

Appendix C

Letter from Bourn Parish Council received 10th September 2019 and referenced at the Scrutiny and Overview Committee at its meeting on the 10th September 2019.

Dear Grenville and Tumi

Des O'Brien and I are sorry but we are both away on business and will not be able to represent Bourn PC at the scrutiny committee on 10th September.

In view of this, we would like to express our serious concern about the way in which the issue of direct access to the A428 is summarily dismissed in the officers' report to Scrutiny and Overview and the implications this will have for rat running by traffic through our villages.

We refer to Section 2 Site Context – Highways England.

Highways England states in its response to the consultation that direct access onto A428 is not policy compliant, or needed.

HE states: *“Policy is set out in DfT Circular 02/2013 The Strategic Road Network and the Delivery of Sustainable Development. The policy states proposals for the creation of new junctions or direct means of access may be identified and developed at the plan-making stage in circumstances where it can be established that such new infrastructure is essential for the delivery of strategic planned growth.*

Our response: SCDC as the Planning Authority was remiss since there was no discussion, debate, or consultation to assess whether there was a need for direct access to the A428 at the plan making stage.

If the need for a direct access to the A428 was discussed (as it should have been) in the context of delivery of strategic planned growth, Bourn Parish Council would like to see the paper trail and will issue an FOI request, if necessary.

HE states: *Policy also requires consideration of the standard of road. For motorways and routes of near motorway standard development access is limited to the use of existing junctions with all-purpose roads. Modifications to existing junctions will be agreed where these do not have an adverse impact on traffic flows and safety. In line with the standards contained in the Design Manual for Roads and Bridges, for safety and operational reasons, direct connections to slip roads and/or connector roads will not be permitted. For other roads there is a graduated approach.*

HE states: *The A428 is part of the Cambridge to Oxford expressway which has a high status, and therefore in line with policy there is a presumption against a new junction at this location. This position needs to be balanced with strategic need, and whilst within the context of the local plan, Bourn Airfield New Village can be*

considered as a strategic site, its wider strategic importance is more limited. Consequently, the case for a new junction is not made.”

Our response

HE should be asked to:

1. show evidence of how this policy was applied, in this case, and explain the circumstances under which the junction examples contained in Bourn Parish Council’s consultation response were permitted.
2. explain how they define ‘strategic importance’. Bourn Airfield Village will be the final stage in creating a town of over 30,000 people (West Cambourne – Cambourne-Bourn Airfield) which will generate significant traffic. While Oxford to Cambridge Expressway may be a road of strategic importance it will be used in the Cambridge Sub-Region (along with the M11 and A14) by local traffic. Also, the expressway will become a single lane road (with a hatched second lane) a few miles east of Bourn Airfield, which argues against this road, near Bourn Airfield being considered a road of near motorway standard.

The report states: *Transport modelling was undertaken to support the preparation of the Local Plan and did not identify a need for a new junction onto the A428. The modelling did identify a need for a dedicated high quality public transport route to link with jobs and services in and around Cambridge, within the Local Plan policy. The overarching vision for the adopted Local Plan, including for the new settlements, is to secure a modal shift away from use of the private car. This is also consistent with the recent declaration by the Council of a “climate emergency” alongside an adaptation to achieve net zero carbon for the district by 2050. Major new car-based infrastructure would not be compatible with that vision.*

Our response: Our The Transport modelling in the Local Plan has been extensively criticised and discredited. As we explain in our consultation response, based on the experience of Cambourne, the busway will not result in a huge shift from car to bus because the busway will not take people where they want to go to work. . We estimate that 70% of commuter from Bourn Airfield will still travel by car (see the analytical submission to our submission).

The report states: *Notwithstanding the principle of whether a major new junction onto the A428 is necessary to serve the development, such provision would have significant land take implications and contribute to a car dominated independent gateway to the site from the A428.*

Our response: The land take implications should be fully explored and not simply used as a reason to refuse a direct access. The contribution to car domination comes from the decision to build on Bourn Airfield a site where car transport is much

more likely due to the it distance for employment centres. Allowing these cars onto rural roads is surely a greater evil than permitting the traffic to access the A428

The report states: *Officers are not proposing to recommend any changes to include a junction onto A428. Changes to the text at section 1D could be made to replace existing text that says that “the new village will not be served by direct access from the A428” with text that explains the Local Plan process for context and a factual statement that no new access to the A428 is included in the Local Plan policy.*

Our response: **In our view, SCDC as the Planning Authority failed to follow due process by not entering into discussion, debate, or consultation to assess whether there was a need for direct access to the A428 at the plan making stage.**

The report states: *Amend text in section 1D of the SPD to reflect the Infrastructure Delivery Plan (IDP) item No.14 and be clear that traffic calming and other measures should be implemented in surrounding villages if required and that appropriate monitoring will also be needed.*

Our response: This is closing the door after the horse has bolted. This statement, that traffic calming may be needed in surrounding villages is an acknowledgement that allowing thousands of cars onto local rural roads is poor policy

The report states: *Amendments will be proposed to strengthen the wording in respect of the western access to the site in Fix A. These will include that the detailed design of the junction on the Broadway should incorporate physical islands, or similar, to prohibit traffic movements to the south (location 1). Amendments will also be proposed in respect of the junction with St Neots Road to clarify that measures should be included to deter and hamper as far as possible any u-turns that would enable southern movements (location 3). The detail will be a matter for the planning application process, which will be supported by a detailed Transport Assessment.*

Parking provision is to be determined through a design-led approach, consistent with Local Plan Policy TI/3, with the aim of providing shared use parking where possible to minimise provision (for example provision to serve the mixed-use area and HQPT stop).

Our response: We welcome the comments on the western access but must point out that disallowing direct access to the A428 will inevitably cause serious issues at both the western and eastern access points. **There has been a serious underestimation of traffic volumes in particular from the developers - whose figures should be challenged.**

We hope this is helpful

Best wishes

Cllr Des O'Brien and Cllr Steve Jones

Bourn Parish Council.

Officer Assessment

New junction / Highways England

Highways England and Cambridgeshire County Council were consulted throughout the plan making process. The transport modelling approach and evidence supporting the Local Plan was to identify any strategic infrastructure necessary for the allocation of Bourn Airfield to be appropriate in planning terms – as a comparison, the Waterbeach New Town policy includes a requirement for strategic road improvements identified by the modelling as necessary to serve the development, and had such measures been identified as needed for Bourn Airfield they would have been identified and included in the Local Plan policy, but they were not.

The Local Plan was submitted for public examination in 2014 after public consultations in 2012 and 2013.

A very small number of representations from individuals calling for a new junction onto the A428 were made to the Proposed Submission Local Plan consultation in 2013 and were before the Local Plan Inspector. It was not raised at that stage by Bourn Parish Council. The issue was not identified by the Local Plan Inspectors as one where they needed more information through a hearing. The Local Plan Inspectors concluded that the Local Plan was 'sound' and did not require any additional transport infrastructure to be included in the Local Plan regarding Bourn Airfield.

The SPD must supplement the adopted Local Plan

Transport Modelling

The transport modelling supporting the Local Plan came under extensive scrutiny from objectors and at Local Plan hearings into the soundness of the Local Plan, including the holding of an additional Transport hearing specifically to address the transport modelling. The Local Plan Inspector concluded that the Local Plan was 'sound' and did not require any additional transport infrastructure to be included in the Local Plan regarding Bourn Airfield.

Traffic Mitigation in Villages

The reference to village traffic mitigation is not new. Local Plan Policy SS/7 'Bourn Airfield New Village' includes a requirement at section 9ci that requires measures to mitigate the traffic impact of new development on surrounding villages and roads. It is good planning practice to include a requirement for such mitigation in respect of large new developments. A similar requirement was included in the Local Plan policy for Waterbeach New Town.

Traffic Volumes

The references to traffic volumes are matters for the planning application for the new village and the associated Transport Assessment.