#### MATTER SC6C:- POLICY SS/6 NEW VILLAGE AT BOURN AIRFIELD

General approach agreed for reps:

Focus on the un-sustainability of the location, its proximity to surrounding villages, and the likelihood that any local centre provision (particularly the long list identified in the

#### 1. General Policy

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

No: The nearest concentration of employment is Cambourne Business Park, which is located some 2 kilometres from the western edge of Bourn Airfield, significantly beyond acceptable walking distances. Beyond Cambourne, then Cambridge represents the main focus of employment opportunities. Given the distance of the Airfield to Cambridge, the key to making the location sustainable is the ability to maximise journeys by public transport. The original policy for the Airfield sought to address this by proposing a park & ride (P&R) at the site to maximise sustainable transport links to Cambridge. The P&R no longer forms a part of the proposals for the Airfield and so sustainable transport is undermined.

The lack of P&R at the Airfield site means that the opportunity to address the current high levels of car commuting from Cambourne (to Cambridge, Royston & St Neots stations) will also be missed. As a result the current car-based commuting patterns from this general location will persist. This is fundamentally different from the proposal at North Cambourne, which includes a P&R facility as a focus for public transport options particularly to Cambridge and also St Neots. The location of the P&R immediately adjacent to the A428 junction means that it also provides the opportunity to intercept commuting journeys into Cambridge that are currently being undertaken by car into Cambridge along this route.

The Airfield masterplan contains an element of employment (9.8ha in 3 parcels) with a view to providing job opportunities within the site. However, the location of the employment is remote from the main road network, with little/no visibility from outside of the site, and therefore unlikely to prove attractive to investors / occupiers. This arrangement is therefore unlikely to address the sustainability deficit caused by the lack of locally available jobs.

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?

No: the lack of scale of the Airfield proposal is compounded by its remote location and distance from the A428 via the single carriageway St Neots Road (former A.428) to Childerley Gate roundabout. In terms of scale, the experience at Cambourne is informative given its comparative scale (3,300 dwellings consented in 1994 with an additional 950 dwellings consented in 2011) in that the settlement has over many years failed to attract a diverse retail offer within its district centre; a fact that is identified repeatedly in surveys of residents. The principal reason for this is the size of the overall population, which is below that which retail operators consider suitable for investment. The exception is the Morrison's store, which has operated successfully on the site since it opened. One of the key reasons for the success of Morrison's, however, is the passing trade that turns in to the site from the A428. This is not trade that has its final destination in Cambourne; it is the fact that Cambourne is a convenient stopping-off point as part of a longer journey on the A428.

The Airfield proposal aims to replicate the arrangement at Cambourne; with a mixed-use centre serving the requirements of the new community (Ref. No. RD/FM/013). Our analysis, and the evidence from Cambourne, is that the new community will be too small to sustain a diverse retail offer. Additionally, the remoteness of the site from the A428 (indeed any passing trade) means that there will be no additional market-capture to sustain potential retail operators.



The risk therefore is that a district centre within the Airfield will compete with, rather than complement, Cambourne. In the illustrative layout provided, the Airfield's mixed-use centre is located towards the western side of Bourn. In this location it is likely to capture some customers from Upper Cambourne (see Figure 3: Pedestrian Isochrones from Bourn Airfield Site) and therefore further diminish the chances of Cambourne maintaining its viability as a retail hub. In essence the two centres are too remote to work together, but not sufficiently remote to avoid competing.

In general terms, the larger a settlement the more sustainable it becomes as it is better able to support the range of services and facilities that a community requires and in doing so provide local jobs. Research has shown, as contained in our earlier evidence, that a settlement of at least 25,000 population is required to provide the critical mass to sustain a wide variety and quantum of land uses and facilities. The graph in Appendix A (source: National Travel Survey) shows that a settlement of around 10,000 homes (circa 25,000 population) is required to reach a critical mass to minimise travel demand. A new settlement of 3500 homes (circa 8500 population) falls well short of the ideal scale for sustainability.

Appendix B provides further evidence of how the size of settlements affects self-containment (2011 Census data). The graph plots the percentage of people living and working in a range of local settlements of different sizes and shows that the larger the settlement the greater number of people who live and work in that settlement. For settlements with a population of around 25,000 the percentage of people living and working in that settlement is around 45%, which contrasts with populations of the size proposed at the Airfield at around 25%. It can also be seen that for Cambourne (7000 population in 2011) the percentage living and working in the settlement was only 20%.

It can therefore be concluded that if the Airfield proposal proceeds it is likely to repeat the poor performance of Cambourne with a self-containment of around 20%-25% and do little to improve the existing self-containment of Cambourne, indeed it has the potential to diminish it by undermining the district centre.

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?

The implication of the proposed changes to the development boundary at Bourn (particularly areas 3 and 4 identified in RD/FM/013) is that a larger site than that originally envisaged is required (a factor not considered in the initial SEA). This enlargement will increase the visibility of the proposal as well as extend encroachment towards Caldecote. Development at the Airfield would contribute to the coalescence of Cambourne and Caldecote.

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

The definition of PDL is contained in the NPPF at Appendix 2 and refers to 'land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure'. We note the parenthesis, that not all of 'curtilage' should be developed. Our measurement of the brownfield parts of the site, including hard-surfacing, shows that this represents 13% of the site, with the vast majority of the site being greenfield; agriculture and woodland.

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?



Yes: the plans contained in Appendix C shows how development at the Airfield will create a string of coalesced villages to the south of the A428 extending some 5.5 kilometres (3.5 miles) from Caxton Gibbet in the west to Caldecote Highfields in the east. The three Cambourne villages were proposed to work together and a further village will be added now that West Cambourne has been granted planning permission. The addition of the Airfield will effectively fill the gap between Upper Cambourne and Caldecote Highfields.

In contrast the proposals for Cambourne North / Harbourne would establish a single combined settlement with its nucleus concentrated around the existing A428 junction. The plans in Appendix C show the opportunity to achieve this much more sustainable arrangement.

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?

No evidence on the viability of the proposals has been submitted to address this question. It is unclear as to the proportion of off-site infrastructure that the site will be expected to/is able to contribute. However, there are in addition the on-site costs associated with establishing a new community from scratch. In order to be successful in attracting early occupiers to the site this will require significant up-front infrastructure.

Whilst some of the same challenges exist in relation to the competing proposal at North Cambourne/Harbourne, there is in that case an existing established principal access to the site direct from the dualled A428. Furthermore, at least in the first instance the new community can benefit from access to services and facilities in Cambourne because of its proximity. This will help to improve the viability of facilities in Cambourne and help to establish the combined single settlement, which is the concept on which the proposal is founded. This was a factor considered to be beneficial in SCDC's analysis of the West Cambourne proposals<sup>2</sup>.

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

It is good quality land, but major development anywhere around Cambourne is likely to involve the loss of similar quality land.

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

Yes: as referred to above, the remoteness of the Airfield from existing facilities means that it is proposed to provide facilities on a stand-alone basis. The small scale of the Airfield development means that on a stand-alone basis it would not be able to support a mixed-retail centre. This means that in order to sustain any retail offer it will be necessary to attract shoppers from Cambourne and other local villages. It has taken many years for Cambourne to build up the range of services that it provides and even now residents consider that further facilities are necessary as reflected in resident surveys.

<sup>&</sup>lt;sup>2</sup> SCDC Planning Committee report, 11 January 2017, paragraph 134. (<a href="http://scambs.moderngov.co.uk/documents/s99144/Cambourne%20West%20Committee%20Final%20Report.pdf">http://scambs.moderngov.co.uk/documents/s99144/Cambourne%20West%20Committee%20Final%20Report.pdf</a>)



The Cambourne North/Harbourne offer proposes a different model entirely; one that aims to complement what Cambourne already provides and enhance the range of choices available to residents (see submitted masterplan document).

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

This is unnecessary as this would be included as part of the AAP / SPD, and will be a requirement of any planning application.

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

This is not addressed in SCDC's analysis of the site. The site analysis only refers to the potential positive effect if employment land within the masterplan is occupied. We question the demand for such employment land and whether jobs will ever be delivered. Furthermore, the loss of employment from the site, for example the Rural Flying Corps, is not addressed in the analysis, nor is any resolution identified for the loss of the ability to maintain and operate aircraft.

### 2. Future Area Action Plan Development Plan Document (AAP)

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

We propose that the next stage of plan-making should continue to be an AAP rather than SPD given our proposition that this mechanism be used to determine which of the two options for strategic growth in the A428 be properly be compared and considered and the appropriate site allocated i.e. land to north of Cambourne (North Cambourne / Harbourne) or to the east (Bourn Airfield). Only through this mechanism can the failings of the SEA process, identified in our written statement and evidence in relation to Matter 1 (see Matter 1 / ref: 21709) and which persist in more recent site analyses (Ref. No: RD/FM/012, Appendix 1: Site Assessment Proforma for Bourn Airfield), be addressed.

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?

The policy requires that the proposal should provide employment development 'of a quantum, type and mix to meet the needs of the new village'. The masterplan for the Airfield (RD/FM/013) proposes some 9.83ha of employment land. It is unclear whether this achieves the policy objective for the proposal or not or on what basis this level of provision has been determined. Furthermore, the dedication of land for employment is not a guarantee of its delivery for that purpose. Again, the experience at Cambourne is informative given the time it has taken to achieve any significant employment activity at the business park. Cambourne has the benefit of direct access from the A428 and a visually prominent location. This is not the case at the Airfield and it is therefore highly uncertain that any level of local employment will become established to achieve a balanced arrangement that the Local Plan anticipates between residents, and therefore potential workforce, and jobs. The information contained in Appendix B provides further evidence that the Airfield proposal on its own is unlikely to establish sufficient critical mass to attract a significant resource of local jobs.

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



We consider that this is a matter of detail that can be addressed in the subsequent AAP/masterplan, should the Airfield be selected through this process.

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?

This is unclear as the masterplan work carried out to date for the Airfield is not sufficiently detailed as to what mitigation measures are proposed. The land use budget indicates that the site has relatively little room for green space (36% of the site), with a proportion of that already existing habitat (woodland), which has little potential to be enhanced for mitigation reposes. This raises concerns over the deliverability of requirements for biodiversity corridors and protection from coalescence with surrounding villages.

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?

The County Council's proposals for the A428 include provision for a P&R at Madingley Mulch and this has the potential to serve some of the journeys generated by the Airfield proposal. However, the need for a further P&R in the A428 corridor is identified in the report on prioritised infrastructure for the 'City Deal' as considered at the joint assembly on 2nd January 2015 (see page 51):-

#### 'A428 corridor Park & Ride

One or more Park & Ride or rural interchange sites accessed from the A428, to take advantage of the bus priority measures on the A1303 between the A428 and the M11 in order to intercept more Cambridge-bound general traffic on the A428. Additional Park & Ride capacity along the corridor would improve the corridor in a number of ways. Through the provision of segregated facilities along the corridor, Park & Ride buses would benefit from the same advantages in terms of journey time and reliability as other services on the corridor, making it an attractive option for people who would otherwise drive all the way to Madingley Road Park and Ride or further into the city centre.'

Any such P&R in the A428 corridor must be easily accessible from the A428 in order to effectively intercept the journeys identified in the report and indeed to do so further to the west would be advantageous in order to maximise journey length by sustainable modes. A P&R at the Airfield cannot perform this function and it is on this basis that the policy requirement for an on-site facility has been dropped. In contrast such a facility could be provided at Cambourne North/Harbourne and thereby contribute to the objectives of the 'City Deal' in the manner anticipated by the report of 2<sup>nd</sup> January 2015.

An additional benefit of a P&R is that it will serve as a transport hub accessible by residents who can walk and cycle to the facility from both North Cambourne/Harbourne and from existing Cambourne plus West Cambourne, enhancing the sustainable transport options for the whole of the combined settlement. The provision of a P&R should therefore be a necessary component of any strategic-scale housing proposal in the A428 corridor.

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?

Such measures could be included in the IDP, with cross reference to that document in the Local Plan. A higher degree of clarity would help to make clear what burden of infrastructure the Airfield proposals should bear and their deliverability tested. At present there is an absence of clarity both in terms of deliverability or viability, which is critical evidence given its importance to demonstrating the acceptability of the whole proposal.



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?

Avoiding vehicle access onto the Broadway was a specific requirement of granting planning permission for Cambourne. The logic underlying this requirement was the avoidance of significant levels of traffic onto the local road network which it was recognised, by the Inspector, would lead to "rat-running" via the Village of Bourn on the "country way" to the City and to Royston station so impacting local communities. The proposed amendment to allow vehicular access to the Broadway is a matter of significant local concern. If vehicular access is permitted to the Broadway, it seems highly unlikely that a ban on southbound traffic towards Bourn village could be enforced. Given that this prohibition has been a long-held principle, and to deviate from it would be difficult to enforce, it seems entirely correct that it should be sustained.

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?

Yes, as referred to in relation to 6y, but in the absence of evidence on viability this has the potential to make the scheme undeliverable.

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?

Specific policy wording is not required as this would form part of the flood risk assessment to be submitted with the planning application.

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

Specific policy wording is not required as this would normally form part of the Section 106 planning obligation associated with the grant of planning permission.

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?

Given the past use of the site and the potential for contamination to impact extensive areas of the site a detailed ground investigation is necessary to address site contamination and confirm any issues can properly be addressed in a manner that does not impact delivery.

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

Yes: such a requirement is typical in our experience.

## 3. Council's Further proposed modifications November 2016

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

The additional documentation issued by SCDC in October 2016 and referenced RD/FM/013 clearly demonstrates that the proposed modifications are necessary in order to accommodate the scale of development proposed. Even with the expanded site, it is apparent that there is only very limited



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space for the range of uses proposed. Beyond the modifications, uncertainties persist in relation to the deliverability of the Airfield proposal, in particular the delivery of supporting infrastructure, which means that the plan cannot be 'sound'. The key deficit is evidence to support policy, rather than policy itself.

If the Inspector concludes that the plan needs to move forwards with a major allocation in the A428 corridor, the policy could be re-written to allow 'a strategic development site of at least 3,500 dwellings related to the A428 corridor'. An AAP should be prepared to review how the new strategic site could best work in the area in order to: -

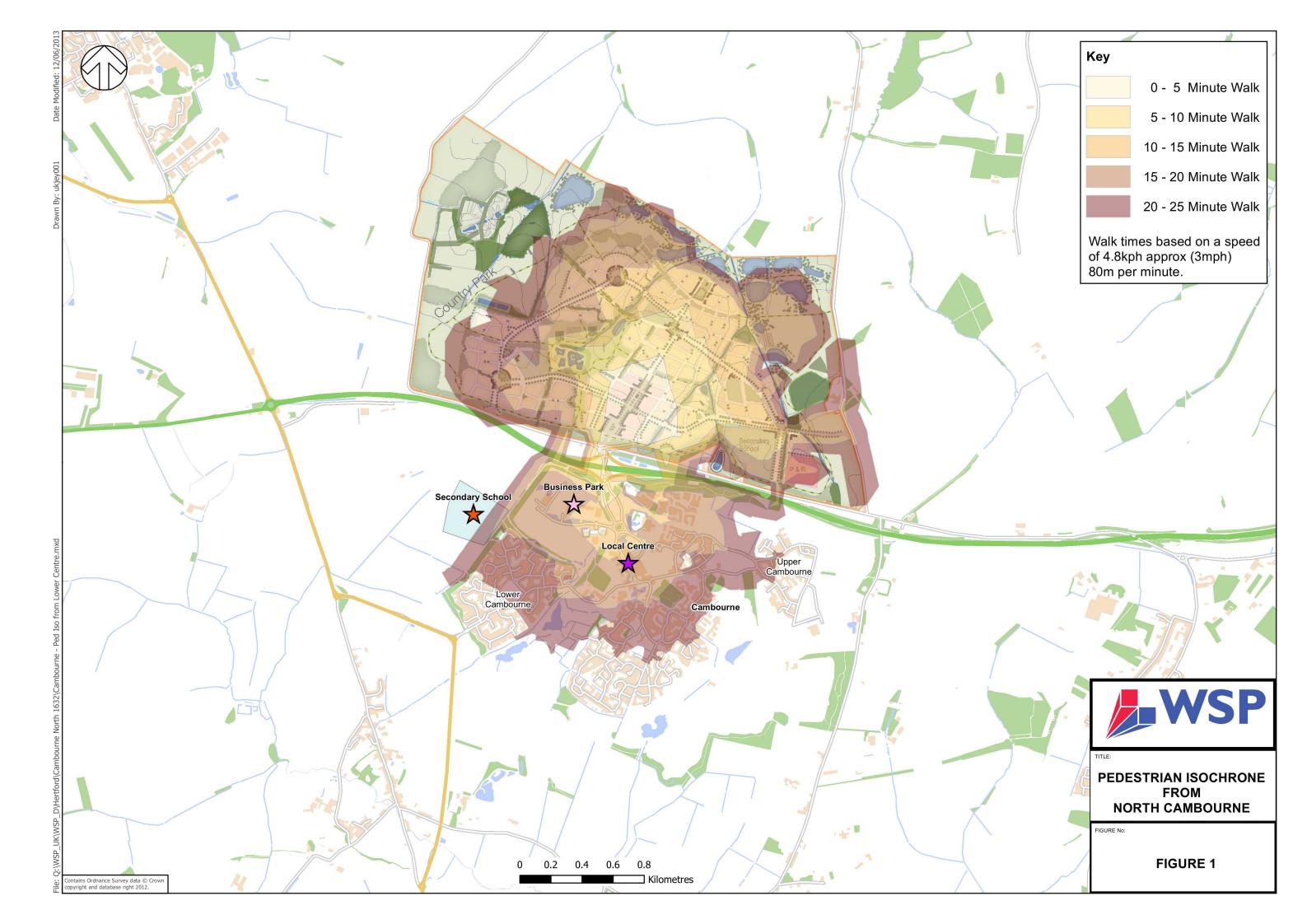
- maximise sustainability, both of the new community and the existing community of Cambourne;
- minimise impacts on surrounding areas/communities;
- complement and not undermine existing retail, leisure and employment provision in Cambourne; and
- deliver necessary infrastructure, in particular P&R and other transport improvements.

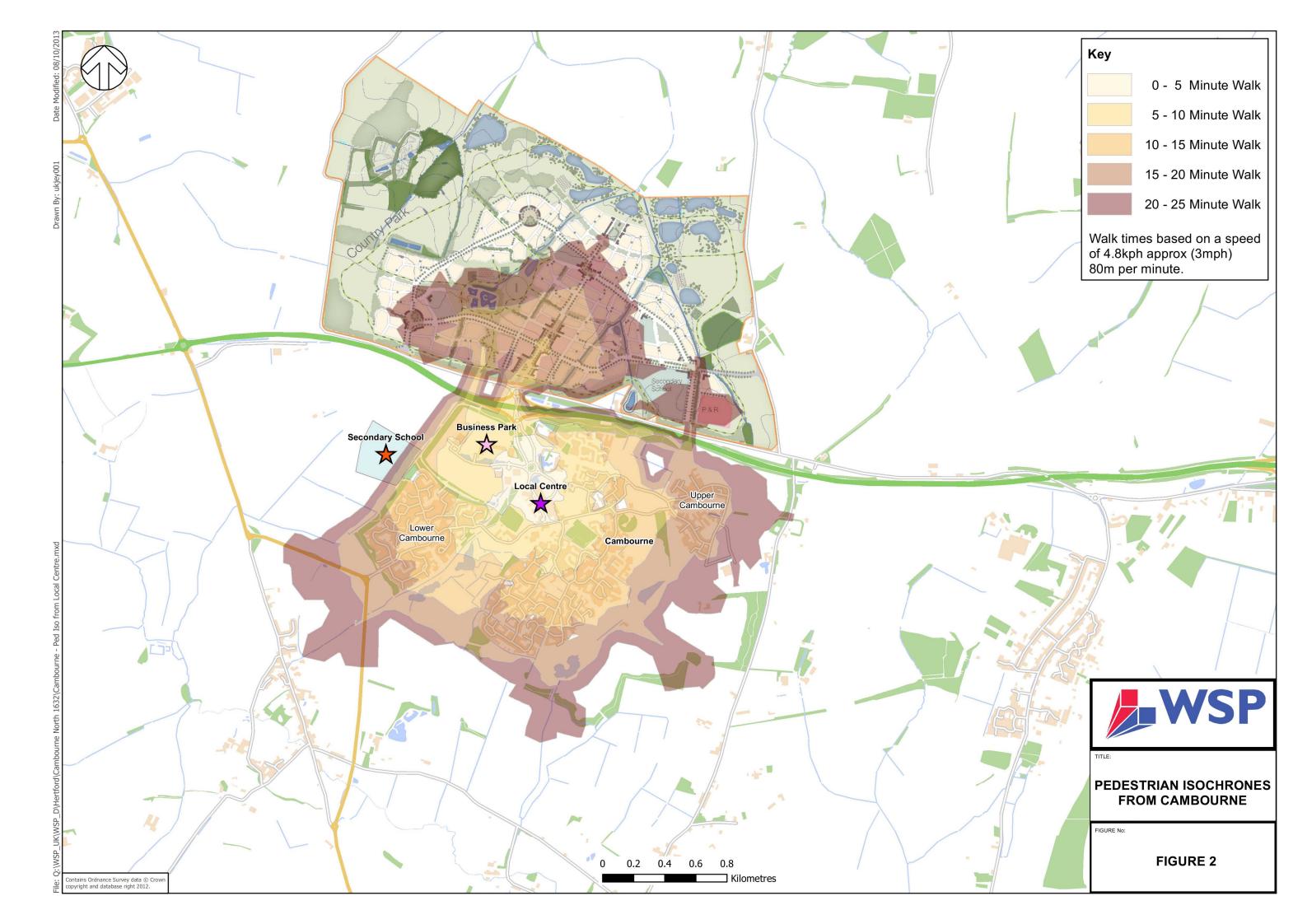
This AAP boundary should be drawn in the Local Plan to provide for both development options in the vicinity of Cambourne, both to the north (North Cambourne / Harbourne) and to the east (Bourn Airfield). This additional plan-making process would allow the options to be properly tested, including appropriate SA/SEA, in a way that has not been undertaken to date.

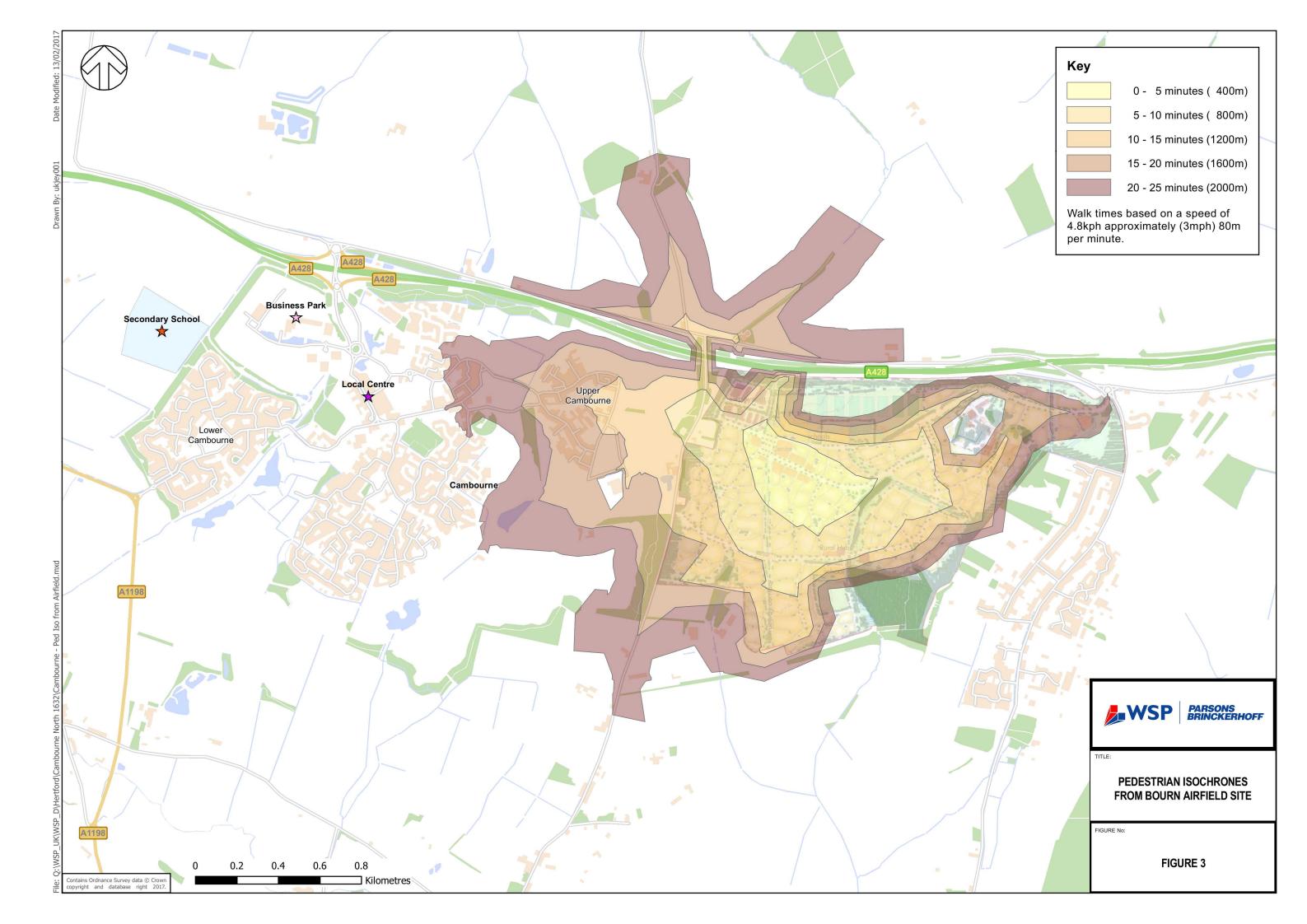


# **Figures**





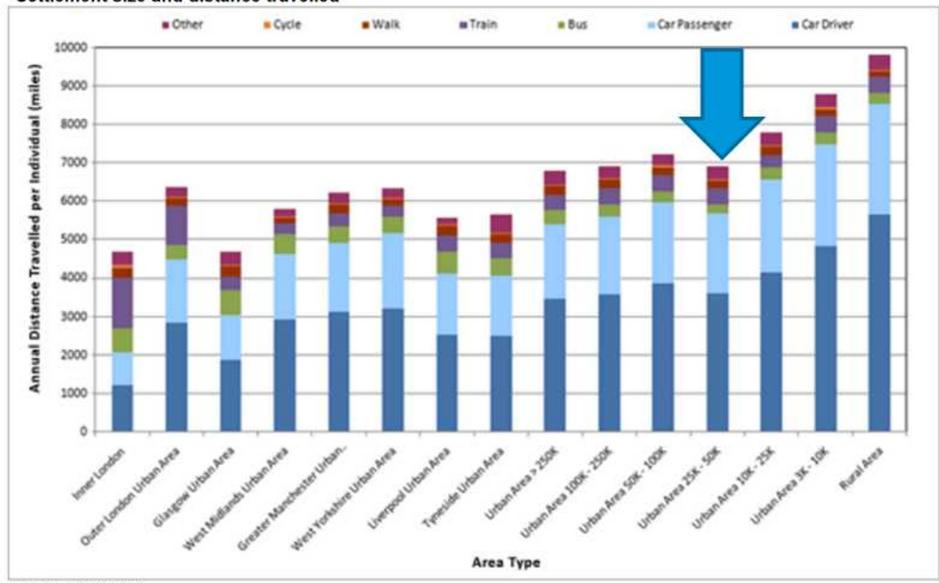




# Appendix A



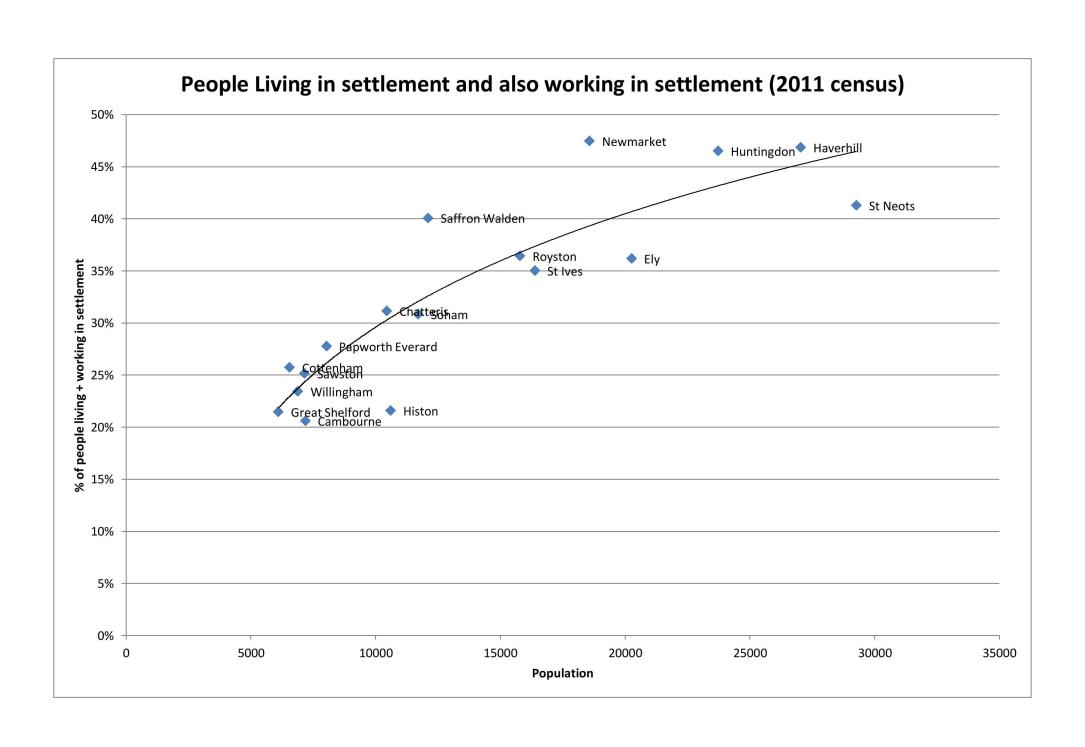
## Settlement size and distance travelled



(NTS, 2002-06)

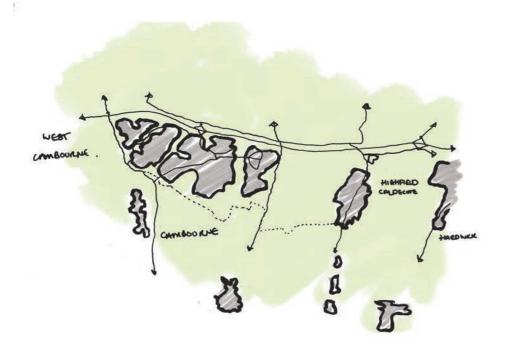
# Appendix B





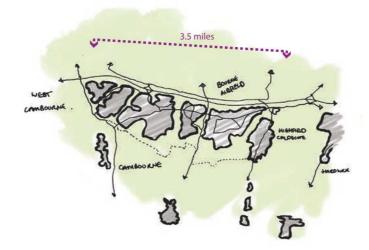
# **Appendix C**





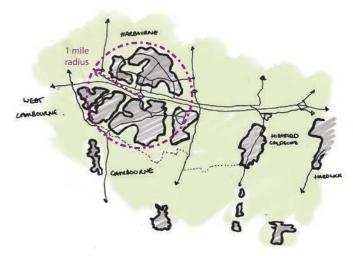
## Existing development pattern

- Clearly separated settlement areas; and
- Green landscape buffers between settlements.



# Ribbon/Linear development pattern with Bourne New Village

- Continuous line of development along A428; and
- Blurring of settlement boundaries.



# Circular development pattern based around pair of centres at Cambourne

- Clear separation of settlements with landscape buffers; and
- Opportunity for Intergration of infrastructure within settlement.

