



South Cambridgeshire District

Local Plan 2011 - 2031

Policy SS/6 – New Village at Bourn Airfield

Representations to SCDC on behalf of

Countryside Properties (UK) Ltd and the Taylor Family
in respect of the proposed MDA boundary and to substitute the
preparation of a SPD to replace the requirement for an AAP

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1.0 INTRODUCTION AND BACKGROUND

- 1.1 This statement has been prepared on behalf of Countryside Properties (UK) Limited and the Taylor Family (CP/Taylors), promoter/developer and landowner respectively, of Bourn Airfield in South Cambridgeshire District. It is in response to the Examination hearing session to deal with *Policy SS/6: New village at Bourn Airfield*.
- 1.2 In general terms support is extended for Policy SS/6 and the Policies Map, Insert I – that relate to Bourn Airfield, where it is proposed to develop a new village of approximately 3,500 dwellings.
- 1.3 The submitted Plan proposes to allocate land for two new settlements: a new town at Waterbeach (policy SS/5) as well as the new village at Bourn Airfield (policy SS/6). Both policies, as currently formulated, provide that an Area Action Plan (AAP) will be prepared to progress the new settlements.
- 1.4 Legal advice given to CP/Taylors, by Andrew Tait QC states that an AAP is not the only mechanism to advance policy SS/6, and unless required to create new policy, it has disadvantages in terms of timescales associated with such a formal process. As an alternative a SPD can be used as the vehicle to advance the policy.
- 1.5 Policy SS/6 refers to a Major Development Area (MDA) to accommodate the built development of the proposed new village. The original objective of the MDA as set out in Paragraph 5 of the policy is to ensure that the development potential of the former airfield was maximised and to ensure separation from the surrounding rural area, especially Caldecote/Highfields. Paragraph five of Policy SS/6 states that the MDA is “to be planned through the AAP”. If the new village is now to be progressed via SPD the flexibility to change the MDA is lost as our legal advice confirms that a SPD cannot amend the MDA boundary. This raises the importance of establishing a boundary now, which is sufficiently flexible to deal with change, whilst respecting the original objectives for establishing the designation.
- 1.6 The advice of Andrew Tait QC is that the MDA could be altered as a further modification to the Local Plan and that evidence will be required to justify the change. The purpose of this statement is to set out the changes that justify a revision to the MDA and ensure soundness of the Local Plan.



2.0 HOW THE PLAN IS CURRENTLY UNSOUND AND CHANGE BEING SOUGHT

- 2.1 Previous representations to the emerging Local Plan submitted on behalf of CP/Taylors, raised an *objection to the MDA as identified on the Policies Map and referred to in Policy SS/6 on the grounds that:*
- *It is not the most appropriate strategy when considered against the alternatives, i.e. the plan is not 'justified' as required by paragraph 182 of the National Planning Policy Framework (NPPF);and*
 - *It could limit the Plan's deliverability over its period, as set out by the 'effective' test at paragraph 186 of the NPPF.*
- 2.2 Representations made at various stages of the Local Plan process, argue that the final boundaries for the MDA would be more appropriately defined through detailed master planning and subsequent planning stages, when further baseline information and the extent of all necessary land uses is known and fully tested. A SPD was called for, as a vehicle to advance the proposals, albeit without the constraints of a MDA. The existing MDA boundary was criticised on the basis of a lack of understanding as to how it was derived and again it was argued that this should not be fixed until detailed master planning of the site had been undertaken. Previous representations called for the removal of the MDA. They also called for a SPD to be used to advance the new settlement proposals.
- 2.3 Previous representations stated that an AAP is not consistent with the proposed modifications to the Plan to increase flexibility and provide deliverable sites within the Plan period. It would take significantly longer to prepare and would therefore be contrary to other main modifications to the Plan to remove the restriction on faster rates of development than those envisaged in the housing trajectory.
- 2.4 It is acknowledged that under the provisions of the 2012 Local Plan Regulations the boundaries of the MDA cannot be determined in a SPD. Therefore, we continue our objection to the MDA designation and the restriction this places on the proposed new village, unless this can be drawn with sufficient flexibility to deal with change. We also accept that any revision must acknowledge the original objectives for creating the MDA designation.
- 2.5 The MDA as originally drafted was intended to accommodate the built development of the new village. Its purpose was to ensure that the development potential of the former airfield is maximised and to ensure that the new village includes green infrastructure, landscaping and separation, particularly from Caldecote/Highfields, to help it fit into its rural setting. It was based on arithmetic assumptions of gross to net development areas, density range and an anticipated land use budget. Without the benefit of a master plan for the site, informed by baseline evidence and assessment, the MDA as initially proposed could only ever have been an arbitrary designation. The need to amend the MDA was inevitable in the interests of devising a workable and deliverable master plan, both to guide the development of a sustainable new settlement and to create an attractive place to live, work and play.



- 2.6 Over the last two to three years CP/Taylor's together with a large team of consultants have collated substantial baseline evidence in relation to the site and surrounding area. This has been used to test and assess a range of master plan options, that proves that a new village comprising up to 3,500 homes together with all appropriate supporting services and facilities can be accommodated on the site. The latest illustrative master plan - Option 9A – is attached at Appendix 1. On pages 41 and 54 it demonstrates one example of how development could be delivered to achieve the levels of growth required by the emerging Local Plan at this location. The emerging master plan has been the subject of consultation with key stakeholders and officers of the Council. In July 2016 it was presented to the Cambridgeshire Quality Panel and was well received. The presentation to the Panel and their Report of the Meeting are attached at Appendix 2. Finally the layout of development at this location has been discussed with officers of the County Council in relation to transport considerations, in particular the City Deal.
- 2.7 A paper prepared by Rummey Design, and attached at Appendix 1 is the culmination of several years work and demonstrates a holistic approach to development that takes into consideration topography, drainage and vegetation, geology and soils, visual impact, neighbouring settlements, biodiversity, archaeology, historic assets, noise, ground conditions and other site features. Sufficient analyses has been undertaken to justify an amendment to the MDA and the proposed change is shown in Section 5 of Appendix 1 and the proposed change to Policy Map Inset I at Appendix 3.
- 2.8 The following section summarises the reasons for change and how this translates into a revised MDA to be incorporated onto the Local Plan Policies Map, Insert I.
- 2.9 Appendix 4 shows a revised Policy Map Inset I proposed by Countryside Properties. This shows the precise change to the MDA boundary that is sought to make the Local Plan sound. The change to the Policy Map and consequential changes within the policy to substitute 'SPD' for 'AAP' will meet the tests of soundness by ensuring that:
- The Plan is 'justified', and provides the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - The Plan is 'effective', ensuring that it is deliverable over its period; and
 - The Plan is consistent with national policy and will enable the delivery of sustainable development in accordance with the policies in the Framework.



3.0 EVIDENCE BASE TO JUSTIFY THE CHANGE SOUGHT

(i) Baseline evidence and assessment that have influenced the landscape strategy and emerging master plan design

3.1 The collation of baseline evidence and assessments has identified clear constraints and opportunities, that in turn have translated into the production of a *proving master plan* design. The site's capacity for change to accommodate a new village, and the drivers for this, are explored in detail in the document prepared by Rummey Design at Appendix 1, under the following topic headings on pages 14-26:

- Historic landscape pattern.
- Geology and topography
- Hydrology and Water
- Biodiversity
- Landscape Character
- Landscape and Ecology
- An Overarching Landscape

3.2 The master plan layout aims to respond to all the above considerations in a variety of ways. It proposes to retain existing woodland and tree belts as a basis for landscape structure and to integrate development. The northern edge of the site will be reinforced by planting and bunding for noise attenuation and screening, reinforcing the east-west viewshed. There are plans to link existing plantations and tree belts to the east, between the site and Caldecote/Highfields, with new tree planting for continuity and screening. Reinforcement of the western edge tree belts will strengthen the buffer between the site and Cambourne and control views in from the road. There are proposals to exploit long views southwards through New Barns Plantation and retain the highest (most exposed) ground as open space. Topographical separation and screening provided by New Barns Plantation will be used to guide land uses in the southern most quarter of the site. The southern boundary hedgebank can be reinforced to reduce visibility from the footpath and views from the land to the south.

(ii) Identification of a land use budget required to support a new village of up to 3,500 homes.

3.3 Since the MDA was first drafted, in addition to the baseline evidence referred to above, a land use budget for the proposed new village has been established, in conjunction with specialist officers of the Council and key stakeholders. A wealth of information has been acquired on the scale of new development and associated infrastructure to support a sustainable new community. With the benefit of additional research and analysis, there is better understanding of required land take and preferred juxtaposition of uses within the new village, and how these will be required to fit into a landscaped setting.



- (iii) Change in transport infrastructure proposals for the region
- 3.4 Change in the form of transport infrastructure proposals have influenced the potential layout for a new village at Bourn Airfield. These justify amendment to the MDA. There are now requirements associated with City Deal for a transport route/ bus link through the Bourn Airfield site, which is supported by Countryside Properties. The precise alignment for this route is yet to be determined and flexibility is therefore required to accommodate this transport infrastructure. However, work has shown that the master plan can be amended to accommodate the bus link (please refer to pages 30 and 37 of the Rummey Design document at Appendix 1), whilst respecting the MDA. In addition when the MDA was first established in the emerging Local Plan, it was proposed to include a Park and Ride site at Bourn Airfield. This has now been abandoned in the context of the Bourn Airfield site.
- (iv) Change in the form of an Employment Allocation that was deleted and included within the MDA, and closure of a large industrial plant on the site.
- 3.5 Modifications to the Local Plan that relate to existing employment uses at Bourn Airfield will have implications on the layout of a new village.
- 3.6 Some 13.09 hectares of employment land in the north east of the site was coloured purple on the Proposed Submissions Policies Map Insert I as an ‘Employment Allocation’ but was also marked as being within and subject to Policy SS/6. However, Minor Changes to the Local Plan corrected this mapping error by amending the colouring to show that it was part of the MDA (Minor Change – MC/PM/9), but retained a large buffer. Policy SS/6 at paragraphs 5 and 6c emphasise that the AAP should consider how the employment development could be integrated with the new village.
- 3.7 Part of the employment land was formerly occupied by Thyssen Krupp, who operated an industrial plant under Class B2. Other premises in this location remain in use by David Ball Group Limited, who operate a research and development centre, classified as B1 use. Although planning permission has been granted for the redevelopment of the former Thyssen Krupp site (9.4 hectares) for B2, supported by B1 and B8 uses, the Council state (in the Draft Final Sustainability Appraisal Report – Audit Trail) that paragraph c of Policy SS/6 already includes sufficient flexibility to accommodate these uses in suitable locations compatible with the wider new village.
- 3.8 The overall employment area comprises 13.09 hectares of land that is roughly square shaped and surrounded by farmland and other open land between Highfields/Caldecote. Its eastern boundary lies close to the AAP designation, and at its closest point is 214 metres from the edge of the defined settlement boundary of Highfields/Caldecote.
- 3.9 Following the closure of the Thyssen Krupp industrial plant and in the interests of good planning and in accordance with Policy SS/6 as above, the proving master plan layout proposes that employment provision be more widely distributed throughout the new settlement in a more sustainable pattern and encompassing a wider range of business uses.



Provision continues to be made in this location to retain the existing business of David Ball Group and other existing business established adjacent to Grange Farm. These uses are entirely compatible with surrounding residential development.

- 3.10 The master plan proposes that land vacated by Thyssen Krupp and the surrounding open space noise buffer that is no longer required, should be incorporated into the MDA and planned comprehensively, predominately for residential development, in order to make best use of previously developed land and create a better entrance and gateway into the village compared with the submitted MDA boundary.
- (v) Need to address inconsistency in the formulation of the original boundary and how this deals with structural planting.
- 3.11 The MDA was not only intended to identify a focus for the *built development* of the new village but also ensure that sufficient land is available for *substantial strategic landscaping*. The Proposed Submission Policies Map Inset I with proposed minor change, at Appendix 3, shows the MDA boundary as proposed in the submitted Local Plan. The evidence set out in this report and Appendix 1 justifies changes to the submitted Policies Map Inset I as shown in Appendix 4. The overall size of the MDA in each plan is similar. The submitted Local Plan boundary includes 154.79 hectares of land, whilst the evidence-based, design-led boundary includes 159.66 hectares. Yet the residential area of the latter is 107.2ha compared with 112 ha of the submitted Plan.
- 3.12 The key difference between the two MDA boundaries is in the way they respond to the need to maintain the rural character and separation from Cambourne, Caldecote/Highfields and Bourn. The MDA boundary in the Local Plan allows for strategic landscaping *within* the MDA to north and west, but to the east and south it is proposed to be *outside* the MDA. To the east of the site the MDA is pulled back from the boundary of the site and structural planting is proposed in open land to ensure separation from Caldecote/Highfields. To the south the boundary has been drawn to respect areas of important woodland and ecological value (Bucket Hill Plantation). However to the west and north the development boundary aligns with the AAP boundary i.e. strategic allocation for the new settlement. The need for structural planting along the A428 or adjacent to the Broadway, separating the site from Cambourne is proposed *within* the MDA in these parts of the site. Policy SS/6 at '6(j)' states the requirement for strategic landscaping 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 Caldecote/Highfields and Bourn". However this is not reflected in the MDA as proposed in the emerging Local Plan.
- 3.13 The design-led MDA drawn to accommodate the proving master plan reflects the need for separation and hence structural planting along *all* boundaries of the site, outside of the MDA.
- 3.14 The eastern edge of the site is an area where the two MDA boundaries differ the most. This in part reflects the loss of an industrial plant and associated noise buffer, referred to in paragraph 3.9 above. Aerial photographs of the eastern boundary are shown in Appendix 1 on the cover and on pages 4, 13 and 43. These show the significant gap with dimensions



on pages 43, 59 and 60, together with the depth of existing vegetation between the village of Caldecote/Highfields and the site, as defined by the existing employment area. The eastern edge of the site is well-treed along its length, leading into Bucket Hill Plantation. The SCDC detailed buffer is unnecessarily wide, especially given the existing substantial tree cover and screening that will be reinforced and enhanced by the Countryside Properties' proposals. The master plan proposals show a gap varying in width from 214m to 390m between the proposed new MDA boundary and the defined boundary of Caldecote/Highfields.

- 3.15 The proposed design-led MDA respects the need for a landscaped gap between the site and Caldecote/Highfields. The loss of the industrial plant and associated buffer afford the opportunity to realign the MDA which is drawn to show a more uniform gap along the eastern edge, consistent with separation distances to the west of the site.
- 3.16 Variation between the two boundaries exists to the south of the site. The Local Plan MDA abuts the boundary of Bucket Hill plantation, excluding it from the development area. For consistency the design-led boundary has been drawn to adjoin but exclude an area of protected woodland that extends from the plantation and forms the southernmost boundary to the Bourn Airfield site.