



17 February 2017

Dear Ms. Graham and Mr. Wood

StopBAD represent the views of the over 1700 residents who took the time and trouble to make personal submissions on Matters SS/6 and SS/8 during the Local Plan consultation and the many thousands of other local residents who object to the development of Bourn Airfield.

Since the original public consultation a number of modifications have been made to the Local Plan and a number of local circumstances have changed. These modifications and changes make the rationale for the development of the airfield even less justifiable.

The number for houses to be built at West Cambourne was increased from 1200 to 2350 and, beyond the Local Plan process, planning permission has been granted for this number of houses. Consequently, Policy SS/8 West Cambourne has been effectively removed from the Local Plan.

The proposed development of the airfield has been brought forward to earlier in the planned period.

Significant changes have been made to the eastern boundary of the Major Development Site without proper local consultation.

Doubling the number of houses to be delivered on an adjacent Major Development Site, bringing forward the delivery of houses at Bourn Airfield to early in the planned period, and significantly altering the site boundaries published in the original Local Plan without local consultation must surely call into question the validity of the whole consultation process in relation to Policy SS/6.

StopBAD submitted a response to the South Cambridgeshire District Council Proposed Submission Local Plan on the 11th October 2013 and a response to the Main Modifications Revised Submission Local Plan on the 24th October 2016. We must assume that the inspectors have had access to both of these documents.

We attach our Statement addressing the questions raised by the inspectors in their Matters and Issues relating to the hearings on Policy SS/6 - New Village on Bourn Airfield.

I will be attending the hearing sessions on the 4th, 5th and 6th of April and hope to be supported by a number of StopBAD colleagues.

Yours sincerely

Des O'Brien

StopBAD Statement in response to Matter SC6C - Policy SS/6 New Village at Bourn Airfield

1. General Policy

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

The answer to this question is clearly no. As illustrated in Figure 1 and Figure 2 the key employment centres are in Cambridge City itself, at the Science Park off Milton Road, at Addenbrookes and the Biomedical Campus, and further south at the Babraham Research Campus and Granta Park. At the moment there are in the region of 118,500 jobs at these 5 sites. Furthermore, the concentration of employment at these sites is set to significantly increase with plans already in place to employ 30,000 people on the Biomedical Campus.

The only significant employers near the Bourn Airfield site are the South Cambridge District Council and Papworth Hospital - **which will relocate 2000 jobs to the Biomedical Campus next year (2018)**. There is now universal consensus among statutory bodies and observers that R&D Heath Sciences companies and agencies will increasingly look to work in close proximity with one another and consequently there is little prospect that this pattern of employment dispersal will change.

Bourn Airfield is not a sustainable distance away from the main centres of employment and represents an over-concentration of housing development away from the main centres of employment.

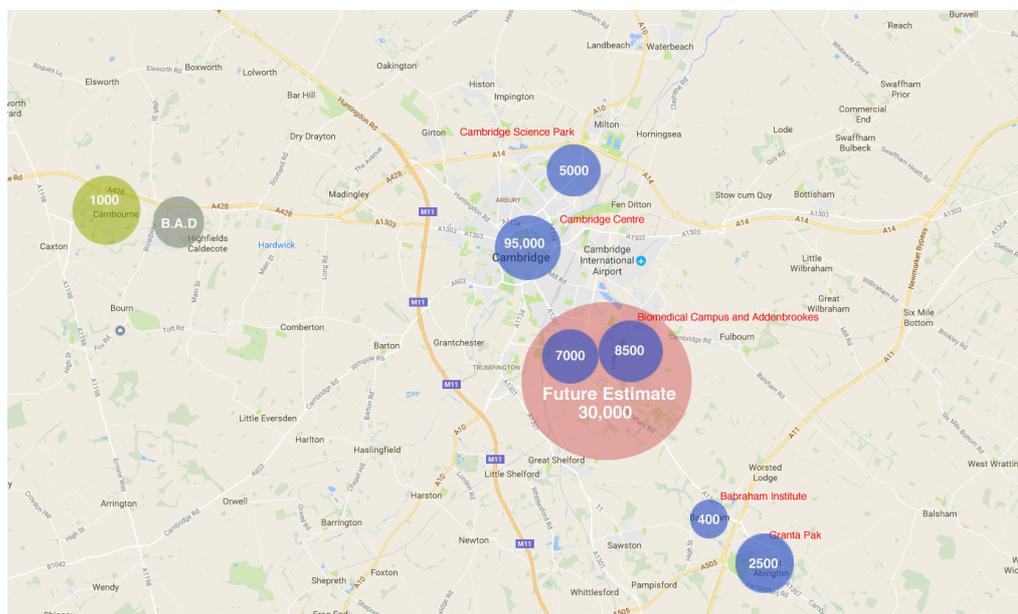


Figure 1: Distribution of major centres of employment Cambridge and South Cambridgeshire

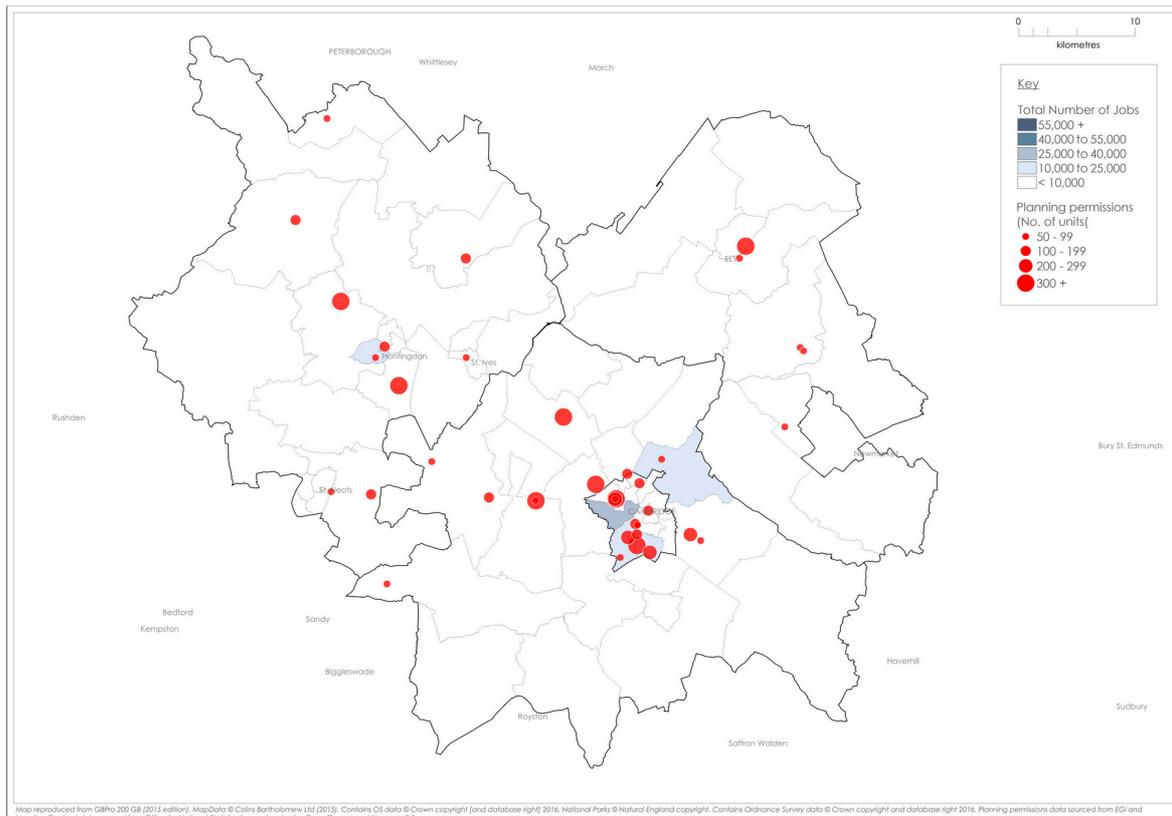


Figure 2: Royal Town Planning Institute Map of Major Employment Clusters (Cambridge)¹

Wessex Economics' conducted the *Cambourne Employment Sites Study* on behalf of the developers of West Cambourne and concluded that "the lack of recent office development is an indication that Cambourne has fallen out of favour as an office location. This is confirmed by trends reported in the most recent Employment Land Review undertaken for SCDC and CCC. The great majority of large scale office occupiers want to be in Cambridge itself, while biotech firms are drawn to business parks to the south of Cambridge."

More damning still for the prospects of Bourn Airfield as a sustainable location was the admission by Wessex Economics that "an expanded employment base in Cambourne would be unlikely to significantly increase self-containment in the sense that a much higher proportion of people will live and work in Cambourne." They conclude "there is not a strong planning rationale for a seeking to ensure a balance of jobs and homes in a relatively small settlement such as Cambourne".

The great majority of Cambourne residents travel to work by car (75.9%). Bus use remains low (about 5%) and, apart from a tiny minority of hardy and fit enthusiasts, cycling to work is not an option and walking is completely impractical because of the distances involved.

Census 2011

Prospects for improved accessibility to Cambridge and the business parks to the south, took a considerable blow recently when Highways England confirmed that they would not be re-considering their decision NOT to build an all-ways interchange at Girton. **This effectively means that eastbound A428 traffic heading to Addenbrookes and the southern biotech campuses, either gets caught up in the severe congestion on Madingley Hill, or takes**

¹ <http://www.rtpi.org.uk/locationofdevelopment>

iii Does the area of land identified on Inset I of the Policies Map provide sufficient capacity to achieve the quantum of development associated with the new village?

StopBAD's original submission in October 2013 questioned the site's ability to accommodate the 3500 houses to be built. We pointed out that the council made significant mistakes in their calculation of the site's capacity.

Questions concerning the site's capacity are not new. In 1992 when Bourn Airfield was being considered as a potential site for the new settlement of Cambourne, the Planning Inspector, Mr T Kemann-Lane, submitted a report in which he drew particular attention to the "generally small and cramped nature of the site". He observed "the Bourn Airfield proposal does lack sufficient room within its boundaries to give adequate separation (from Highfields Caldecote)". Similarly, he thought the proposal (for only 3,000 dwellings, rather than the currently-proposed 3,500) "**would produce a tight development**". This was prior to the building of Cambourne, and Highfields was less than half its present size. In addition, the A428 was not a dual carriageway in 1992, which has also reduced the size of the Bourn Airfield site by 10 ha.

Schedule of yields and land uses related to Option 9A, the landscape-led proposed MDA boundary masterplan

residential parcels	93.82 ha.
development open space	13.37 ha.
mixed use	3.56 ha.
schools	13.32 ha.
other community	0.08 ha.
allotments and orchards	3.93 ha.
sports pitches	10.82 ha.
structural open space/landscape	91.70 ha.
employment	9.83 ha.
main streets	13.60 ha.
total land uses areas	254 ha



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Figure 4: Schedule of Yields, Proposed Development at Bourn Airfield by Rummey Design²

² RD/FM/013, Additional Evidence Relating to Bourn Airfield, Appendix 1: https://www.scambs.gov.uk/sites/default/files/rd.fm_013_-_app_1_landscape_led_settlement_part_2.pdf

StopBAD analysis	
Original AAP	282 ha.
Major Development Area	141 ha.
Access spur*	11.3 ha
Landscaping and buffering	18.2 ha.
Estimated for residential use	85 ha.

** Not considered due to proximity to Caldecote*

Figure 5: Overview of StopBAD's original analysis

The updated land yield allocated to residential parcels (93.82 ha.) by Rummey Design (see Figure 4) on behalf of Countryside Properties comes close to StopBAD's estimated figure from our 2013 Submission of 85 ha (Figure 5). However, the yield of 93.82 ha. comes at the expense of the employment land on the Tallent site and the loss of the access spur on the North East on the site. **The subsuming of these areas into the MDA means that the proposed new settlement is effectively conjoined to Highfields Caldecote.** Clearly, there are now insufficient distances to achieve an effective buffer zone and visual separation between Upper Cambourne, Bourn Airfield and Caldecote Highfields.

In addition, building 3,500 houses on an area of 93.82 hectares produces a housing density of 37 dwellings per hectare (dph). A density of 37 dph is well in excess of the densities in the original Cambourne Masterplan, and closer to urban than rural density levels.

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

While we acknowledge that airfields, as land that has been previously developed, are now to be regarded as brownfield land we would like to point out that a central premise of the policy has been, and remains, that it should not be assumed that the whole of the curtilage of a brownfield site should be developed. This has been made clear in the definitions of previously developed land set out in Planning Policy Guidance. The definition in Planning Policy Guidance 3 included a footnote that defined curtilage and stated that **“where the footprint of a building only occupies a proportion of a site of which the remainder is open land (such as at an airfield or a hospital) the whole site should not normally be developed to the boundary of the curtilage.”** The glossary to the NPPF defines previously developed land as *“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.”*

Clearly the vast majority of the Bourn Airfield site is agricultural land and woodland. Within the original Major Development Site area the runways and perimeter tracks represent only 16% of the total, the remainder being farmed land. The runways and industrial areas occupy just 14% of the total AAP. This is illustrated in Figure 6.



Figure 6: Previously developed land marked in red, StopBAD

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

*“While lacking any formal definition, sprawl generally refers to development on the urban fringe of growing areas, but covers a range of settlement patterns **from continuous suburbs to linear patterns of strip development**... As a model of development, it has been variously associated with increased infrastructure costs, transportation costs, congestion, pollution and loss of natural land, and with reduced public health and accessibility”.*

Introduction to the Royal Town Planning Institute 'Location of Development Report'

The problem of coalescence was apparent back in 1992. Paragraph 12.4.1 of the 1992 Inspectors Report states, **'In the case of Bourn Airfield there would be appear to be almost a continuous ribbon of development from the Broadway eastward along the side of the A45 (now A428) to the Hardwick turn on the A1303 - a distance of 4.5 km.'**

Today, the case for coalescence and ribbon development is even more compelling. The 'new village' would unquestionably result in the over intensification of the **settlements to the south of the A428 between Hardwick and the Caxton Gibbet roundabout and form a linear pattern of strip development approximately 8 kilometres long**. There has been significant development in Caldecote Highfields over the last 10 years and houses have edged ever closer to the A428 and Hardwick. The soon-to-be-completed 950 homes in Upper Cambourne will bring the total number of houses in Cambourne to 4,400 and see houses right up to the Bourn Broadway. The recent approval of 2,350 houses in West Cambourne means that there will be housing to the west right up to the A1198. If Bourn Airfield were to go ahead it would mean that an 8k long stretch of land - that up until 20 years ago was almost exclusively green fields - will have been lost to 10,250 houses. The relaxation of rules on rural housing density further exacerbates the intensification problem. **The villages of Bourn, Caldecote, Caxton and Knapwell characterised this area for hundreds of years; this area is NOT characterised by Cambourne alone.**

Should the development of Bourn Airfield be given the go-ahead, it would be a clear example of the unrestricted sprawl of a large built-up area; the merging of neighbouring communities; and an encroachment into the countryside that will severely damage the setting and special character of historic villages.

Error! Reference source not found.7 below illustrates the existing settlements to the south of the A428 together with the West Cambourne (1) and the proposed development of Bourn Airfield (2).

Figure 8 illustrates how the area will look once West Cambourne has been completed and if Bourn Airfield goes ahead. What is immediately apparent is that this creates a continuous ribbon of development of 7.7km (4.7m) from Hardwick (4) and Caldecote (3) to the Caxton Gibbet roundabout.



Figure 7: Bourn Airfield and West Cambourne shown with existing settlements

Key to Figure 7

(1) West Cambourne new development (2) Proposed Bourn Airfield new development (3) Caldecote (4) Hardwick (5) Caxton



Figure 8: Urban development in a rural setting, StopBAD

2 Future Area Action Plan Development Plan Document (AAP)

ii. Paragraph 6b: Would the proposed level of employment on the site be consistent with the proposed number of dwellings? In this regard, should the paragraph be consistent with Policy E/12: New Employment Development in Villages which restricts employment uses to B1, B2 and B8?

Company	Number of staff in Cambourne
Regus	2
Biochrom	45
Premier Travel	5
Netcracker	40
Fluenta	6
Gewiss	10
ProCam	20
ip Access	90
MediaTek	90
VINCI Construction	20
EEF	10
Global Graphics	5
South Cambridgeshire District Council	350
TOTAL	693

Figure 9: Employment Numbers for Cambourne Business Park³

In 1992, Policy EM5 for Cambourne allocated 20 hectares to a business park development. When complete, the business park was to have yielded 69,675 square metres of Class B1 development. The Business Park was part of a larger vision that was set to deliver 14,000 new jobs. Cambourne Business Park currently employs only 693 people (see Figure 9); 350 of these jobs were relocated from Cambridge by the District Council. Furthermore, the South Cambridgeshire Strategic Housing Land Availability Assessment (SHLAA) Report August 2013 included 7.33 hectares of the original Cambourne Business Park for a development of 230 houses. Finally, significant portions of the office buildings on the Business Park that were delivered remain un-let to this day.

There are approximately 1,100 people working in Cambourne - that's from population of 11,200 (working population in the region of 7,300). This strongly suggests the that levels of employment that could realistically be achieved at Bourn Airfield would not be consistent with the number of dwellings and development on the site and would **simply exacerbate the very high levels of out-commuting we see from Cambourne, and will again see from West Cambourne.**

³ Sourced through StopBAD interviews with companies, 2017.

v. Paragraph 6u: Would the Park and Ride facility for the A428 corridor be critical to the sustainability of the location of the new village in transport terms? Would it have to be funded through a planning obligation as referred to above?

In light of the replacement plans for the Madingley Park and Ride a new facility will be required to cover traffic entering Cambridge from the west on the A428 and from junction 13 of the M11. The provision of this new facility will need to go ahead with, or without, the development of Bourn Airfield. The siting of this P&R is already hugely contentious but most commentators agree that the Bourn Airfield site would be the wrong location and none of the current schemes recommend it.

vi. Paragraph 6y: The criterion makes reference to highway improvements. Should the proposed schemes therefore be set out in the policy if they are critical to the implementation of the policy?

Clarity is needed on the proposed highway improvements as nothing substantial has been done to take account of the many thousands of additional cars that will be generated by West Cambourne's 2,350 houses and the proposed 3,500 houses on Bourn Airfield. DVLA figures put the number of cars registered to the 4,000 homes in Cambourne at 5,300. So West Cambourne and Bourn Airfield will generate a further 7,800 cars. A clear and detailed list of all proposed highways improvements, together with a schedule of delivery, should be set out in policy.

vii. Paragraph 6aa: Should there be a direct access for private motor vehicles to the Broadway provided that the appropriate measures are put in place to mitigate the traffic impacts in terms of highway safety?

Absolutely not. Since the 1992 decision to site Cambourne at Swansley Wood there has been an understanding that traffic on to the Broadway from Cambourne would seriously and adversely affect Bourn village. At the time planning permission was granted for 950 houses in Upper Cambourne, the SCDC Planning Committee accepted this continuing risk and voted against the provision of a bus access route from Upper Cambourne to the Broadway. Recently there has been a 'rapprochement' between the parish councils of Bourn and Cambourne and bus and emergency vehicle access has now been secured on the strictest of understandings that this would never materialise into full vehicle access. In the event, it now transpires that while SCDC were brokering this deal between Bourn and Cambourne, and were making assurances about no private motor vehicle access, they were, at the same time, negotiating on full vehicle access on to the Broadway with the Bourn Airfield developers. In effect their end-game was to open up the Broadway between Cambourne and Bourn Airfield. The ban on cars on to the Broadway must be maintained. It is the only way that the quality of life of the villages of Bourn and Knapwell can be partially maintained in the face of these enormous local changes. Villagers in these communities have long felt beleaguered but to be cheated is too much.

Traffic numbers for the Broadway and the village of Bourn have increased. At peak travel times it is already seen as expeditious for vehicles from Cambourne to route through Bourn village to avoid slow traffic on routes into Cambridge or to the M11/A14 Highways.

In addition;

- **A traffic survey of cars travelling through southbound through Bourn village undertaken between 0700-0900 on Monday 6th Feb 2017 counted 353 vehicles. This is already a very high number.**
- The entrance to High Street, Bourn, is on a hill and is very narrow. A bus or lorry fills both lanes on this section of the road. Opposite traffic must reverse out of this section until the bus/lorry is clear
- Increases in traffic using the Broadway and Alms Hill into Bourn High Street decreases pedestrian safety at peak travel times. No safe crossing place for children or the elderly is available in Bourn village.

viii. Paragraph 6cc: Should there be a cross reference to Policy TI/8: Infrastructure and New Developments as the policy indicates that planning permission will only be granted for proposals that have made suitable arrangements for the improvement or provision of infrastructure necessary to make a scheme acceptable in planning terms?

Yes.

ix. Paragraph 6ee: Would the flood risk reduction measures be sufficiently resilient to the effect of climate change over the lifetime of the new village? Would this form part of the flood risk assessment for the site?

Bourn experienced a significant and highly damaging episode of flooding in February 2001 due to the breakdown of the attenuation ponds for Cambourne. Bourn is a particular risk of flooding because of its valley setting and should the airfield development get the go-ahead this **risk will inevitably be heightened due the cumulative risk of run off from the domineering, and topographically higher, 8 km long, suburban strip that would run south of the A428.**

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

Should the development of Bourn Airfield be given the go-ahead, and in light of the very substantial problems this decision would engender, appropriate community governance arrangements to assist the development must be mandatory. These must include representatives from the surrounding villages.

xi. Paragraphs 6gg and 6hh: Given the previous use of the site for military purposes, is there a reasonable prospect that the de-contamination of the site could be achieved satisfactorily so as to enable residential occupation whilst not prejudicing the viability of the proposed development?

There are serious concerns about the site both because of military history and because for many years it was a paint factory. Anecdotally there are reports that

significant amounts of waste lead paint was discharged on the site.

3 Council's Further proposed modifications November 2016

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

We do not believe that the November 2016 modifications to the Plan made in respect of policy SS/6 have made any contribution to the soundness of the Plan.

Removal of Policy SS/6 would be the only modification that would make the plan sound by realigning it with the development hierarchy and addressing the very serious charge that the Plan is patently over-reliant on new settlements to achieve the District's housing targets.