appendix 4 to Matter 7 provides information about the City Deal and its role in helping to deliver sustainable transport infrastructure to support the development strategy.
42. The City Deal Board Report March 2016²⁷ agreed a position statement setting out the role of the City Deal in supporting the delivery of the development strategy contained in the Local Plans so as to provide clarity about how it will prioritise funding. Paragraph 7 of the statement states that “the City Deal will support delivery of the strategy set out in the Cambridge and South Cambridgeshire Local Plans through investment in transport infrastructure, housing delivery and skills.” Also that this is consistent with “a key objective of City Deal, namely the delivery of transport schemes necessary to support continued economic growth, including through

²³ A10 Corridor Constraints Study: Constraints Assessment February 2016. Cambridgeshire County Council (RD/MC/074)

²⁴ Cambridge and South Cambridgeshire Infrastructure Delivery Study (November 2015) (RD/MC/080)

²⁵ Cambridge and South Cambridgeshire Local Plans Viability Update (November 2015) (RD/MC/090)

²⁶ Cambridge and South Cambridgeshire Infrastructure Delivery Study (November 2015) (RD/MC/080)

²⁷ City Deal and the Cambridge and South Cambridgeshire Local Plans (March 2016) (RD/MC/110)

improved network connectivity and by supporting the sustainable development strategy included in the submitted Cambridge and South Cambridgeshire Local Plans”.

43. The report goes on to state in paragraph 13 that “the City Deal partnership is confident about the funding and delivery of schemes identified in Tranche 1 and thereafter. The City Deal is investing in infrastructure schemes to ensure continued economic growth. The delivery of housing and employment is an important part of ensuring continued economic growth in the Greater Cambridge area, and thus the achievement of the City Deal objectives. Therefore, and consistent with this, in the event that the need to do so arises, the City Deal Board will consider favourably the prioritisation of those schemes that deliver the infrastructure to support housing and employment growth within the Local Plans. The list of schemes will be kept under review and amended as required as the programme rolls forward to ensure it best meets infrastructure priorities in the area.”
44. The delivery of the new settlement is now anticipated earlier than when the original prioritisation was made. The City Deal Board agreed in December 2016²⁸ an objective for Tranche 2 (2020-2025) prioritisation, being to ensure that those investments support the growth strategy set out in the Local Plans and the supporting Transport Strategy for Cambridge and South Cambridgeshire. Notwithstanding, City Deal Tranche 1 funding is already being used to develop potential Tranche 2 schemes. This includes funding a study of the A10 (north), which is currently underway. Developers in the corridor, including the new settlement promoters, are also contributing funding to the study.
45. Work to develop a City Deal investment strategy to deliver the City Deal vision and objectives, and to allocate resources for Tranche 2 is already in the early stages of preparation.
46. As identified in the question, the Council put forward a Proposed Modification to the examination in March 2016 response to the Inspectors’ letter of May 2015 (reference PM/SC/3/H) that removes the restriction on development prior to 2026 contained in the submitted Local Plan²⁹. This date was not identified on the basis of delivery of infrastructure, but on the anticipated lead in time for a new settlement based on circumstances at the time the plan was submitted in early 2014 and experience at Northstowe.
47. Significant progress has been made since the submission of the Local Plan, including the appointment of Urban & Civic by DIO in September 2014 as their development partner, their working up of proposals including with significant community engagement, and the submission of an outline planning application on 17 February 2017 for 60% of the site. There is therefore a reasonable expectation of considerably earlier delivery than at the time the plan was submitted.

²⁸ Greater Cambridge City Deal Executive Board 8 December 2016 – Tranche 2 prioritisation (RD/CR/740)

²⁹ South Cambridgeshire Local Plan Proposed Modifications (March 2016) (RD/MC/150)

48. The housing trajectory update in November 2015³⁰, updated in the Annual Monitoring Report December 2016³¹, made a number of changes to assumptions for delivery of housing, including reduced delivery rates at a number of strategic sites to take a more cautious approach, and now anticipates development two years earlier at Waterbeach. The revised start date is not as early as the promoters have suggested, and the Council is taking a more cautious but balanced approach to housing delivery.
49. The Local Plan, as modified, does not prevent earlier delivery at Waterbeach than the Council's trajectory envisages, if it can be delivered in an appropriate way. Local Plan policies (in particular Policy TI/8) continue to require necessary infrastructure to be in place for all stages of development, or for phased delivery when it is needed. Such an approach is achievable at the Waterbeach New Town. Phasing of delivery will be a matter considered through the proposed SPD.
50. In terms of phasing of development, it is not necessary for all the infrastructure measures identified in the policy to be in place for the start of development to take place, including transport infrastructure. The County Council will be a key stakeholder in the preparation of the proposed SPD, along with the new town promoters and other stakeholders. The SPD will provide further guidance regarding levels of development that could be accommodated prior to the different pieces of infrastructure being available. This includes the phasing of transport measures, which are also being explored by the A10 study, and how the delivery of these measures will relate to phasing.
51. Another infrastructure requirement necessary to deliver the Waterbeach new town is additional Waste Water Treatment capacity, although there is some capacity for early phases in the existing facility within the site. There are options available to provide the necessary infrastructure enhancements and Anglian Water have advised that they consider there to be practicable solutions. This issue is addressed in further detail in Question 1.x.
52. In terms of education provision: primary school capacity is likely to be needed to accommodate early phases, reflecting experience on other sites; whilst secondary education will be phased in, taking account of capacity in other schools in this part of the district. This can be appropriately addressed through a S106 and the County Council supports this approach (see Appendix 8).

1.vi

Should the policy clarify how the proposed new town would relate to the setting of the River Cam adjacent to the site?

53. The new town site does not lie adjacent to the River Cam, being approximately 550 metres from it in the south, and 880 metres from it in the north, and being separated from it by a railway line and numerous field boundaries with hedges and trees. Access to the river can be had at the eastern end of Bannold Road and also on the

³⁰ RD/MC/050

³¹ South Cambridgeshire District Council Annual Monitoring Report 2016 (RD/AD/480), Table SC1a, page 46.

road between Waterbeach and Clayhithe further to the south of Waterbeach village. There is no need for policy to clarify its relationship to the river, and there would be no significant direct adverse impact on the setting of the River Cam although it is likely that the new settlement will be visible in views from the Cam to some degree. Section 9b of the policy as proposed to be modified already requires the provision of strategic landscaping to deliver high quality environs.

1.vii

Does the area of land identified on Inset H of the Policies Map provide sufficient capacity to achieve the quantum of development associated with the new town whilst ensuring that the setting and historic significance of Denny Abbey is preserved or enhanced?

Should the policy include a requirement for a setting study to be submitted at Local Plan the planning application stage in respect of the relationship of the development to the designated heritage assets within the site?

54. Yes, the area of land identified on Inset H of the Policies Map³² does provide sufficient capacity to achieve a site capacity of approximately 8,000-9,000 dwellings, but also see matter 1.i above.
55. Policy SS/5, as proposed to be modified, in section 1 states that the final number of dwellings will be determined through a design-led approach and spatial framework included in an SPD having regard to maintaining an appropriate setting for Denny Abbey listed building and scheduled monument. Section 5 of the policy states that the built area of the settlement will be contained within the major development site and the location of land uses and design of the northern edge of the new town will ensure an appropriate relationship with Denny Abbey. Section 9 requires the provision of strategic landscaping to screen views of the town from Denny Abbey, the conservation and enhancement of the significance of Denny Abbey including the contribution made by its setting, the extent and nature of separation from built development and formal open spaces, and protection of key views to and from the Abbey. Section 10 states that the new town will provide and retain woods, hedges and water features that will help preserve and enhance the setting of Denny Abbey, and section 11 requires a review of the access arrangements to Denny Abbey. These policy elements together will ensure that the setting and historic significance of Denny Abbey is preserved and enhanced.
56. An important consideration in deciding where the northern limit of built development at the new town should be is the need to make best use of this strategic site whilst providing an appropriate setting for Denny Abbey, which is a Scheduled Monument and Grade 1 Listed Building.
57. The submitted Local Plan boundary was agreed with English Heritage before the Local Plan was submitted for examination in March 2014, following site visits that included the site promoters. English Heritage made representations to the proposed

³² [Proposed Submission South Cambridgeshire Policies Map](#) (RD/Sub/SC/020)

submission Local Plan to this effect (representation 59748) and advised that a setting study was needed to confirm whether any refinements to the boundary were justified.

58. Setting studies were subsequently prepared by each of the two site promoters. For RLW, a setting study is provided by a 'Denny Abbey and its setting: Analysis and Recommendations for Waterbeach New Town' document (November 2014)³³, informed by a 'Landscape and Heritage Appraisal of Denny Abbey and its Setting' (October 2013, submitted as part of their representations to the examination)³⁴. For Urban & Civic a setting study is provided by a 'Heritage Appraisal of the Proposed Development of Waterbeach MOD site and Neighbourhood' (April 2016)³⁵. The RLW study concluded that a different boundary to that in the submitted Local Plan was justified. That boundary would be one field further to the north on the east of the site, it would be pulled back further south, to the south of Denny Abbey, and extend further north on the west part of the site. The Urban & Civic study only looked at the western boundary and concluded that a boundary south of Denny Abbey could extend further to the north than the submitted Local Plan boundary (or that in the RLW study).
59. Officer reports to the 8 November Planning Portfolio Holders meeting³⁶ and to Council on the 17 November 2016³⁷ were advised that the site promoters had agreed a joint position on the boundary that was currently being considered by Historic England (the new name for English Heritage), and that if Historic England concludes that the boundary could be revised whilst retaining an appropriate setting to Denny Abbey, it would be consistent with the approach taken in the submitted Local Plan to consider modifications to give effect to such a change.
60. Historic England has considered both of the promoters' studies and has now confirmed a clear preference for a northern limit of built development that follows the line in the RLW study which provides for a larger open landscaped buffer between Denny Abbey and the built edge of the new town due south of the Abbey, along the line of the ancient causeway route to the Abbey from the village. In doing so they have rejected the promoters' jointly agreed boundary.
61. The Historic England statement to this hearing has been shared with the Council. It states (paragraph 23) that "Historic England's key area of concern with respect to the definition of the northern limit of development in relation to the setting of Denny Abbey is the area around the earthwork causeway orientated towards Soldiers Hill." It states (paragraph 21) that "the historic setting of Denny Abbey is centred on its remoteness. Located on a small island of raised, dry land on the fen edge, west of the River Cam and north of Waterbeach, it was accessed to the south by a short causeway linking it to routes south to Waterbeach". The heritage significance of Soldiers Hill located on this causeway is therefore particularly important and Historic England considers it

³³ RD/SS/320

³⁴ RD/SS/310

³⁵ RD/SS/330

³⁶ South Cambridgeshire District Council Planning Portfolio Holders Meeting 8 November 2016 South Cambridgeshire Local Plan Update (RD/CR/660)

³⁷ South Cambridgeshire District Council Meeting 17 November 2016 - South Cambridgeshire Local Plan Update (RD/CR/670)

important to “step development back” (paragraph 24) from the Abbey, further than in the submitted Local Plan in the area around the Causeway and Soldiers Hill.

62. However, Historic England considers that there are areas towards each end of the northern boundary that are further away from Denny Abbey and where additional land could be included in the Major Development Site whilst providing an appropriate setting to Denny Abbey (paragraph 25 bullet point 6).
63. The Council’s position, as set out in the report to the Planning Portfolio Holder on 8 November and Council of 17 November 2016, is to take account of the advice of Historic England which has been reached in light of its detailed consideration of the appropriate boundary having regard to setting studies prepared since the submission of the Local Plan.
64. The boundary preferred by Historic England has given more detailed consideration to the land that should be retained as setting of Denny Abbey than was possible at the time the Local Plan was submitted and will ensure that the most sensitive part of the setting is reflected in the boundary of the Major Development Site. This alternative boundary would also provide a slightly larger development area than the boundary in the submitted Local Plan and so would make best use of the proposed allocation, a large part of which is previously developed land. Not all of this additional land will necessarily be built on and it is not proposed to increase the capacity of the site from approximately 8,000 to 9,000 dwellings. The location, design and treatment of development along the northern boundary of the new town will be a matter for consideration in the proposed Supplementary Planning Document.
65. In this situation the submitted Local Plan boundary for the Major Development Site would not be sound without a modification to the boundary of the Major Development Site shown on Inset Map H that reflects the views of Historic England.
66. The Council is therefore proposing a main modification to the Local Plan as set out in Appendix 5 and as shown on the attached map. This decision will need to be agreed by Full Council on the 23 February 2017 and the Council will subsequently notify the Inspector and Matter SC6A hearing participants of their decision.

1.viii

Would any of the existing facilities within the site be retained e.g. sports facilities?

67. The Local Plan (Policy SS/5 6k as submitted, para 8c as proposed to be Modified in November 2016) requires the new town to provide sports and leisure facilities, but does not require existing facilities to be retained given that these may have a limited service life, be too small for a new town or eventually be found to be in the wrong place once the masterplanning of the new town has been completed. Nevertheless it is understood that the site promoters already have brought some facilities back into use and the district council has granted planning permission to secure constructive on-going use of these facilities (including the re-use / re-opening of the existing squash courts, sports hall and tennis courts, reuse of redundant buildings to provide a community meeting space and museum, and use of the watch tower building to

provide office and meeting space for Urban & Civic). The site promoters matter statement is expected to provide additional details of their strategy in respect of existing facilities.

1.ix

Would the provision of town centre uses be detrimental to the existing convenience retail offer in Waterbeach village?

68. No. Policy E/21 of the Local Plan states that the new town centre at Waterbeach will be at the top of the retail hierarchy in the district, and paragraph 8.69 explains that convenience and comparison floorspace provision will be of a scale necessary to ensure that the settlement is sustainable but not of a scale where they could perform a sub-regional role to compete with the role of Cambridge. Policy SS/5 (Policy SS/5 6h as submitted, para 8c as proposed to be Modified in November 2016) requires that this provision should avoid significant impacts on the vitality and viability of surrounding centres, and section 16 (as proposed to be Modified in November 2016) states that the phasing of the new town must be in accordance with the a spatial framework diagram to be set out in the SPD and be informed by appropriate evidence reports, assessments and evidence reports. This will include the phasing of the delivery of the principal town centre. Policy E/21 section 4 states that where impact assessments indicate significant adverse impacts on an existing town or village centres development will be refused. Taken together these policies will enable the scale, location and phasing of the town centre uses in the new town to be controlled to ensure that they can serve the new town as it develops without unacceptable impact on the convenience offer in Waterbeach village.
69. Village Services and Facilities Studies for the existing village from 2012 and 2014³⁸ both record the existing 'retail' offer in the village as follows: a bakery, butcher, two newsagents, a village store, a post office and a pharmacy. Anecdotal evidence has recorded that the closure of the barracks in early 2013 with the loss of 950 service personnel plus family members has impacted their trading but the studies identify no loss of retail services over this period. Evidence of the experience of settlements close to Cambourne is also of relevance. Cambourne grew rapidly between 2001 and 2011³⁹ from 900 residents to 6,800 a 656% growth rate and yet there is no evidence of any loss of village convenience retail in local villages.
70. The existing convenience offer in the village can be expected to benefit from additional trade before provision is made on site, and in the longer term, the considerably increased retail expenditure from new residents and employees within the new town will also help to sustain existing village shops and facilities.
71. The new town will eventually provide for a different order of magnitude and range of services and facilities in additional to the provision of local convenience shops.

³⁸ RD/Strat/250 (for 2014), and RD/Strat/251 (for 2012)

³⁹ Cambourne West Employment and Economic Impact Assessment (RD/SS/300), table 4.1

1.x

Would other land not identified on Inset H of the Policies Map be required to facilitate storm and foul drainage arrangements?

72. Section 13 of policy SS/5 requires the development to make appropriate arrangements for foul drainage and sewage disposal and to provide, manage and maintain sustainable surface water drainage measures to control the risk of flooding on site and reduce the risk of flooding both downstream and upstream of the development. Further detail is added by submitted Local Plan Policy CC/7 'Water Quality' which addresses foul drainage, and by Policy CC/9 'Managing Flood Risk'. Section c) of this policy specifically requires there to be no increased flood risk downstream and that the discharge of surface water post development should be limited to natural greenfield rates or lower.
73. The Joint Position Statement on Foul Water and Environmental Capacity in relation to Proposed Development within South Cambridgeshire District (January 2014)⁴⁰ sets out the position of Anglian Water and the Environment Agency at the time of submission on waste water treatment issues within South Cambridgeshire and the associated environmental implications. It states that the location of the proposed new town is currently served by a small Water Recycling Centre (WRC) that has insufficient capacity to serve this proposal. The preferred option is to build a new WRC to serve the proposed development, and initial assessment suggests that final effluent could be discharged into the River Cam without causing environmental damage.
74. The Water Cycle Study (WCS) prepared by Mott MacDonald with input from Anglian Water and the Environment Agency for RLW Estates in December 2014⁴¹ considers the options for providing this infrastructure. The preferred option identified in the WCS is the provision of a new WRC to deal with flows from the new town and the existing village with discharge to the River Cam. This would allow the decommissioning of the existing works.
75. The WCS proposes that the WRC could be located between the railway line and the River Cam on land within the control of RLW Estates, but outside the development site area. In this regard this is no different from the provision of off-site highway works. Expansion of the existing WRC which lies within the development site area is not considered to be necessary and would significantly reduce the land available for development due to the necessary cordon-sanitaire which would have to be kept undeveloped around the site. This issue will be considered further in the proposed SPD.
76. The WCS also addresses arrangements for storm water drainage. It concludes following input from the Waterbeach Internal Drainage Board and the Environment Agency, that sustainable drainage water storage areas should be provided to cope with storm water. The topography and the location of the internal drainage board watercourses make it practical that some of these features can be located outside of

⁴⁰ RD/Sub/SC/082, [agreed by Anglian Water and the Environment Agency](#)

⁴¹ Denny St Francis Water Cycle Study (RD/SS/340), pages 94 and 113

the major development site to the north and east. Section 7 of Policy SS/5 as proposed to be modified makes specific reference to this land providing drainage structures as well as for habitat compensation and informal open space. This type of solution has already been implemented for Cambourne and the urban extensions around Cambridge, has been agreed for West Cambourne, and is proposed to be employed at Bourn Airfield.

1.xi

Should the policy specifically require a surface water and foul water drainage water strategy?

77. No, this is already addressed by policy SS/5 at section 13c (as modified) and by Policy CC/7 (see matter 1.ix above).

Future Area Action Plan Development Plan Document (AAP)

2.i

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?

78. The preparation of AAPs for each new settlement was considered an appropriate approach when the Local Plan was submitted in March 2014, following on from the preparation of AAPs as part of the suite of adopted Local Development Framework documents. These include AAPs for Cambridge East (an urban extension for 10,000 dwellings)⁴², Northstowe (a new town for 10,000 dwellings)⁴³ and North West Cambridge (to accommodate the long term growth of Cambridge University)⁴⁴.
79. The Council has obtained legal advice regarding the status of the proposed AAPs, and whether they remain the correct approach in law to providing further planning guidance for these major proposals, having regard to the nature and context of the documents proposed and relevant statutory provisions and recent case law. In recent years there has been extensive consideration of this matter by the Courts, which has clarified the legal definition and relationship of local plans (including AAPs) and SPDs. The legal advice which has been received has confirmed that the matters intended to be included in the second tier planning documents within each of Policies SS/5 and SS/6 should, as a matter of law, be prepared as SPD. The advice to the Council is that, as such, the documents the Council intends to prepare pursuant to Policies SS/5: Waterbeach New Town and SS/6; New Village at Bourn Airfield, in law, should appropriately be prepared as SPD rather than as AAP (which now fall under the term "local plan" under the 2012 Regulations). It is therefore considered that these

⁴² Cambridge City Council & South Cambridgeshire District Council - Cambridge East Area Action Plan (RD/AD/280)

⁴³ South Cambridgeshire District Council Northstowe Area Action Plan (RD/AD/130)

⁴⁴ Cambridge City Council & South Cambridgeshire District Council - North West Cambridge Area Action Plan (RD/AD/290)

planning documents should be prepared as SPD and not as AAP. This advice is appended for information in Appendix 3.

80. The preparation of SPDs for Waterbeach new town and Bourn Airfield new village would rectify this issue. However, this change does necessitate certain consequential modifications to Policies SS/5 and SS/6 to ensure comprehensive statutory policies that provide an appropriate and sufficient framework for the preparation of SPD and ultimately for the determination of planning applications. This is addressed in the Council's response to matter 3i.
81. The Council proposed further modifications in November 2016⁴⁵ that the further guidance for the new settlements should be prepared as SPD rather than AAP. In December 2016⁴⁶ it agreed to commission consultants to prepare the SPD on the Council's behalf and it is expected that a procurement process will commence in March 2017. The Council would then be in a position to adopt an SPD as soon as possible after the adoption of the Local Plan.

2.ii

Paragraph 6n: Should reference also be made to measures to mitigate the effect of the development on the wider landscape area including Landbeach and Milton settlements?

82. Section 9 b of the policy as proposed to be modified requires the provision of strategic landscaping within and beyond the Major Development Site to deliver high quality environs and section 9 d requires the conservation of Car Dyke which runs to the east of the A10. Policy HQ1 will also apply and is intended to ensure that development will preserve and enhance the special character of the district generally and of the locality specifically. These measures will mitigate the effect of the development on the wider landscape. Existing hedges and woodland areas on the edges of the site can be retained as appropriate and scope exists to retain and reinforce existing bunding alongside the A10. These are matters which can be appropriately detailed in the SPD.
83. In regard to Landbeach it should be noted that it is around 1.2 kilometres from the proposed new town and is separated from it by fields with hedges and some woodland patches. In regard to Milton this is located around 3 kilometres south of the new town and with the existing village of Waterbeach between the two and so is very unlikely to be visible.
84. Finally it should be noted that none of the surrounding landscape is a designated landscape within which planning permission for major development should be refused for major development except in exceptional circumstances (NPPF paragraph 115 and 116⁴⁷). Policy SS/5 already makes special provision in regard to Denny Abbey as set out in response to matter 1.vii above.

⁴⁵ RD/FM/010

⁴⁶ [South Cambridgeshire District Council Planning Portfolio Holder Meeting 13 December 2016](#)
(RD/CR/690)

⁴⁷ National Planning Policy Framework (NPPF) (RD/NP/010)

2.iii

Paragraph 6p: Would the assessment of heritage assets also include World War II structures on the site which may be worthy of retention?

85. Yes, Policy SS/5 as proposed to be modified already includes reference to World War II structures in section 9 d (see proposed modification reference MC/3/05 dated March 2014⁴⁸).

2.iv

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

86. Yes, Policy SS/5 section 10 requires the provision and retention of woods, hedges and water features, to provide connectivity between them, to restrict public access to enhance biodiversity within certain restricted areas, to manage green infrastructure to enhance ecological value, to consider the multifunctional value of spaces and to carry out a full programme of ecological surveys and monitoring to guide a Biodiversity management plan to provide appropriate mitigation and enhancement.
87. Section 7 of the policy states that land outside the Major Development Site can provide other associated uses including habitat compensation. Policy NH/4 'Biodiversity' requires new development to maintain, enhance, restore or add to biodiversity.
88. The site was considered through the SHLAA⁴⁹ process which concluded that impacts were capable of appropriate mitigation. The site has been subject to a number of ecological surveys by the promoters: badger, bats, water vole, amphibians, reptile, birds, invertebrates, Phase 1 Habitat Survey⁵⁰ and detailed (targeted) botanical survey. These surveys have identified that the site has a rich ecology which presents opportunities to draw on and develop the landscape in a way which establishes distinctive places. It identifies that high value habitats will be retained with any discrete losses compensated, ensuring a balance between wildlife and future public access. The information provided, and potential enhancement or mitigation measures, will be considered further through the SPD and planning application process.
89. Finally it should be noted that the new town proposal is not subject to objection from Natural England. In fact in rep 59947 they express support for policy SS/5 as follows: 'the strategic sites policies generally seek to ensure that environmental issues, including ecological impacts and mitigation, will be fully addressed and landscape, biodiversity, green infrastructure and access are protected and enhanced where possible. We particularly welcome requirements to retain and enhance existing ecological features and link these to areas of open space to provide a network of

⁴⁸ Schedule of Proposed Minor Changes following Proposed Submission Consultation (March 2014) (RD/Sub/SC/040)

⁴⁹ Strategic Housing Land Availability Assessment (SHLAA) - Update 2013 (RD/Strat/140)

⁵⁰ LDA Ecology Phase 1 Update Summary Report (July 2012) (RD/RLW & DIO/090)

accessible green infrastructure. Requirements for the incorporation of multi-functional SuDS and sustainable transport are also welcomed’.

2.v

Paragraph 6x: Would the relocation of the railway station be detrimental to the residents of Waterbeach village in terms of the increased travel distances to a sustainable mode of transport?

90. Policy SS/5 section 11 as proposed to be modified requires the provision of a relocated railway station with appropriate access arrangements by all modes to serve the village and the new town. It also states that the new town will be founded on a comprehensive movement network for the whole town that connects key locations including the railway station to encourage the use of sustainable modes of travel. The relocated station would have much better passenger facilities including car and cycle parking than the existing station. The exact location of the new railway station will be agreed as part of the SPD and subsequent planning applications. A location close to the existing village will be sought to best serve the existing village, and for parts of the existing village, such a location will be closer than the existing station.
91. The existing station alone could not provide for the new town. It has inadequate parking, sits astride a level crossing with its inherent dangers and accessibility constraints, and cannot easily be extended to accommodate the longer trains that are planned for introduction north of Cambridge. Its retention would also mean traffic from the new town coming through the existing village which already suffers from congestion and heavy on street parking close to the existing station. These limitations are expected to be addressed by the relocation of the Waterbeach Station, consistent with the submitted policy.

2.vi

Paragraph 6hh: 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?

92. No, the plan needs to be read as a whole to avoid confusion which can be the result of sometimes including cross references and sometimes not, for example if the cross reference is added for one site allocation but not for all others, and would raise questions about the policy requirements for all the other sites.
93. The November 2016 proposed modification⁵¹ to section 16c of Policy SS/5 should also be noted which relates to the planning and delivery of necessary infrastructure.

⁵¹ RD/FM/010

2.vii

Paragraph 6ii: Would the flood risk reduction measures be sufficiently resilient to the effect of climate change over the lifetime of the new town given that it is low lying land? Would this form part of the flood risk assessment for the site?

94. Yes. In summary, the risk of flooding is considered to be low and appropriate flood mitigation measures can be implemented as needed.
95. The significant majority of the site is located within Zone 1 (Low risk). A Waterbeach Water Cycle Study (2014)⁵² has been prepared for the site by the developers in consultation with relevant agencies, exploring flooding and drainage issues related to the site. This included an assessment of any residual risks, including detailed additional hydraulic modelling to the River Cam related breaching of defences in extreme events. The study concluded that appropriate mitigation measures were available to address these residual risks which apply to a limited part of the site.
96. The EA released on 19 February 2016 new climate change guidance which superseded the 'Flood and coastal risk guidance: climate change allowances (2013)' and forms supplementary guidance to the National Planning Policy Framework (NPPF).⁵³ This guidance recommends for Anglian region and the design life of the development, to include a climate change allowance for peak river flows from 25% CC allowance (Central Percentile) up to 65% CC allowance (upper end) for peak river flow. The climate change allowance to be applied to this development site will be discussed and agreed with the EA. It is anticipated that based on the 2014 River Cam breach hydraulic modelling outcomes, the increase in the climate change allowance will have limited impact on the extent of flooding (although it is anticipated that the depth of flood water might increase slightly) and it will be the north eastern-most corner of the site that will be affected. As previously described above, appropriate flood risk mitigation measures are available could include land use placement, ground raising and/or flood bunds.
97. At application stage a site-specific FRA will be required to be submitted for the site which will need to respond to the guidance set out in National Planning Policy Framework and National Planning Policy Guidance, the EA guidance on climate change as well as Regional and Local policies. The FRA will need to be prepared in consultation with key stakeholders including the EA, the Internal Drainage Board, Anglian Water and South Cambridgeshire District Council. The FRA will need to assess all potential sources of flooding that may affect the proposed development site and based on that, strategic measures for sustainable flood risk management (including the management of surface water runoff using SuDS) as well as mitigation of climate change impacts over the lifetime of the development will be set out. The exact details of these will be defined as part of the planning application.

⁵² Denny St Francis Water Cycle Study (December 2014) (RD/SS/340)

⁵³ Flood risk assessments: climate change allowances (RD/Gov/310)

2.viii

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

98. No, this not a planning matter and can be best addressed through other statutory procedures. It can be noted that a new parish was created to encompass Cambourne at an appropriate time after the commencement of the development and Cambourne Parish Council has already requested that a similar process take place with regard to Cambourne West.

2.ix

Paragraph 6kk and 6ll: 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?

99. Yes, a large portion of the site has always been in agricultural use without concern. Military airfields have been decontaminated locally without prejudicing their development viability at Northstowe and Cambourne (part of the wartime Bourn Airfield was located to the west of the Broadway) and the matter is properly one for resolution at the planning application stage.

Council's Further proposed modifications November 2016

3.i

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

100. Yes, the Council has set out above in its response to matter 2i why it is preparing a Supplementary Planning Document for the site to add necessary detail to Policy SS/5 rather than an Area Action Plan. The great majority of the modifications flow from this change, so as to provide clarity on what the SPD is expected to include and to ensure that policy SS/5 reads clearly.
101. An annotated table of Policies SS/5 and SS/6 including all proposed modifications is attached as Appendix 4 . This sets out a fuller soundness justification for each proposed change than was included in the November 2016 Proposed Modifications document.⁵⁴

⁵⁴ Further Modifications to the South Cambridgeshire Local Plan (RD/FM/010)

Matter SC6B - Policy SS/7 Northstowe Extension

General Policy

1.i

Is there a realistic prospect that the reserve land to which the policy relates would be required for development within the Plan period? If so, should this be reflected in Figure 3 of the Plan (Housing Trajectory)?

102. To distinguish the land in question it is addressed as the 'reserve land' for the purposes of this question, although it is included in the submitted Local Plan as a firm allocation.
103. As detailed in Policy SS/7, the 'reserve land' from the Northstowe AAP is being brought forward as a firm allocation in the Local Plan to enable the comprehensive planning of the new town, and is needed in order to achieve the delivery of the 10,000 homes identified in the Area Action Plan. This is reflected in the Northstowe Area Development Framework (endorsed by the Council in 2012)⁵⁵, where the Framework Masterplan includes the 'strategic reserve land' as defined in the NAAP. This has the advantage of providing a comprehensive approach to the planning of the strategic reserve land, ensuring it is integrated with and connected to the first phase of development. It also provides flexibility in the way the construction of the town is phased. Planning for development of phase 3, which the HCA has advised will include both the remainder of the site allocated in the AAP and the reserve land from the AAP that is proposed to be firmly allocated in the Local Plan, is likely to commence this year.
104. Whilst the Council is not relying on the 'reserve land' to deliver the 3,445 dwellings recorded in the AMR⁵⁶ as expected to be delivered at Northstowe in the plan period 2011-2031, the allocation of the 'reserve land' will provide additional flexibility as to where development can take place over the plan period, the Council cannot say when the land will be required at this time and delivery could be faster than is anticipated in the AMR or brought forward in a different order.
105. With regard to the housing trajectory, as described in the Housing Land Supply Update (November 2015)⁵⁷ the Council has taken a cautious and robust approach, by assuming 250 dwellings a year. This figure is also consistent with a number of representations in relation to housing land supply at new settlements. It is also similar to the actual delivery of homes at the smaller new settlement of Cambourne which has delivered on average 220 dwellings per annum over the last 20 years through several economic cycles. However, there are no limits on the rate of delivery of Northstowe, so if more than 250 dwellings can be delivered in a year there are no

⁵⁵ Northstowe Area Development Framework (RD/SS/280) page 48

⁵⁶ RD/AD/480 table Sc1a

⁵⁷ Housing Land Supply Update, Cambridge City Council and South Cambridgeshire District Council (November 2015) RD/MC/050 paragraphs A31 to A39.

planning policy barriers to that. This is also made clear in the Annual Monitoring Report 2016⁵⁸.

106. The landowners are working with the Council to accelerate delivery of the site. This includes the Homes and Communities Agency whose original proposal for affordable housing on Phase 2 would have seen 20% affordable homes built but permission has recently been granted for 40% starter homes and 10% affordable rented homes. This follows the former Prime Minister's announcement in January 2016 of Northstowe as one of five pilots for direct commissioning with 40% starter homes to accelerate housing delivery and enhance access to the housing market for first time buyers.
107. Finally it should be noted that Figure 3 of the submitted Local Plan (Housing Trajectory) referred to in the question is out of date and the Council has proposed modifications to delete it from the plan and to make reference to a housing trajectory being updated annually through our Annual Monitoring Report⁵⁹. The most recent AMR was published in December 2016⁶⁰.

1.ii

Has the aim to meet the Northstowe Area Action Plan (2007) [AAP] target of at least 4,800 homes by 2016 as set out in the Objective D3/a and Policies NS/7 and E3/c of the document, and the Housing Trajectory for Northstowe 2007- 2016, been achieved?

108. No. Whilst the delivery timing has not reflected the Area Action Plan, construction of the new town is now underway. At time of writing the first dwellings are under construction, access roads built and the Cambridgeshire Guided Bus which will provide rapid public transport journeys to Cambridge, the northern fringe science parks and to the Cambridge Biomedical Campus from the new town has been in operation since August 2011. Works have also commenced on the Cambridge to Huntingdon A14 upgrade which are due for completion in 2020⁶¹. Evidence from Cambourne and past and current Cambridge fringe sites is that whilst there can be long lead in times to start of development of strategic sites, and they can be more sensitive to delay in their start dates particularly with downturns in the economy as happened in 2007, once they commence delivery they can provide a robust and reliable supply of housing even during different part of economic cycles.

⁵⁸ Annual Monitoring Report 2016 (RD/AD/480) page 161

⁵⁹ See RD/MC/010 of December 2015, proposed modifications PM/SC/2/T, and PM/SC/2/V

⁶⁰ South Cambridgeshire District Council Annual Monitoring Report 2016 (RD/AD/480)

⁶¹ <http://roads.highways.gov.uk/projects/a14-cambridge-to-huntingdon/>

1.iii

Should the policy refer to 10,000 homes in order to be consistent with the 2006 Plan, the AAP and the Northstowe Development Framework Masterplan?

109. Yes. The Council proposed a modification alongside the Submitted Local Plan⁶² to amend the figure to 10,000 dwellings, for consistency with the above documents. This would amend the policy as follows:

Policy SS/7: Northstowe Extension

The reserve land identified in the Northstowe Area Action Plan (AAP) is allocated as an extension to the site of the new town of Northstowe. It will help provide the ~~9,500~~ **10,000** homes allocated in the AAP at an appropriate density and design and will not increase the overall number of homes.

1.iv

Would Objective D9/a of the AAP relating to the development of an Archaeological Strategy directly apply to the reserve land?

110. Objective D9/a creates an objective to develop an appropriate Archaeological Strategy which mitigates any adverse effects of the new settlement on the archaeological resource. As described by paragraph D9.1 of the Northstowe Area Action Plan⁶³ this is actioned through implementation of Policy CH/2 (Archaeological Sites) in the Development Control Policies DPD⁶⁴. This will be superseded by policy NH/14 (Heritage Assets) of the Local Plan⁶⁵. This will ensure Archaeology is appropriately considered through the development process for all stages of development at Northstowe.
111. It should be noted that this principle applies to all the adopted Area Action Plans, which are to remain part of the development plan, and which in places make reference to policies in other parts of the Local Development Framework, in particular the Core Strategy DPD⁶⁶ and Development Control Policies DPD⁶⁷. For clarity on the policies to be applied in decision making involving the Area Action Plan sites, a Modification to the Local Plan is proposed to include a new Policy that makes clear that where reference is made in an AAP to a policy elsewhere in the LDF, the replacement policy in the Local Plan will apply. A schedule of these references is included in Appendix 6 of this statement, identifying the Local Plan policies that will be applied. The Proposed Modification is as follows:

⁶² Modification MC/3/13, Schedule of Proposed Minor Changes following Propose4d Submission Consultation (March 2014) (RD/Sub/SC/40)

⁶³ South Cambridgeshire District Council Northstowe Area Action Plan (RD/AD/130)

⁶⁴ South Cambridgeshire District Council Development Control Policies Development Plan Document (RD/AD/110)

⁶⁵ Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010)

⁶⁶ South Cambridgeshire District Council Core Strategy Development Plan Document (RD/AD/100)

⁶⁷ South Cambridgeshire District Council Development Control Policies Development Plan Document (RD/AD/110)

Add new Policy and paragraph after paragraph 1.17

Policy LP/1: Superseded Policies Referred to in Adopted Area Action Plans

Where policies of the Local Development Framework referred to in adopted Area Action Plans are superseded by policies of this Local Plan, the more up to date Local Plan policies will be applied, as set out in Appendix Ba.

1.17a The adopted Area Action Plans remain part of the development plan, and in places make reference to policies in other parts of the Local Development Framework, in particular the Core Strategy DPD and Development Control Policies DPD. For clarity on the policies to be applied in decision making involving the Area Action Plan sites, where reference is made in an AAP to a policy elsewhere in the LDF, the replacement policy in the Local Plan will apply. A schedule is included in Appendix Ba of the plan, identifying the relevant references in the adopted Area Action Plans that are superseded by the Local Plan and the Local Plan policies that will be applied.

Note: Appendix Ba is shown in Appendix 6 of this statement.

1.v

Will the policies in the AAP be subject to review to ensure that no out of date policy requirements (e.g. Policy D13/b) are applied to development proposals on the reserve land?

112. The Northstowe AAP⁶⁸ will remain part of the statutory development plan for South Cambridgeshire alongside the Local Plan. The Proposed Submission Local Plan clarifies at Appendix B that only Policy NS/3 (1g) of the Northstowe AAP is formally superseded by the Local Plan⁶⁹.
113. It is not currently the intention of the Council to review the Area Action Plan. On a practical level it is likely that the significant majority of the Northstowe site would have gained planning permission before a review of the AAP could be completed.
114. The Northstowe AAP will remain part of the statutory development plan for South Cambridgeshire alongside the Local Plan. The Proposed Submission Local Plan clarifies at Appendix B that only Policy NS/3 (1g) of the Northstowe AAP is superseded by the Local Plan.
115. It should also be noted that D13b is an objective of the Northstowe AAP rather than a policy. Implementation of 'Exemplar in Sustainability' is secured through policy NS/23.

⁶⁸ South Cambridgeshire District Council Northstowe Area Action Plan (RD/AD/130)

⁶⁹ Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010)

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

General Policy

1.i

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

116. A new village at Bourn Airfield is part of the sustainable development strategy for the Greater Cambridge area. It provides an opportunity to deliver sustainable development to help meet the housing needs of the district. It is capable of achieving an appropriate element of self-containment with high quality services and facilities to provide for the needs of its residents and together with some local employment (see question 2ii). The Bourn Airfield site already adjoins a bus route Citi 4 with a 20 minute frequency service to Cambridge and its interconnecting buses routes. However, the policy requires the provision of a high quality bus route to Cambridge to provide enhanced connectivity with key centres of employment and higher order services and facilities in and around Cambridge via high quality (fast, frequent and reliable) sustainable transport links.
117. Evidence from the recent Cambourne West application⁷⁰ records that its residents have a higher rate of economic activity and an identical rate of unemployment to the remainder of the Greater Cambridge area (table 4.3), and table 4.4 shows that its occupation profile is essentially identical to the Greater Cambridge profile, all of which indicate that this is a sustainable location in respect to employment. This is notable in the context of the rapid growth of Cambourne from 900 residents in 2001 to 6,800 residents in 2011 (table 4.1) showing that residents consider it to be a sustainable location to live.
118. The projects to be delivered by the City Deal, support the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC)⁷¹. These in turn will support planned housing and employment growth outlined in the Local Plans and will make it easier to travel in, out and around Cambridge and South Cambridgeshire by public transport, cycle or on foot, and reduce and maintain lower traffic levels to ease congestion. In this context, it is important to acknowledge that current journey to work patterns are not representative of expected future mode shares and patterns of travel across the Greater Cambridge area.
119. The Transport Report 2015 concluded that the sustainable transport measures, including a new Park and Ride and cycling facilities will deliver a significant increase in the proportion of trips made by non-car modes from new settlements, including 27% public transport to Cambridge in the case of Bourn Airfield new village, which includes 12% from Park and Ride⁷². Modelling also indicated a 13% reduction in car mode share, combined with a 4% increase in public transport and an 8% increase in

⁷⁰ Cambourne West Employment and Economic Impact Assessment (RD/SS/300)

⁷¹ Transport Strategy for Cambridge and South Cambridgeshire (RD/T/120)

⁷² Transport Report (RD/MC/070) paragraph 5.64 The Bourn Airfield/Cambourne Phase 2 model run.

Park & Ride mode share to Cambridge⁷³ (Page 55 Figure 5-14 Change in Mode Share of AM due to Transport Measures (Cambridge)).

120. The Cambourne to Cambridge better bus journeys scheme is planned to deliver reliable 30 minute journeys into Cambridge on a frequent basis with a segregated route through Bourn Airfield as part of busway to Cambridge. The busway will be supplemented by on street bus priority measures in Cambourne and Cambridge City Centre to provide effective end to end journeys. In addition, it is proposed to provide a new Park and Ride facility at Madingley Mulch on the A1303. The full scheme is expected to be opened in 2024. This means there will be significant improvements in opportunities for residents of Bourn Airfield, and also for Cambourne and Cambourne West, to make trips wholly or partially by bus to services and facilities and jobs in and around Cambridge and to avoid current delays through congestion on Madingley Hill. The busway will connect into an orbital route northwards already secured through the North West Cambridge and Darwin Green developments and join the existing route round to the Science Park and the new Cambridge North Station, which is due to open in May 2017. Complementary City Deal schemes will address city centre movements and western orbital movements to the south to link to the southern end of the existing Busway from Trumpington to the Biomedical Campus and on to the City Centre. All of these measures will assist Cambourne and Bourn Airfield residents access employment in Cambridge City Centre, on the Science Park and northern fringe and at the Cambridge Biomedical Campus. Further information on the City Deal can be found in this statement in response to Matter 1.vi below.
121. Looking at the bigger picture it is also relevant that the site is located in the Cambridge, Milton Keynes, Oxford corridor. In November 2016 the National Infrastructure Commission Interim Report was published to provide government with proposals and options to maximise the potential of the Cambridge- Milton Keynes- Oxford corridor as a single, knowledge-intensive cluster that competes on a global stage, protecting the area's high quality environment, and securing the homes and jobs that the area needs⁷⁴. It recognises at paragraph 3.1 that investment in transport infrastructure can help connect new settlements to jobs.
122. The Government, in the Autumn Statement November 2016⁷⁵ at paragraph 3.16, welcomed the NIC interim report, committed £27 million of funding to develop plans for an Oxford-Cambridge expressway and £110 million to accelerate East-West rail links between the two cities and stated that it will carefully consider its recommendations concerning the delivery of housing and transport infrastructure in the corridor.
123. The Government originally committed to improvements to East-West Rail in the 2011 Autumn Statement. The East West Rail project will ultimately provide a direct rail service between Oxford and Cambridge by the early 2030s. In 2015 Phase 2 of the Western Section (between Bicester and Bedford) was planned for completion in the

⁷³ Transport Report (RD/MC/070) Page 55 Figure 5-14 Change in Mode Share of AM due to Transport Measures (Cambridge)) - Bourn Airfield/Cambourne Phase 2 model run

⁷⁴ Cambridge, Milton Keynes, Oxford corridor: Interim Report (RD/Strat/510)

⁷⁵ Autumn Statement 2016 (RD/Gov/290)

next five year period (2019-24). In March 2016 Network Rail announced that the Preferred Route for the Central Section (between Bedford and Cambridge) will be routed via Sandy.⁷⁶ A detailed study is underway to explore options for this section, which could include the provision of a new railway station at the Cambridge Biomedical Campus and help tackle congestion in and around Cambridge.

124. The Government's Road Investment Strategy (RIS)⁷⁷ committed £15.2 billion to major roads, including 17 major road schemes in the East of England in the period 2015-2020. RIS2 will cover the period post 2020 and includes the Oxford to Cambridge Expressway. The Oxford to Cambridge Expressway Strategic Study⁷⁸ will inform the development of the second phase of the RIS (RIS2).
125. Government has committed funding (in the RIS) to delivering an upgrade to the A428 between the A1 Black Cat roundabout and A1198 Caxton Gibbet roundabout, as the first phase of the Oxford to Cambridge Expressway. The RIS announcement states *"improvement of the A428 near St Neots, linking the A421 to Milton Keynes with the existing dual carriageway section of the A428 to Cambridge, creating an Expressway standard link between the two cities via Bedford. The scheme is expected to include significant improvements to the Black Cat roundabout, where the A1 currently meets the A421."*
126. The A428 Black Cat to Caxton Gibbet improvement scheme is currently in the options phase, with public consultation on Route Options anticipated in March 2017, ahead of a Preferred Route announcement. A further round of consultation on the preferred scheme will be undertaken in 2018. It is anticipated the Development Consent Order Application will be submitted to the Secretary of State in 2018 and, if consent is given, works will begin in 2020.
127. It is therefore important to see the Bourn Airfield new settlement proposal not only as an appropriate location in the context of the development strategy contained in the Cambridge and South Cambridgeshire Local Plans, with the proposed connectivity with Cambridge through schemes identified in the Transport Strategy for Cambridge and South Cambridgeshire, but also as an appropriate location in the context of the Government's focus on the Cambridge-Milton Keynes-Oxford corridor through a variety of complementary initiatives.

⁷⁶ <http://www.networkrailmediacentre.co.uk/news/preferred-corridor-for-east-west-rail-central-section-announced#>

⁷⁷ Road Investment Strategy: for the 2015/16 – 2019/20 road period (Department for Transport, 2015) <https://www.gov.uk/government/publications/road-investment-strategy-for-the-2015-to-2020-road-period>

⁷⁸ Oxford to Cambridge Expressway Stage 3 report <https://www.gov.uk/government/publications/oxford-to-cambridge-expressway-strategic-study-stage-3-report>

1.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?

128. Yes. Policy SS/6 requires Bourn Airfield to be developed as a new rural centre for approximately 3,500 homes which will equate to over 9,000 residents. The policy at section 6 requires the provision of shops, services, leisure and other town centre uses (using the term included in the NPPF), smaller local centres, community services and facilities including for health, and the provision of new primary and secondary schools on-site. The new village will also provide for local outdoor recreation including for sports and play. In terms of creating a sustainable settlement, the Council places emphasis on the need for the development to be of sufficient size to accommodate a secondary school, which reduces the need for longer journeys to school and help encourage sustainable modes of transport for older pupils. This is one of the lessons from Cambourne where a secondary school was not part of the original proposal, the education authority at that time choosing instead to rely on secondary education at Comberton, and provision had to be retrofitted into the new settlement at a late stage. As such, provision of a secondary school is an important policy requirement of the Bourn Airfield development and the County education authority has confirmed its support for this approach⁷⁹.
129. In July 2012 the Council published its Village Classification Report⁸⁰ which assesses the relative sustainability of villages in South Cambridgeshire. Based on its 2010 population of 7,060 and 2012 services and facilities, Cambourne was already the second most sustainable settlement in the district (See Appendix 2).
130. The March 2012 Village Services and Facilities study⁸¹ entry for Cambourne provides a good proxy for assessing whether the new village at Bourn will be of a sufficient size to be sustainable in terms of its ability to support local services and facilities. In mid 2012 Cambourne had 3,250 occupied dwellings and a population of 8,820, very similar to the proposed new village. The entry for Cambourne at that stage in its development shows that it supported the following:
- A secondary school and multiple primary schools
 - A nursery
 - A Fire Station and Police Station (which provision would also benefit Bourn Airfield)
 - A library
 - A medical practice and pharmacy
 - A veterinary surgery
 - A dental practice
 - A large supermarket and a small convenience Co-op
 - A hairdressers, bookmakers, estate agents, café, laundrette, 2 restaurants, a public house, a hotel, a petrol filling station, a Building Society and ATM, 2 hot food take-aways, youth club, Parish offices and village hall, and a church.

⁷⁹ RD/Strat/120 Appendix 7i new Settlements site 057 'school capacity' page 109

⁸⁰ RD/Strat/240

⁸¹ RD/Strat/251

- A sports centre, multiple equipped play areas, football, rugby and cricket pitches and changing facilities, tennis courts, a bowling green, a floodlit multi-use games area, allotments, community orchard and extensive areas of informal open space.

131. It can be expected that the residents of the new village would have a similar rate of economic activity, unemployment and occupation profile as Cambourne (see paragraph 117). On this basis it would seem reasonable to assume confidently that the new village will be able to support a similar and broadly equivalent range of local services and facilities. The services and facilities of the new village will also complement and supplement those in Cambourne and those to be provided in West Cambourne.

1.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?

132. Yes, the capacity of the site was explored in the SHLAA⁸², and it is anticipated that there is capacity to accommodate the scale of development envisaged in the Local Plan of approximately 3,500 dwellings, which reflects the SHLAA proposal that was assessed having been received through the call for sites. Clearly at the strategic allocation stage ahead of masterplanning it is difficult to be specific on development capacity and it would not be appropriate to imply a specificity at this stage in the planning process or for any particular figure to be regarded as a target to be met at any cost. Modifications to the policy in November 2016 make clear that the actual capacity is to be determined through a design-led approach. This modification reflects the proposed modification to prepare an SPD rather than an AAP in light of legal advice on the nature of the document intended to be prepared and the need for the Local Plan policy to provide the only strategic policy guiding the development of the new settlement.
133. Densities will vary across the whole site with scope for higher densities in the village centre and lower densities around the village edge. Average net densities across the site with a range of 30dph to 40dph have been explored. The August 2013 SHLAA technical assessment⁸³ demonstrates that a capacity of approximately 3,500 homes can be achieved on 40% of the wider AAP area of 282 hectares at a density of between 30 dph and 35 dph which is consistent with the promoter's intended densities and slightly below the 40dph average assumed in Policy H/7 for new settlements in the submitted Local Plan. The 40% developable area is drawn from experience at Cambourne and Northstowe⁸⁴.
134. In November 2016 the Council proposed a modification to the eastern boundary of the Major Development Site included in the submitted Local Plan⁸⁵. This proposed

⁸² RD/Strat/120 Appendix 7i site 057

⁸³ RD/Strat/120 as above pages 110-11

⁸⁴ RD/Strat/120 Chapters 1-5 methodology pages 13 and 14

⁸⁵ South Cambridgeshire District Council Meeting 17 November 2016 - South Cambridgeshire Local Plan Update (RD/CR/670)

modification is addressed in further detail under question 3i of this statement. The Council consider that the Major Development Site boundary should be extended in order to make better use of this brownfield site, enable the creation of a more sustainable and better designed place, whilst maintaining an appropriate relationship with Highfields Caldecote. This will also provide greater flexibility for master planning a successful new settlement, including flexibility regarding the best locations for land uses such as employment.

135. The capacity of the Bourn Airfield site will be explored further in the proposed Supplementary Planning Document (SPD), within the policy context provided by the Local Plan. The actual capacity at Bourn Airfield will ultimately be arrived at following a design led approach through the planning application process, which will include masterplanning. The policy, as proposed, together with the suggested modifications, will provide a suitable and appropriate framework to guide this process.

1.iv

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

136. The NPPF definition of Previously Developed Land (PDL) does not exclude airfields and provides that PDL includes *'Land which is or was occupied by a permanent structure, including the curtilage of the developed land - and any associated fixed surface structure'*⁸⁶. Most of the site except, the fields to the south of the Major Development Site, were previously developed as a military airfield with hardstanding, hangers, accommodation and other buildings and retain substantial concrete runways 50 metres in width and over 1,000 metres in length. The site includes existing employment uses and also an area with planning permission to redevelop previous industrial uses on land that has since been cleared for safety reasons. The whole of the curtilage of the former airfield, including the existing employment areas, can therefore be considered to be PDL. In the SHLAA⁸⁷ the Council accepted the site was partly PDL given the fields to the south (outside the Major Development Site but within the SPD area boundary) may not have been within the curtilage of the airfield. The Aerial Photograph from the 1940's, included at Appendix 7, which shows airfield development across the Major Development Site area with only the fields to the south excluded, which is consistent with the SHLAA assessment. .
137. Irrespective of the exact area of PDL, it is clear that the Bourn Airfield site, along with the barracks and runways at the Waterbeach new town site, are the two largest areas of remaining PDL available for development in a district which otherwise is almost entirely agricultural. In this regard it can be noted that the new Housing White Paper⁸⁸ intends that as much use as possible should be made of brownfield sites to help deliver more homes.

⁸⁶ NPPF (RD/NP/010) Annex 2

⁸⁷ RD/Strat/120 Appendix 7i site 057

⁸⁸ Housing White Paper: Fixing our broken housing market (RD/Gov/300)

1.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?

138. The new village will replace a former military airfield now mostly put to arable and low level employment, which is itself an uncharacteristic landscape element in this part of the district. The development of the new village will lie close to Cambourne / West Cambourne and to a lesser degree to Caldecote / Highfields. They will be neighbouring settlements with inevitably an element of interaction, particularly due to the proposed busway through the two settlements. However, it is envisaged that they will be designed as settlements in their own right with their own services, facilities and schools and each surrounded by significant strategic soft green landscaping to the A428, along the Broadway between Cambourne and Bourn Airfield and between the new village and Caldecote / Highfields. This will prevent these existing and proposed settlements appearing as a ribbon of continuous built development. Section 7 of Policy SS/6 specifically states that this landscaping is intended to avoid it appearing as part of a ribbon of development south of the A428. There is every reason to expect that this will be successful, particularly as part of a design-led masterplanned new settlement. Part of the work to prepare an SPD will be to look at the design of the new settlement and how it should be designed in terms of its internal design and also how it appears from outside in both near and longer views.

1.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?

139. There is a reasonable prospect of planned infrastructure being made available, and in a timely manner to support development.
140. The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC)⁸⁹, which was prepared in parallel with the Local Plans, identifies infrastructure that would be needed to support the new settlements, including Bourn Airfield. The TSCSC proposes to create a new High Quality Public Transport (HQPT) route on the A428 corridor serving Bourn Airfield New Village and Cambourne West. This will provide a service frequency for journeys to Cambridge of at least every 15 minutes and higher at peak times. The HQPT corridor proposals will reduce peak bus journey times to Cambridge by approximately 24% by implementing measures that enable buses to reliably bypass queuing traffic. It includes measures to develop highly accessible pedestrian and cycling infrastructure.

⁸⁹ Transport Strategy for Cambridge and South Cambridgeshire (RD/T/120)

141. The transport infrastructure requirements for the Bourn Airfield new village, including in the wider A428 corridor, are reflected in Policy SS/6. The policy also identifies a range of services and facilities and infrastructure that will be required to serve a settlement of this scale.
142. Significant additional work was undertaken by the Councils in 2015 in response to the Inspectors' letter of May 2015⁹⁰, which included a suite of updated evidence documents reviewing the appropriateness and deliverability of the development strategy contained in the submitted local plans.
143. The Development Strategy Update November 2015⁹¹, concludes that new settlements provide an opportunity to focus growth on key radial routes into Cambridge and bring with them significant improvements to deliver high quality public transport and cycling access into Cambridge, connecting with key destinations. This has the potential to deliver significant improvements to existing settlements along these corridors, both within and beyond the Greater Cambridge area. In the case of the A428 corridor, it currently experiences congestion, and the transport improvements to be delivered through the proposed development strategy offer the opportunity to provide high quality and reliable sustainable travel choices to both residents of those new communities as well as existing residents, including in places such as Cambourne.
144. The new settlement at Bourn Airfield will create a need for new infrastructure, but will also create significant development value with opportunities to provide and fund new infrastructure to meet the needs generated. There are also other sources of funding, including the City Deal, which can support the delivery of a sustainable new settlement.
145. The transport measures identified in the TSCSC⁹² were reviewed and confirmed by a new Local Plan Transport Report⁹³. An A428 corridor constraints study⁹⁴ was also prepared, which demonstrated that the measures identified in the TSCSC are capable of being delivered.
146. The Cambridge and South Cambridgeshire Infrastructure Delivery Study 2012⁹⁵, was updated in November 2015⁹⁶ and included specific consideration of the infrastructure requirements and deliverability of Bourn Airfield new settlement. The Cambridge and South Cambridgeshire Local Plans Viability Update⁹⁷ also in November 2015 provides

⁹⁰ Letter from the Inspectors to the Councils dated 20 May 2015 regarding Preliminary Conclusions (RD/Gen/170)

⁹¹ Cambridge and South Cambridgeshire Development Strategy Update (November 2015) (RD/MC/060)

⁹² Transport Strategy for Cambridge and South Cambridgeshire (RD/T/120)

⁹³ Local Plans CSR – Cambridge and South Cambridgeshire Local Plans Transport Report, (November 2015) (RD/MC/070)

⁹⁴ A428 Constraints Report : South Cambridgeshire District Council (RD/MC/073)

⁹⁵ Cambridge City & South Cambridgeshire Infrastructure Delivery Study (RD/T/010)

⁹⁶ Cambridge and South Cambridgeshire Infrastructure Delivery Study (November 2015) (RD/MC/080)

⁹⁷ Cambridge and South Cambridgeshire Local Plans Viability Update (November 2015) (RD/MC/090)

a strategic viability assessment appropriate to this stage of the planning process. The Viability Update informed the Infrastructure Delivery Study, which considered the delivery and funding of infrastructure.

147. The Infrastructure Delivery Study considered infrastructure needs for the site, and potential funding opportunities, in particular developer funding, taking account of viability. It concludes that there is sufficient funding opportunities to deliver specific infrastructure requirements arising from the proposed allocation, as well as potential to make an appropriate contribution to off-site transport infrastructure (see chapter 15).
148. The major development proposals in the Local Plan as necessary to support the new settlement are not the sole purpose of many of the improvements. As such, it is intended that the development will make an appropriate contribution towards the funding of the schemes identified in the relevant Local Plan policies, via Section 106 or CIL.
149. The City Deal for Greater Cambridge will make a significant contribution to funding, and provide added certainty regarding commitment to delivery. The City Deal has secured a commitment for up to a total of £500 million of Government funding. The £100 million that has already been secured as the first tranche of funding, with two further five-year tranches with up to £200m each. The City Deal has already been considered at the examination at a number of matters including Matter 2: Strategy, Matter 5: Infrastructure, and Matter 7: Transport. In particular Appendix 4 to Matter 7 provides information about the City Deal and its role in helping to deliver sustainable transport infrastructure to support the development strategy.
150. The City Deal Board Report March 2016⁹⁸ agreed a position statement setting out the role of the City Deal in supporting the delivery of the development strategy contained in the Local Plans so as to provide clarity about how it will prioritise funding. Paragraph 7 of the statement states that “the City Deal will support delivery of the strategy set out in the Cambridge and South Cambridgeshire Local Plans through investment in transport infrastructure, housing delivery and skills.” Also that this is consistent with “a key objective of City Deal, namely the delivery of transport schemes necessary to support continued economic growth, including through improved network connectivity and by supporting the sustainable development strategy included in the submitted Cambridge and South Cambridgeshire Local Plans”.
151. The report goes on to state in paragraph 13 that “the City Deal partnership is confident about the funding and delivery of schemes identified in Tranche 1 and thereafter. The City Deal is investing in infrastructure schemes to ensure continued economic growth. The delivery of housing and employment is an important part of ensuring continued economic growth in the Greater Cambridge area, and thus the achievement of the City Deal objectives. Therefore, and consistent with this, in the event that the need to do so arises, the City Deal Board will consider favourably the prioritisation of those schemes that deliver the infrastructure to support housing and

⁹⁸ City Deal and the Cambridge and South Cambridgeshire Local Plans (March 2016) (RD/MC/110)

employment growth within the Local Plans. The list of schemes will be kept under review and amended as required as the programme rolls forward to ensure it best meets infrastructure priorities in the area.”

152. The City Deal A428 Cambourne to Cambridge Better Bus Journeys project is now significantly progressed, as summarised below, thereby providing further confidence in the deliverability of key sustainable transport infrastructure to support the delivery of Bourn Airfield new village.
153. Public consultation was carried out by the City Deal on early options for the bus improvements in October 2015⁹⁹. The options were split into two phases. The first phase covered the area from Madingley Mulch roundabout (where the A428 meets the A1303) to Grange Road in Cambridge to be delivered through Tranche 1 City Deal funding for the period 2015/16 to 2019/20). The options for this first phase comprised an on-line route, an off-line route to the north and an off-line route to the south. The second phase from Cambourne to the Madingley Mulch roundabout would be a second phase to be funded through Tranche 2 of the City Deal (covering the period 2020/21 to 2025/26). The options for the second phase comprised an on-line route using the existing road, an off-line route to the south and a central off-line route between the two. The findings of public consultation were reported to the City Deal Executive Board in March 2016.¹⁰⁰
154. Further work was then undertaken and in October 2016 the Executive Board¹⁰¹ considered the merits of the options and the results of consultation. The Executive Board identified a catchment area for a preferred route, being an area within which a specific preferred alignment will be identified. The preferred route for the section between Madingley Mulch and Cambridge comprises an offline route to the south of the existing road with a new bridge over the M11 and options for a new Park & Ride site. The preferred route for the section between Cambourne and Madingley Mulch is within the corridor of the former A428 (as a variation of a southern route that was part of the consultation). The Executive Board gave authority to officers to develop a specific route alignment or alignments and a further report is programmed for July 2017, which will seek authority to undertake further consultation on those in late 2017.
155. It is anticipated by the City Deal Board that, following the consultation, an application for powers, anticipated to be through a transport and works order, as necessary to construct the scheme, will be undertaken in late 2018/early 2019. The period of determination of such an application is likely to be between 18 months and 2 years and a public inquiry is likely to form part of this process. It is now envisaged that the scheme will come forward in a single holistic scheme, rather than in two separate phases.

⁹⁹ http://www.gccitydeal.co.uk/citydeal/info/2/transport/1/transport_projects_and_consultations/2

¹⁰⁰ City Deal and the Cambridge and South Cambridgeshire Local Plans (March 2016) (RD/MC/110)

¹⁰¹ Greater Cambridge City Deal Executive Board Meeting 13 October 2016: A428 Cambourne to Cambridge Better Bus Journeys: Selection of a catchment area for detailed scheme development (RD/CR/650)

156. The above programme anticipates start of construction of the scheme in 2020. A number of options exist around the phasing of delivery, including alignment with the construction of new housing development and the potential to construct the parts of the scheme in areas of highest demand first. It is planned to complete the entire Cambourne to Cambridge scheme in Summer 2024.
157. The scheme cost for the scheme will be confirmed once further detailed work has been undertaken on the preferred option. The current preferred option is a variation on one of the options consulted on and has not yet itself been costed. However, it is expected to have a lower cost than the option on which it is based, which has an estimated cost of £141,883,000. This is because the preferred option will make use of an existing transport corridor and therefore be less than the cost of an entirely off-line scheme.
158. There are already significant resources identified to deliver the busway scheme. The City Deal Executive Board allocated £59m in January 2015¹⁰² from Tranche 1 of City Deal funding for the section from the A428 at Madingley Mulch to Cambridge. This section, together with the new Park and Ride, comprises approximately half of the total scheme costs.
159. Once the preferred scheme and its costs are identified, as had always been intended, the funding of the remainder of the scheme will be considered by the City Deal Executive Board as part of the assessment of funding priorities through Tranche 2 funding contributions against the stated objectives of the City Deal and taking account of other sources of funding. It is worth noting that the City Deal Executive Board was aware of the scheme costs and funding implications when it made a decision on the preferred scheme option for further development. The total funding resource available to City Deal as a result of the Government's commitment has been referred to in paragraph 149 above.
160. City Deal funding will be supplemented by up to £9m of Local Economic Partnership Growth Deal funding already secured for the scheme as a whole. Developer contributions will also provide part of the funding package and a contribution has been agreed in a draft S106 with the Cambourne West developers for £8.5 million, the full amount sought by County Transport for off-site transport infrastructure reflecting need arising from the development. Total committed funding is therefore currently £76.5m.
161. A similar approach to developer contributions at Cambourne West is anticipated for the Bourn Airfield development. Whilst the appropriate contribution to be sought for Bourn Airfield will need to be considered on its own merits, on a pro rata basis (in relation to the number of dwellings proposed) contributions could be in the order of £12.6 million.

¹⁰² 2015-20 prioritised infrastructure investment programme report - Greater Cambridge City Deal Joint Assembly 12 January 2015 (RD/CR/142)

162. Work to develop a City Deal investment strategy to deliver the City Deal vision and objectives, and to allocate resources for Tranche 2 to secure the remaining funding to deliver the scheme is already in the early stages of preparation.
163. As identified in the question, the Council put forward a Proposed Modification to the examination in March 2016 in response to the Inspectors' letter of May 2015 (references PM/SC/3/I and PM/SC/2/R) that removes the restriction on development prior to 2022 contained in the submitted Local Plan.¹⁰³ This date was not identified on the basis of delivery of infrastructure, but on the anticipated lead in time for a new settlement based on circumstances at the time the plan was submitted in early 2014 and the phasing of housing land supply. The Councils' Development Strategy Update November 2015¹⁰⁴, explained that having regard to indications from the promoters of both new settlements that development could start considerably earlier than had been anticipated by the District Council at the time the plan was submitted, and in order to provide a flexible strategy that can respond to any changing circumstances, modifications were proposed to remove the restrictions on the start date of the new settlements.
164. The housing trajectory update in November 2015¹⁰⁵, updated in the Annual Monitoring Report December 2016¹⁰⁶, made a number of changes to assumptions for delivery of housing, including reduced delivery rates at a number of strategic sites to take a more cautious approach, and now anticipates development one year earlier at Bourn Airfield. The revised start date is not as early as the promoters have suggested, and the Council is taking a more cautious but balanced approach to housing delivery.
165. The Local Plan, as modified, does not prevent earlier delivery at Bourn Airfield than the Council's trajectory envisages, if it can be delivered in an appropriate way. Local Plan policies (in particular Policy TI/8) continue to require necessary infrastructure to be in place for all stages of development or for phased delivery when it is needed. Such an approach is achievable at the Bourn Airfield new settlement. Phasing of delivery will be a matter considered through the proposed SPD.
166. In terms of phasing of development, (and subject to checks through the Transport Assessment process as part of the consideration of any planning applications), it will not be necessary to have all transport measures identified in policy in place for the development to commence. The housing trajectory¹⁰⁷ indicates up to 310 dwelling completions prior to the anticipated completion of the busway. The Development Strategy Update included advice from the County Council that it will work with developers to identify what interim measures would be needed to support early housing delivery. These interim measures will need to complement the wider corridor

¹⁰³ South Cambridgeshire Local Plan Proposed Modifications (March 2016) (RD/MC/150)

¹⁰⁴ Cambridge and South Cambridgeshire Development Strategy Update (November 2015) (RD/MC/060)

¹⁰⁵ RD/MC/050

¹⁰⁶ South Cambridgeshire District Council Annual Monitoring Report 2016 (RD/AD/480), Table SC1a, page 46

¹⁰⁷ South Cambridgeshire District Council Annual Monitoring Report 2016 (RD/AD/480), Table SC1a, page 46

proposals, must not be abortive work, and are likely to include improved provision for cyclists, a focus on pinch points that impact on bus journey times and possibly localised highway works.

167. An actual example of viability, deliverability and phasing of strategic scale development in this corridor, and the off site transport infrastructure contributions able to be secured, is provided by the Cambourne West proposal where the Council resolved to grant planning permission for a major extension to Cambourne in January 2017 for 2,350 dwellings. The development will provide a range of services and facilities including a secondary school, 30% affordable housing, and £8.5 million for off site strategic transport infrastructure, being the full contribution sought from the County Council towards the City Deal scheme reflecting the needs arising from the development on a pro rata basis with Bourn Airfield new village and background growth. The developer will also be required to provide in conjunction with the local authorities a local public transport strategy for the West Cambourne to Bourn corridor linking into a new bus gate and thereby significantly improving bus connections by providing a bus only link from Cambourne to the Broadway. The developer of the Bourn Airfield site will need to go through the same processes undertaken for Cambourne West in terms of setting out phasing of delivery and identification of any off-site and on-site mitigation measures.
168. In regard to education, primary school capacity is likely to be needed to accommodate early phases of development, reflecting experience on other sites. On site secondary education will be phased in, considering capacity in other schools in the area. This can be appropriately addressed through a S106 agreement. A note from Cambridgeshire County Council as local education authority is attached at Appendix 8.

1.vii

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

169. The need to identify and maintain a large supply of land for development in the district means there is pressure for the development of agricultural land. The map of Agricultural Land Classification¹⁰⁸ for the district demonstrates that the vast majority of the district comprises grades 1, 2, and 3 agricultural land, with only small isolated areas of grade 4 or 5.
170. According to the district wide land classification maps the site includes over 140 ha of good quality agricultural land (grades 2 and 3). A more detailed assessment of the site commissioned by the developers (to be submitted as part of their examination statement) indicates that the largest proportion of the agricultural land is grade 3b, lower quality agricultural land, and only 83ha being grade 3a or above. The Draft Final Sustainability Appraisal¹⁰⁹ at page B1552 records a significant negative impact from the loss of productive agricultural land, above the 20 hectare threshold above which Natural England have to be consulted on planning applications for the

¹⁰⁸ RD/Sub/SC/060 Draft Final Sustainability Report Part 2 Annex 1 chapter 10 figure 5 Page 2A-8

¹⁰⁹ RD/Sub/SC/060 Annex B SHLAA site 231

development of such land. The National Planning Policy Framework (NPPF) requires that Local Planning Authorities should take into account the economic and other benefits of the best and most versatile agricultural land.

171. South Cambridgeshire has a significant resource of good quality agricultural land. Agricultural land classification provides a uniform method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. The most productive and flexible land falls into Grades 1 and 2 and Subgrade 3a and collectively comprises about one third of the agricultural land in England and Wales. Within the district there are significant areas of high quality agricultural land and development needs cannot be met without the use of such land. This was highlighted by the Sustainability Appraisal, which identified that all strategic development strategy options would have negative impacts on agricultural land¹¹⁰.
172. The development of Bourn Airfield will take place partly on one of the largest areas of PDL in the district. The benefits of re-use previously developed land were identified in the Sustainability Appraisal. The strategy options which could utilise significant areas of previously developed land include either or both of two new settlement options, at Waterbeach and Bourn Airfield scored more highly against the 'land' theme, and the sustainability objective to minimise the irreversible loss of undeveloped land.¹¹¹ If it were to take place elsewhere there would be a greater loss of agricultural land.
173. Finally it can be noted that Natural England has generally supported the allocation at Bourn Airfield and the provisions of policy SS/6 (representation 59948).

1.viii

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

174. With the exception of Cambourne the convenience retail offer in neighbouring villages is very limited and focused on serving a local catchment for day to day needs. The Village Services and Facilities study of March 2014¹¹² records that Bourn has a village store with Post Office and a butchers, Caldecote/Highfields had a village store (currently closed and in use as a cafe), Caxton has no retail provision, Elsworth has a community village shop and Hardwick has a village store with Post Office and florist.
175. Section 6 of Policy SS/6 requires the provision of shops of an appropriate scale for a Rural Centre subject to avoiding significant impacts on the vitality and viability of surrounding centres including Cambourne. The appropriate nature and extent of this retail provision will be considered in the SPD based on appropriate evidence as required by section 14b) of the policy, with a view to meeting the needs of the village without unacceptable impacts on surrounding centres.

¹¹⁰ Supplement to Sustainability Appraisal Addendum Report (November 2015) (Revised March 2016) (RD/MC/021) Chapter 7 Strategic Development Alternatives Table 7.2 (page 99).

¹¹¹ Supplement to Sustainability Appraisal Addendum Report (November 2015) (Revised March 2016) (RD/MC/021) Chapter 7 Strategic Development Alternatives Table 7.2 (page 99)

¹¹² RD/Strat/250

1.ix

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

176. Policy SS/6 (as proposed to be modified), in combination with policies in the Climate Change chapter of the plan, provide appropriate guidance and requirements regarding storm water attenuation and foul drainage.
177. Policy SS/6 paragraph 6ee as submitted (section 11 as proposed to be modified), already requires the provision, management and maintenance of sustainable surface water drainage measures to control the risk of flooding on site and which reduce the risk of flooding downstream. Further detail is added by submitted Local Plan Policy CC/7 'Water Quality' which addresses foul drainage, and by Policy CC/9 'Managing Flood Risk'. Section c) of this policy specifically requires there to be no increased flood risk downstream and that the discharge of surface water post development should be limited to natural greenfield rates or lower. This policy also requires the submission of a site specific Flood Risk Assessment for a site of this scale, reflecting national guidance. These measures will require appropriate flooding and drainage information to be provided and measures to be implemented, and therefore adding reference to a 'storm water attenuation strategy' is not necessary,
178. The site falls within flood zone 1, and almost all of it drains southwards towards Bourn Brook. The site masterplan provides for the provision of sustainable drainage measures to the south of the site in the form of storage ponds, swales and scrapes to regulate flows from the development. Such measures are in place for Cambourne and similar measures have been agreed by the Environment Agency for the recently permitted development of 2,350 homes at Cambourne West¹¹³. Land to the south of the Major Development Area would form part of the necessary Sustainable Drainage infrastructure comprising open watercourses and attenuation features that would accommodate flows from the development.
179. The introduction of sustainable drainage at Bourn Airfield provides opportunity for betterment, by controlling run-off from the currently uncontrolled previously developed parts of the site (such as the concrete runways), and reducing downstream flood risk.
180. Parallels can be drawn with the recently permitted Cambourne West site. This will provides attenuation features which will provide storm water storage capacity for 1 in 100 year events, plus an allowance of 30% for increased rainfall as a result of climate change, so that surface water would be held within the site. The outfall of the southernmost attenuation lake would release water into the Bourn Brook a rate equivalent to if the site were to remain as a greenfield site. The level of this discharge would be agreed with the Environment Agency and would be accompanied by a scheme of monitoring to ensure that unregulated flows from the development would not have a negative impact upon the Bourn Brook.

¹¹³ Letter RD/Gen/380 including a link to the officers report to Planning Committee

181. This approach follows that of the existing Cambourne valleys. One of the benefits of this approach is that it ensures a regular flow of water into the brook, which reduces the negative impacts upon biodiversity during times of the year when flows would be reduced. The regulation of flows also means that damage caused to the banks of the brook by unregulated flows following heavy rain events would also be reduced.
182. The satisfactory provision, management and on-going maintenance of sustainable surface water drainage facilities, to control the risk of flooding on site and reduce the risk of flooding to areas downstream would be in accordance with section 11 of Policy SS/6 and with Policy CC/9.
183. The Joint Position Statement on Foul Water and Environmental Capacity in relation to Proposed Development within South Cambridgeshire District (January 2014)¹¹⁴ sets out the position of Anglian Water and the Environment Agency at the time of submission on waste water treatment issues within South Cambridgeshire and the associated environmental implications.
184. The Council has worked with Anglian Water and the Environment Agency, who have confirmed that the site is capable of being appropriately served for foul drainage. The existing WRC has limited capacity but could take a portion of foul flows from the new site. Alternative WRCs in the vicinity are Papworth Everard and Utton's Drove, and each may be able to accommodate some or all of the foul water flows from the development. The preferred solution is likely to be a combination of Bourn and Papworth.
185. It should be noted that in their representations on the Proposed Modifications November 2015, Anglian Water indicated that providing necessary infrastructure is in place to serve the proposed development Anglian Water would have no issue with the flexibility in the start date of delivery of the new settlements¹¹⁵.
186. The policy requires arrangements to be made for foul drainage and sewage disposal. Anglian Water in their representations on the Proposed Submission Local Plan requested this be demonstrated through a Foul Drainage Strategy. A minor change was proposed alongside the submission Local Plan¹¹⁶ to reflect this, which would make the plan more effective. This was superseded by a modification proposed by the Council in November 2016 and the relevant wording is repeated below for convenience:

Amend criterion dd. of Policy SS/6 to read:

~~dd.~~ **b. Make appropriate arrangements for foul drainage and sewage disposal, to be explored and identified through a Foul Drainage Strategy.**

¹¹⁴ RD/Sub/SC/082, agreed by Anglian Water and the Environment Agency

¹¹⁵ Proposed Modifications Consultation November 2015 Representation 65592

¹¹⁶ South Cambridgeshire Schedule of Proposed Minor Changes March 2014 (RD/Sub/SC/040)

1.x

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

187. The site is used for agriculture and for open storage on the runways of bulky items. There is no known aviation employment on site. It is understood that a flying club is based on the site with 45 members with 14 aircraft parked in the hangers which use a grass runway. There are other local alternatives to continue this role including at Duxford, Croydon, Connington and Fowlmere as well as at Cambridge Airport.
188. The current available capacity for light aircraft parking at these alternative locations is 4 spaces in hangers and 40 spaces outside.

Future Area Action Plan Development Plan Document (AAP)

2.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.

189. The preparation of AAPs for each new settlement was considered an appropriate approach when the Local Plan was submitted in March 2014, following on from the preparation of AAPs as part of the suite of adopted Local Development Framework documents. These include AAPs for Cambridge East (an urban extension for 10,000 dwellings), Northstowe (a new town for 10,000 dwellings) and North West Cambridge (to accommodate the long term growth of Cambridge University).
190. The Council has obtained legal advice regarding the status of the proposed AAPs, and whether they remain the most appropriate and legally correct approach to providing further planning guidance for these major proposals, having regard to relevant statutory provisions and recent case law. In recent years there has been extensive consideration of this matter by the Courts, which has clarified the legal definition and relationship of local plans (including AAPs) and SPDs. The legal advice which has been received has confirmed that the matters intended to be included in the second tier planning documents within each of policies SS/5 and SS/6 should, as a matter of law, be prepared as SPD. The advice to the Council is that, as such, the documents the Council intends to prepare pursuant to policies SS/5: Waterbeach New Town and SS/6; New Village at Bourn Airfield, in law, should appropriately be prepared as SPD rather than as AAP (which now fall under the term "local plan" under the 2012 Regulations). It is therefore considered that these planning documents should be prepared as SPD and not as AAP. This advice is appended for information in Appendix 3.
191. The preparation of SPDs for Waterbeach new town and Bourn Airfield new village would rectify this issue. However, this change does necessitate certain consequential modifications to policies SS/5 and SS/6 to ensure comprehensive statutory policies that provide an appropriate and sufficient framework for the preparation of SPD and

ultimately for the determination of planning applications. This is addressed in the Council's response to matter 3i.

192. The Council proposed further modifications in November 2016¹¹⁷ that the further guidance for the new settlements should be prepared as SPD rather than AAP. In December 2016¹¹⁸ it agreed to commission consultants to prepare the SPD on the Council's behalf and it is expected that a procurement process will commence in March 2017, with the SPD preparation timetable to be considered further with the local community. The Council would then be in a position to adopt an SPD as soon as possible after the adoption of the Local Plan.

2.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?

193. The policy does not specify a particular level of employment. The new village is not expected to be self contained in terms of employment, reflecting its primary role in the development strategy to provide a source of housing to meet needs in the area, including from new jobs arising from the successful Cambridge economy. However, the new village is expected to provide for some local employment to ensure it is not simply a dormitory settlement and that it has a vibrant character with activity during the day.
194. The Council has proposed a modification to Policy SS/6 paragraph 6c as submitted, related to the change from producing an AAP to an SPD to ensure a clear policy requirement. The modified policy requires employment development, of a quantum, type and mix to meet the needs of the new village to be established through an Economic Development Strategy prepared in partnership with the local authority and key stakeholders. An Economic Development Strategy has provided an effective mechanism at Northstowe, helping to identify and refine the employment role of a new settlement. The appropriate level and type of employment at Waterbeach new town will be considered through the proposed SPD.
195. The Bourn Airfield site is of sufficient scale to include new employment provision appropriate to a Rural Centre. This could include development on the former ThyssenKrupp land, or land elsewhere within the site where it can be most effectively masterplanned into the village.
196. The Policy approach identified in the proposed modifications is compatible with Policy E/12. Policy E/12 identifies that B1, B2 and B8 uses can be appropriate in villages, taking into account the category and scale of the village and it being in character and scale with the location. Policy SS/6 as proposed to be modified no longer specifically references B1 uses. A range of employment uses, appropriate to creation of a

¹¹⁷ RD/FM/010

¹¹⁸ South Cambridgeshire District Council Planning Portfolio Holder Meeting 13 December 2016 (RD/CR/690)

sustainable new village will be required. This could include employment use other than B1.

2.iii

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

197. Existing green corridors and ecological features such as hedges and woodland areas are located primarily on the perimeter of the former airfield which otherwise is dominated by concrete runways and open land used for arable. Section 7 of the policy requires the provision of strategic landscaping around the boundary of the new village which will provide a better level of green connectivity than currently exists and closely adjoin similar green areas in Cambourne. The masterplanning of the new village will create additional opportunities to provide green connectivity through the creation of an enhanced network of footpaths and bridleways which will provide green links across the wider site.
198. The Wildlife Trust in their representation¹¹⁹ seek amendments to this element of the policy, in particular to refer to ecological networks. Such a modification is not required for soundness, as Green Infrastructure networks will include ecological networks, and ecology issues are already specifically addressed under 6q.

2.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?

199. Yes, the site predominantly consists of arable land and concrete runways of low ecological and biodiversity value. Section 8 of policy SS/6 requires existing green corridors and networks to be connected (part a), include areas with restricted access to enhance biodiversity (part b), retain existing woods, hedges and water features and manage them to enhance biodiversity (part c), consider the multifunctional value of green spaces (part d) and take account of a full programme of ecological survey and monitoring to guide a biodiversity management plan to provide mitigation and enhancement (part e). The measures will ensure that any potentially negative impacts on the County Wildlife Site can be appropriately addressed and mitigated.
200. The SHLAA¹²⁰ process did not identify issues that could not be appropriately addressed. It is also noted that the site was subject to a phase 1 habitat survey commissioned by the site promoters, which concluded that 'findings to date suggest that there would be relatively few ecological constraints to residential development, with potential to integrate those identified as part of the proposals and in line with planning policy'¹²¹. The information provided, and potential enhancement or mitigation measures, will be considered further through the SPD and planning application process.

¹¹⁹ Representation Number 58406

¹²⁰ Strategic Housing Land Availability Assessment (SHLAA) - Update 2013 (RD/Strat/140)

¹²¹ Representation number 60329 - Appendix 12 Ecological Appraisal 2012 - summary

2.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?

201. The Cambridge and South Cambridgeshire Transport Strategy¹²² includes provision of additional park and ride capacity on the A428 corridor but does not specify that this must be on the Bourn Airfield site. A decision has now been made to locate a new P&R further along the A428/A1310 corridor, closer to Cambridge City Centre, not on-site at the new village. Options are currently being explored through the City Deal process. Following public consultation the City Deal Board in October 2015¹²³ agreed, in principle, that a Park and Ride near the Madingley Mulch roundabout, best meets the strategic objectives of the City Deal and the City Deal Agreement, given the wider economic benefits. It also instructed that further work be carried out to assess site options around the Madingley Mulch roundabout and at Scotland Farm. A further report is programmed for July 2017 which will seek authority to undertake further consultation in late 2017, as part of the wider corridor scheme.
202. The new facility would be partly funded by s106 contributions as part of the package of interventions making up tranches 1 and 2 of the Cambourne to Cambridge Better Bus City Deal scheme. The Cambourne West development has already agreed a contribution toward these works (£8.7 million towards both tranches of the City Deal proposals and the new Park and Ride). Local Plan policy TI/8 states that planning permission will only be granted for proposals that make suitable arrangements for the improvement or provision of infrastructure necessary to make a scheme acceptable in planning terms. It is expected that the new village will make a proportionate contribution to the cost of the tranche 1 and/or 2 infrastructure as appropriate depending upon the timing the s106 agreement. Funding is addressed in more detail at Question 1.vi.
203. Finally it should be noted that whilst the submitted Local Plan Policy SS/6 section 9r) said 'potentially provide a Park & Ride facility, this criterion being proposed for deletion in the November 2016 Proposed Modifications¹²⁴ because of the evolution of the City Deal scheme since submission of the Local Plan.

2.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?

204. Details of local transport impacts and associated mitigation will be fully assessed and agreed through the Transport Assessment (TA) process. The TA will assess specific development impacts and inform the small scale highway measures required.

¹²² RD/T/120 March 2014

¹²³ Report to and Decision of City Deal Executive Board 13 October 2016 (RD/CR/650)

¹²⁴ RD/FM/010 page 33

205. The major transport mitigations required are set out in policy SS/6. More local measures are expected to be needed as set out in section 6y of the submitted plan as they are in many schemes, but they cannot be identified in detail at this stage and nor is it essential that they should be so as long as there is a policy requirement for the measures needed to mitigate impacts to be included. These measures will likely include small scale measures such as signage and traffic calming to help influence driver behaviour and be assessed as part of a transport assessment associated with a planning application.

2.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?

206. The Council made clear in the submitted Local Plan that it is necessary for a major development of the scale of Bourn Airfield new village to have two separate access points to serve it and the submitted policy required access to the north west and north east of the site (criterion z). It said there should be no direct vehicular access to the Broadway (except for buses and taxis) (criterion aa). However, the Council recognised that this was an error in the submitted plan and that this was not a reasonable or deliverable policy requirement in view of the existing highway arrangement to the north west of the site. Things have moved on since the plan was submitted and the north west access to the Bourn Airfield development clearly needs to link into the Broadway. A modification has therefore been proposed, agreed by the Council at their meeting of November 2016¹²⁵, and subsequently submitted to the Local Plan Examination¹²⁶.
207. The modification (to Policy SS/6 paragraph 6aa, renumbered as SS/6 9 c iii) is explicit that there will be “no direct vehicular access to the Broadway for southbound traffic from the new village (except buses and bicycles). The Council intends this to provide clarification of the access arrangements and to strengthen the policy requirement that there be no direct southbound movements provided at the north west access to the new village.

2.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?

208. No, the plan needs to be read as a whole to avoid confusion which can be the result of sometimes including cross references and sometimes not, for example if the cross reference is added for one site allocation but not for all others, and would raise questions about the policy requirements for all the other sites.

¹²⁵ South Cambridgeshire District Council Meeting 17 November 2016 - South Cambridgeshire Local Plan Update (RD/CR/670)

¹²⁶ Further Modifications to the South Cambridgeshire Local Plan November 2016 (RD/FM/010)

209. The November 2016 proposed modification¹²⁷ to section 14c of Policy SS/6 should also be noted which relates to the planning and delivery of necessary infrastructure.

2.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?

210. Yes. The site is located in flood zone 1 and is not at risk of fluvial flooding. Local Plan Policy CC/9 requires development not to increase flood risk elsewhere, to limit post development surface water discharge from the site to natural greenfield rates, and to require site specific Flood Risk Assessments to take account of climate change. Also see the response to question 1 ix.

2.x

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

211. No, this not a planning matter and can be best addressed through other statutory procedures. It can be noted that a new parish was created to encompass Cambourne at an appropriate time after the commencement of the development and Cambourne Parish Council has already requested that a similar process take place with regard to Cambourne West.

2.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?

212. Yes, the land has been used for arable since at least 1961 without concern, military airfields have been decontaminated locally without prejudicing their development viability at Northstowe and Cambourne (part of the wartime Bourn Airfield was located to the west of the Broadway) and the matter is properly a matter for resolution at the planning application stage.

2.xii

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

213. No, this requirement is adequately addressed by policy NH/14 Heritage Assets and paragraph 6.53 which requires developers of sites of interest such as this site to submit an appropriate desk-based assessment and where necessary a field evaluation. During the preparation of the SHLAA the County Council's Historic Environment Team advised the Council that this is a 'non-statutory archaeological site

¹²⁷ RD/FM/010

within which excavations to the north and west have identified extensive evidence of late prehistoric and Roman settlement. There is also evidence for Roman burials within the airfield. Further information would be necessary in advance of any planning application for this site'.¹²⁸

Council's Further proposed modifications November 2016

3.i

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

214. Yes, the Council has set out above in its response to matter 2i why it is preparing a Supplementary Planning Document for the site to add necessary detail to policy SS/6 rather than an Area Action Plan. The great majority of the modifications flow from this change, so as to provide clarity on what the SPD is expected to include and to ensure that Policy SS/6 reads clearly.
215. An annotated table of Policies SS/5 and SS/6 including all proposed modifications is attached as Appendix 4. This sets out a fuller soundness justification for each proposed change than was included in the November 2016 Proposed Modifications document¹²⁹.
216. Particular attention is drawn to the site promoters' representations 60333 and 65715 which raise concerns about the boundary of the Major Development Site and particularly to its eastern boundary included in the submitted Local Plan. They have undertaken a range of design-led work since the plan was submitted and have provided a document to the Council that sets out a number of parcels of land where they consider the Major Development Site boundary could be extended to make better use of this brownfield site, enable the creation of a more sustainable and better designed place and maintain an appropriate relationship with Highfields Caldecote - *Additional Evidence Relating to Bourn Airfield New Settlement Major Development Site Boundary*).¹³⁰
217. The Council reviewed the potential boundary changes, and broke them down into 5 parcels in order to consider the merits of each parcel - *Council's Assessment of Additional Evidence Relating to Bourn Airfield New Settlement Major Development Site Boundary*¹³¹.
218. At the meeting of 8 November 2016 the Planning Portfolio Holder¹³² proposed a refinement to the proposals for consideration by Council on 17 November 2016. Council agreed changes are proposed to the Bourn Airfield new village Major Development Site boundary in respect of parcels 1, 2, 4 and 5 only, and that parcel 3

¹²⁸ Strategic Housing Land Availability Assessment (SHLAA) (RD/Strat/120), Appendix 7i – Assessment of 2011 'Call for Sites' SHLAA sites, Page 104 Site 057 Bourn Airfield, Bourn

¹²⁹ RD/FM/010

¹³⁰ RD/FM/013

¹³¹ RD/FM/014

¹³² South Cambridgeshire District Council Planning Portfolio Holders Meeting 8 November 2016 South Cambridgeshire Local Plan Update (RD/CR/660)

be rejected, with parcel 4 included subject to additional wording to be included in Policy SS/6 paragraph 7b of the schedule. This wording was included in a letter to the Inspectors dated 13 January 2017¹³³.

219. The proposals would contribute positively to the policy objectives for the site set out in the submitted plan, make more effective use of a largely previously developed site, are justified by the evidence available, would deliver sustainable development and so contribute to sustainable development and the 'soundness' of the plan.

¹³³ RD/Gen/380

Appendix 1: List of Reference Documents

The Council's evidence in relation to SC6: New Settlements is set out in the following documents:

General Documents:

- Letter from the Inspectors to the Councils dated 20 May 2015 regarding Preliminary Conclusions (RD/Gen/170)
- Letter to Inspectors from South Cambridgeshire District Council regarding update on Cambourne West and Bourn Airfield New Village (13 January 2017) (RD/Gen/380)

National Policy:

- National Planning Policy Framework (NPPF) (RD/NP/010)
- National Planning Practice Guidance (NPPG) (RD/NP/020)
- Census 2011 (RD/NP/150)

Government Regulations and acts:

- Autumn Statement 2016 (RD/Gov/290)
- Housing White Paper: Fixing our broken housing market (RD/Gov/300)
- Flood risk assessments: climate change allowances (RD/Gov/310)
- Road Investment Strategy (2015/6-2019/20) (RD/Gov/320)

Cambridge and South Cambridgeshire Submission Documents:

- Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010)
- Proposed Submission South Cambridgeshire Policies Map (RD/Sub/SC/020)
- Schedule of Proposed Minor Changes following Proposed Submission Consultation (March 2014) (RD/Sub/SC/040)
- South Cambridgeshire Draft Final Sustainability Appraisal Report and HRA Screening Report (RD/Sub/SC/060)
- Joint Position Statement on foul water and environmental capacity in relation to proposed development within South Cambridgeshire (RD/Sub/SC/082)

Committee reports and minutes:

- 2015-20 prioritised infrastructure investment programme report - Greater Cambridge City Deal Joint Assembly 12 January 2015 (RD/CR/142)
- Greater Cambridge City Deal Executive Board Meeting 13 October 2016: A428 Cambourne to Cambridge Better Bus Journeys: Selection of a catchment area for detailed scheme development (RD/CR/650)
- South Cambridgeshire District Council Planning Portfolio Holders Meeting 8 November 2016 South Cambridgeshire Local Plan Update (RD/CR/660)
- South Cambridgeshire District Council Meeting 17 November 2016 - South Cambridgeshire Local Plan Update (RD/CR/670)
- South Cambridgeshire District Council Planning Portfolio Holder Meeting 13 December 2016 (RD/CR/690)
- Greater Cambridge City Deal Executive Board 8 December 2016 – Tranche 2 prioritisation (RD/CR/740)

Adopted Development Plan Documents:

- South Cambridgeshire District Council Core Strategy Development Plan Document (RD/AD/100)
- South Cambridgeshire District Council Development Control Policies Development Plan Document (RD/AD/110)
- South Cambridgeshire District Council Northstowe Area Action Plan (RD/AD/130)
- Cambridge City Council & South Cambridgeshire District Council - Cambridge East Area Action Plan (RD/AD/280)
- Cambridge City Council & South Cambridgeshire District Council - North West Cambridge Area Action Plan (RD/AD/290)
- South Cambridgeshire District Council Annual Monitoring Report 2016 (RD/AD/480)

Development Strategy:

- Strategic Housing Land Availability Assessment (SHLAA) (RD/Strat/120)
- South Cambridgeshire Village Classification Report (RD/Strat/240)
- South Cambridgeshire Village Services and Facilities Study (March 2014) (RD/Strat/250)
- South Cambridgeshire Village Services and Facilities Study (March 2012) (RD/Strat/251)
- Cambridge, Milton Keynes, Oxford corridor: Interim Report (RD/Strat/510)

Strategic Sites:

- Northstowe Area Development Framework (RD/SS/280)
- Land at West Cambourne Transport Assessment Appendix 9.1a Transport Addendum (RD/SS/290)
- Cambourne West Employment and Economic Impact Assessment (RD/SS/300)
- Waterbeach - Landscape and Heritage Appraisal of Denny Abbey and its Setting (RD/SS/310)
- Waterbeach - Denny Abbey and its Setting: Analysis and Recommendations (RD/SS/320)
- Waterbeach: Heritage Appraisal (RD/SS/330)
- Denny St Francis Water Cycle Study (RD/SS/340)

Transport and Infrastructure:

- Cambridge City & South Cambridgeshire Infrastructure Delivery Study (RD/T/010)
- Cambridge City & South Cambridgeshire Infrastructure Delivery Study Update (RD/T/020)
- Transport Strategy for Cambridge and South Cambridgeshire (RD/T/120)

Documents referred to in representations submitted by RLW Estates Ltd and the Defence Infrastructure Organisation:

- LDA Ecology Phase 1 Update Summary Report (July 2012) (RD/RLW & DIO/090)

Modifications Consultation:

- Supplement to Sustainability Appraisal Addendum Report (November 2015) (Revised March 2016) (RD/MC/021)
- Housing Land Supply Update, Cambridge City Council and South Cambridgeshire District Council (November 2015) (RD/MC/050)
- Cambridge and South Cambridgeshire Development Strategy Update (November 2015) (RD/MC/060)
- Local Plans CSRM – Cambridge and South Cambridgeshire Local Plans Transport Report, (November 2015) (RD/MC/070)
- A428 Constraints Report : South Cambridgeshire District Council (RD/MC/073)
- A10 Corridor Constraints Study: Constraints Assessment (February 2016) (RD/MC/074)
- Cambridge and South Cambridgeshire Infrastructure Delivery Study (November 2015) (RD/MC/080)
- Cambridge and South Cambridgeshire Local Plans Viability Update (November 2015) (RD/MC/090)
- City Deal and the Cambridge and South Cambridgeshire Local Plans (March 2016) (RD/MC/110)
- South Cambridgeshire Local Plan Proposed Modifications (March 2016) (RD/MC/150)

South Cambridgeshire Further Modifications:

- Further Modifications to the South Cambridgeshire Local Plan (RD/FM/010)
- Further Evidence Bourn Airfield MDS Boundary (RD/FM/013)
- Council's Assessment of Evidence re Bourn Airfield (RD/FM/014)

Appendix 2: Travel to Work Patterns - 2011 ONS Data from Nomis

2011 data	Cambridge	South Cambs
Jobs	98,000	80,000
Employed Residents	59,865	79,690
Top 5 places where workers commute from	Cambridge (33,704) South Cambridgeshire (23,367) East Cambridgeshire (7,206) Huntingdonshire (4,716) St Edmundsbury (2,858) Forest Heath (1,852)	South Cambridgeshire (23,832) Cambridge (8,272) Huntingdonshire (5,830) East Cambridgeshire (4,554) St Edmundsbury (2,302) North Hertfordshire (2,100)
Top 5 places where residents commute to	Cambridge (33,704) South Cambridgeshire (8,272) At home in Cambridge (6,570) No fixed place (3,203) London (1,449) Huntingdonshire (855) East Cambridgeshire (667)	South Cambridgeshire (23,832) Cambridge (23,367) At home in South Cambridgeshire (10,714) No fixed place (5,443) Huntingdonshire (2,690) North Hertfordshire (1,812) London (1,438)

WU03UK - Location of usual residence and place of work by method of travel to work
London - City of Westminster and Camden

**Appendix 3: Legal Advice to South Cambridgeshire District Council Regarding Area
Action Plans and Supplementary Planning Documents, by Douglas Edwards QC**

DRAFT SOUTH CAMBRIDGESHIRE LOCAL PLAN 2011-2031

ADVICE

1. I am asked to advise South Cambridgeshire District Council (“the Council”) with regard, in particular, to draft policies SS/5 and SS/6 of the emerging South Cambridgeshire Local Plan 2011 to 2031.
2. As submitted, policies SS/5 and SS/6 allocated land for respectively a new town at Waterbeach and a new village at Bourn Airfield. Both set out policies for both allocations, including the number of new dwellings to be provided at each of the two new settlements (in the form of an approximation in respect SS/6, and a range in respect of SS/5).
3. Both policy SS/5 and SS/6, as submitted, provide that an Area Action Plan (“AAP”) will be prepared for each allocation. At paragraph six of each policy the matters and issues to be addressed within the AAP is set out.
4. I have been asked to consider this correctness from a legal perspective of the use of AAPs in this context, and, in particular, to address the issue whether a supplementary planning document (“SPD”) should in law be prepared to address those matters and issues, rather than an AAP or other form of local plan.
5. I advised in respect of this matter during 2016. I understand that the Council had regard to, and referred to, that advice when it considered and resolved to advance modifications to policies SS/5 and SS/6, and the text accompanying those policies, to remove the reference to the production of AAPs and to insert reference, in their place, to SPDs, as well as consequential modifications. I have now been asked to set out in writing, and for the purposes of disclosure to examination into the submitted Local Plan, my advice in respect of this matter.
6. The starting point is regulation 5 of the Town and Country Planning (Local Plan) (England) Regulations 2012 (“the 2012 Regulations”). Regulation 5 of the 2012 Regulations provides as follows:
“5.— Local development documents
(1) For the purposes of section 17(7)(za) of the Act the documents which are to be prepared as local development documents are—
(a) any document prepared by a local planning authority individually or in cooperation with one or more other local planning authorities, which contains statements regarding one or more of the following—

- (i) the development and use of land which the local planning authority wish to encourage during any specified period;
 - (ii) the allocation of sites for a particular type of development or use;
 - (iii) any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in paragraph (i); and
 - (iv) development management and site allocation policies, which are intended to guide the determination of applications for planning permission;
- (b) where a document mentioned in sub-paragraph (a) contains policies applying to sites or areas by reference to an Ordnance Survey map, any map which accompanies that document and which shows how the adopted policies map would be amended by the document, if it were adopted.
- (2) For the purposes of section 17(7)(za) of the Act the documents which, if prepared, are to be prepared as local development documents are—
- (a) any document which—
 - (i) relates only to part of the area of the local planning authority;
 - (ii) identifies that area as an area of significant change or special conservation; and
 - (iii) contains the local planning authority's policies in relation to the area; and
 - (b) any other document which includes a site allocation policy.”

7. Regulation 6 of the 2012 Regulations provides that any document of the description referred to in regulation 5(1)(a)(i), (ii) or (iv) or regulation 5(2)(a) or (b) is a Local Plan. By regulation 2(1) a “supplementary planning document” is defined as “... any document of a description referred to in regulation 5 (except an adopted policies map or a statement of community involvement) which is not a local plan”.
8. The upshot of these regulations is that any document which contains a statement regarding the matters set out within regulation 5(1)(a)(i),(ii) or (iv) or regulation 5(2)(a) or (b) must be prepared as local plan and follow the relevant procedure set out in the Town and Country Planning Act 1990 and subordinate legislation for consultation and examination of local plans. Where a document contains only a statement regarding “any environmental, social, design and economic objectives which are relevant to the attainment of the development and use of land mentioned in [regulation 5(a)(i)]” that document should be prepared as SPD.
9. Finally, an AAP is a document falling within regulation 5(2) of the 2012 Regulations.
10. Whether or not a particular document falls within those parts of regulation 5 of the 2012 Regulations so as to be required to be prepared as a local plan as opposed to an SPD is a matter of law (see *R (Wakil) v Hammersmith and Fulham LBC* [2012] EWHC 1411). Moreover, the Court

has, subsequent to *Wakil*, had cause to consider and to determine whether a document prepared as an SPD should in law have in fact been prepared as a local plan. The decision of John Howell QC (sitting as a deputy high court judge) in *R (RWE Npower Renewables Limited) v Milton Keynes Borough Council* [2013] EWHC 751 (Admin) and the decision of Lindblom J. (as he then was) in *R (West Kensington Estate Tenants and Residents Association) v Hammersmith and Fulham LBC* [2013] EWHC 2834 (Admin) are of particular relevance and I consider these decisions later in this advice.

11. The issue on which I am asked to advise, in substance, concerns whether those matters set out in paragraphs 6 of policies SS/5 and SS/6, when considered in the context of those policies and the development strategy within the emerging Local Plans as a whole, are required in law to be set out in a document comprising a Local Plan (and more particularly an AAP within the meaning of regulation 5(2) of the 2012 Regulations) or whether they should take the form of an SPD, as defined in regulation 5(1)(a)(iii).
12. Submitted policy SS/5 of the emerging Local Plan identifies land at Waterbeach for development as a “new town” (para.1). It refers to the area so identified on the policies map (para.1). The policy provides further details and justification including the identification of land for 8,000-9,000 dwellings to be provided (para.1).
13. Submitted policy SS/6 concerning the development of a new village at Bourn Airfield follows the same approach, with the identification of the land for approximately 3,500 new dwellings secured by paragraph one of the policies and the policies map.
14. Seen in that context, what paragraph six of each policy provides for is the preparation of a further document to address those matters set out in that paragraph. Those matters, which are themselves part of each policy, in substance set out the parameters and principles to which the developments at Waterbeach and at Bourn Airfield are required to adhere. When considered in the context of the identification of the land at Waterbeach and at Bourn Airfield for new development having been secured by policies SS/5 and SS/6, what is intended and required to be achieved by the further document required by paragraph six of each policy is, in my view, a document which states “the environmental, social, design and economic objectives” relevant to the development at both locations which is provided for through the earlier paragraphs of the

policies. As such, I consider that, in principle, the objective of the further document envisaged and required by paragraph six of both policy SS/5 and of policy SS/6 should in law take the form of an SPD, rather than an AAP, or some other form of Local Plan. I should add that paragraph six of policies SS/5 and SS/6 forms part of those policies, as well as prescribing what the further document should contain. As such it is not correct to suggest, as some commentators on the draft Local Plan have done, that SS/5 and SS/6 are not themselves “policy” but defer, in whole or in part, policy making to the further document which is anticipated at paragraph six.

15. In this respect paragraphs 80 and 81 of the judgment of the Deputy Judge in *RWE Npower* are material and in particular the conclusion that the term “objectives” in regulation 5(1)(a)(iii) should be construed widely. The Deputy Judge held inter alia that “an objective that is relevant to the attainment of the development of land that a planning authority wishes to encourage may be one that the authority wants to be satisfied [of] if it is to encourage that development” (emphasis added) (para.81). Therefore specific objectives relating to a specific development may properly form the subject matter of SPD. That in substance is the function that the further document envisaged by paragraph 6 of policies SS/5 and SS/6 seeks to fulfill, in my view.
16. Moreover, what paragraph six of both policies does *not* require or envisage is that the further document itself either identifies land for development or allocates land for development, or identifies Waterbeach or Bourn Airfield as “an area of significant change”. Those purposes are secured by policies SS/5 and SS/6 themselves. As such, it may be concluded that the further document to be prepared pursuant to paragraph six of each policy is not a document which is to, or is intended to, contain a statement regarding the matters set out in regulation 5(1)(a)(i),(ii) or (iv) (in part) or regulation 5(2)(a) or (b). In *RWE Npower* the Deputy Judge held that the reference within regulation 5(1)(a)(iv) to statements of “development management ... which are intended to guide the determination of applications for planning permission” concerns general development control policies and not “policies” or other requirements which concern only a specific development or form of development” (see para.75).

17. Indeed, policies SS/5 and SS/6 and their context have strong parallels with the circumstances addressed by the Lindblom J. (as he then was) in *West Kensington Residents Association*. There the identification or allocation of land for major development was made through the London Plan and through the core strategies of the London Borough of Hammersmith and Fulham and of the Royal Borough of Kensington and Chelsea. The document there under challenge, which was prepared as an SPD, provided guidance on the implementation of that major development, which itself was “identified” through development plan policy. The Court held that to be acceptable in law and that the document under challenge was properly in law prepared as a SPD. In my view the facts in *West Kensington Residents Association* and the Judge’s conclusions are consistent with the view I have set out above in respect of policies SS/5 and SS/6.
18. In conclusion, I consider that the further documents envisaged and required by paragraph six in policies SS/5 and SS/6 should in law be advanced through a SPD, rather than an AAP or some other form of Local Plan document. Indeed, given the 2012 Regulations and recent case law I consider that the intended function and purpose of that document may not in law be performed by an AAP, since the document envisaged is not intended to identify an area “as an area of significant change”; that function is performed by policies SS/5 and SS/6 themselves.
19. I consider therefore that the Council should advance a modification to both policies to provide that the further documents to be prepared should comprise SPD rather than AAP and to effect accordingly any consequential modifications to each policy to reflect the change from and AAP to an SPD.



DOUGLAS EDWARDS QC

Francis Taylor Building,

Temple, London.

EC4Y 7BY.

16 February 2017.

Appendix 4: List of Proposed Modifications to the South Cambridgeshire Local Plan

This schedule includes the proposed modifications agreed in November 2016 (RD/FM/010). The justification has been reviewed in places to provide further clarification of the reasons why the changes are needed for soundness. The justification in some cases is a summary of the Council's position and the response in substance can be found in the RD/FM/010 document in which the schedule was originally provided and in the Council's responses to the Inspector's matters and issues questions in this statement.

It includes the further changes to the boundary of the Major Development Site at Bourn Airfield (policy SS/6) included in our January 2017 letter (RD/GEN/380). The Council has obtained legal advice regarding the status of the proposed AAPs, and whether they remain the most appropriate and legally correct approach to providing further planning guidance for these major proposals, having regard to relevant statutory provisions and recent case law. This is set out in a Appendix 3 to this statement and referenced in the responses to issue 2i for each new settlement.

A large number of modifications to policies SS/5 and SS/6 are proposed in response to this advice so as to provide clarity on what the SPD is expected to include, and to ensure that the policy reads clearly. These are set out below.

Text to be deleted is shown as a ~~strike through~~ and text to be added is shown in **bold and underlined**.

The references to page and paragraph numbers in the table below do not take account of the deletion or addition of text proposed through modifications submitted previously.

Chapter 3 Strategic Sites

Page	Policy/Paragraph	Modification	Justification
63	Policy SS/5: Waterbeach New Town Subsection 1	Amend paragraph 1 of Policy SS/5 as follows: 1. A new town of <u>approximately</u> 8,000 to 9,000 dwellings and associated uses is proposed on the former Waterbeach Barracks and land to the east and north as shown on the Policies Map. <u>A Supplementary Planning Document (SPD) will be prepared for the new town as addressed at subsection 17 of this policy.</u> The final number of dwellings will be determined <u>through a design-led approach and spatial framework diagram included in the SPD</u> in an	Positively prepared, Justified, Consistent with national policy & Effective Modifications are necessary for soundness in response to legal advice that the documents proposed should in law be produced as SPD rather than AAP, as set out in Appendix 3 of this statement and in the response to Waterbeach issue 2.i of this statement. Modifications are proposed to give effect to this

Page	Policy/Paragraph	Modification	Justification
		<p>Area Action Plan (AAP) having regard to:</p> <ol style="list-style-type: none"> The quantum, location and distribution of development in the town; and The land outside the town necessary to maintain Maintaining an appropriate setting for Denny Abbey listed building and scheduled monument. 	<p>advice and, as a consequence to provide the appropriate policy context and clarity for the preparation of an SPD. Some additional changes to the detailed wording of the submitted policy are also required to reflect the change from a production of an AAP to an SPD. These changes are set out both here and below.</p> <p>It is important to ensure that best use is made of this largely brownfield site and hence the Council has proposed modifications to include the word ‘approximately’ before the 8,000 to 9,000 dwelling reference to provide this necessary flexibility. Also see the response to issue 1.i for Waterbeach in this statement.</p>
63	<p>Policy SS/5: Waterbeach New Town Subsection 2</p>	<p>Amend paragraph 2 of Policy SS/5 as follows:</p> <ol style="list-style-type: none"> The new town will be developed to high standards of design and layout which draw on its Fen edge location. The new town will be kept separate from Waterbeach village by an extension to the Cambridge Green Belt. <u>will be a sustainable and vibrant new community that is inclusive and diverse with its own distinctive local identity which is founded on best practice urban design principles, drawing on the traditions of fen-edge market towns, which encourages the high quality traditions and innovation that are characteristic of the Cambridge Sub-Region.</u> 	<p>Positively prepared, Justified, Consistent with national policy & Effective</p> <p>The land at Bannold Road, Waterbeach that was to form a Green Belt extension between Waterbeach village and the new town now has planning permission to be developed for housing following appeal decisions in June 2014 and the proposed Green Belt extension is therefore deleted.</p> <p>It is appropriate to set out a high level vision for the new town in the Local Plan which will then be taken forward and implemented through the production of an SPD.</p>
63	<p>Policy SS/5: Waterbeach New Town</p>	<p>Amend paragraph 3 of Policy SS/5 as follows:</p> <ol style="list-style-type: none"> It will be developed to maintain the identity of Waterbeach as 	<p>Positively prepared, Justified, Consistent with national policy and Effective</p> <p>Village residents should not find it difficult to</p>

Page	Policy/Paragraph	Modification	Justification
	Subsection 3	a village close to but separate from the new town. Appropriate integration to should be secured by the provision of suitable links to enable the residents of Waterbeach village to have convenient access to the services and facilities in the new town but without providing limited and controlled opportunities for direct road access from the wider new town to Waterbeach, other with emphasis on connections than by public transport, cycle and on foot.	access the relocated railway station or the services and facilities of the new town which the existing wording implies. However neither should village residents be put at risk from uncontrolled rat-running.
63	Policy SS/5: Waterbeach New Town Subsection 4	Amend paragraph 4 of Policy SS/5 as follows: 4. It will deliver an example of excellence in sustainable development and healthier living, which will make a significant contribution to the long term development needs of the Cambridge area. It will deliver high quality public transport links to Cambridge, including a new relocated railway station, to enable a high modal share of travel by means other than the car.	Effective The existing Waterbeach Station would relocate rather than remain open in its existing location.
63	Policy SS/5: Waterbeach New Town Subsection 5	Delete paragraph 5 of Policy SS/5: 5. No more than 1,400 dwellings will be completed by 2031, except as may be agreed by the Local Planning Authority to be necessary to maintain a 5-year supply of deliverable housing sites.	Positively prepared, Justified, and Effective Consequential modification to reflect the modification to Policy S/6, published in Proposed Modifications (March 2016) (RD/MC/150) reference PM/SC/3/H and Further Proposed Modifications (RD/FM/010).
63	Policy SS/5: Waterbeach New Town Subsection 6	Delete paragraph 6 of Policy SS/5: 6. An AAP will be prepared for the area shown on the Policies Map. The AAP will establish a policy framework for the site, and will address issues and requirements including:	Positively prepared, Justified, Effective & Consistent with national policy See subsection 1 justification for removal of reference to AAP and to introduce a reference to an AAP. <i>Each subsequent paragraph of the policy that formed part of the submitted subsection 6 is renumbered and modified to be a stand-alone</i>

Page	Policy/Paragraph	Modification	Justification
			<i>part of the policy.</i>
64	Policy SS/5: Waterbeach New Town <i>The Site</i> c.	Amend criterion c. of Policy SS/5 to read: <i>The Site</i> e 5. Establish + The built area of the settlement <u>will be contained</u> within the Major Development Site, and the location of major land uses <u>and design of the northern edge of the new town</u> will ensure, having particular regard to ensuring an appropriate relationship with Denny Abbey listed building and scheduled monument.	Justified & Effective To improve clarity and effectiveness of the policy.
64	Policy SS/5: Waterbeach New Town <i>The Site</i> d.	Amend criterion d. of Policy SS/5 to read: d 6. Consider <u>The new town will establish an appropriate</u> the relationship and interaction with Waterbeach village, and the Cambridge Research Park.	Justified & Effective To ensure that the policy reads clearly and provides clear and effective guidance for future decision making.
64	Policy SS/5: Waterbeach New Town <i>The Site</i> e.	Amend criterion e. of Policy SS/5 to read: E 7. The provision of a All All built development and formal open space uses <u>will be provided</u> within the Major Development <u>Site</u> area shown on the Policies Map. <u>Land outside the Major Development Site can provide other associated uses and mitigation including drainage, habitat compensation and informal open space.</u>	Justified & Effective To provide clear and effective guidance on the matters to be detailed in the SPD for the development. Also see the justification to subsection 17.
64	Policy SS/5: Waterbeach New Town <i>The Phasing and Delivery of a Mix of Land Uses</i> f.- i.	Amend criteria f. to i. of Policy SS/5 to read: <i>The Phasing and Delivery of a Mix of Land Uses</i> 8. <u>The new town will provide a range of uses appropriate to a new town, including:</u> f a. Residential development of a mix of dwelling sizes and types, including affordable housing, to achieve a balanced and inclusive community;	Consistent with national policy, Justified & Effective To provide clear and effective guidance on the matters to be detailed in the SPD for the development.

Page	Policy/Paragraph	Modification	Justification
		<p>gb. Employment provision <u>of a quantum, type and mix</u> to meet the needs of the town and provide access to local jobs, and support the continued development of the economy of the Cambridge area <u>to be established through an Economic Development Strategy prepared in partnership with the local authority and key stakeholders;</u></p> <p>hc. Shops, services, leisure and other town centre uses¹ of an appropriate scale for a town whilst avoiding significant impacts on vitality and viability of surrounding centres, and not competing with Cambridge as the sub regional centre;</p> <p>id. A town centre supported by local centres, to ensure services and facilities are easily accessible to residents;</p> <p>je. Community services and facilities, including health and both primary and secondary school education;</p> <p>kf. Open space, sports and leisure facilities;</p> <p>lg Appropriate provision <u>for</u> and design of waste / recycling management facilities.</p> <p>Footnote: ¹ <i>Main town centre uses defined in the NPPF: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</i></p>	
64	<p>Policy SS/5: Waterbeach New Town <i>Measures to Address</i></p>	<p>Amend criteria m. to r. of Policy SS/5 to read:</p> <p><i>Measures to Address Landscape, Townscape and Setting of Heritage Assets in the Surrounding Area, and Deliver a High Quality New Development:</i></p>	<p>Consistent with national policy, Justified & Effective</p> <p>To take account of the historic raised causeways linking the village to Denny Abbey and to take account of the Waterbeach Waste</p>

Page	Policy/Paragraph	Modification	Justification
	<p><i>Landscape, Townscape and Setting of Heritage Assets in the Surrounding Area, and Deliver a High Quality New Development:</i> m.- r.</p>	<p>9. The new town will:</p> <p>ma. Establish and follow Design principles to deliver a high quality development responding to local character, but also with its own identity;</p> <p>mb. Provide Strategic landscaping within and beyond the Major Development Site to deliver high quality environs and:</p> <p>i. provide an appropriate screening of the town in views from Denny Abbey in order to protect the historic significance of the Abbey, and</p> <p>ii. maintain the village character of Waterbeach;</p> <p>mc. Measures to conserve Conserve and enhance the significance of Denny Abbey Grade 1† listed building and scheduled monument, including the contribution made by its setting, the extent and nature of separation from built development the Major Development Site and formal open spaces, and protection of key views including to and from the Abbey;</p> <p>md. Include an Assessment, conservation and enhancement of other heritage assets as appropriate to their significance, including non designated assets such as Car Dyke, World War II structures, raised causeways, and the Soldiers Hill Earthworks.</p> <p>me. Identification and Incorporate necessary mitigation to sensitive receptor boundaries, with regard to noise and odour , including from the A10, proposed railway station, and recreational activities, and the Waterbeach Waste Management Park to ensure no significant adverse impact on quality of life / amenity and health using separation distances or acoustic earth bunding rather than physical barriers if appropriate and where practicable;</p> <p>mf. Ensure there is no significant adverse impact on local air quality and or mitigate as necessary with a Low Emissions</p>	<p>Management Park sited to the west of the A10.</p> <p>To provide clear and effective guidance on the matters to be detailed in the SPD for the development.</p> <p>This modification (highlighted text) – reference MC/3/05 was submitted in March 2014 (RD/Sub/SC/040).</p> <p>Heritage studies of the site and of the setting of Denny Abbey have identified the significance of the raised causeways .</p> <p>The Waterbeach Waste Management Park lies just to the west of the new town site.</p>

Page	Policy/Paragraph	Modification	Justification
65	<p>Policy SS/5: Waterbeach New Town <i>Delivery of a Significant Network of Green Infrastructure:</i> s. - w.</p>	<p>Scheme.</p> <p>Amend criteria s. to w. of Policy SS/5 to read:</p> <p><i>Delivery of a Significant Network of Green Infrastructure:</i></p> <p>10. The new town will:</p> <p>sa. Provide a high degree of connectivity to existing corridors and networks;</p> <p>tb. Include areas accessible to the public as well as areas with more restricted access with the aim of enhancing biodiversity;</p> <p>tc. Provision Provide and retention retain of woods, hedges, and water features which would contribute to the character and amenity of the town and help preserve and enhance the setting of Denny Abbey, managed to enhance their ecological value;</p> <p>vd. Consider the multifunctional value of spaces, e.g. amenity, landscape, biodiversity, recreation and drainage;</p> <p>we. Requirement for Carry out a full programme of ecological survey and monitoring, to guide a Biodiversity management plan to provide appropriate mitigation and enhancement.</p>	<p>Effective & Consistent with national policy These modifications will help to ensure that the policy is easy to read, and clear.</p>
65	<p>Policy SS/5: Waterbeach New Town <i>Significant Improvements in Public Transport</i> x. - y. <i>Measures to Promote Cycling and Walking</i> z. - bb. <i>Highway</i></p>	<p>Amend criteria x. to ff. of Policy SS/5 to read:</p> <p><u>Creation of a comprehensive movement network:</u></p> <p><u>11. The new town will be founded on a comprehensive movement network for the whole town, that connects key locations including the town centre and relocated railway station to encourage the use of sustainable modes of travel, and includes:</u></p> <p>a. Significant Improvements in Public Transport, including:</p> <p>xi. Provision of a A relocated Waterbeach station with appropriate access arrangements by all modes to serve</p>	<p>Positively prepared, Justified, Effective & Consistent with national policy To provide clear and effective guidance on the matters to be detailed in the SPD for the development.</p> <p>It is important to ensure the delivery of a comprehensive movement network for the development as a whole as there are now two site promoters, and it has become clear since the plan was submitted that development on the site will be brought forward by way of two</p>

Page	Policy/Paragraph	Modification	Justification
	<p><i>Improvements cc.- ff.</i></p>	<p>the village and the new town;</p> <p>yii. Provision of a A Park and Ride site on the A10 to intercept traffic from the north of Waterbeach, served by a new segregated Busway link to Cambridge;</p> <p>b. Measures to Promote Cycling and Walking, <u>from the start of the development including:</u></p> <p>zi. Provision of a A-network of attractive, direct, safe and convenient walking and cycling routes linking homes to public transport and the main areas of activity such as the town centre, schools and employment areas;</p> <p>aa.ii. Provision of dDirect, segregated high quality pedestrian and cycle links to north Cambridge, surrounding villages and nearby existing facilities such as the Cambridge Research Park;</p> <p>bb.iii.A Smarter Choices package including residential, school and workplace travel planning.</p> <p>c. Highway Improvements, <u>including:</u></p> <p>ee.i. Primary road access to from the A10;</p> <p>ee.ii. Additional capacity to meet the forecast road traffic generation of the new town, particularly on the A10 and at the junction with the A14;</p> <p>ee.iii.Measures to mitigate the traffic impact of the new town on surrounding villages including Waterbeach, Landbeach, Horningseas, Fen Ditton and Milton;</p> <p>ff.iv. A Review <u>review</u> of the access arrangements to Denny Abbey <u>and the Farmland Museum.</u></p>	<p>planning applications.</p> <p>These modifications will otherwise help to ensure that the policy is easy to read ,clear and effective.</p> <p>This modification (highlighted text) – reference MC/3/06 was submitted in March 2014 (RD/Sub/SC/040).</p>
66	<p>Policy SS/5: Waterbeach New Town</p>	<p>Amend criterion gg. of Policy SS/5 to read:</p> <p>Sustainability Sustainable Design and Construction:</p>	<p>Effective</p> <p>To provide clear and effective guidance on the matters to be detailed in the SPD for the</p>

Page	Policy/Paragraph	Modification	Justification
	<i>Sustainability</i> <i>gg.</i>	gg 12. Sustainable Design and Construction measures. The new town will incorporate and deliver The AAP will identify opportunities to exceed sustainable design and construction standards established by the Local Plan. These measures could include combined heat and power provided from the adjacent Waterbeach Waste Management Park.	development.
66	Policy SS/5: Waterbeach New Town <i>Infrastructure Requirements</i> <i>hh.- ii.</i>	Amend criteria hh. to ii. of Policy SS/5 to read: <i>Infrastructure Requirements:</i> 13. The new town will: hha. Requirements for Ensure the delivery of improvement to any existing infrastructure which will be relied upon by the new town as well as the provision, management and maintenance of new infrastructure, services and facilities to meet the needs of the town. hib. Make appropriate a Arrangements for Foul Drainage and Sewage Disposal. ii.c. Ensure the p Provision, management and on-going maintenance of sustainable surface water drainage measures to control the risk of flooding on site and which will reduce the risk of flooding to areas downstream or upstream of the development.	Effective These modifications will help to ensure that the policy is easy to read, clear and effective. Shown as a heading in the submitted plan. This modification (highlighted text) – reference MC/3/07 was submitted in March 2014 (RD/Sub/SC/040).
67	Policy SS/5: Waterbeach New Town <i>Community Development:</i> <i>jj.</i>	Amend criterion jj. of Policy SS/5 to read: <i>Community Development:</i> jj 14. Measures will be required to assist the development of a new community, such as through community development workers.	Effective These modifications will help to ensure that the policy is easy to read, clear and effective.
67	Policy SS/5: Waterbeach New Town <i>Site Preparation:</i>	Amend criteria kk. to ll. of Policy SS/5 to read: <i>Site Preparation:</i> 15. Developers will be required to:	Effective These modifications will help to ensure that the policy is easy to read, clear and effective.

Page	Policy/Paragraph	Modification	Justification
	<i>kk. - ll.</i>	kk.a. Undertake ss site wide investigation and assessment of land contamination and other issues resulting from former land uses, including military use, to ensure the land is suitable for the proposed end use and is not presenting a risk to the environment; ll.b. Ensure that all ordnance is removed from the site in ways that ensure the development can take place without unacceptable risk to workers and neighbours including major disruption to the wider public off site.	
67	Policy SS/5: Waterbeach New Town <i>Delivery</i> <i>mm. - nn.</i>	Amend criteria mm. to nn. of Policy SS/5 to read: <u><i>Phasing and Delivery:</i></u> 16. The delivery of the new town, including any individual phases, must: a. Be in accordance with the spatial framework diagram set out in the Supplementary Planning Document to ensure a comprehensive development of the site as a whole that will not prejudice the creation of a fully functioning and successful new town. b. Be informed by appropriate strategies, assessments and evidence reports. mm.c. Plan for essential services, facilities and infrastructure to be provided in a comprehensive manner, anticipating future needs, and establishing suitable mechanisms to deliver the infrastructure in a timely and efficient way to achieve the successful delivery of the new town, including the needs of individual phases, The process for achieving delivery, and including the requirements on developers. nn.d. Requirements for Make satisfactory arrangements to ensure appropriate engagement and consultation with local people and stakeholders.	Positively prepared, Justified, Effective & Consistent with national policy To provide clear guidance on the matters to be detailed in the SPD for the development and to ensure that the development of the town will be properly planned and delivered over the plan period. This additional text is needed to ensure development is planned and delivered comprehensively and so deliver sustainable development. It has become clear since the Plan was submitted in March 2014 that each of the two promoters will submit their own planning applications.
67	Policy SS/5:	Add new paragraph to the end of Policy SS/5 to read:	Positively prepared, Justified & Effective

Page	Policy/Paragraph	Modification	Justification
	Waterbeach New Town New	<p><u>Supplementary Planning Document:</u></p> <p><u>17. The SPD to be prepared for the Strategic Site shown on the Policies Map will provide further guidance and detail on the implementation of Policy SS/5. The SPD will include:</u></p> <p>a. <u>An overarching, high level vision for the new town.</u></p> <p>b. <u>Consideration of relevant context including key constraints and opportunities.</u></p> <p>c. <u>The broad location of the components of the new town which are essential to support comprehensive and seamless development. A spatial framework diagram will be included that ensures the creation of a sustainable, legible and distinctive new settlement.</u></p> <p>d. <u>The location, nature and extent of any formal open space to be provided outside of the Major Development Area.</u></p> <p>e. <u>Broadly how the development is to be phased, including the delivery of key infrastructure.</u></p>	<p>Consistent with national policy See the justification to paragraph 1.</p> <p>To provide clear guidance on the matters to be detailed in the SPD for the development.</p> <p>There may be scope to provide some formal open space outside the Major Development Site whilst providing an appropriate setting for Denny Abbey, which will need to be considered through the SPD.</p>
67	Paragraph 3.35 (there are no changes to paragraph 3.34, 3.38 and 3.39)	<p>Amend paragraph 3.35 to read:</p> <p>This is a long term development opportunity. Development will take place towards the end of over the plan period, and much of it beyond the plan period. In order to create a comprehensive policy framework, and to allow the nature of the town to be established with the local communities and stakeholders, an Area Action Plan (AAP) will be prepared by the Council in close cooperation with stakeholder which will cover the area shown on the Policies Map. This will form part of the development plan, and have the status of a Development Plan Document. <u>The implementation of the new town development provided for by this policy will be informed by a SPD produced in</u></p>	<p>Effective and Consistent with national policy Consequential modification to reflect changes to Policy SS/5.</p>

Page	Policy/Paragraph	Modification	Justification
		<p><u>accordance with policy paragraph 17 and the local community and stakeholders will be engaged in its preparation.</u> The policy establishes principles <u>requirements and objectives</u> that will need to be addressed in the AAP <u>SPD</u>, and subsequently by developers. A full range of detailed assessments will be required, initially at a level appropriate to inform the AAP <u>SPD</u>, and ultimately as part of any planning application.</p>	
67	Paragraph 3.36	<p>Amend paragraph 3.36 to read:</p> <p>The Policies Map also identifies the Major Development Site, which will accommodate the built development of the new town. This does not mean the whole of the area will be developed. Large parts of it will remain undeveloped and green after the settlement is complete to provide open spaces within the new town and a substantial green setting for the new town, Denny Abbey and <u>Farmland Museum and</u> Waterbeach village. Areas to the north of the town within the area to be covered by the AAP <u>SPD</u> will ensure that it will remain physically separate from Denny Abbey. Assessment of the setting of Denny Abbey using English Heritage's <u>Historic England's</u> guidance on Setting of Heritage Assets will be required in view of the importance of conserving and where possible enhancing the remote rural and historic setting of Denny Abbey, a nationally important heritage asset, will be a key element of the plan, including having regard to key views and landscape character. <u>There may be scope to provide some formal open space outside the Major Development Area whilst providing an appropriate setting for Denny Abbey, if demonstrated to be appropriate through the SPD.</u></p>	<p>Effective and Consistent with national policy Consequential modification to reflect changes to Policy SS/5.</p> <p>This modification (highlighted text) – reference MC/3/08 was submitted in March 2014 (RD/Sub/SC/040).</p>
68	Paragraph 3.37	Amend paragraph 3.37 to read:	Effective and Consistent with national

Page	Policy/Paragraph	Modification	Justification
		<p>Delivery of large areas of green infrastructure will also enable the enhancement of biodiversity within the town, whilst providing a network of open spaces for new and existing communities. Maintaining separation with the <u>identity of</u> Waterbeach village <u>as a village close to but separate from the new town</u> is also necessary to avoid coalescence and the Green Belt has been extended in the vicinity of Bannold Road to ensure this. The nature of the remainder of the transition between Waterbeach village and the new town will be addressed through the AAP <u>SPD</u>.</p>	<p>policy Consequential modification to reflect changes to Policy SS/5.</p>
69	<p>Policy SS/6: New Village at Bourn Airfield Subsection 1</p>	<p>Amend paragraph 1 of Policy SS/6 to read:</p> <p>1. Land south of the A428 based on Bourn Airfield is allocated for the development of a new village of approximately 3,500 dwellings. <u>A Supplementary Planning Document (SPD) will be prepared for the new village as addressed at subsection 15 of this policy. The final number of dwellings will be determined through a design-led approach and spatial framework diagram included in the SPD.</u> An Area Action Plan (AAP) will be prepared by the Council for the area shown on the Policies Map to guide development of the site. It will be classified as a Rural Centre once built.</p>	<p>Positively prepared, Justified, Consistent with national policy and Effective Modifications are necessary for soundness in response to legal advice that the documents proposed should in law be produced as SPD rather than AAP, as set out in Appendix 3 of this statement and in the response to Bourn Airfield issue 2.i of this statement.</p> <p>Modifications are proposed to give effect to this advice and, as a consequence to provide the appropriate policy context and clarity for the preparation of an SPD. Some additional changes to the detailed wording of the submitted policy are also required to reflect the change from a production of an AAP to an SPD. These changes are set out both here and below.</p>
69	<p>Policy SS/6:</p>	<p>2. The new village will be developed to high standards of</p>	<p>No change</p>

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	New Village at Bourn Airfield Subsection 2	design and layout. A key consideration will be the relationship with other settlements in the A428 corridor, and maintaining rural character and separation of individual villages.	
69	Policy SS/6: New Village at Bourn Airfield Subsection 3	3. It will deliver an example of excellence in sustainable development and healthier living, which will make a significant contribution to the long term development needs of the Cambridge area.	No change
69	Policy SS/6: New Village at Bourn Airfield Subsection 4	Delete paragraph 4 of Policy SS/6: 4. Development will be phased so that the first housing completions will be in 2022, with no more than 1,700 dwellings being completed by 2031, except as may be agreed by the Local Planning Authority to be necessary to maintain a 5 year supply of deliverable housing sites.	Positively prepared, Justified, Effective & Consistent with national policy A consequential modification to reflect the modification to Policy S/6, published in Proposed Modifications (March 2016) (RD/MC/150) reference PM/SC/3/1 and Further Proposed Modifications (RD/FM/010).
69	Policy SS/6: New Village at Bourn Airfield Subsection 5	Amend paragraph 5 of Policy SS/6 to read: 4.5. The Major Development area Site , which will accommodate the built development of the new village, is shown on the Policies Map. The area to be planned through the AAP SPD is also shown on the Policies Map. This includes additional land to ensure that the development potential of the former airfield site is maximised and to ensure that the new village includes green infrastructure including formal and informal open space, strategic landscaping and green separation, particularly from Caldecote / Highfields to help it fit into its rural setting.	Positively prepared, Justified, Effective & Consistent with national policy See subsection 1 justification. Revisions to the boundary of the Major Developed Site (MDS) are proposed. The site promoters have asked the Council to consider a number of revisions to the eastern boundary of the Major Development Site included in the submitted Local Plan. They have undertaken a range of design-led work since the plan was submitted and have provided a document to the Council that sets out a number of parcels of land where they consider the Major Development Site boundary could be extended to make better use of this brownfield site,

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			<p>enable the creation of a more sustainable and better designed place and maintain an appropriate relationship with Highfields Caldecote. See the Further Modification to the Policies Map, Inset I in RD/FM/010.</p> <p>To provide clear and effective guidance on the matters to be detailed in the SPD for the development, particularly in relation to defining green infrastructure provision.</p>
69	Policy SS/6: New Village at Bourn Airfield Subsection 6	Delete paragraph 6 of Policy SS/6: 6. The AAP will establish a policy framework for the site, and will address issues and requirements including:	Positively prepared, Justified, Effective & Consistent with national policy See Subsection 1 justification. Text no longer required in the absence of preparing an AAP.
69	Policy SS/6: New Village at Bourn Airfield <i>The Site</i> a.	Amend criterion a. of Policy SS/6 to read: <i>The Site</i> 5-a. Establish the built area of the settlement <u>will be contained</u> within the Major Development <u>Site</u> area, and the location of major land uses; <u>and the design of the edges of the new village will have particular regard to ensuring an appropriate relationship with Cambourne and Highfields Caldecote.</u>	Positively prepared, Justified, Effective & Consistent with national policy See Subsection 1 justification. These modifications will help to ensure that the policy is easy to read, clear and effective and to provide clear guidance on the matters to be detailed in the SPD for the development especially in relation to the landscape setting of the new village in relation to existing settlements.
70	Policy SS/6: New Village at Bourn Airfield <i>The Phasing and Delivery of a Mix of Land Uses:</i> b. - h.	Amend criteria b. to h. of Policy SS/6 to read: <i>The Phasing and Delivery of a Mix of Land Uses:</i> 6. <u>The new village will provide a range of uses appropriate to a new village including:</u> b.a. Residential development of a mix of dwelling sizes and types, including affordable housing, to achieve a balanced and inclusive community.;	Positively prepared, Consistent with national policy, Justified & Effective To provide clear guidance on the matters to be detailed in the SPD for the development.

Page	Policy/Paragraph	Modification	Justification
		<p>e.b. Employment development, <u>of a quantum type and mix to meet the needs of the new village to be established through an Economic Development Strategy prepared in partnership with the local authority and key stakeholders.</u> to include the existing ThyssenKrupp site, appropriate to a residential area in Use Class B1. Where distant from residential areas the site could also include other employment uses. The AAP will consider how this site can be integrated with the new village;</p> <p>d.c. Shops, services, leisure and other town centre uses¹ of an appropriate scale for a Rural Centre, whilst avoiding significant impacts on vitality and viability of surrounding centres, and not competing with Cambridge as the sub regional centre or Cambourne village centre.;</p> <p>e.d. Smaller local centres to meet the needs of residential areas to ensure accessible local services.;</p> <p>f.e. Community services and facilities, including health, primary school and secondary school education;</p> <p>g.f. Open space, sports and leisure facilities.;</p> <p>h.g. Appropriate provision <u>for</u> and design of waste / recycling management facilities.</p> <p>Footnote: ¹ <i>Main town centre uses defined in the NPPF: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).</i></p>	
70	Policy SS/6:	Amend criteria i. to l. of Policy SS/6 to read:	Consistent with national policy, Justified &

Page	Policy/Paragraph	Modification	Justification
	<p>New Village at Bourn Airfield <i>Measures to Address Landscape, Townscape and Historic Setting of the New Village, and Deliver a High Quality New Development:</i> i - l.</p>	<p><i>Measures to Address Landscape, Townscape and Historic Setting of the New Village, and Deliver a High Quality New Development:</i> 7. The new village will: i.a. Establish and follow Design principles to deliver a high quality development responding to local character, but also with its own identity; j.b. Provide strategic landscaping within and beyond the Major Development Area Site to deliver a high quality landscaped setting around the boundary of the settlement to avoid it appearing as part of a ribbon of urban development south of the A428, to maintain the rural nature of the Broadway and ensure separation from Cambourne, and to ensure countryside separation from Caldecote / Highfields and Bourn. – The strategic landscaping along the eastern boundary of the Strategic Site south of the existing employment area will include a substantial and continuous woodland belt along the full length of the boundary to provide a suitable buffer to Caldecote / Highfields, including land within the Major Development Site. k.c. Measures to Protect and enhance the setting of listed buildings near to the site; l.d. Identification and Incorporate necessary mitigation to sensitive boundaries, with regard to noise, including the A428, using landscaped earth bunds.</p>	<p>Effective To provide clear guidance on the matters to be detailed in the SPD for the development. The modifications would lead to a more sustainable and coherent settlement form through the inclusion of additional land within the Major Development Site to better integrate the employment uses and ensure the provision of strategic landscaping including a continuous woodland belt along the eastern boundary to Caldecote/Highfields.</p>
71	<p>Policy SS/6: New Village at Bourn Airfield <i>Delivery of a Significant Network of Green</i></p>	<p>Amend criteria m. to q. of Policy SS/6 to read: <i>Delivery of a Significant Network of Green Infrastructure:</i> 8. The new village will: m.a. Provide a high degree of connectivity to existing corridors and networks, including through an enhanced</p>	<p>Effective & Consistent with national policy These modifications will help to ensure that the policy is easy to read and clear.</p>

Page	Policy/Paragraph	Modification	Justification
	<i>Infrastructure: m.-.q.</i>	<p>network of footpaths and bridleways-</p> <p>r.-b. Include areas accessible to the public as well as areas with more restricted access with the aim of enhancing biodiversity-</p> <p>o.-c. Retain Retention of existing woods, hedges, and water features which would contribute to the character and amenity of the village or separation from surrounding communities, managed to enhance their ecological value-</p> <p>p.-d. Consider the multifunctional value of spaces, e.g. amenity, landscape, biodiversity, recreation and drainage-</p> <p>q.-e. Take account of Requirement for a full programme of ecological survey and monitoring, to guide a biodiversity management plan to provide appropriate mitigation and enhancement.</p>	
71	<p>Policy SS/6: New Village at Bourn Airfield <i>Significant Improvements in Public Transport, including: r.- t. Measures to Promote Cycling and Walking, including: u.-.x.</i></p>	<p>Amend criteria r. to x. of Policy SS/6 to read:</p> <p><u>Creation of a comprehensive movement network:</u> <u>9. The new village will be founded on a comprehensive movement network for the whole village, that connects key locations including the village centre and schools to encourage the use of sustainable modes of travel and includes:</u></p> <p>a. <i>Significant Improvements in Public Transport, including:</i> r.-i. Provision of a A segregated bus link from Cambourne to Bourn Airfield new village across the Broadway, and on through the development to the junction of the St Neots Road with Highfields Road;-</p> <p>s.-ii. Any measures necessary to ensure that a bus journey between Caldecote / Highfields and the junction of the A428 and the A1303 is direct and unaffected by any</p>	<p>Positively prepared, Justified, Effective & Consistent with national policy To provide clear and effective guidance on the matters to be detailed in the SPD for the development.</p> <p>It is important to ensure the delivery of a comprehensive movement network for the development which includes land in more than one ownership.</p> <p>These modifications will otherwise help to ensure that the policy is easy to read and clear.</p> <p>The Park & Ride is to be provided away from the site, also see the response to issues SC6</p>

Page	Policy/Paragraph	Modification	Justification
		<p>congestion suffered by general traffic;-</p> <p>t.iii. Provision of h High quality segregated bus priority measures or busway on or parallel to on the A1303 between its junction with the A428 and Queens Road, Cambridge.</p> <p>b. <i>Measures to Promote Cycling and Walking, including:</i></p> <p>u. Potentially incorporate a Park and Ride facility for the A428 corridor.</p> <p>v.i Provision of a A network of attractive, direct, safe and convenient walking and cycling routes from the start of the development linking homes to public transport and the main areas of activity such as the village centre, schools and employment areas;</p> <p>w.ii Provision of d Direct, segregated high quality pedestrian and cycle links to west Cambridge, Cambourne, Caldecote / Highfields, Hardwick and Bourn;</p> <p>x.iii. A Smarter Choices package including residential, school and workplace travel planning.</p> <p>c. <i>Highway Improvements including:</i></p> <p>y.i. Include m Measures to mitigate the traffic impact of the new village on surrounding villages and roads;</p> <p>z.ii. Provide c Convenient vehicular access, with at least two separate access points to the north west and north east of the site;</p> <p>aa.iii. Ensure that there will be no direct vehicular access to the Broadway for southbound traffic from the new village There will be no direct vehicular access to the Broadway (except buses and bicycles).</p>	<p>C 1.vi and 2.v of this statement.</p>
72	Policy SS/6: New Village at Bourn Airfield	<p>Amend criterion bb. of Policy SS/6 to read:</p> <p><i>Sustainability:</i></p>	<p>Effective To provide clear and effective guidance on the matters to be detailed in the SPD for the</p>

Page	Policy/Paragraph	Modification	Justification
	<i>Sustainability:</i> <i>bb.</i>	bb.10. Sustainable design and construction measures. The AAP will The new village will incorporate and deliver identify opportunities to exceed sustainable design and construction standards established by the Local Plan. These measures could include combined heat and power.	development.
72	Policy SS/6: New Village at Bourn Airfield <i>Infrastructure Requirements:</i> <i>cc. – ee.</i>	Amend criteria cc. to ee. of Policy SS/6 to read: <i>Infrastructure Requirements:</i> 11. The new village will: ee.a. Ensure t he provision, management and maintenance of infrastructure, services and facilities to meet the needs of the village; dd.b. Make appropriate a rrangements for foul drainage and sewage disposal, to be explored and identified through a Foul Drainage Strategy; ee.c. Ensure the p rovision, management and on-going maintenance of sustainable surface water drainage measures to control the risk of flooding on site and which will reduce the risk of flooding to areas downstream and upstream of the development.	Effective These modifications will help to ensure that the policy is easy to read, clear and effective.
72	Policy SS/6: New Village at Bourn Airfield <i>Community Development:</i> <i>ff.</i>	Amend criterion ff. of Policy SS/6 to read: <i>Community Development:</i> ff. 12. Measures will be required to assist the development of a new community, such as through community development workers.	Effective These modifications will help to ensure that the policy is easy to read, clear and effective.
72	Policy SS/6: New Village at Bourn Airfield <i>Site Preparation:</i> <i>gg.- hh.</i>	Amend criteria gg. to hh. of Policy SS/6 to read: <i>Site Preparation:</i> 13. Developers will be required to: aa.a. Undertake s ite wide investigation and assessment of land contamination and other issues resulting from	Effective These modifications will help to ensure that the policy is easy to read, clear and effective.

Page	Policy/Paragraph	Modification	Justification
		<p>former land uses, including military use, to ensure the land is suitable for the proposed end use and is not presenting a risk to the environment.</p> <p>bb. b. To eEnsure that all ordnance is removed from the site in ways that ensure the development can take place without unacceptable risk to workers and neighbours including major disruption to the wider public off site.</p>	
72	<p>Policy SS/6: New Village at Bourn Airfield <i>Delivery: ii- jj.</i></p>	<p>Amend criteria ii. to jj. of Policy SS/6 to read:</p> <p><i>Phasing and Delivery:</i> <u>14. The delivery of the new village, including any individual phases, must:</u> <u>a. Be in accordance with the spatial framework diagram set out in the Supplementary Planning Document to ensure a comprehensive development of the site as a whole that will not prejudice the creation of a fully functioning and successful new village.</u> <u>b. Be informed by appropriate strategies, assessments and evidence reports.</u> <u>ii.c. Plan for essential services, facilities and infrastructure to be provided in a comprehensive manner, anticipating future needs, and establishing suitable mechanisms to deliver the infrastructure in a timely and efficient way to achieve the delivery of the new village, including the needs of individual phases, The process for achieving delivery, and including the requirements on developers;</u> <u>jj.d. Requirements for Make satisfactory arrangements to ensure appropriate</u> engagement and consultation with local people and stakeholders.</p>	<p>Positively prepared, Justified, Effective & Consistent with national policy</p> <p>To provide clear and effective guidance on the matters to be detailed in the SPD for the development and to ensure that the development of the town will be properly planned and delivered over the plan period.</p> <p>This additional text is needed to ensure development is planned and delivered comprehensively and so deliver sustainable development.</p>
72	<p>Policy SS/6: New Village at</p>	<p>Add new paragraph to the end of Policy SS/6 to read:</p>	<p>Positively prepared, Justified, Effective & Consistent with national policy</p>

Page	Policy/Paragraph	Modification	Justification
	<p>Bourn Airfield <i>Supplementary Planning Document: New</i></p>	<p><u>Supplementary Planning Document:</u> <u>15. The SPD to be prepared for the Strategic Site shown on the Policies Map will provide further guidance and detail on the implementation of Policy SS/6. The SPD will include:</u> <u>a. An overarching, high level vision for the new village.</u> <u>b. Consideration of relevant context including key constraints and opportunities.</u> <u>c. The broad location of the components of the new village which are essential to support comprehensive and seamless development. A spatial framework diagram will be included that ensures the creation of a sustainable, legible and distinctive new settlement.</u> <u>d. Broadly how the development is to be phased, including the delivery of key infrastructure.</u></p>	<p>See the justification to Subsection 1.</p> <p>To provide clear and effective guidance on the matters to be detailed in the SPD for the development.</p>
	<p>Policies Map – Inset I</p>	<p>Amend the boundary of the Major Development Area – see attached map</p>	<p>Effective and Consistent with national policy. A consequential modification. See above at subsection 5 and 7.</p>
<p>72</p>	<p>Paragraph 3.41 (there are no changes to paragraphs 3.40, 3.43, 3.44, 3.45, 3.46, 3.47, and 3.48)</p>	<p>Amend paragraph 3.41 to read:</p> <p>This is a long term development opportunity. Development will take place in the second half of <u>over</u> the plan period, and much of it beyond the plan period. In order to create a comprehensive policy framework, and to allow the nature of the new village to be established with the local communities and stakeholders, an Area Action Plan (AAP) will be prepared by the Council. This will form part of the development plan, and have the status of a Development Plan Document. <u>The implementation of the new village development provided for by this policy will be informed by a SPD produced in accordance with policy paragraph 15 and the local community and stakeholders will</u></p>	<p>Effective and Consistent with national policy A consequential modification to reflect changes to Policy SS/6</p>

Page	Policy/Paragraph	Modification	Justification
		<p>be engaged in its preparation. The policy above establishes principles requirements and objectives that will need to be addressed in the AAP SPD, and subsequently by developers.</p>	
72	Paragraph 3.42	<p>Amend paragraph 3.42 to read:</p> <p>The Plan Policies Map identifies the Mmajor Development Site which will accommodate the built development of the new village and infrastructure to support it. Not all the site will be developed within the Plan period and large parts of it will remain undeveloped and green after the settlement is complete to provide a substantial green setting for the settlement. A wider Strategic Site area is identified to be addressed by the SPD planned through the AAP. This will allow the consideration of measures to mitigate the wider impacts of the village, such as through strategic landscaping and green infrastructure, to ensure that it will remain physically separate from surrounding villages especially the closest villages of Caldecote / Highfields, Bourn and Cambourne.</p>	<p>Effective and Consistent with national policy A consequential modification to reflect changes to Policy SS/6</p>

Appendix 5: Modification to Waterbeach Major Development Site Boundary (to be considered by Full Council Meeting on the 23 February 2017)

The proposed modifications set out below relate to the South Cambridgeshire Local Plan¹³⁴ and Policies Map¹³⁵.

Text to be deleted is shown as a ~~strikethrough~~ and text to be added is shown in **bold and underlined**.

Policy/Paragraph	Modification	Justification
Inset Map H Waterbeach New Town	Amend the boundary of the Major Development Site as shown on the attached map. (Note that this will also require a consequential amendment to the tile page of Chapter 3 Strategic Sites)	To make best use of this strategic site whilst providing an appropriate setting for Denny Abbey.

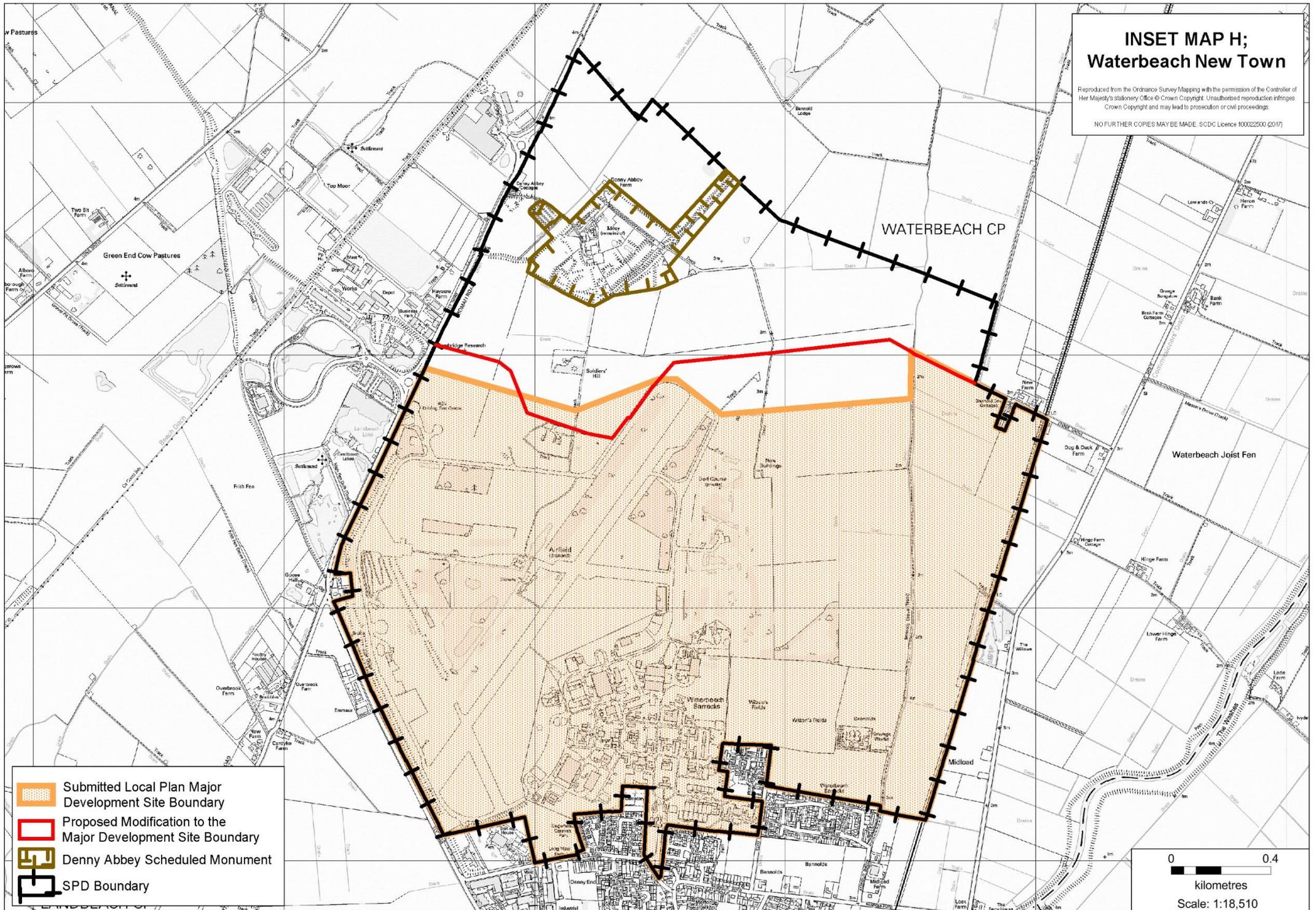
¹³⁴ Proposed Submission South Cambridgeshire Local Plan (RD/Sub/SC/010)

¹³⁵ Proposed Submission South Cambridgeshire Policies Map (RD/Sub/SC/020)

INSET MAP H; Waterbeach New Town

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-  Submitted Local Plan Major Development Site Boundary
-  Proposed Modification to the Major Development Site Boundary
-  Denny Abbey Scheduled Monument
-  SPD Boundary

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kilometres
Scale: 1:18,510

Appendix 6: New Proposed Modification to the South Cambridgeshire Local Plan related to references in Adopted Area Action Plans to Adopted Development Plan Document Policies, and their replacement Local Plan Policies

The proposed modification set out below is referred to in Matter SC6B (question 1.iv). Text to be deleted is shown as a ~~strikethrough~~ and text to be added is shown in **bold and underlined**.

The references to page and paragraph numbers in the table below do not take account of the deletion or addition of text proposed through modifications submitted previously.

Page	Policy/Paragraph	Modification	Justification
6	Add new Policy LP/1 and supporting text after paragraph 1.17	<p>Add new Policy LP/1: Superseded Policies referred to in Adopted Area Action Plans and supporting text after paragraph 1.17 as follows:</p> <p>Policy LP/1: Superseded Policies referred to in Adopted Area Action Plans</p> <p><u>Where policies of the Local Development Framework referred to in adopted Area Action Plans are superseded by policies of this Local Plan, the more up to date Local Plan polices will be applied, as set out in Appendix Ba.</u></p> <p><u>1.17a The adopted Area Action Plans remain part of the development plan, and in places make reference to policies in other parts of the Local Development Framework, in particular the Core Strategy DPD and Development Control Policies DPD. For clarity on the policies to be applied in decision making involving the Area Action Plan sites, where reference is made in an Area Action Plan to a policy elsewhere in the Local Development Framework, the replacement policy in the Local Plan will apply. A schedule is included in Appendix Ba of the plan, identifying the relevant references in the adopted Area Action Plans that are superseded by the Local Plan and the Local Plan policies that will be applied.</u></p>	<p>The adopted Area Action Plans (AAPs), which will remain part of the development plan, make reference to policies in other parts of the Local Development Framework (LDF) that will be superseded by the Local Plan, in particular the Core Strategy DPD and Development Control Policies DPD. For clarity on the policies to be applied in decision making involving the Area Action Plan sites, a modification is proposed that makes clear where a reference is made in an AAP to a policy elsewhere in the LDF, the replacement policy in the Local Plan that will apply.</p>

262	Add new Appendix Ba after Appendix B	<p>Add a new Appendix Ba after Appendix B as follows:</p> <p>Appendix Ba: Local Development Framework Policies referred to in Area Action Plans superseded by Local Plan Policies, as referenced in Policy LP/1</p> <p>Northstowe AAP</p> <table border="1" data-bbox="564 531 1547 1206"> <thead> <tr> <th data-bbox="564 531 891 647">Reference in AAP</th> <th data-bbox="891 531 1218 647">Local Development Framework Policy referred to</th> <th data-bbox="1218 531 1547 647">Replacement Local Plan Policy</th> </tr> </thead> <tbody> <tr> <td data-bbox="564 647 891 836">Policy NS/7: Northstowe Housing Affordable Housing, subsection 6</td> <td data-bbox="891 647 1218 836">Policy HG/3: Affordable Housing Development Control Policies DPD</td> <td data-bbox="1218 647 1547 836">Policy H/9: Affordable Housing</td> </tr> <tr> <td data-bbox="564 836 891 1024">Paragraph D3.8 supporting Policy NS/7: Northstowe Housing</td> <td data-bbox="891 836 1218 1024">Policy HG/2: Housing Mix Development Control Policies DPD</td> <td data-bbox="1218 836 1547 1024">Policy H/8: Housing Mix</td> </tr> <tr> <td data-bbox="564 1024 891 1206">Paragraph D3.9 supporting Policy NS/7: Northstowe Housing</td> <td data-bbox="891 1024 1218 1206">Policy HG/3: Affordable Housing Development Control Policies DPD</td> <td data-bbox="1218 1024 1547 1206">H/9: Affordable Housing</td> </tr> </tbody> </table>	Reference in AAP	Local Development Framework Policy referred to	Replacement Local Plan Policy	Policy NS/7: Northstowe Housing Affordable Housing, subsection 6	Policy HG/3: Affordable Housing Development Control Policies DPD	Policy H/9: Affordable Housing	Paragraph D3.8 supporting Policy NS/7: Northstowe Housing	Policy HG/2: Housing Mix Development Control Policies DPD	Policy H/8: Housing Mix	Paragraph D3.9 supporting Policy NS/7: Northstowe Housing	Policy HG/3: Affordable Housing Development Control Policies DPD	H/9: Affordable Housing	<p>The adopted Area Action Plans (AAPs), which will remain part of the development plan, make reference to policies in other parts of the Local Development Framework (LDF) that will be superseded by the Local Plan, in particular the Core Strategy DPD and Development Control Policies DPD. For clarity on the policies to be applied in decision making involving the Area Action Plan sites, a modification is proposed that makes clear where a reference is made in an AAP to a policy elsewhere in the LDF, the replacement policy in the Local Plan that will apply.</p>
Reference in AAP	Local Development Framework Policy referred to	Replacement Local Plan Policy													
Policy NS/7: Northstowe Housing Affordable Housing, subsection 6	Policy HG/3: Affordable Housing Development Control Policies DPD	Policy H/9: Affordable Housing													
Paragraph D3.8 supporting Policy NS/7: Northstowe Housing	Policy HG/2: Housing Mix Development Control Policies DPD	Policy H/8: Housing Mix													
Paragraph D3.9 supporting Policy NS/7: Northstowe Housing	Policy HG/3: Affordable Housing Development Control Policies DPD	H/9: Affordable Housing													

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		Paragraph D4.3 supporting Policy NS/8: Northstowe Employment	Policy ST/8: Employment Provision Core Strategy DPD	Policy S/5: Provision of New Jobs and Homes	
		Paragraph D5.12 supporting Policy NS/9: Community Services, Facilities, Leisure, Arts and Culture	Policy SF/6: Public Art and New Development Development Control Policies DPD	Policy HQ/2: Public Art and New Development	
		Policy NS/11: Alternative Modes Car and Cycle Parking Standards, subsection 10	Development Control Policies DPD	Policy TI/3: Parking Provision	
		Paragraph D6.14 supporting Policy NS/11: Alternative Modes	Travel Chapter of the Development Control Policies DPD	Policy TI/3: Parking Provision	
		Paragraph D6.21 supporting Policy NS/11: Alternative Modes	Development Control Policies DPD	Policy TI/3: Parking Provision	
		Paragraph D9.1	Policy CH/2: Archaeological Sites	Policy NH/14: Heritage Assets	

		supporting Policy NS/18: Use of Existing Buildings	Development Control Policies DPD		
		Paragraph D10.2 supporting Policy NS/19: Public Open Space and Sports Provision	Policy SF/11: Open Space Standards Development Control Policies DPD	Policy SC/8: Open Space Standards	
		Paragraph D10.11 supporting Policy NS/19: Public Open Space and Sports Provision	Development Control Policies DPD	Policy SC/8: Open Space Standards	
		Paragraph D10.15 supporting Policy NS/19: Public Open Space and Sports Provision	Policy SF/11: Open Space Standards Development Control Policies DPD	Policy SC/8: Open Space Standards	
		Paragraph D13.4 supporting Policy NS/23: An Exemplar in Sustainability	Policy NE/3: Renewable Energy Technologies in New Development Development Control Policies DPD	Policy CC/3: Renewable and Low Carbon Energy in New Developments	

Cambridge Southern Fringe AAP		
Reference in AAP	Local Development Framework Policy referred to	Replacement Local Plan Policy
Policy CSF/7: Trumpington West Housing Affordable Housing, subsection 5	Policy HG/3: Affordable Housing Development Control Policies DPD	Policy H/9: Affordable Housing
Paragraph D2.7 supporting Policy CSF/7: Trumpington West Housing	Policy HG/2: Housing Mix Development Control DPD	Policy H/8: Housing Mix
Paragraph D2.8 supporting Policy CSF/7: Trumpington West Housing	Policy HG/3: Affordable Housing Development Control Policies DPD	Policy H/9: Affordable Housing
Paragraph D3.3 supporting Policy CSF/8: Employment	Policy ET/1: Limitations on the Occupancy of New Premises in South Cambridgeshire	Policy E/11: Large Scale Warehousing and Distribution Centres

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			Development Control Policies DPD		
		Paragraph D4.12 supporting Policy CSF/9: Community Services, Facilities, Leisure, Arts and Culture	Policy SF/6: Public Art and New Development Development Control Policies DPD	Policy HQ/2: Public Art and New Development	
		Paragraph D8.5 supporting Policy CSF/16: Archaeology at Trumpington West	LDF Development Control Policies	Policy NH/14: Heritage Assets	
		Paragraph D12.3 supporting Policy CSF/21: An Exemplar in Sustainability	Development Principles and Natural Environment Chapters of Development Control Policies DPD	Policy CC/6: Construction Methods	
		Paragraph E1.11 supporting Policy CSF/22: Construction Strategy	Policy DP/1: Sustainable Development Development Control Policies DPD	Policy CC/6: Construction Methods	
		Paragraph E2.1	Policy DP/4: Infrastructure and New	Policy TI/8: Infrastructure and New	

			Developments Development Control Policies DPD	Developments	
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February 2017

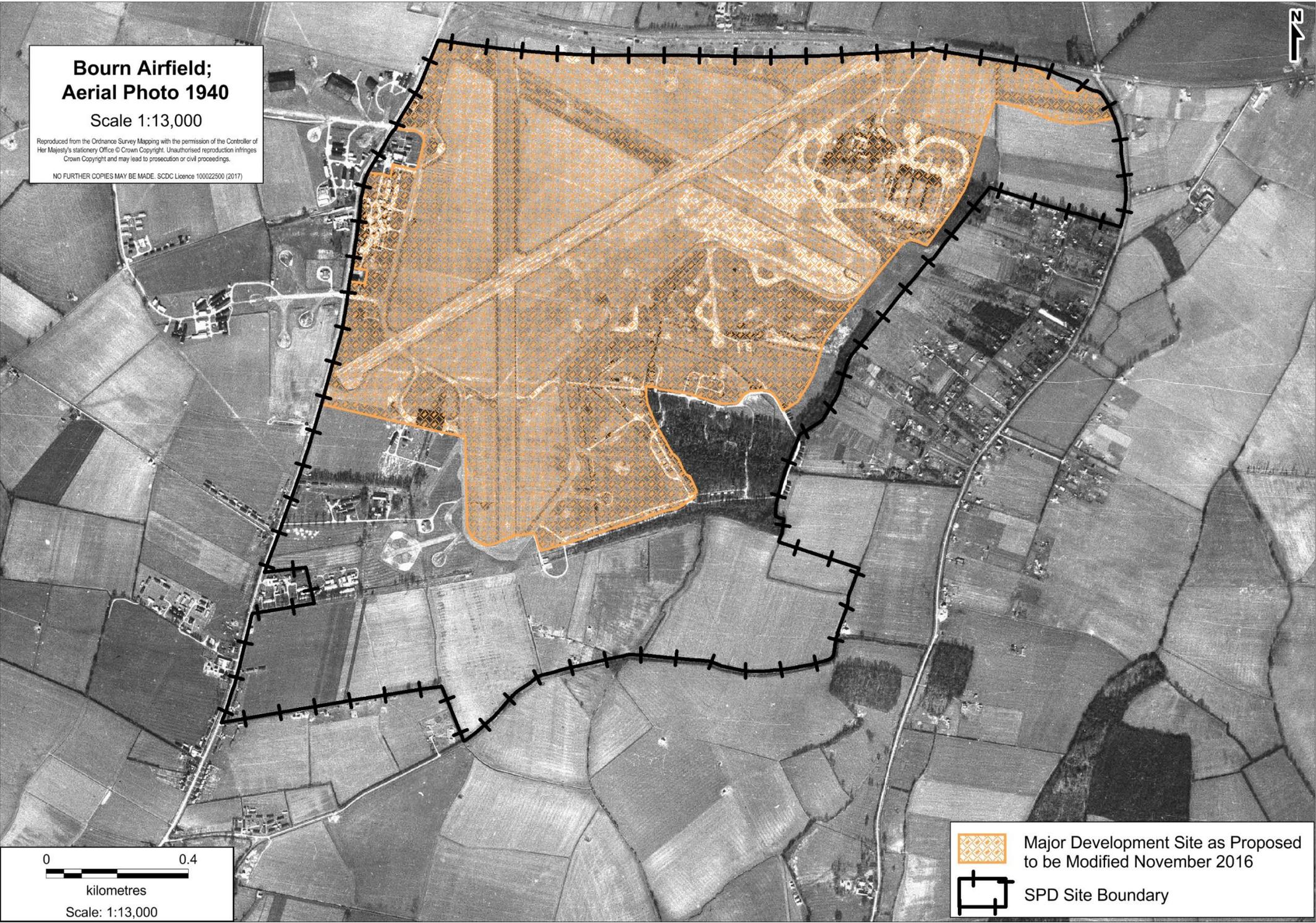
Appendix 7: Aerial Photograph of Bourn Airfield from the 1940's

Bourn Airfield; Aerial Photo 1940

Scale 1:13,000

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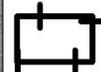


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Major Development Site as Proposed
to be Modified November 2016



SPD Site Boundary

Appendix 8: Statement by Cambridgeshire County Council Education regarding school provision at new settlements

Bourn Airfield

As with any green field housing development, the County Council would expect the development to make provision for early years and primary education provision from the outset of development. This is required to ensure that there is sufficient capacity to allow the County Council to fulfil its statutory duty to secure sufficient school places as the development is built. This could include the use of parts of the school building to accommodate community provision on a temporary basis. This also reflects the need to support the development of community cohesion, with schools playing a central role within the new community. In order to achieve this the County Council would anticipate the early transfer of the identified site, delivery of the required infrastructure and capital contributions to be secured through a S106 agreement.

It is recognised that there will be a requirement for additional provision to be delivered as the development is built out. The timescales for the delivery of this provision will need to be identified to reflect the proposed phasing and trajectory of the housing development. The timing of this additional infrastructure, as well as appropriate capital contributions, would need to be secured through the S106 agreement.

The County Council considers that the scale of proposed housing development at Bourn Airfield will require the delivery of additional secondary education provision. There will need to be flexibility in the timescales of this additional capacity being secured. This will be influenced by the pattern, and pace, of housing development within the catchment areas of surrounding secondary schools, as well as growth in pupil numbers, specifically Cambourne and Comberton Village Colleges. The County Council recognises the need to open the school at an early stage in the development, especially if it is planned to secure additional community facilities. However, the Council is also mindful of the need to ensure that the opening of the new school is not premature, and does not secure too much surplus capacity within the local area. Failure to do so could undermine existing schools and have a detrimental impact on educational outcomes for existing pupils.

As with the primary education provision, it would be anticipated that the site, necessary infrastructure and capital funding for the new school would be secured through the S106 agreement.

It would be anticipated that the development would make a contribution towards the delivery of a new Area Special School, planned to be delivered as part of the Northstowe Education Campus.

Waterbeach New Town (Barracks site)

As with any major housing development, the County Council would expect the development to make provision for early years and primary education provision from the outset of development. This is required to ensure that there is sufficient capacity to allow the County Council to fulfil its statutory duty to secure sufficient school places as the development is built. This also reflects the need to support the development of community cohesion, with schools playing a central role within the new community. This could include the use of parts of the school building to accommodate community provision on a temporary basis. In order to achieve this the County Council would anticipate the early transfer of the identified site, delivery of the required infrastructure and capital contributions to be secured through a S106 agreement.

It is recognised that there will be a requirement for additional provision to be delivered as the development is built out. The timescales for the delivery of this provision will need to be identified to reflect the proposed phasing and trajectory of the housing development. The timing of this additional infrastructure, as well as appropriate capital contributions, would need to be secured through the S106 agreement.

With the scale of housing development proposed at the new town, alongside the proposals to ensure appropriate links and relationship with the existing Waterbeach village community, it is anticipated that there will be a need to secure at least one new secondary school. Final decisions about the size and / or number of school(s) will need to be determined as details of housing numbers and tenure/mix are clarified.

The County Council recognises the need to open the school at an early stage in the development, especially if it is planned to secure additional community facilities. However, it is unlikely that the County Council would want the early delivery of the secondary school(s) on the Waterbeach new town site, as it is mindful of the need to ensure that opening the new school does not generate too much surplus capacity, which could have a detrimental impact on the nearby Cottenham Village College, which is currently the catchment school for Waterbeach. It is anticipated, but not yet confirmed that Waterbeach Primary will become a feeder school for the school in the new town.

It is anticipated that there will be a need for a new Area Special School to mitigate the demand generated from the development. The timescales for opening this would need to be determined based on information about the pace of development, at Waterbeach new town as well as other developments across South Cambridgeshire. This reflects the fact that Special Schools serve a wider area than other types of school.

There may also be a requirement to secure additional post-16 capacity within the new town. It is likely that this would not be until later phases of the housing development, reflecting the fact that post-16 education is planned across a wider area and is planned strategically. Timescales and details of the type of provision

would need to be confirmed through pre-application discussions and through more detailed discussions throughout the delivery of the site. This would also need to reflect the outcomes of wider reviews of post-16 education provision.

As with the primary education provision, it would be anticipated that the site, necessary infrastructure and capital funding for the new school would be secured through the S106 agreement.