

# PLANNING APPLICATION

## S/3729/18/FL: RESPONSE FROM

### BABRAHAM PARISH COUNCIL

Babraham Parish Councillors voted unanimously at their Parish Council meeting on 11 October 2018 to object to Planning Application S/3729/18/FL and have agreed the following grounds and Material Considerations.

Babraham Parish Council understands the needs and drivers of the National Planning Policy Framework (NPPF, 2012), the Localism Act 2011 and the ways in which developers will contribute to funding supporting services and infrastructure through Section 106 contributions and the Community Infrastructure Levy (CIL).

#### 1. THE APPLICANT HAS NOT SATISFIED THE POLICY REQUIREMENT OF THE SOUTH CAMBRIDGESHIRE LOCAL PLAN

The Applicant TA notes Policy under the South Cambridgeshire Local Plan as follows.

2.7 In respect of transport matters, the policy identifies that:

‘Contribution to any highway works required to mitigate the impact of development as a whole on the eastern flank of Sawston’

The Applicant makes no mention of highway works required to mitigate impacts on Babraham, in which H/1:b entirely lies. This is a direct consequence of all parts of the planning process using the incorrect designation of H/1:b (see [4](#) and [5](#), below).

- ***Babraham Parish Council argues that the Applicant has not satisfied the requirements of the South Cambridgeshire Local Plan or has been misdirected by designation in that Local Plan.***
- ***Babraham Parish Council objects to the application in its current form and until such time as the Applicant can demonstrate that it has satisfactorily addressed mitigation of the impact of development on the host Parish, Babraham.***

#### 2. THE APPLICANT HAS NOT SATISFIED THE NPPF IN DEVELOPING THE MEASURES TO BE TAKEN TO DEAL WITH TRANSPORT IMPACTS OF H/1:B

NPPF defines a Transport Assessment (TA) as follows.

##### **Transport assessment [emphasis added]**

A comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for ***alternatives to the car such as walking, cycling and public transport*** and ***what measures will need to be taken to deal with the anticipated transport impacts of the development.***

<https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

The measures the Applicant Transport Assessment proposes are engagement, information provision, a 'cycle voucher' of unspecified value, an opportunity to request a one-month 'bus taster ticket' (the current cost of four-week Megarider Plus is £96).

There are no other measures to address anticipated transport impacts.

The Applicant's data states current bus usage is 6.5% of journeys. Babraham Parish Council anticipates that the more distant location of H/1:b from bus stops (see 3, below) would make the uptake from residents lower still, increasing private car or other usage.

Babraham Parish Council notes that the bus provider has informed the Applicant that it will not provide closer stops (Applicant Transport Assessment, par. 4.14).

Babraham Parish Council argues below (see Sections 6, 8, 11, 12, 13, 15, 16, 17) that the Applicant has not adequately satisfied the NPPF requirement of identifying "what measures will need to be taken to deal with the anticipated transport impacts of the development".

- ***Babraham Parish Council argues that the Applicant has not so demonstrated adequate measures to be taken and thus has not satisfied NPPF requirement.***
- ***Babraham Parish Council objects to the application in its current form and until such time as the Applicant can demonstrate that it has satisfied the NPPF requirement.***

### 3. THE APPLICANT HAS NOT SATISFIED THE NPPF IN TAKING UP SUSTAINABLE TRANSPORT MODES, DEVELOPING SAFE ACCESS AND AMELIORATING THE SEVERE CUMULATIVE IMPACTS OF H/1:B

NPPF Section 4, Promoting sustainable transport (Paragraphs 29 to 41) states that:

*32. All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:*

- *the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure*
- *safe and suitable access to the site can be achieved for all people*
- *improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe*

<https://www.gov.uk/guidance/national-planning-policy-framework/4-promoting-sustainable-transport>

H/1:b lies remote from bus services. The proposed access is approximately 800 m (10 minutes' walk) from the nearest bus service towards Cambridge (Churchfield Avenue), served every 20 minutes (not 15 minutes as stated in the Applicant Residential Transport Plan). It is 1.1 km (13 minutes' walk) from Cambridge Road services.

Babraham Parish Council notes that the bus provider has informed the Applicant that it will not provide closer stops (Applicant Transport Assessment, par. 4.14).

Additionally, Babraham Parish Council believes that the additional traffic resulting from H/1:b will generate severe and cumulative impacts on Babraham Parish, in addition to already consented developments (see Sections [6](#), [8](#), [11](#), [12](#), [13](#), [15](#), [16](#), [17](#), below).

- ***Babraham Parish Council argues that the distant location of H/1:b from bus services will act as a disincentive for bus usage.***
- ***Applicant has not demonstrated effective measures to be taken and thus has not satisfied the NPPF requirement.***
- ***Babraham Parish Council objects to the application in its current form and until such time as the Applicant can demonstrate that it has satisfied NPPF requirement to adequately describe and assess “what measures will need to be taken to deal with the anticipated transport impacts of the development”.***

#### 4. H/1:B HAS CONSISTENTLY BEEN INCORRECTLY LABELLED AS LAND NORTH OF ‘BABRAHAM ROAD, SAWSTON’ THROUGHOUT THE PLANNING PROCESS

While it would be simple to defend this designation as a convenient shorthand for the site, its consequences are far too substantial.

This error has led to and propagated dramatic and severe impacts for Babraham Parish (and Sawston Parish).

Babraham Parish Council summarises in this section the key chronology of this error, and argues below (Section 5) that, by using this designation consistently, Planning Officers, the Planning Inspectorate, Local and County Councillors and the Developers have consistently been led to ignore or give scant notice to the implications of H/1:b for its host Parish, Babraham.

Among the key planning, review and consultation documents using the incorrect designation are:

- 27 September 2018: [Report to SCDC Full Council](#) (lead officer, Stephen Kelly);
- 29 August 2018: Planning Inspectorate [Report to South Cambridgeshire District Council](#);
- January 2018: [Local Plan Main Modifications](#);
- 30 November 2016: [Further Proposed Modifications to SCDC Local Plan](#);
- July 2014: Cambridgeshire County Council representations on [H/1:b](#) and [H/1:c](#);
- 28 March 2014: [Proposed Submission Local Plan](#)

Selected, relevant extracts are presented in Appendix B: [History of H/1b designation](#), which provides a strong evidence base for a consistent and uncorrected designation of site H/1:b.

It might be argued that this error is not important.

If that were so, then there would be no need to make the first published correction of this unacceptable action, ***made only at adoption of the [Local Plan](#) on 27 September, 2018 (Chapter 7: Delivering High Quality Homes; p. 135).***

**H/1:b** Sawston, land north of Babraham Road (In Babraham Parish); 3.64 ha.; 80 dwellings

However, because other incorrect designations on this date persist, Babraham Parish Council argues that this alteration is a late, hurried and incomplete attempt to correct the long-standing error. Unchanged references include:

- the main text of the adopted *Local Plan*, p. 25, par. 2.34, which explains that “land is released from the Green Belt at Sawston, Impington and Comberton (Policy H/1)”;
- the adopted *Local Plan, Appendix F*, pp. 310—11, which refers to H1 developments as being in Sawston: “new residential development at three sites in Sawston (Dales Manor Business, Park, land north of Babraham, Road, land south of Babraham, Road)...”
- the report to Council dated 27 September, 2018, which states that “housing allocations at Sawston, Histon and Impington, Melbourn, Gamlingay, Willingham and Comberton are found sound”.

Moreover, Babraham Parish Council notes that, in Modifications to the *Local Plan*, par 2.54a was modified to treat works in Pampisford as if in Sawston.

At no time was an equivalent modification is made for Babraham Parish.

Add new paragraph 2.54a as follows:

INSERTED: '2.54a For the purposes of village classification and related Local Plan policies, part of Pampisford parish west of London Road on the southern end of Sawston will be treated as if part of the Rural Centre of Sawston. It is therefore included within the Sawston development framework boundary and shown on the Sawston Inset of the Policies Map. It is shown as an area covered by another map on the Pampisford Inset of the Policies Map. It remains part of Pampisford parish.'

These actions (and similar content in the Application) demonstrate that incorrect designation was belatedly recognised and held to be important.

Babraham Parish Council concludes that this incorrect designation has been consistently used throughout the planning process and does not satisfy [NPPF: Section 8 Promoting healthy communities](#).

- ***Babraham Parish Council demonstrates that the incorrect designation was applied erroneously to H/1:b from initiation of the planning process and continues to the most recent published and adopted Local Plan.***
- ***Babraham Parish Council demonstrates that, by changing designation of land at Pampisford, such designations are held to be important, but have not been addressed for H/1:b.***
- ***Babraham Parish Council objects to the application in its current form because the planning and application processes have consistently and incorrectly labelled H/1:b as a site in Sawston.***

## 5. INCORRECT DESIGNATION LED TO INADEQUATE OR ABSENCE OF IMPACT ASSESSMENT OF H/1:B ON BABRAHAM PARISH DURING THE PLANNING PROCESS, OR BY THE DEVELOPERS, OR BY THE PLANNING INSPECTORATE, RESULTING IN INACCURATE ANALYSIS, REVIEW AND COMMENT AND UNSAFE CONCLUSIONS

The incorrect designation might not, of course, affect subsequent study, analysis, review and conclusion.

However, as outlined above, all documentation until 27 September 2018 reveals that the Local Authority and developers regarded H/1:b as part of Sawston. *None of these documents provides evidence of appropriate examination of the consequences of the development for Babraham.*

Indeed, the consequences are many and severe.

### A. SCDC LOCAL PLAN

For example, as noted above, the Applicant TA notes Policy under the South Cambridgeshire Local Plan as follows (emphasis added).

2.7 In respect of transport matters, the policy identifies that:

‘Contribution to any highway works required to mitigate the impact of development as a whole on the ***eastern flank of Sawston***’

The Policy, as a consequence of incorrect designation, makes no mention of highway works required to mitigate impacts on Babraham.

Similarly, the Applicant notes in par 2.26 of their TA that:

2.26 Policy SE2, ‘*List of Rural Growth Settlement*’, identified that development within rural growth settlements, which includes Sawston, would be permitted given that the land use of the site is not essential to the village and the village has the necessary infrastructure capacity.

This land use is within Babraham, an in-fill village.

## B. MIS-DESIGNATION PERVADES ALL CONCLUSIONS IN THE PLANNING PROCESS

The lack of review persisted in published reports until at least 27 September 2018 at publication of SCDC *Local Plan* and the report submitted for consideration by Council on 27 September 2018, which refers to:

1. In the rural area, **housing allocations at Sawston**, Histon and Impington, Melbourn, Gamlingay, Willingham and Comberton are found sound.

This inaccurate designation was therefore propagated into the *Report to South Cambridgeshire District Council* by Laura Graham BSc MA MRTPI and Alan Wood MSc FRICS, working to the 2014 *Local Plan*, and published on 29 August 2018.

The Planning Inspectorate *Report on the Examination of the Cambridge Local Plan 2014*, states (emphasis added):

Green Belt allocations

59. The Plan proposes to release a limited number of sites from the Green Belt. These are: a site between Huntingdon Road and Histon Road as an extension to the urban extension which is currently being developed; a site on Fulbourn Road as an extension to the Peterhouse Technology Park; and ***sites for residential development in Sawston***, Comberton and Impington.

Understandably, given the Inspectors’ source information, their report contains no mention of consequences for Babraham Parish.

H/1:b Planning Application (S/3729/18/FL) was registered on **28 September 2018**.

Because published reports contain the public record of consideration and review:

- **Babraham Parish Council is able to assert**, therefore, that, at least until 27 September 2018, consideration of H/1:b was based on an inaccurate description;
- **Babraham Parish Council is able to conclude** that the District Council, developers and their agents have not given sufficient consideration – as they are required – to the consequences for the host Parish;

- **Indeed, Babraham Parish Council is able to conclude** that the advice and guidance provided by SCDC and others focused almost exclusively and incorrectly on consequences for Sawston;
- **Babraham Parish Council is also able to conclude** that the Planning Inspectorate Examination was founded on this inaccurate designation.
- ***Babraham Parish Council concludes that this incorrect designation has been consistently used throughout the planning process and does not satisfy [NPPF: Section 8 Promoting healthy communities](#).***
- ***Consequently, Babraham Parish Council objects to the Application in its current form because the process of review has not given the required consideration to the consequences for the host Parish of Babraham.***

## 6. THE APPLICANT HAS FOCUSED TRAFFIC AND TRAVEL ANALYSIS ON SAWSTON, TO THE DETRIMENT OF BABRAHAM

Because the Application process is driven to consider consequences for Sawston, the Applicant analysis gives insufficient weight to consequences for Babraham. For example, only 22 of 160 pages of traffic analysis in Applicant Appendices N—R report on data for High Street, Babraham (see section Data and conclusions in Appendix E: [Applicant Traffic Assessment](#)).

The Applicant TA is advised by the Policy described under the South Cambridgeshire Local Plan, which states:

2.7 In respect of transport matters, the policy identifies that:

‘Contribution to any highway works required to mitigate the impact of development as a whole on the eastern flank of Sawston’

The Applicant makes no mention of highway works required to mitigate impacts on Babraham. This is a direct consequence of all parts of the planning process using the incorrect designation of H/1:b.

- ***Babraham Parish Council argues that traffic and transport analyses have not provided sufficient study of Babraham.***
- ***Babraham Parish Council argues that Policy under SCDC Local Plan should include amendments to ensure contribution to any highway works required to mitigate the impact of development as a whole on the host Parish of Babraham.***
- ***Babraham Parish Council argues that the Applicant should enhance its analysis of traffic in Babraham, specifically as identified below.***
- ***Consequently, Babraham Parish Council objects to the Application until such time as the Applicant can demonstrate that it has satisfactorily addressed mitigation of the impact of development on the host Parish, Babraham.***

## 7. HIGHWAY AUTHORITY RECOMMENDS DEMONSTRATION OF MITIGATION OF IMPACTS

The Site Assessment Proforma (Applicant Planning Statement, Appendix 1—SHLAA Proforma) reports that:

“Highways Officers have... commented that it is likely that the transport impacts of the development could be mitigated, or at least not be ‘severe’ in NPPF terms, with the appropriate sustainable transport solutions and junction improvements. We would recommend that... developers demonstrate how the impacts of their developments can be mitigated”.

Babraham Parish Council notes that Highway Authority comments that transport impacts could be severe and recommends that Applicant demonstrates mitigation of their development.

- ***Babraham Parish Council argues that the Applicant does not address Highway Authority comments and does not demonstrate mitigation of impacts of H/1:b in Babraham.***
- ***Consequently, Babraham Parish Council objects to the Application until such time as the Applicant can demonstrate that it has satisfactorily addressed mitigation of the impact of development on the host Parish, Babraham.***

## 8. ACCESS TO SUSTAINABLE AND PUBLIC TRANSPORT IS LIMITED

Babraham Parish notes that, as detailed by the Applicant, access to Public transport is limited because of H/1:b location.

### BUS

The nearest Cambridge-bound (northbound) bus stop is approximately 800 m (10 minutes’ walk) from the site. It is this stop commuters are most likely to use.

The Cambridge Road stops (north- and south-bound) are approximately 1.2 km (14 minutes’ walk) away.

The Citi7 bus service runs every 20 minutes, not every 15 as recorded in the Application. A weekly ticket (Cambridgeshire 4 week megarider Plus) costs £96.00.

Although, as stated in Applicant Residential Travel Plan (par. 3.18, p 4), “There nearest bus stop to the site is located approximately 450 metres west of the site on the eastern side of Sunderland Avenue and facilitates southbound movements” this stop is for southbound journeys, towards Saffron Walden.

### RAIL

Although Shelford and Whittlesford Railway Stations are accessible via the bus services 7 and 7A, these services run only every 90 minutes and so are unlikely to provide a robust option for most travellers who will therefore use car or taxi.

- ***Babraham Parish Council supports sustainable transport solutions, but is not persuaded by Applicant evidence that bus and train travel will be a viable solution for most residents of H/1:b.***

## 9. CONCLUSIONS FROM APPLICANT TRAFFIC SURVEYS DO NOT CAPTURE PEAK TIMES

Traffic surveys were conducted at 07.00—10.00 and 15.00—19.00. Peak times were designated as 08.00—09.00 and 17.00—18.00.

However, while these times fit the data reasonably well for Sawston, they capture peaks for Babraham only poorly.

Applicant data show that peaks in Babraham occurred outside designated peak times for seven journey times, including movement in eastward and westward directions and at morning and evening surveys (see Appendix D: Peak traffic flows):

Moreover, mapping analysis (Appendix D: Peak traffic flows) supports Babraham Parish Council's contention that altered peak flows would be more appropriate.

Because traffic in Babraham supports six distinct needs (commute in towards Cambridge/other distant employment; commute towards Sawston/other local employment; morning school run; afternoon school run; commute home from Cambridge/other distant employment; commute home from Sawston/other local employment), the spread of peak flows is wider than many.

Babraham Parish Council argues that Applicant Traffic Analysis demonstrates that single Peak Flows are misleading for a small community serving these publics. Rather, Applicant data show that 'peak traffic' flows are wider and more inconsistent than use of single periods.

Applicant data show that traffic on weekdays at 07.00—08.00 eastwards from Sawston is almost 60% of that at 08.00—09.00. Indeed, that Applicant states that "The surveys identified the morning peak hour to occur between 0745 and 0845".

With these concerns in mind, Babraham Parish Council requests that a turn survey be conducted that more accurately reflects real experience, to include 07.00—09.00.

- ***Babraham Parish Council notes that the Applicant has chosen not to use the morning peak time of traffic flow.***
- ***Babraham Parish Council notes that significant peak flows occur at times other than the designated peak periods chosen by the Applicant.***
- ***Babraham Parish Council objects to the Application until such time as a new turn survey is undertaken, to reflect more accurately likely peak traffic times, to cover 07.00—09.00 and to cover changes since July 2016 (the date of the survey).***

## 10. THE APPLICANT INAPPROPRIATELY DISCARDS 16% OF THEIR PEAK DATA

The Applicant agrees with our point 7, above, that the time of 08.00—09.00 **does not capture peak flow** (TA, par. 3.53).

The Applicant comments that the turning survey was conducted on "Tuesday 5th July 2016, between the hours of 0700 and 1000, and 1500 and 1900 to capture both morning and evening peak periods".

3.53 Interrogation of the survey results identified the peak hour on the highway network during the morning and evening respectively. ***The surveys identified the morning peak hour to occur between 0745 and 0845.*** However, the analysis indicated that the traditional morning peak period of 0800 to 0900 only generated 30 fewer vehicles. Given that the peak generation of the proposed development will be between 0800 to 0900 this period has been selected for analysis.

Babraham Parish Council finds this paragraph misleading, confused or incorrect. Moreover, it ignores consequences for Babraham, where Babraham Parish Council has argued that different peak times are appropriate.

The Applicant summary data show a weekday average of 110 vehicles from 07.00—08.00 and 187 from 08.00—09.00. This is a difference of 67 vehicles. However, using Applicant data of 30 fewer vehicles 08.00—09.00 compared to 07.45—08.45 resolves as 30/167 or 16% lower traffic.

The Applicant discarded these valuable data from their analysis.

This decision to discard Babraham village data stands in stark contrast to the assessment of Babraham Research Campus data, where the Applicant *included data outside the proposed peak* hour for H/1:b, arguing it provides robust assessment (emphasis added):

7.18 In addition, whilst the morning peak hour for the trips associated with the Babraham Institute is identified as 0815 – 0915, all identified trips have been included within this assessment despite the misaligned peak hour. This therefore presents a **robust assessment** of the trips associated with the Babraham Institute development, as a number of trips identified for the development will fall outside the 0800 – 0900 peak hour of this assessment.

Moreover, [as Babraham Parish Council has shown above](#), peaks of movements in Babraham occurred outside the designated periods for seven journey types/times.

Finally, Applicant data show that morning peak travel northward on the A1307 (a major driver for vehicle movement through Babraham) occurs at 07.15—08.15.

- ***Babraham Parish Council believes the Applicant provides no reason to discard 16% of their data.***
- ***Babraham Parish Council demonstrates that the Applicant has demonstrated inconsistent use of data to decide peak traffic flows***
- ***Babraham Parish Council objects to the Application until such time as a new survey is undertaken to address these concerns, to determine more accurately likely peak traffic times for Babraham village and to cover changes since July 2016 (the date of the survey).***

## 11. THE APPLICANT SURVEY DATES AND COMPARATOR DATA ARE FLAWED

In Applicant Appendix 1, SCDC stated “July is not generally accepted as a neutral month”.

Nevertheless, the Applicant surveyed traffic in July 2016: SCDC asked for comparator data were collected to support Applicant data.

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### THE COMPARATOR SITES CHOSEN ARE NOT SUFFICIENTLY COMPARABLE WITH H/1:B

Babraham Parish Council argues that the comparators used to inform the TA are not viable.

Although classified as *PPS6 Out of Centre*, most of the 12 sites are either suburbs of major population and employment centres (such as Doncaster, Workington, Norwich, Telford, Shrewsbury, Northallerton) or lie less than 4 km ACF from a major centre, or lie within 2 km ACF of a major trunk route.

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### THE COMPARATOR SITES ARE SMALLER THAN H/1:B, COMPROMISING THE VALIDITY OF THE DATA

The average size of the selected 12 sites is fewer than 83 dwellings: four sites are fewer than 60 dwellings. None is larger than 125 dwellings (total = 995 over 12 sites).

Babraham Parish Council concludes that the travel time to the nearest employment centre and the statistical reliability of smaller samples used compromises strong conclusions founded in these comparator data.

- ***Babraham Parish Council argues, on this basis, that using July as survey month was poorly judged and that the comparator data used as a consequence was inadequate or unsuitable for H/1.b.***
- ***Consequently, Babraham Parish Council objects to the Application until such time as the Applicant can present more reliable data from a suitable month or until suitably robust and directly relevant comparisons can be made.***

## 12. APPLICANT DATA DEMONSTRATE ALREADY UNACCEPTABLE LEVELS OF PEAK TRAFFIC THROUGH BABRAHAM

Applicant data show that more than six vehicles a minute enter the High Street in the designated morning peak: one every 9.4 seconds. A vehicle enters the village every 22 seconds from the west (direction of Sawston); one enters every 17 seconds from the east (direction of A1307).

The analysis suggests the vast majority use the High Street as a through route.

More than five vehicles a minute enter the High Street in the designated evening peak: one every 11.4 seconds. A vehicle enters the village every 26 seconds from the west (direction of Sawston); one enters every 20 seconds from the east (direction of A1307).

The evening analysis also suggests the vast majority use the High Street as a through route.

Applicant data demonstrate that ***queue lengths in the narrow Babraham High Street are higher than any other junction surveyed except for the two traffic-light-controlled junctions*** at Babraham Road—High Street and Cambridge Road—A1301, Sawston (Applicant Appendix C, pp. 47—79).

- ***Babraham Parish Council objects to the Application because Applicant data demonstrate already high levels of traffic in Babraham High Street that, without mitigating measures, the Application will exacerbate.***
- ***Babraham Parish Council is acting to improve traffic in the village, including through use of Parish funds, but seeks support from developers, SCDC, CCC and Highways Department.***

## 13. ALREADY CONSENTED DEVELOPMENTS WILL INCREASE TRAFFIC THROUGH BABRAHAM BY 13%

The Applicant presents data for consented developments (pars 7.6 *et seq.*, Figs 7.3—7.12) revealing that the morning and evening peaks will add 44 and 38 journeys through Babraham High Street, respectively (see Appendix E: [Applicant Traffic Assessment](#), section ‘Consented developments will increase traffic through Babraham by 13%’).

The average increase due to consented developments is 13.6%.

However, the increase is 24.3% during the morning peak, the most severe consequence.

- ***Babraham Parish Council notes the increase of almost 25% in morning peak traffic, and an average increase of 13.6% from already consented development.***
- ***Babraham Parish Council objects to the Application because, in the absence of mitigating actions, it will exacerbate traffic movements arising from already consented developments.***
- ***Babraham Parish Council is acting to improve traffic in the village, including through use of Parish funds, but seeks support from developers, SCDC, CCC and Highways Department.***

#### 14. APPLICANT TRAFFIC DATA ARE LIKELY TO UNDERREPRESENT OGV1 TRAFFIC

Babraham Parish Council argues that peak times underestimate true large vehicle movements.

Applicant's own data (Appendix C, pp. 64—67 and 69—72) justify this argument.

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##### EASTBOUND MOVEMENTS

Applicant data show six OGV1 turning into High Street from Sawston in the period 15.00—17.00 (average, 3 OGV per hour), but only one in the period 17.00—18.00.

Similarly, five OGV1 (2.5 per hour) leave the High Street towards A1307 (south) in the period 15.00—17.00, but none in the period 17.00—18.00.

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##### WESTBOUND MOVEMENTS

Applicant data show seven OGV movements into the High Street from A1307 south in the period 15.00—16.00 (average, 3.5 OGV per hour) compared with three in the period 17.00—18.00.

Similarly, there are nine OGV1 movements turning from the High Street to Sawston Road in the period 15.00—17.00 (average, 4.5 OGV per hour), but only two in the period 17.00—18.00.

It is not surprising to find higher movements outside peak times, given the likely delivery and collection times for OGVs.

Applicant ATC records weekday averages of 251 daily movements for OGV1 and 7.3 daily movements for OGV2 westbound from the Eastern site (Appendix B, page 12) and 187 and 7.5 eastbound (Appendix B, page 16).

It is notable that LGVs follow a similar pattern.

The vast majority of the surveyed HGV traffic appears to be through traffic: Babraham Parish Council expects the remainder to represent farm traffic, essential to village economy.

- ***Babraham Parish Council objects to the Application until such time as a full-day HGV survey of traffic through Babraham can be delivered and any impacts addressed.***

**15. APPLICANT TRANSPORT ANALYSIS REVEALS THE SEVERE IMPACTS CAUSED BY MOVEMENTS TO AND FROM H/1:B**

The Applicant provides extensive analysis and modelling of traffic movement. The data are broadly consistent, allowing Babraham Parish Council to draw robust conclusions from Applicant projections.

**MORE THAN 40% OF TRAFFIC TRAVELS EASTWARD ALONG BABRAHAM ROAD**

Applicant Transport Assessment, Table 3.5 ATC assesses movement along Babraham Road (see Appendix E: Applicant Traffic Assessment, section ‘Applicant data suggests that more than 40% of traffic travels eastward along Babraham Road).

The conclusion is that more than one in four trips is eastward along Babraham Road near H/1:b at all times (except the most distant location from H/1:b and only at 17.00—18.00).

- **Babraham Parish Council notes that Applicant data demonstrated that, closest to H/1:b, four in ten vehicle movements passes from Sawston eastward along Babraham Road.**

**MORE THAN 32% OF TRIPS WILL BE VIA BABRAHAM HIGH STREET**

Applicant data (TA, Table 6.2) show that 32.7% of traffic travels through Babraham village when A1307 traffic southbound is included.

The Applicant data indicate that 34.2% of trips will be via Babraham High Street (A1307 north- or south-bound, plus A11 northbound).

**Note that the conclusion to the Applicant Vehicle Route Distribution data contains a significant error.** It states (emphasis added):

“6.14 The results in Table 6.2 indicates that the majority of trips from the application site would be expected to *travel along the A505 westbound (28.7%)*, with significant proportions of traffic expected to travel along the A1301 northbound (21.8%).”

**The correct majority route is the A1307 northbound through Babraham village with 28.7% of traffic.**

However, please note that this erroneous statement is not carried over into later analysis. Applicant Table 6.2 is presented below.

- **Babraham Parish Council notes that Applicant data suggest that one in three trips will be via Babraham High Street.**

**APPLICANT ANALYSIS SUGGEST THAT AVERAGE PEAK TRAFFIC THROUGH BABRAHAM WILL INCREASE BY 10% AS A RESULT OF H/1:B**

Applicant data in Fig 6.2 suggest that morning peak periods will generate a total of 31 additional journeys through Babraham High Street and evening peak periods 29 additional journeys.

	Current Movement		Development movement	
	Morning	Evening	<b>Morning</b>	Evening

Direction through Babraham	East	West	East	West	East	West	East	West
Vehicles	144	198	111	148	26	5	7	22
Increase (%)					18.1	2.5	6.3	14.9
Total	342		259		31		29	
Increase (%)					9.1		11.2	

The most **severe impact** is during the eastbound morning peak, which **increases by 18%**: the westbound evening peak increases by almost 15%.

It was noted above that already consented developments increase the morning peak by 24.3%.

Applicant data show that the proposed and consented developments will cause **severe impact, by increasing morning peak traffic through Babraham High Street by 42.3%**.

- ***Babraham Parish Council notes that the Applicant development will cause an increase of 18% in morning peak traffic, almost 15% in evening peak traffic and daily average increase of 10%.***
- ***Babraham Parish Council objects to the Application because, in the absence of mitigating actions, such peak morning and evening increases constitute a severe impact for Babraham along a rural, narrow village High Street.***
- ***Babraham Parish Council objects to the Application because, together with consented developments and in the absence of mitigating actions, it will lead to a total average increase of more than 23% in traffic passing through Babraham High Street.***
- ***Babraham Parish Council objects to the Application because, together with consented developments and in the absence of mitigating actions, it will lead to an increase of more than 42% in traffic passing through Babraham High Street 08.00—09.00.***
- ***Babraham Parish Council is acting to improve traffic in the village, including through use of Parish funds, but seeks support from developers, SCDC, CCC and Highways Department.***

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APPLICANT DATA PREDICTS SEVERE IMPACT OF UP TO 31% ON JUNCTION TRANSIT TIMES FROM BABRAHAM HIGH STREET RESULTING FROM H/1:B

Applicant TA 8 *Junction Capacity Analysis* and Appendix M show **severe impacts** on the junction of Babraham High Street and A1307. While the Applicant states:

“8.5 The results presented in Table 8.1 shows the forecast traffic that may be generated by the proposed development would have a minimal impact on the local highway network with a maximum of 11% at any junction. The majority of junctions will experience an impact of less than 5% which may be reflective of daily variation.”

The true **severe impact** is hidden behind the ‘majority’ value used by the Applicant.

Individual data entries in Applicant Appendix M (PDF page 33) shows that the turn left to A1307 Cambridge Road (North) from Babraham High Street **reaches a staggering 31.0% impact in the Applicant morning peak** (development 22, on existing 71). This is traffic in Babraham village's narrow High Street.

This **severe impact** would be worse, had the Applicant designated the true peak period for morning traffic: it was noted above that the true peak was earlier and higher than the selected peak.

Similar effects are seen in the evening peak, where the turn from the **A1307 (S) to Babraham High Street turn reaches a severe impact of 29.0%** (development 18, on existing 62).

Babraham Parish Council believes these average values calculated by the Applicant are deflated by the Applicant including Worsted Lodge route, which is effectively a cul-de-sac serving a very small number of dwellings and businesses (see next Section).

- ***Babraham Parish Council notes the severe impact of H/1:b traffic predicted by Applicant data, in excess of 29% at peak times.***
- ***Babraham Parish Council objects to the Application because of the severe impact on junctions serving the village caused by traffic from the Applicant development, in the absence of mitigating actions.***

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#### APPLICANT DATA FOR BABRAHAM HIGH STREET IS COMBINED WITH OTHER ROUTES IN APPLICANT ANALYSIS

Data in Applicant Appendix R are used to examine the junction of Babraham High Street with the A1307.

This analysis appears, in all cases, to combine data from Babraham High Street (route D) with other routes. Consequently, Babraham Parish Council believes there is no analysis of the turn in either direction or at either peak time of Babraham High Street and A1307.

Rather, the analysis appears to be of, for example, Babraham High Street to A1307 *plus* Worsted Lodge (Appendix R, PDF page 183).

By contrast, data for A1307 to Worsted Lodge route (effectively zero) are detailed at both time periods.

Babraham Parish Council does not understand why, if this conclusion is correct, the Applicant has analysed data in this manner. Babraham Parish Council expects that combining routes would artificially increase apparent capacity for Babraham High Street.

- ***Babraham Parish Council concludes from analysis of Applicant data that it combines data from Babraham High Street and other routes, leading to lower apparent impacts on Babraham High Street.***
- ***If this is true, Babraham Parish Council requests detail of Babraham High Street turns in these data or an explanation of the rationale for this analysis.***

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#### FORECAST DATA: 2028

Applicant TA, Section 7 *Forecast* uses data to project traffic growth forward to 2028. Applicant Figure 7.1 and 7.2 model future changes in traffic.

Applicant Figure 7.1 predicts, without including site H/1:b, an increase in morning peak of 31 journeys into Babraham High Street from the west and an increase of 37 journeys into Babraham High Street from the east.

Similarly, Figure 7.2 predicts an increase in evening peak of 34 journeys into Babraham High Street from the east and an increase of 22 journeys into Babraham High Street from the west (Sawston).

- ***Babraham Parish Council accepts the modelling to 2018, noting only this represents a further increase of around 10% on pre-development levels for H/1:b, or 20% increases on post-development H/1:b.***

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#### COMMITTED DEVELOPMENT: CAMBRIDGE CITY FC

The Applicant refers to data for this development as follows.

7.7 The Transport Assessment, produced by MLM (document ref: DMB/770765/R571 revision B, dated October 2013), that supported the planning application for the construction of the Cambridge City Football Club stadium presents trip generation associated with the development for the year 2019. Whilst the assessment identifies the local PM peak hour as 1700 – 1800, trips associated with the development are not presented for this time period. Instead, the Transport Assessment identifies that the development will generate peak trips in the hour 1900 – 2000.

7.8 The trips generated within the analysis have therefore not been considered within this Transport Assessment as they fall outside of the identified peak hours of 0800 – 0900 and 1700 – 1800.

However, Babraham Parish Council believes this analysis ignores the Conference activities that form part of the CCFC stadium business model (See Appendix F [Cambridge City Football Club](#)).

Babraham Parish Council estimates that Cambridge City FC Conference and Meetings activity could generate an additional 20 journeys through Babraham High Street at peak times of 08.00–09.00 and 17.00–18.00.

- ***Babraham Parish Council argues that CCFC business activities will produce significant weekday traffic that the Applicant has not included.***
- ***Babraham Parish Council objects to the Application until such analysis is produced, included in its modelling, impacts identified and appropriate measures described.***

#### 16. CONSIDERATION OF H/1:B MUST ADDRESS H/1:C

The Applicant provides an account of efforts to determine the likely scope of H/1:c. However, the Applicant reports that effective information is not available and would not be forthcoming prior to adoption of the SCDC Local Plan.

Nevertheless, from Applicant data and the SCDC *Local Plan*, Babraham Parish Council can produce a desk analysis of the likely impact of H/1:c on Babraham (in which a part of H/1:c lies).

In the SCDC Local Plan (now adopted), H/1:c is scheduled for 260 dwellings (22.4 dph). Babraham Parish Council assumes here that developers of H/1:c do not seek a density of 40 dph (465 dwellings).

Assuming a mix similar to H/1:c would suggest 1.65-fold more dwellings than H/1:b and, given a similar car use and traffic routing, Babraham Parish Council concludes that delivery of H/1:c would result in:

- an increase of 15% in morning peak traffic (1.65 x 9.1);
- an increase of 18% in evening traffic (1.65 x 11.2).

Together, H/1:b and H/1:c will result in:

- an increase of 24% in morning traffic;
- an increase of 30% in evening traffic.
- ***Babraham Parish Council appreciates the efforts by the Applicant to obtain findings for H/1:c, but argues that the anticipated additional severe impact due to H/1:c should form part of the Applicant's submissions and that, without this, the Application does not provide a fair assessment.***
- ***Babraham Parish Council objects to the Application until such analysis is produced, included in its modelling, impacts identified and appropriate measures described.***

## 17. COMMENTS ON APPLICANT TRANSPORT ASSESSMENT CONCLUSIONS

Babraham Parish Council provides the following responses to the Conclusions to the Applicant TA and notes that Conclusion 9.3 reiterates Conclusion 9.1 and therefore does not respond to 9.3

9.1 No comment.

9.2 The site is accessible, but public transport towards Cambridge is 800 m distant and a cycle route requires crossing Babraham Road, Sawston.

9.4 Comments of 9.2 apply.

9.5 Babraham Parish Council is not persuaded by Applicant arguments or data that sustainable travel for a large majority is achievable or realistic. It is also not persuaded that proposed Applicant work to achieve this aim will be effective.

9.6 Babraham Parish Council rejects the assertion that H/1:b will produce "low impact upon the operation of junctions across the local highway network" for the reasons identified in the Section [15: Applicant Transport Analysis Reveals the severe impacts caused by movements to and from H/1:b](#), above, which show that Applicant highway capacity data reveal **severe impact** on junctions serving Babraham at peak times.

9.7 No comment.

9.8 No comment.

9.9 No comment.

9.10 Because of the focus on Sawston, Babraham Parish Council does not agree with the conclusion that transport impacts will not be severe.

9.11 Babraham Parish Council notes that the Applicant refers here only to junctions and links in Sawston, so not raising the detrimental effects Applicant data shows for effects on Babraham.

## 18. HOUSING DENSITY AND HOUSING SUPPLY

As noted in the Applicant Planning Statement (Section 14, Housing Density), “Site H/1:b was allocated to deliver 80 units. The delivery of 80 units on site H/1:b would be at a rate of 22dph”.

Policy H/8 of the SCDC Local Plan details the average for such a development:

### **Policy H/8: Housing Density**

1. Housing developments including rural exception sites, will achieve an average net density of:

a. 30 dwellings per hectare (dph) in Rural Centres, Minor Rural Centre villages, and Group villages;

and continues:

*7.35 A density of 30 dwellings per hectare will achieve an efficient use of land. A higher density of 40 dph (net) will make the most of land in our most sustainable locations on the Cambridge fringe and in new settlements... Local character, the scale of development, and other circumstances can justify development at lower and higher densities than 30 dph and 40 dph (net).*

Babraham Parish Council recognises the benefits from the Applicant proposal for all types of housing: the Council also welcomes the allocation of affordable housing, which could benefit both Babraham and Sawston residents.

However, Babraham Parish Council does not accept that this justifies a density that exceeds that guidance of 30 dph. The Council also questions the Applicant assertion that, because H/1:c is at feasibility, “H/1:b is therefore essential to meet immediate local housing need”.

The Applicant argument that “the housing-only part of the development (excluding the apartments) delivers at 30dph to coincide with a lower density towards the more rural edge of the new village framework” is specious and should be disregarded.

For H/1:b, a density of 30 dph would deliver 109 dwellings. A density of 40 dph would deliver 145 dwellings.

Either of these solutions, or a value between, would deliver much-needed accommodation over the 32-month construction period and respect the guidance provided by SCDC Local Plan Policy H/8.

It would also help to ameliorate the concerns of many residents expressed clearly during engagement and of objections by Babraham Parish Council expressed in this submission about the severe impacts resulting from H/1:b.

- ***Babraham Parish Council objects to the Application at the proposed Housing Density because it exacerbates impacts from the proposed development and suggests resubmission at a more appropriate value.***

## 19. HEALTH ASSESSMENT

While the Applicant agents have provided three opportunities to Babraham residents for public discussion (starting in May 2018), the Applicant provides direct evidence of their limited consideration of the needs of Babraham Parish, the location for H/1:b.

The Applicant Health Impact Assessment specifically excludes Babraham from its list of important stakeholders in its engagement section:

#### Engagement

3.5. The following stakeholders were considered important to engagement in respect of their responsibility to promote and protect health and wellbeing of the local population:

- Local Educational bodies (Primary and Secondary schools based within Sawston and Babraham).
- Sawston Parish Council (representative of local residents)
- Cambridgeshire County Council (Rights of Way)
- Cambridgeshire County Council (Highways)
- Hill (construction workers' employer)

This document is written in accordance with South Cambridgeshire District Council's Health Impact Assessment SPD Adopted March 2011 which states:

*"A Health Impact Assessment should:*

- *Appraise the potential positive and negative health and well-being impacts of the proposed development on planned new communities and the **adjacent existing communities in the development area.***

In the Risk Assessment (Table 4.2, p. 19), the Applicant assesses Impact of additional traffic on local road network.

Although the Applicant reports "Limited impact. The TA indicates the road network can cope with the intended traffic levels", it argues that it is certain that "The greatest impact will be for Sawston & Babraham residents who experience greater traffic movements on the local road network within their villages."

The Applicant Report notes (par. 5.4 III) that "The extension to the 30mph zone along Babraham Road should be implemented and any required traffic calming measures should be put in place at the start of the construction period. This should be secured via a condition of permission to ensure compliance."

- ***Babraham Parish Council notes with disappointment its exclusion from Applicant stakeholders important for its responsibility to promote Parishioners' health and wellbeing.***
- ***Babraham Parish Council requests that, because of the impact for residents of the host Parish, traffic measures within Babraham High Street be included in the Application.***
- ***Babraham Parish Council objects to the Application until traffic calming in Babraham High street is included in proposals to address the impact on the village.***

The Applicant Report states (par. 5.4 IV) that "The Travel Plan should incorporate a commitment to traffic associated with the construction phase of the development avoiding Babraham village. Regular reviews incorporating consultation with both Sawston and Babraham Parish Councils should take place during the Construction Phase, and if issues are identified then reviews of the relevant processes should take place. The Travel Plan should be implemented via a condition of permission to secure this commitment."

- ***Babraham Parish Council supports Applicant commitment to minimising construction traffic through the village.***
- ***Babraham Parish Council will welcome a strong Travel Plan mandating routing of all construction-associated traffic via A1301/Babraham Road, Sawston, detailing monitoring measures and reporting to the council.***
- ***Babraham Parish Council notes that construction traffic and routing via Sawston will have severe impacts for residents of Sawston.***
- ***Babraham Parish Council will also welcome explanation by the Applicant of measures taken to resolve any issues.***

## 20. CONTRIBUTIONS TOWARDS INFRASTRUCTURE

The Applicant notes SCDC Local Plan Policy

3.4. The proposed development site is allocated under emerging **policy H/1** which reads *‘The following sites shown on the Policies Map are allocated for housing development and associated uses. They will be developed in accordance with relevant Local Plan policy requirements, and the development requirements identified in respect of each site in the table below. The number of homes granted planning permission on the site may be higher or lower than the indicative capacity and should be determined through a design-led approach.*

*All sites will need to make appropriate financial contribution to any necessary additional infrastructure requirements, including towards additional capacity in local schools.’*

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## EDUCATION

The Applicant Section 26: Education notes:

“26.2. In accordance with the requirements of emerging **policy TI/9** which requires early engagement with the County Council and emerging **policy SC/4** which sets out developer duties to contribute to the provision of local services, pre-application discussions have taken place with Cambridgeshire County Council concerning infrastructure requirements arising from the development. A formal written response was received on 14th June 2018 (see Section 3.20 above). This confirmed that contributions would be required towards Early Years provision, Primary School Provision and Libraries and Lifelong Learning provision...

26.3. Through appropriate contributions, the development will be able to meet its requirement to provide suitable education facilities. The site is therefore suitable in terms of being able to deliver the required school spaces.”

Babraham Parish Council is not aware of such discussions addressing the needs of Babraham Parish or Babraham CofE Primary School, other than that initiated by Babraham Parish Council. Discussions between Parish representatives and Education Officers indicated that the Officers were unaware of the location of H/1:b within Babraham Parish.

The Pro Forma (August 2013: Applicant Planning Statement Appendix A) confirms this conclusion: the Education Officer consulted discussed only the two primary schools in Sawston and made no mention of Babraham CoFE Primary School.

- ***Babraham Parish Council notes that H/1:b is located in Babraham Parish and welcomes the recognition of the Applicant under SCDC Policy to contribute towards infrastructure and to providing capacity in local schools.***
- ***Consequently, Babraham Parish Council objects to the Application until published accounts of discussion on the consequences of H/1:b for Babraham CoFE Primary School can be examined.***

Additionally:

- ***Babraham Parish Council notes that Babraham CoFE School was rated 'Outstanding' at its last Ofsted review and is currently oversubscribed.***
- ***Babraham Parish Council believes that, because of its Ofsted rating and close proximity to H/1:b, Babraham CoFE School will be an attractive choice for residents of H/1:b.***

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## HIGHWAY WORKS

Applicant section Planning History (par. 3.5) notes:

3.5. Guidance for the site appears under **policy H/1:b** which confirms site-specific development requirements include:

- *'Contribution to any highway works required to mitigate the impact of development as a whole on the eastern flank of Sawston.'*

Given Applicant own data identifying severe impacts of H/1:b on its host Parish of Babraham, Babraham Parish argues that the Applicant is required to consider works not only the 'eastern flank of Sawston' but also in Babraham.

- ***As noted under [Point 1, above](#), Babraham Parish Council objects to the application in its current form and until such time as the Applicant can demonstrate that it has satisfactorily addressed mitigation of the impact of development on the host Parish, Babraham.***

## 21. COMMUNITY ENGAGEMENT

The Applicant Planning Statement states (par. 4.30, p. 36):

It is therefore reasonable to conclude that this early engagement has directly led to improved outcomes for the local community in accordance with paragraphs 39 - 43 of the Revised NPPF.

- ***Babraham Parish Council notes the work carried out by the Applicant, but concludes that NPPF requirement of 'improved outcomes' are not as yet apparent for the 'local community' of the host village, Babraham***

# APPENDICES

## A. NATIONAL POLICY PLANNING FRAMEWORK

Babraham Parish Council argues that NPPF has not been adequately followed in the process of developing and examining Applicant development H/1:b.

Specifically, because the location of the development in Babraham was not noted, indicated or appreciated until the first recorded mention in September 2018, Babraham Parish Council believes the Application has not addressed the needs in *Section 8 Promoting healthy communities*.

69. The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities should create a shared vision with communities of the residential environment and facilities they wish to see.

72. The government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:

- give great weight to the need to create, expand or alter schools
- work with schools promoters to identify and resolve key planning issues before applications are submitted.

<https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

## B. HISTORY OF H/1B DESIGNATION

Planning documentation has never recognised the location of H/1:b within Babraham Parish. Rather, all documentation refers to Sawston as the host location.

Consequently, planning assessments are flawed in analysis and conclusion.

In addition to the examples noted from September 2018 in the Sections 4 and 5 above, selected texts include the following documents.

2013: SOUTH CAMBRIDGESHIRE STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA) REPORT: APPENDIX 7I: ASSESSMENT OF 2011 'CALL FOR SITES' SHLAA SITES

This report makes no mention of H/1:b; however, H/1:c is listed as 'Land south of Babraham Road, Sawston'.

August 2013 <https://www.scams.gov.uk/media/3962/07-appendix-7i-sawston.pdf>

2016: SCDC SUBMISSION OF PROPOSED MODIFICATIONS (31 MARCH 2016)

For example, SCDC's *Submission of Proposed Modifications (31 March 2016)* and *Annex 1. Site Assessment Proformas and Summary Results - Sites at Rural Centres (Part 1, 2,3)*, refers to developments including H/1:b **without any assessment of impact on Babraham**, the host Parish.

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**EQUIVALENT TO CURRENT H/1:B**

- **Site reference number(s): SC313 [and SC313a]**
- Consultation Reference numbers: H6 (I&O 2013 part 2)
- Site name/address: Land north of Babraham Road, Sawston
- Potential residential capacity: 80 dwellings (30 dph)

The analysis scores:

Community Facilities (Q: Will it encourage and enable engagement in community activities?) as GREEN. *It makes no reference to the community of Babraham.*

Integration with Existing Communities (Q: How well would the development on the site integrate with existing communities?) as RED, but notes only integration with Sawston (inhibited by industrial buildings). *It makes no mention of host Parish, Babraham.*

Access (Q: Will it provide safe access to the highway network, where there is available capacity?) is listed as GREEN = No capacity / access constraints identified that cannot be fully mitigated. No capacity constraints identified, safe access can be achieved. *No mention is made of traffic to/from Babraham.*

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**EQUIVALENT TO PART OF CURRENT H/1:C**

- **Site reference number(s): SC258**
- Consultation Reference numbers: 8 (I&O 2012)
- Site name/address: Land south of Babraham Road, Sawston

***Babraham Parish Council note: This location lies entirely within Babraham Parish and forms part of Local Plan site H/1:c.***

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**SIMILAR TO CURRENT H/1:C**

- **Site reference number(s): SC 178 & 258**
- Consultation Reference numbers: 8 & 9 (I&O 2012)
- Site name/address: Land South of Babraham Road, Sawston

***Babraham Parish Council note: This location lies partly within Babraham Parish and in 2018 corresponds in part to Local Plan site H/1:c.***

- **Site reference number(s): SC178**
- Consultation Reference numbers: 9 (I&O 2012)
- Site name/address: Land east of Sawston.

Source: <http://www.scambs.gov.uk/localplanmods-dec2015>

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**CAMBRIDGESHIRE COUNTY COUNCIL COMMENTS ON THE LOCAL PLAN**

This misapprehension of designation includes Cambridgeshire County Council (Juliet Richardson, on behalf of Council).

The County Council made three comments in support of H1 developments; the following relate to H/1:b and H/1:c (which lie partly or wholly within Babraham Parish).

*No mention is made by Cambridgeshire County Council of host Parish Babraham, its transport or schools.*

*“No objections to proposals in Sawston but consider that there would be merit in planning all three sites in conjunction with each other... Three sites are identified within Sawston... the County Council*

considers that there would be merit in there being an understanding that these sites should be planned in conjunction with each other... The level of overall development is likely to have a significant impact on the wider community infrastructure requirements, not least primary education provision”

<https://scams.jdi-consult.net/localplan/viewreplefull.php?repid=64679>

“Three sites are proposed for development in Sawston. The County Council is content that these sites can be appropriately accessed however detailed Transport Assessment work on the combined impact of this development on the village of Sawston has not yet been undertaken and it is not possible at this stage for a definitive comment on the impacts of the development, any required local mitigation works and the viability, deliverability and acceptability of such works.”

<https://scams.jdi-consult.net/localplan/viewreplefull.php?repid=59854>

#### 2018: PLANNING INSPECTORS’ REPORT ON THE EXAMINATION OF THE CAMBRIDGE LOCAL PLAN 2014

This report states:

Green Belt allocations

59. The Plan proposes to release a limited number of sites from the Green Belt. These are: a site between Huntingdon Road and Histon Road as an extension to the urban extension which is currently being developed; a site on Fulbourn Road as an extension to the Peterhouse Technology Park; and **sites for residential development in Sawston**, Comberton and Impington.

Their report contains only one mention of Babraham Parish, noting a reduction in distance between Sawston and Babraham.

Babraham Parish Council argues that the Inspectors would not have paid such scant attention to impacts in Babraham had the designation been correct.

#### 2018: SCDC LOCAL PLAN MAIN MODIFICATIONS - JANUARY 2018

This document makes no mention of Babraham Parish.

Instead, it acts inconsistently and incorrectly.

First, it sites H/1:b incorrectly in Sawston (emphasis and current H/1 designations added):

To deliver **new residential development at three sites in Sawston** (Dales Manor Business Park [H/1:a], land north of Babraham Road [H/1:b], land south of Babraham Road [H/1:c]), Histon & Impington (land north of Impington Road)...

Second, it addresses Parish boundaries inconsistently. A decision was made to modify par 2.54a to ensure works in Pampisford were treated as if in Sawston.

No equivalent modification is made for Babraham Parish.

Add new paragraph 2.54a as follows:

INSERTED: '2.54a For the purposes of village classification and related Local Plan policies, part of Pampisford parish west of London Road on the southern end of Sawston will be treated as if part of

the Rural Centre of Sawston. It is therefore included within the Sawston development framework boundary and shown on the Sawston Inset of the Policies Map. It is shown as an area covered by another map on the Pampisford Inset of the Policies Map. It remains part of Pampisford parish.'

- **Hence, Babraham Parish Council can conclude that the review and Modifications on January 2018 identified boundary questions, but did not address Babraham boundaries in respect of H/1:b and H/1:c.**

Source: <https://scambsjdi-consult.net/localplan/readdoc.php?docid=245&chapter=6>

## C. BABRAHAM: A STRANGLERED VILLAGE; TRAFFIC THROUGH BABRAHAM

H/1:b is a proposed development that lies entirely within the Parish of Babraham.

Its nearest trunk road is the A1307 (typically 3 minutes; 1.5 miles, road), reached through the village of Babraham. The A1301, to the west of Sawston, is 1.6 miles away (typically 4 minutes, road).

Babraham is a village struggling under the burden of its location. Roads to and from the City and major employers, such as the Addenbrooke's site (4.4 miles, road) and Granta Park (2.2 miles, road), suffer heavy loads. The consequent use of Babraham as a rat run to and from the A1307, A11 and M11 has led to the village being strangled at peak times and suffering HGV transit during the day.

There are no measures in the South Cambridgeshire Local Plan or other documents that address the current, very challenging conditions in this small village.

Developments proposed in Babraham Parish and other local parishes will strangle Babraham at peak times and damage residents' and visitors' environment, well-being and rural experience at other times.

While the proposals of the Greater Cambridge Partnership might provide public and sustainable transport solutions in the future, these lie many years away.

H/1:b cannot be considered in isolation: the Local Plan identifies several developments that it anticipates will reach approval. The H1 developments could produce up to 600 new houses on the east of Sawston, many located in Babraham Parish.

The current situation is a village under extreme strain: the future should not be sacrificed for new development. These must be considered in concert and measures established in the approval process to ensure the predicted harms to the village of Babraham are mitigated.

## D. PEAK TRAFFIC FLOWS

### PEAK FLOWS DATA FIT SAWSTON BETTER THAN BABRAHAM

Babraham Parish Council analysis of Applicant data (Transport Pts A—F, PDF pp. 64—67 and 69—71) demonstrate that Peak Flow designation is a poor surrogate for true traffic movement through Babraham. This designation fits Sawston better than it does Babraham.

Our analysis of Applicant data shows the following **real peak flows outside the designated Peak Flow** times of 08.00—09.00 and 17.00—18.00.

Southbound from A1307, turning to Babraham:

- total movements are higher at 07.30—08.00 than those at 08.00—08.30 (95 v. 88);
- total movements are higher at 18.00—18.30 than those at 17.30—18.00 (41 v. 37);
- total movements are lower at 17.00—17.30 than any 30-minute period 16.15—17.00.

Northbound from A1307, turning to Babraham:

- total movements are as high at 07.30—08.00 as those at 08.00—08.30 (16).

From High Street, Babraham towards Sawston:

- total movements are higher at 07.30—08.00 than those at 08.00—08.30 (104 v. 96);
- total movements are higher at 18.00—18.30 than those at 17.30—18.00 (91 v. 86)

From High Street, Babraham, towards A1307 (south):

- total movements at are higher 07.30—08.00 and 09.00—09.30 than those at 08.15—08.45 (31 and 32 v. 29).

From High Street, Babraham, towards A1307 (north):

- total movements are similar at 09.00—09.30 to those at 08.00—08.30 (34 v. 33);
- total movements are higher at 18.00—18.30 than those at 17.30—18.00 (30 v. 28)

#### A1307 PEAK FLOWS

Using Applicant data (Transport Pt A—F, PDF P. 71), Babraham Parish Council has examined travel northwards along the A1307 in one-hour segments.

Time	Vehicles
<b>07.15—08.15</b>	<b>1122</b>
07.30—08.30	1068
08.45—08.45	1091
08.00—09.00	1081

Babraham Parish Council notes that this analysis shows a broad plateau over 135 minutes, with a peak at 07.15—08.15. Babraham Parish Council argues that:

- this broad peak emphasises the need for a similar analysis on days in a neutral month to collect significant data for Babraham High Street;
- it would be likely that traffic through Babraham High Street turning north would reflect this skew away from 08.00—09.00.

Applicant data support this conclusion.

#### CONSENTED DEVELOPMENT

Applicant TA data (pars 7.6 *et seq.*) provide the following estimates for additional journeys resulting from consented development.

Pars/ Figs	Site	Morning Peak		Evening Peak	
		From A1307 (westbound)	From Sawston/Wych (eastbound)	From A1307 (westbound)	From Sawston/Wych (eastbound)
7.3, 7.4	Babraham Institute	1	13	10	1
7.5, 7.6	Common Lane	0	3	2	1
7.6, 7.7	Mill Lane	5	13	10	5
7.9, 7.10	58 Mill Lane	3	6	5	4
7.11, 7.12	Sawston Distribution Centre	0	0	0	0
	Total	9	35	27	11
	Total journeys	44		38	

## MAPPING ANALYSIS

### MORNING TRAFFIC

The survey period is 08.00—09.00

Online mapping solutions suggest that:

- to arrive in Cambridge centre by 08.30, traffic must leave Babraham at 07.50—08.10;
- to arrive on Newmarket Road by 08.30, traffic must leave Babraham at 07.55—08.10;
- to arrive at Addenbrookes site by 08.30, traffic must leave Babraham at 08.10—08.15.
- to reach Drummer Street by 08.30 from Babraham Park & Ride, traffic must leave Babraham at 07.45—07.55 (8 minutes to P&R, plus 30 minutes).

### EVENING TRAFFIC

The survey period is 17.00—18.00

Mapping solutions suggest that:

- to arrive at Babraham from Cambridge centre by 17.00, traffic must leave the city centre at 16.25;
- to arrive at Babraham from Cambridge centre by 18.00, traffic must leave the city centre at 17.25;
- to arrive at Babraham from Addenbrookes site by 17.00, traffic must leave Addenbrooke’s at 16.40;
- to arrive at Babraham from Addenbrookes site by 18.00, traffic must leave Addenbrooke’s at 16.44;
- to arrive at Babraham from the Park & Ride by 17.00, traffic must leave the Park & Ride at 16.50; therefore to reach Babraham Park & Ride from Drummer Street by 16.50, traffic must leave the city centre at 16.11;
- to arrive at Babraham from the Park & Ride by 18.00, traffic must leave the Park & Ride at 17.50; therefore to reach Babraham Park & Ride from Drummer Street by 17.45, traffic must leave the city centre at 17.11.

## E. APPLICANT TRAFFIC ASSESSMENT

### DATA AND CONCLUSIONS

Babraham Parish Council contends that the Applicant analysis gives insufficient weight to consequences for Babraham. Only 22 of 160 pages of traffic analysis in Applicant Appendices N—R report on data for High Street, Babraham.

- Appendix N: 36 pages; the junction of the A1301 with Cambridge Road, Sawston;
- Appendix O: 23 pages; the junction of the A1301 and Mill Lane;
- Appendix P: 58 pages; the traffic-light junction of Hillside—Cambridge Road with Babraham Road—New Road;
- Appendix Q: 21 pages; the junction of Babraham Road with Wych Road—High Street, Babraham;
- Appendix R: 22 pages; the junction of High Street, Babraham with the A1307

### CONSENTED DEVELOPMENTS WILL INCREASE TRAFFIC THROUGH BABRAHAM BY 13%

The Applicant presents data for consented developments (pars 7.6 *et seq.*, Figs 7.3—7.12).

Pars/ Figs	Site	Morning Peak		Evening Peak	
		Westbound from A1307	Eastbound from Sawston/ Wych	Westbound from A1307	Eastbound from Sawston/ Wych
7.3, 7.4	Babraham Institute	1	13	10	1
7.5, 7.6	Common Lane	0	3	2	1
7.6, 7.7	Mill Lane	5	13	10	5
7.9, 7.10	58 Mill Lane	3	6	5	4
7.11, 7.12	Sawston Distribution Centre	0	0	0	0

	<b>Total</b>	<b>9</b>	<b>35</b>	<b>27</b>	<b>11</b>
	<b>Increase (%)</b>	<b>4.5</b>	<b>24.3</b>	<b>18.2</b>	<b>9.9</b>
	<b>Total journeys</b>	<b>44</b>			<b>38</b>
	<b>Increase (%)</b>	<b>12.9</b>			<b>14.7</b>

The data show that the morning and evening peaks will add 44 and 38 journeys through Babraham High Street, respectively. The average increase is 13.6%.

However, this is most severe at the morning peak, reaching 24.3%, an increase of almost one quarter.

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**APPLICANT DATA SUGGESTS THAT MORE THAN 40% OF TRAFFIC TRAVELS EASTWARD ALONG BABRAHAM ROAD**

Applicant Transport Assessment, Table 3.5 ATC provides the following data for movement along Babraham Road (**percentage values added by Babraham Parish Council**).

	Babraham Road (West)			Babraham Road (Middle)			Babraham Road (East)		
	Eastbound	Westbound	% East	Eastbound	Westbound	% East	Eastbound	Westbound	% East
Daily	2,130	2,400	47	1,530	1,797	46	1,529	1,798	46
0800-0900	308	200	61	186	244	43	187	245	43
1700-1800	126	307	29	162	181	47	162	181	47

More than four of ten trips is eastward along Babraham Road near H/1:b at all times (except the most distant location from H/1:b and only at 17.00–18.00).

All percentages of travel eastbound, towards Babraham lie in the range 43–47%, apart from 08.00–09.00 at Babraham Road (West), which is 61% and 17.00–18.00 at Babraham Road (West), which is 29%.

The higher morning value might reflect both commuters and school transport (to Icknield and Babraham schools). The lower evening percentage is likely to reflect traffic leaving the large industrial estate at Grove Road.

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**MORE THAN 32% OF TRIPS WILL BE VIA BABRAHAM HIGH STREET**

Applicant Table 6.2 is presented below.

Table 6.2 Vehicle route distribution

Route		Distribution (%)
A1301 Northbound		21.8
Sawston Traffic	South Cambridgeshire Business Park	3.5

	Sawston Town Centre	3.4
	Spicer Papermill	3.4
M11 Northbound		6.0
M11 Southbound		7.6
A505 Westbound		12.6
<b>A1307 Northbound</b>		<b>28.7</b>
<b>A1307 Southbound</b>		<b>4.1</b>
<b>A11 Northbound</b>		<b>1.4</b>
A505 Eastbound		7.5

Traffic through Babraham village is 32.8% when A1307 traffic southbound is included.

The Applicant data indicate that 34.2% of trips will be via Babraham High Street (A1307 north- or south-bound, plus A11 northbound).

## F. CAMBRIDGE CITY FOOTBALL CLUB

Babraham Parish Council believes Applicant discussion of CCFC analysis ignores the Conference activities that form part of the CCFC stadium business model.

Babraham Parish Council estimates the meetings and conferences could generate an additional 20 journeys through Babraham High Street at peak times of 08.00—09.00 and 17.00—18.00.

### CONFERENCES & EVENTS

In their Community Impact Statement (Ref 792/13/CIS), the Applicant states that the plan: “sets out the consultation process informing the design of the stadium to ensure its compliance with the conference and events needs of the area and of the local businesses”, with no mention of impact of such activities on non-business – social, domestic, neighbourhood – needs or concerns.

*Indeed, in response to Sawston Parish Council concerns, the Applicant states that it is “intended that all facilities and function rooms will be all available for hire as a means of income generation. The permitted use would be the subject of normal Licensing laws to protect the amenity of nearby residents.”*

The facilities are to “be used on non-match days for conferencing and events”.

A consequence is that additional traffic is not restricted to match days (principally Saturday afternoons and Wednesday evenings for the first team), but would continue on other days that **are non-match days**.

The Applicant discussions with conference providers conclude: “HotelRes identified a need for large scale conference and events facilities (for 100 people +) outside Cambridge City Centre itself and believe that this scheme will fill a gap in the market if marketed correctly.”

The business model is thus for events for more than 100 people on Monday—Friday.

The Meeting Professionals International (MPI) Foundation Report (2011) found that “On average, each venue was used for 125 days in the year”.

Babraham Parish Council assumes that, given the Applicant’s argument that there are no facilities in Sawston or nearby, CCFC could achieve such an average goal of events on more than two days each week.

The Applicant report states that “subject to the necessary licensing there are multi-uses for the site” and propose use for weddings: these would possibly be most often held on Saturdays that are not first-team match days or out of season: the days on which Sawston would not face match traffic.

So, in addition to proposals for weekday conferences, the business model drives to weekend weddings.

1. The event business model is aimed at attendance of more than 100 on Monday—Friday
  - No examination is provided of weekday traffic increase from this development
  - 100 guests might indicate additional 20-40 cars per event
  - Delegates are quite likely to use train and taxi and hence travel via Sawston: however, the location of CCFC at the east of Sawston implies significant traffic could travel via Babraham (Cambridge and east, A11 east, A1307 and south, some M11/A11 south)
2. The wedding business model allows for up to 150 guests on non-match days
  - This would create additional weekend traffic on non-match days
  - No examination is provided of weekday traffic increase from this development
  - A wedding for 100 people might indicate an additional 30-50 cars per event.
  - Because of CCFC location at the east of Sawston, a significant part of traffic will travel via Babraham (Cambridge and east, A11 east, A1307 and south, some M11/A11 south)

In summary, although Babraham Parish Council can produce only broad estimates, CCFC non-match-day activities imply that traffic through Babraham increases by:

- 15 25 additional car journeys each way on match days, which total approximately 30 in the eight and a half months from mid-August to end-April
- 15 30 journeys each way on non-match weekend days from wedding activities
- 50 150 journeys each week each way on working days from conference activities

Babraham Parish Council is aware of no study carried out in the planning proposals to address this increase through Babraham.