

Cambridge City and South Cambridgeshire Local Plan Examinations

Our ref 13577/MS/NB
Prepared By Lichfields and Bryan G Hall on behalf of CEG
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Subject **MATTER SC6C: NEW VILLAGE AT BOURN AIRFIELD**

Preface

CEG supports the Councils' Development Strategy (Local Plan Policy S/6 refers), including the development of new settlements, where sustainable, as part of the long term solution to accommodate housing need and support economic growth where development cannot be accommodated in or on the edge of Cambridge as the initial preference.

However there is a need to recognise, consistent with the sustainable development sequence of Policy S/6, that the edge of Cambridge is the preferred and more sustainable location for development. Development on the edge of Cambridge is also more deliverable, has shorter lead-in times, and requires less new infrastructure.

Early delivery of homes on the edge of Cambridge therefore has an important role in meeting short and medium term housing needs as well as helping meet the conditions for releasing later tranches of City Deal funding which - it is now clear - will be necessary for the delivery of infrastructure necessary for new settlements, including investment in the A428 corridor. It is now clear that significant City Deal and other funding will be needed to deliver the transport infrastructure needed to support sustainable development at Bourn (and Cambourne West).

CEG fully understands that omission sites on the edge of Cambridge - notably an extended housing allocation under Cambridge City Policies GB1 and GB2 - will be discussed in a later examination session. However, in considering questions under Matter SC6C, a conclusion on the soundness of the Plan(s) and effectiveness of its housing trajectory must recognise the presence of alternative options on the edge of Cambridge with greater prospect of immediate delivery, and which - through helping secure future rounds of City Deal monies to pay for A428 corridor works - could themselves help overcome obstacles to sustainability and delivery of new settlement options - including at Bourn Airfield.

1.0 General Policy

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

- 1.1 The site is capable of functioning as a sustainable location in the longer term, but significant investment in essential infrastructure¹ is needed to deliver sustainable access options to link Bourn with existing and emerging employment locations.

¹ RD/MC/o80 Infrastructure Delivery Study 2015, Appendix D

- 1.2 The take up of employment space at Cambourne, the nearest large cluster of employment space, has been slow, with Cambridge and the established science and research parks remaining the focus for the local economy (as explored in CEG's Matters Statement on E/2). Consequently, Cambourne is unlikely to offer significant or well-connected local employment opportunities for Bourn in the short or medium term.

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

- 1.3 The site may be able to support local services and facilities to some extent in the long term, but new residents would continue to look to, and travel to, Cambridge for higher order goods and services.
- 1.4 The sustainability of the site relative to more preferable locations in the development sequence options should therefore be considered having regard to the accessibility of the full range of services and facilities required by residents.

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?

- 1.5 CEG does not wish to comment on this question.

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

- 1.6 CEG does not wish to comment on this question.

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

- 1.7 CEG does not wish to comment on this question.

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?

- 1.8 CEG's Matter 5 Infrastructure/Monitoring/Viability Statement dated 10 October 2014 included showed that the delivery of 'critical' transport infrastructure is incompatible with the housing trajectories for the strategic sites including Bourn. Appendix 4 of that Matters Statement identified that the total estimated costs of the critical transport infrastructure taken from the

Cambridge and South Cambridgeshire Infrastructure Delivery Study Update (Final Report Amended) (August 2013, RD/T/020) was £537 million. At the Matter 5 Hearing on Wednesday 19 November 2014 CEG submitted an amended Major Scheme Programme taken from the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC), April 2014, Action Plan and Scheme Details with the Infrastructure Delivery Study scheme status and City Deal estimated costs and the housing trajectories for the strategic sites added (RD/CEG/020). The total estimated scheme costs were £743 million, an increase of some £206 million over the IDS Update 2013 estimated costs.

- 1.9 Within their preliminary conclusions letter (dated 20 May 2015, RD/GEN/170), the Inspectors conclude (on page 3) that:

‘...if development is to be directed to new settlements rather than the edge of the urban area, it needs to be clear that the challenges of making such development as sustainable as possible have been addressed, in particular infrastructure requirements and sustainable transport options. Evidence presented to the Examination so far indicates that there is a significant funding gap in relation to infrastructure provision. In some cases, the ways in which infrastructure requirements will be met are still at a very early stage of consideration. For example, at the hearing into Matter 7 it was suggested that the segregated bus link to serve proposed development at Bourn Airfield (policy SS6) may be pursued via an off-line route, but little work has yet been done on the feasibility of, or options for, such a scheme. The likely difficulties of land assembly, apart from any other considerations, could well have significant implications for cost and timing which are as yet unknown. We are aware that this development is not expected to come forward until the latter part of the plan period (post 2022) and that an AAP is to be prepared. Nonetheless, the lack of evidence available at this stage does not provide any reassurance that the Plans will deliver sustainable development bearing in mind the reservations expressed in the SDSR. It was also suggested that some development could come forward at Bourn in advance of the provision of the segregated bus route but the Councils were unable to say how much could be provided in advance of the infrastructure requirements identified in Policy SS6.’

- 1.10 CEG’s Major Scheme Programme was updated further to illustrate the shortfall in Tranche 1 City Deal funding of £100 million to meet Tranche 1 Priority List of Schemes estimated to costs some £163 million. This updated Programme was first presented and discussed at the Matters 7 Transport Hearing in the context of the relationship of transport infrastructure delivery timescales with the Strategic sites housing trajectories. The updated Programme which incorporated the IDS 2015 scheme status update was formally submitted to the examination as Annex 1 of CEG’s Matter PM1 – Housing Statement (dated 11 May 2016). This demonstrated that major schemes required for Bourn Airfield were starting to slip beyond the start date of 2021/22 for the delivery of housing. One example is the Bourn Airfield/Cambourne pedestrian/cycle route programme which had moved from a delivery date of 2019/20 to 2024/25.
- 1.11 The Major Scheme Programme has now been updated again to reflect changes in City Deal scheme progress since April 2016. This is attached at Annex 1 of this statement and includes the original Scheme delivery programme taken from the April 2014 TSCSC to illustrate the slippage in scheme progress, particularly schemes essential for Bourn Airfield. The programme shows that the four A428 corridor schemes the delivery date has moved from 2019/2020 to 2023/24 beyond the 2021/2022 housing delivery start date on Bourn. In addition the costs of these four schemes previously estimated to cost £88 million have now risen to £142 million, a 62%

increase for these schemes alone. The total costs of the major schemes have increased from £743 million to £790 million.

Provision of Extensive Off-Site Infrastructure

- 1.12 The programme identifies that the total cost of the essential transport infrastructure required for Bourn Airfield and Cambourne West is £174 million. Due to the complexity of the A428 corridor scheme, costs and delivery timescales have increased significantly with delivery timescales already seven years later than anticipated by the Councils in April 2014².
- 1.13 The updated programme also reflects the fact that delivery of the A428 Bus Corridor Schemes is reliant on securing Tranche 2 City Deal funding. This point was recently reported to the Greater Cambridge City Deal Executive Board on 13 October 2016³. A decision on the release of Tranche 2 funding will only be taken by the Government in 2019 at the earliest and this decision is predicated on the review of key performance indicators during the Tranche 1 Period such as Scheme delivery outputs (i.e on track and on budget), outcomes (i.e realisation of benefits) and wider economic benefits. The trigger points are not yet established or agreed to inform the independent assessment/decision now referred to as the 'Gateway Review' (Agenda Item 10 refers⁴).
- 1.14 The (draft) minutes of this Executive Board meeting also demonstrate the significant further work still required before certainty around the A428 corridor works can be achieved, demonstrating that the concerns raised in the Inspectors' Preliminary Conclusions in May 2015 have not yet been addressed.
- 1.15 As noted above, the current total cost of the A428 Bus corridor schemes is £174 million. Against this, the draft Section 106 Heads of Terms schedule for Cambourne West⁵ includes a contribution of £8.7 million towards the A428 Madingley Road bus priority scheme and £495,000 (which includes £190,000 from the 950 dwelling S106) towards the Broadway Bus Link. The trigger points for the £8.7 million are to be determined following the outcome of further transport modelling work. The total S106 contribution of £9.15 million is only 5% of the total A428 Bus corridor scheme costs. Bourn Airfield is likely to have significantly greater on-site infrastructure costs and therefore for viability reasons it is, *ceteris paribus*, likely to provide a significantly lower S106 contribution than Cambourne West towards the A428 Bus Corridor Scheme costs. While the City Deal envisages developer contributions/obligations as a source of funding⁶, the contributions from Cambourne West and Bourn Airfield are very unlikely to be sufficient to provide the total funding necessary to deliver the scheme. This will increase the uncertainty over securing the necessary funding to deliver the A428 Bus Corridor Scheme in a timely manner.
- 1.16 It should be noted that the infrastructure associated with strategic sites is excluded from the draft South Cambridgeshire CIL charging schedule and R123 list, so there is no opportunity for other developments to contribute to cost of infrastructure on A428 corridor associated with

² RD/T/120 TSCSC Action Plan, page 3-2

³ RD/CR/650 Lead Officer Report, page 41, para 58.

⁴ Independent Economic Assessment Panel Update Report to Greater Cambridge City Deal Executive Board 13 October 2016

⁵ Appendix 2 (Draft s106 Heads of Terms) of the Officer's Report on Application S290314OL to the South Cambridgeshire District Council Planning Committee meeting on 11 January 2017 refers.

⁶ RD/MC/110

Bourn and Cambourne West through CIL payments as currently planned, and a limited opportunity to pool additional S106 contributions.

- 1.17 The Tranche 1 City Deal schemes are focused on Cambridge and the updated Major Scheme Programme at Annex 1 illustrates that the majority of these schemes, unlike the A428 corridor schemes, are still programmed to be delivered by 2019. In this regard, extended GB1 and GB2 allocations provide an opportunity for additional housing to support the Tranche 2 Gateway Review funding decision as the delivery of housing on these sites will provide evidence on the realisation of benefits because trips generated by the development would use the Tranche 1 funded schemes.
- 1.18 It is therefore concluded, having regard to NPPF Para 177, that there is not a reasonable prospect that the planned infrastructure essential for the delivery of sustainable development at Bourn is deliverable in a timely fashion given the continued uncertainty around funding, including the unknown nature of the Gateway Review necessary before additional City Deal Tranche 2 funds are secured and released.

Removal of Phasing of Development (Modification PM/SC/3/I)

- 1.19 As originally drafted, Policy SS/6 (paragraph 4) limits the first completions (to 2022) and the total number of dwellings completed in the plan period to 2031 (to 1,700 dwellings). These limits provide a clear basis for the assessment and provision of infrastructure both in terms of its timing and the capacity needed. The proposed removal of this phasing (under Modification PM/SC/3/I) could theoretically help to boost the supply of housing, but only if this can be accommodated and achieved through delivery of the necessary infrastructure. This will require the delivery of significant and critical infrastructure, notably on the A428 corridor, to be brought forward. If the necessary infrastructure cannot be delivered in time, significant adverse impacts could result.
- 1.20 The latest City Deal information (summarised above) indicates that projects necessary to deliver necessary sustainable travel options on the A428 corridor will not be delivered until 2023/24, and even then only if costs of £143 million can be covered, based on a triggering of City Deal Tranche 2, which is not certain.
- 1.21 Bourn Airfield itself cannot deliver the homes needed to demonstrate City Deal additionality as required to secure the funding required for necessary infrastructure because it needs that same infrastructure. Consequently it will be necessary for either the development to cover the full cost of infrastructure needed to support the first phase, and/or for other developments to deliver the homes and economic growth needed to secure the Tranche 2 (post 2020) funding.
- 1.22 Development at Cambourne West alone cannot be relied upon to achieve this, as it is itself reliant in the same A428 corridor infrastructure to ensure it is a sustainable location and the S106 package committed in relation to that scheme includes only £10.2 million towards bus service and infrastructure improvements on the A428⁷, and it should be noted that the triggers for the payment of most of the funds are “*TBC in accordance with modelling outcomes*”.
- 1.23 The latest SCDC Annual Monitoring Report (RD/AD/480) indicates the first completions at Bourn in 2020/21 (60 units). Recent research by Lichfields⁸ established that sites over 2000 units take on average 6.1 years to secure planning approval and a further 0.8 years from

⁷ Appendix 2 (Draft s106 Heads of Terms) of the Officer’s Report on Application S290314OL to the South Cambridgeshire District Council Planning Committee meeting on 11 January 2017 refers.

⁸ Start to Finish – How Quickly to Large-Scale Housing Sites Deliver? (Lichfields, November 2016)

approval to first completion on site. It is therefore reasonable to expect some slippage in the housing trajectory secured at Bourn, with the consequence that housing completions to support City Deal funding will be delayed.

1.24 Based on all the above, CEG does not believe it appropriate to show Bourn Airfield delivering new completions any earlier than 2023/24, and even this is subject to significant doubt.

1.25 The Local Plans and associated joint trajectory should therefore provide for alternative and additional development which is deliverable in the short term and could assist in securing funding to cover the costs of infrastructure needed for Bourn as part of a co-ordinated and comprehensive development strategy for the Greater Cambridge area.

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

1.26 CEG does not wish to comment on this question.

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

1.27 CEG does not wish to comment on this question.

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

1.28 CEG does not wish to comment on this question.

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

1.29 CEG does not wish to comment on this question.

2.0 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?

2.1 The Planning Practice Guidance (Paragraph: 012 Reference ID: 12-012-20140306) states:

The National Planning Policy Framework makes clear that the Government’s preferred approach is for each local planning authority to prepare a single Local Plan for its area (or a joint document with neighbouring areas). While additional Local Plans can be produced, for example a separate site allocations document or Area Action Plan, there should be a clear justification for doing so.

2.2 The recent White Paper (A.16) indicates the Government will remove the policy expectation of a single local plan document. However, against the existing guidance, there is no clear justification for using an AAP (or a SPD), and in terms of the effectiveness of the plan it is problematic because the SCLP defers significant planning matters on the new settlement (notably essential infrastructure) to another plan.

- 2.3 The delivery of a new settlement on the Bourn Airfield site is a key part of SCDC Housing Trajectory. Footnotes 1 and 2 to NPPF Paragraph 47 are clear that:
- 1.To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years and in particular that development of the site is viable...*
- 2.To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.*
- 2.4 While there may be a role for an AAP or SPD to secure certain details, more detail relating to critical and strategic infrastructure is needed now in Policy SS/6 to ensure the site is deliverable and developable, notably in relation to the essential infrastructure needed to establish it as a sustainable location. If the AAP is dropped in favour of a SPD it is unlikely in of itself to speed up the provision of the necessary policy framework because it provides less certainty and does not obviate the need to resolve difficult planning issues that would ultimately need to be established by the time any planning permission is granted. In this regard, the modification has no effect on reducing likely lead-in times for the development.
- 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?**
- 2.5 CEG does not wish to comment on this question.
- iii. Paragraph 6m: Should there be a reference to the provision of a high degree of connectivity between existing green corridors and ecological networks?**
- 2.6 CEG does not wish to comment on this question.
- 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?**
- 2.7 CEG does not wish to comment on this question.
- 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?**
- 2.8 The Park and Ride facility is identified as essential infrastructure and is integral to the A428 Corridor proposals⁹. All four scheme options tested in the 'Option Assessment Report for Cambourne to Cambridge Better Bus Journeys' included a Park and Ride site at the Madingley Mulch roundabout as this was assessed as the best strategic location. However, it must be noted that for the preferred Option 3 A428 Corridor Scheme the initial Benefit Cost Ratio (BCR) is

⁹ RD/MC/o80 Infrastructure Delivery Study 2015, Appendix D

calculated to be 0.2 which is 'poor' according to Transport Appraisal Guidance (TAG) classifications. The same Officer's report notes that City Deal Assurance Framework requires options to achieve a BCR of more than 2 unless there are clear wider economic benefits. The Lead Officer Report (Agenda Item 9) to the 13 October 2016 Greater Cambridge City Deal Executive Board states at paragraph 48:

'In major transport infrastructure schemes the BCR will evolve as further detailed development of the scheme proceeds with each successive step. At this stage the strategic fit aligned with City Deal objectives is prioritised. The BCR will be refined during the next step, for example as cost certainty increases and/ or the level of third party contributions to the scheme is more clearly understood...'

- 2.9 The evidence of the relatively low s106 contribution secured from the Cambourne West development suggests that the A428 Corridor Scheme S106 obligation for Bourn Airfield is unlikely to have a significant positive impact on the calculated BCR value. There is therefore still considerable uncertainty over the form of the scheme and the funding position. In order to ensure sustainable access to a new settlement at Bourn, the relationship between the Park and Ride Facility and viable bus services along the A428 corridor must be understood.
- 2.10 As there is still considerable uncertainty over the A428 corridor scheme including the site of the Park and Ride and the City Deal funding position, its provision in a timely fashion cannot be relied upon at this stage for the reasons outlined above.
- 2.11 It is concluded that the Park and Ride Facility is essential for the sustainability of a new settlement at Bourn and it would have to be funded principally through a S106 obligation. It should therefore be listed as a separate measure in the Bourn policy (SS/6).

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?

- 2.12 Yes, the highway improvements essential to the implementation of the policy (i.e the development of a new settlement on the Bourn Airfield site) should be set out in Local Plan Policy SS/6.

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?

- 2.13 CEG does not wish to comment on this question.

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?

- 2.14 As explained above, references to the infrastructure essential to make the scheme acceptable in planning terms should be written into Policy SS/6. This should include a clear explanation and identification of the infrastructure which is essential and desirable.

2.15 On this basis, a cross reference to Policy TI/8 is not necessary and, in any event, the Plan should be read as a whole.

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?

2.16 CEG does not wish to comment on this question.

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

2.17 CEG does not wish to comment on this question.

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?

2.18 CEG does not wish to comment on this question.

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

2.19 CEG does not wish to comment on this question.

3.0 Council's Further proposed modifications November 2016

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

3.1 CEG comments on aspects of the modifications under question 2i above.

3.2 CEG does not consider the modifications proposed in November 2016 (which it notes will need to be the subject of future consultation) will address the soundness concerns raised above which arise from matters of principle related to Policy SS/6 New Village at Bourn Airfield.

