

**East Cambridgeshire District Council****Background Note – Justification for the deletion of Employment Site BOT3  
(Adjacent to Tunbridge Lane Business Park, Bottisham) from the Green Belt****March 2014****1. Introduction**

1.1 Following the Local Plan Examination between 4<sup>th</sup> February and the 14<sup>th</sup> February the Inspector, Mr Michael Hetherington published a note summarising his main outstanding soundness concerns regarding the Local Plan. One of the matters referred to is concern over the proposed allocation BOT3 in Bottisham. The Inspector's comments on this matter were as follows:

17. *During the hearing sessions the Council indicated that it would consider a number of detailed site-related concerns raised by representors. This is welcomed. Particular soundness concerns that I have identified in this regard are as follows:*

- *the need to demonstrate exceptional circumstances to justify the deletion of the employment site BOT3 (adjacent to Tunbridge Lane Business Park, Bottisham) from the Green Belt, bearing in mind the intended allocation of a vacant employment site in the village (BOT2) for mixed uses including housing development;*

1.2 This background note sets out East Cambridgeshire District Council's justification for the release of the BOT3 site from the Green Belt.

**2. National Policy**

2.1 The National Planning Policy Framework (NPPF) sets out the overarching roles that the planning system ought to play. In paragraph 17 the NPPF, states the core planning principles for the planning system. These include the statements that planning should:

- *proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*

and

- *take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;*

2.2 Paragraph 28 of the NPPF addresses the need to support a prosperous rural economy and sets out national policy on business and enterprise in rural areas. It states:

*28 Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:*

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;*
- *promote the development and diversification of agricultural and other land-based rural businesses;*
- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and*
- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.*

2.3 National policy on the Green Belt is set out in paragraphs 83, 84 and 85 of the NPPF:

*83. Local Planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.*

*84. When drawing up or reviewing Green Belt boundaries Local Planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.*

*85. When defining boundaries, Local Planning authorities should:*

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

2.4 In paragraphs 160 and 161 the NPPF states that Local Planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. This requires the preparation of a robust evidence base to assess the needs for land or floorspace for economic development.

### **3. Need for Employment Sites in Bottisham**

3.1 East Cambridgeshire is a rural district, which is part of the wider Cambridge sub-regional economy. Between 2000 and 2010 the district saw a large increase in overall employee jobs from 24,000 to 29,000. However despite this growth, the number of employee jobs has failed to keep pace with the increase in resident population resulting in a low job density ratio of 0.54 (total employment to resident population aged 16 to 64). This ratio is the lowest ratio of any local authority in the Greater Cambridge Area, and significantly below the County average of 0.75. As a consequence there are very high levels of out commuting, mainly to Cambridge and its surrounding area.

3.2 East Cambridgeshire has the lowest total number of commercial properties across Cambridgeshire accounting for just 10% of the County's commercial stock. In terms of office units, East Cambridgeshire rates even more poorly with just 7.6% of Cambridgeshire's office units.

3.3 The Draft Local Plan (Document SD/1) recognises as one of its key issues the need to deliver local jobs, and to address out-commuting and congestion. The plan sets the following Strategic Objective on these matters:

1. *Support the local economy and help create more jobs in the district, which meet local employment needs, reduces out-commuting, and helps to increase the sustainability and self-containment of communities in East Cambridgeshire.*

- 3.4 This objective is taken forward in Policy GROWTH 1 which states that the Council will maximise opportunities for jobs growth in the district, with the aim of achieving a minimum of 9,200 additional jobs in East Cambridgeshire.
- 3.5 The Draft Local Plan is built upon the evidence base in the Council’s Jobs Growth Strategy (Document EE/1). This strategy has an important role in seeking to balance population and housing growth with new jobs, local services and infrastructure, with the overall objective being the delivery of more sustainable communities in the future and a reduction in net out-commuting by both industry sector and occupation.
- 3.6 The Jobs Growth Strategy identified the future jobs target of 9,200 jobs and includes a comprehensive package of recommendations to help meet that target. It recommended that Local Plan employment policies and site allocations should consider a broader pattern of employment development. This should allow small-scale employment growth on appropriate sites in rural areas and villages. These would be most suited to quality office and light industrial uses. The Jobs Growth Strategy notes that smaller high quality employment sites, with a variety of building sizes, are more attractive to the business market than large employment sites that have high infrastructure and development costs.
- 3.7 Policy GROWTH 4 in the Draft Local Plan identifies that the Tunbridge Lane site can provide 95 jobs on this 1 hectare site. The Crystal Structures site is identified for a mixed use development of 15 dwellings and 0.2 hectares of employment (64 jobs).
- 3.8 Bottisham currently provides 1300 jobs for a working population of 2,450 giving a ratio of employment to resident population aged 16 to 64 of 0.53, which is below the County average of 0.75. Out-commuting figures from the 2001 census show that 74.7 % of the Bottisham Ward population commuted out of the village every day to work at locations further than 5km away. Data from the 2011 census shows a high level of car or van use for journeys to work (77.6% of journeys). The population of Bottisham is also expected to grow by 18% over the next 20 years.

Table1: Bottisham Ward Population Forecasts

<b>Year</b>	<b>Population</b>
2011	4,030
2016	4,260
2021	4,530
2026	4,640
2031	4,760

Source: Research Group, Cambridgeshire County Council, 15.01.14

- 3.9 The provision of additional employment opportunities in Bottisham is important in order to improve its sustainability and degree of self-containment.

#### **4. Relationship with wider Cambridge Commercial Property Market**

- 4.1 SQW Consulting undertook a Partial Review of the 2005 East Cambridgeshire Employment Land and Labour Market study for East Cambridgeshire District Council in 2008 (Examination Library Reference EE/4). This noted the strong relationship between Bottisham and the Cambridge property market.

*219. In the south of the District development in Bottisham and surrounding villages stretching as far as Burwell is essentially linked to the Cambridge property market. As such demand tends to be strongest nearer to Cambridge. The small B1 schemes in this area have performed well in recent years, although the new developments at Stow cum Quy are said to have drawn tenants from Burwell as well as Cambridge – indicating either a thin market or an appetite for freehold property.*

- 4.2 The stock of grade A offices in Cambridge has decreased markedly in the past three years. This reflects the lack of opportunities to build new offices in the city centre as well as the level of demand. In the main, demand has been partly satisfied by the refurbishment and upgrading of older office space. An example of this can be seen at Clifton Court where passing rents were around £16.50 per sq ft in 2008/9 and now with a programme of upgrading is achieving rents in excess of £20 per sq ft. With the supply of space diminishing it is inevitable that competition would drive up rents even without a significant increase in demand. This market imbalance is unlikely to change in the short-term. Essentially, with the exception of the CB1 scheme, Cambridge City Centre is fully developed. CB1 will bring an extra 133,000 sq ft of space in addition to the 60,000 sq ft pre-let to Mott McDonald and Birketts but otherwise there have been very few opportunities for large scale office development around the city centre. As such it is vitally important that small scale sites within close proximity to Cambridge are identified by Local Plans for East Cambridgeshire and South Cambridgeshire.

#### **5. Past Employment Allocation History in Bottisham**

- 5.1 The East Cambridgeshire District Local Plan (June 2000) allocated the Crystal Structures site for employment/ business use and stated that proposals for alternative forms of development will be resisted. This plan also allocated the Ancient Meadows site in Bottisham for residential development. All of the Tunbridge Lane Business Park site was within the Green Belt at that point in time.
- 5.2 Outline planning permission for the Ancient Meadows site was granted in 2005 and this was followed by the approval of reserved matters and the commencement of development.
- 5.3 The Tunbridge Lane Business Park was established through the conversion and change of use of existing agricultural buildings into office accommodation. The buildings were all originally

cattle buildings, the first of which was converted in 1999. In total there are 8 units and they range from 400 sq ft to 6,300 sq ft. Total floor space is around 12,500 sq ft.

5.4 In light of the conclusions of the SQW Partial Review the East Cambridgeshire Core Strategy (October 2009) stated that a new employment allocation in Bottisham was required on a site of 1 hectare adjacent to Tunbridge Lane Business Park. The East Cambridgeshire Proposals Map (October 2009) included the site of BOT3 within the Green Belt, but indicated an area of search for employment on this land to deliver the allocation required by the Core Strategy. The intention of the Core Strategy was that a subsequent Development Plan Document would bring forward this allocation and release the site from the Green Belt.

5.5 The East Cambridgeshire Core Strategy was considered at a Public Examination in 2009. The Inspector, Mary Travers, came to the following conclusions regarding the proposals to release land from the Green Belt in Bottisham:

*3.107 Paragraph 3.5.9.2 of the CS also refers to the proposal to release lands from the Green Belt at Bottisham to allow for sustainable growth of the village as set out in Policies CS 2 and CS 4. As referred to above, the CS is underpinned by detailed assessments of housing and employment requirements and their consideration against policy objectives. Options for locating additional housing and employment land to meet the district's requirements have been properly examined. The Green Belt study assessed the impact of potential changes to the boundary at Bottisham as well as other areas and concluded that land to the north and south of Bottisham has less value to the Green Belt than land on its eastern and western sides.*

*3.108 The proposals for Bottisham have emerged from these assessments and in my view they are necessary to fulfil housing, including affordable housing need, and employment requirements in the southern part of the district in a sustainable manner. In accordance with PPG2, detailed boundaries of approved Green Belts should be altered only exceptionally. I consider that the PPG2 test is satisfied in this case. However, this should be made explicit in paragraph 3.5.9.2. I recommend accordingly [RC14].*

5.6 Mary Travers translated her conclusions into the following recommended changes in RC14.

*3.5.9.2 i) Delete the 5th sentence of the paragraph and replace with "The Core Strategy also proposes the release of lands on the edge of Bottisham."*

*ii) Insert the following new sentence after the 5<sup>th</sup> sentence: "There are exceptional circumstances justifying the review of the Green Belt boundary in this location in order to provide for sustainable growth of the village in accordance with the details provided in Policies CS2 and CS 4."*

*iii) Delete the 6th sentence.*

## **6. Deliverability of BOT 3 site**

- 6.1 The general positive conditions in the office market in and around Bottisham were recognised in the ECDC/ SQW employment land study in March 2005, which referred to “good demand for office units but on a small scale”. It noted that development in this area is viable. This assessment was confirmed by the updated ECDC/ SQW employment land review in 2008. These market conditions are significantly more positive for office development in Bottisham than is the case in central and northern parts of East Cambridgeshire.
- 6.2 Since the Tunbridge Lane Business Park was established in 1999 it has proved successful at attracting tenants. Up until late 2012 there was 100% occupancy at the site (except for short vacant periods of 1-2 months). An email outlining the occupancy history and the interest in further development was received from David Barker on behalf of the site owners (attachment 1) This clarifies that there is currently only 950 sq ft to let at present which would only accommodate 4-5 people. A letter (attached to the email) from an existing tenant Cambridge Cognition, who has just renewed their lease for units 3, 9, and 10, suggests that additional supply of units would be taken up at the site. A separate letter from Fugro Aperio Limited, who are also currently based on the site, indicates that they would also consider future expansion if premises were to be made available.
- 6.3 The history of the Tunbridge Lane Business Park, its success in attracting tenants, and the level of interest in expansion, clearly shows that there is a need for more employment provision in Bottisham, and that this site is deliverable.

## **7. Deliverability of Crystal Structures site for employment**

- 7.1 The Crystal Structures site (allocation BOT 2) has been identified for employment use for a considerable time, and was allocated for this use in 2000. However, despite the generally positive market conditions in Bottisham, there have been no planning applications for employment development on the site in this time.
- 7.2 The Site Assessment Results Technical Background Paper (Document SE/2) notes that employment use has been decreasing on the site and the buildings are unsuitable for modern market requirements. The buildings themselves were originally military buildings dating from the Second World War. The background paper also notes that there may be viability challenges involved in redeveloping the site for employment only purposes.
- 7.3 The Council is not aware of any development interest in redeveloping the Crystal Structures site wholly for employment use. On the contrary there have been a number of pre-application enquiries for residential development in the last few years. Recently, in February 2014, a potential developer, Bloor Homes, carried out public consultation on a 100% residential scheme in advance of a potential planning application for housing. This planning application is expected to be submitted within the next few months.

7.4 The Council has reviewed the need for the allocation for the Crystal Structures site. It considers that this allocation is inconsistent with the approach adopted for other employment sites in the Local Plan which are within the development envelope. Therefore the Council is proposing a modification to the Plan to delete the BOT 2 allocation. Proposals for development would be assessed against EMP 1. The Council will continue to envisage the site being developed for a mixed use scheme delivering 15 dwellings and 64 jobs.

## **8. Conclusion**

8.1 The Draft Local Plan sets an ambitious jobs target of 9,200 jobs for the district. This recognises the need to improve the balance between population and jobs in the district. To achieve the jobs target the Local Plan contains a package of policies and allocations including allocations in smaller settlements.

8.2 The Council's evidence base shows that office development is more deliverable in the south of the district than in other areas. Demand is particularly high in locations closest to Cambridge, where there are few potential development sites. As the NPPF states every effort should be made objectively to identify and then meet the business needs of an area, respond positively to wider opportunities for growth, and plans should take account of market signals. There is a high level of market interest in office expansion in Bottisham. Therefore it is important to identify opportunities for further employment development in Bottisham.

8.3 The options to provide additional employment development in Bottisham are limited to the Tunbridge Lane site and to the Crystal Structures site, as the other sites assessed through the Local Plan process are either far more suitable for residential use, or more intrusive in the Green Belt. There is no evidence that the Crystal Structures site is deliverable for a 100% employment scheme, and indeed there are proposals coming forward for 100% residential use. By contrast the proposed expansion to the Tunbridge Lane Business Park site looks highly deliverable.

8.4 The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. In this case the principle of releasing the BOT 3 site from the Green Belt was agreed in the East Cambridgeshire Core Strategy in 2009. At that time it was concluded that there were exceptional circumstances to release the site from the Green Belt. There has been no significant change in circumstances since that decision that would lead the Council to make a different decision.

8.5 In conclusion, the Council believes that exceptional circumstances do exist to release the BOT 3 site from the Green Belt. The NPPF states that when drawing up or reviewing Green Belt boundaries Local Planning authorities should take account of the need to promote sustainable patterns of development. The Draft Local Plan outlines the need to create more jobs in the district, to meet local employment needs, reduce out-commuting, and help to increase the



sustainability and self-containment of communities. There is strong market interest in the proposed business park expansion in Bottisham and the Council believes that this would accord with the national policy to support economic growth in rural areas.

From: David Barker [david@evolution-planning.co.uk]  
Sent: 03 March 2014 08:37  
To: Darren Hill  
Cc: Giles Hughes  
Subject: Tunbridge Lane Business Park Bottisham  
Attachments: Cambridge Cognition 27.02.14.pdf; Fugaro 26.02.14.pdf

Darren

It was good to meet you on Friday. As agreed I enclose information on the Tunbridge Lane Business Park. This includes the letter we have received via our clients from Cambridge Cognition who are an existing occupier on the business park. They are the largest occupier and have just renewed their lease and wish to stay and expand. This is contrary to the position put by the objector who attended the recent Local Plan hearing. Cambridge Cognition have been at the Business Park since 2000, they started in a smaller unit and after a year moved to the largest unit. I also attach a letter from Fugro Aperio. Both letters show existing business with between them over 80 staff in the village who wish to stay and grow and who are aware of and interested in the opportunity at Tunbridge Lane. Our clients have one other company interested in Tunbridge Court but this company does not want to become involved in a public process such as the Local Plan as they wish to keep expansion plans confidential from staff and customers till the availability of the land is clearer.

By way of background the buildings at Tunbridge Court were all originally cattle buildings, our clients started converting them in 1999 and the last was completed in late 2000. The conversion was carried out in 3 phases with each phase was let before the next was started.

There are 8 units and they range from 400 sq ft to 6300 sq ft, the largest unit is designed so it can be split in 2 - so there could be 9 units. Total floor space is around 12500 sq ft

Up until late 2012 there was 100% occupancy (except for the odd month here and there). There is only 950 sq ft to let at present which could only accommodate 4-5 people.

The present tenants on average have been at Tunbridge Court for 7+ years, 3 of the tenants are original tenants.

Our clients have a man in the village who maintains the gardens and the lawns are cut every week, and shrubs and bushes cut twice a year so the site always looks tidy in order to attract good quality tenants.

The timescale for the development of the new allocation would be in part dependant on new tenants

and in part on the success of speculative development. With Cambridge Cognition and Fugaro Aperio it is likely that buildings would be developed to their specific requirements as the letters show both companies are looking to expand. Our clients also intend to do some speculative development on part of the site so that buildings are available in the short term for other companies. Our clients have made a success of Tunbridge Court to date and have commercial units on a farm in Forest Heath District, and have obtained a draft employment allocation on the edge of St Ives. They are experienced in employment development and able to take forward the extension to Tunbridge Court.

We consider that this clearly shows that because of the existing high levels of occupancy at Tunbridge Court, achieved despite the recent recession, and because of the interest in the site from new companies who cannot currently be accommodated that there is a need for more employment development in Bottisham. The NPPF gives "significant" weight to achieving economic growth and requires planning to recognise the needs of existing businesses. Paragraph 161 of the NPPF requires that to plan for the needs of businesses that local authorities should assess the sufficiency and suitability of land to meet business needs. We hope that this local evidence shows the suitability of the land at Tunbridge Court and that more land is needed.

I hope that this provides the information that you require. Please let us know if you require anything further.

Kind Regards

David Barker MRTPI MRICS  
Partner

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26/02/14

**Support for proposed extension of Tunbridge Court**

Dear Will

I am the Director of Fugro Aperio, a Geophysical Investigation firm based in Bottisham employing around 30 staff at our Bottisham office. We are steadily expanding and would like to remain in Bottisham, as it suits us well; some staff live in the village and several others live within cycling distance in the surrounding villages, as well as Cambridge.

As we outgrow our present premises, Tunbridge Court is being considered as a suitable site for our expanding needs and to allow us to remain in Bottisham. I therefore strongly support East Cambs' proposal to extend Tunbridge Court for employment use.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "S Dods", written in a cursive style.

Sam Dods  
Operations Director

27<sup>th</sup> February 2014

Will Green  
Greensons Lane & Cattle Co  
2 Tunbridge Court  
Tunbridge Lane  
Bottisham  
Cambs  
CB25 9TU

Dear Will

Further to our recent conversations around the renewal of our lease for Units 3, 9 & 10, I am writing to confirm that we would potentially be interested in a new larger unit on this site. We currently have 50 employees and are looking to expand over the next few years, increasing the number of employees here at Bottisham.

We have been a tenant for over ten years and have invested in the infrastructure of the site by installing a dedicated high speed internet leased line to our premises, at considerable cost. The situation of the site is also ideal for us as we have employees travelling within a 35 mile radius, we wish to avoid relocating to offices within Cambridge centre or the Science Park at this time, due to traffic congestion.

I look forward to discussing this matter with you further in the near future.

Yours sincerely



**TINA BUCKNALL**  
Finance Team Lead