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4th July 2016

FAO Karen Pell-Coggins
Planning & New Communities
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge,
CB23 6EA

Dear Karen

Planning Application S1411/16/OL - Development off Rampton Road Cottenham

Cottenham Parish Council strongly recommends refusal of this proposal. Cottenham is classified - ST/5 in the adopted Local Plan - as a minor rural centre incapable of sustaining a development of this scale. The adverse impacts of this development, particularly the flood risk NPPF 100-103, impact on landscape and traffic increase NPPF 39 and loss of agricultural land NPPF 112, significantly outweigh the benefits of up to 200 homes (40% "affordable") and 70 care places and represent grounds for refusal according to NPPF 14. In particular, rather than 'improving' as per NPPF 9, it will have a significant negative effect on the Cottenham community.

- a) As in the earlier rejected S/1818/15/OL application, we have grave misgivings about the suggested design of the access points onto Rampton Road. This is already a busy road feeding traffic to the rest of the village and beyond via very busy and roundabouts, acknowledged in the application to operate at, or beyond, capacity if the development proceeds without mitigation. Since the traffic generation has, we believe, been under-estimated, we calculate that many of these junctions will become gridlocked if this development proceeds. Vehicle ownership and use, based on independent local measurements, has been seriously underestimated and the proposed travel plan will not mitigate this. The increased intensity of traffic and lack of adequate segregation between pedestrians, cycles and vehicles, especially at these access points, will significantly increase accident risk. The anticipated queue lengths and the related exhaust pollution are unsustainable economically, environmentally and socially. This is contrary to adopted SCDC policy TR/3 mitigating travel impact of the development control polies DPD
- b) Viewed from Rampton Road, the effect of extending the ridge line of the built environment of Cottenham village into open countryside would result in demonstrable and significant harm to the landscape character. This conflicts with the requirements of NPPF 59 and 61, policies DP/3 development criteria and NE/4 landscape character areas of the development control policies DPD, the adopted District Design Guide SPD and policies NH/2 Protecting and Enhancing Landscape Character of the emerging Local Plan. In the recent survey, conducted as part of the Neighbourhood Plan development, 90% of the 973 respondents considered that preserving the character of Cottenham is

important. This very real perception of residents and the need for protection is supported by **NPPF 109** and **113**.

- c) In conflict with NPPF 100-103, the proposed development will expose Cottenham to an existential flood threat. Cottenham Lode, with embankments already below the 1 in 100 year flood risk, takes surface water not only from Cottenham but also from many villages far to the south-east, including excess water from Northstowe in high level conditions. The surface water attenuation being proposed for this development, despite several design attempts, appears insufficient to bring run-off levels down to that which can safely be managed by the pumps of the Old West Internal Drainage Board. A flood event in this scenario would have devastating consequences for Cottenham environmentally, economically and socially. The Old West Internal Drainage Board has clearly stated their acceptable run-off rate and their approval is necessary for the development to proceed. The time needed to achieve an acceptable design could seriously compromise the scheme's delivery timescales, limiting the scheme's ability to contribute to closing the 5-year housing supply.
- d) The proposed development asserts as its main benefit, that 40% of the homes will be "affordable". The application includes (paragraph 2.4.3 of the Socio-economic Report) a DCLG specification (Land Registry and the Annual Survey of Hours & Earnings, ONS) of affordability as requiring a mortgage 3.5x gross income compared to the Cambridgeshire average of 7.7x. With local construction worker wages quoted at £28,000 gross, mortgage of £100,000 plus a 10% deposit implies that these houses will be sold at £120,000 each despite costing £95 per square foot to build. Should this development go ahead and to avoid claims of misrepresentation, we request a binding condition be placed on the affordability criterion, proportion, relative mortgage cost, and local residency credentials of potential purchasers or occupants of these affordable properties so they remain locally truly affordable "in perpetuity".

Many of the arguments stated by the promoter are in the context of national planning policy or the wider context of South Cambridgeshire based on the district's lack of 5-year housing land supply nullifying many of SCDC's development control policies. However location matters and this proposal is for Cottenham and, in that context, is not sustainable economically, environmentally or socially.

- 1. Cottenham is the wrong place for this development
- 2. Rampton Road is the wrong place for this development
- 3. The scale of the development is wrong for Cottenham
- 4. The promised affordable homes are unlikely to be affordable in Cottenham

1 Cottenham is the wrong place for this development

Cottenham Parish Council strongly recommends refusal of this proposal. Cottenham is classified - **ST/5** in the adopted Local Plan - as a minor rural centre incapable of sustaining a development of this scale. The adverse impacts of this development, particularly the flood risk **NPPF 100-103**, impact on landscape and traffic increase **NPPF 39** and loss of agricultural land **NPPF 112**, significantly outweigh the benefits of up to 200 homes (40% "affordable") and 70 care places and represent grounds for refusal according to **NPPF 14**. In particular, rather than 'improving' as per **NPPF 9**, it will have a significant negative effect on the Cottenham community and should be rejected under **NPPF 14**.

Flood risk - NPPF 100 to 103

Cottenham is vulnerable to flooding and the Cottenham Lode, while embanked as it passes through Cottenham, is expected to carry surface water from a wide area to the south-west of Cottenham including, under high water conditions, flows from Northstowe. Although managed by the Environment Agency,

Cottenham Lode is currently understood not to be able to withstand a 1 in 100 year flood event. While only a small number of houses in Cottenham would be directly affected by such an event, all five arterial roads would be impassable for several days with severe consequences for families with parents or children outside Cottenham during the day for school or work unable to re-unite at home. Those homes might also suffer loss of power and communications during such an event.

This proposed development takes this flood risk too lightly. It is not enough to raise floor levels to 150mm above the surrounding ground or increase the size of the retention pond, implicitly recognising the flood risk. It is not enough to install retention ponds with control systems designed to restrict run-off rates to 19 litres / second. The run-off from this 3.7 hA development is proposed to be over 5 litres per second per hectare, well above the level (1.1 litres/second/hectare as in their letter) that the Old West Internal Drainage Board's pumps can deal with. And it is those pumps which must prevent an overflow of the Catchwater Drain, into which the outfall from this site must pass, on its way to the Cottenham Lode.

Further safety margins need to be included to account for a progressive increase in the impermeable area of the development as householders extend property, add parking spaces or even paved paths. In addition maintenance of the efficacy of retention ponds is a challenge as demonstrated by the poor maintenance state of the balancing pond and outfall at the nearby Tenison Manor estate.

Unless the banks of the Lode itself are raised to a higher protection standard, the retention pond size is increased to reduce maximum run-off rates below 5 litres per second and the control system is designed to a high standard of integrity, including its power supplies, the flood risk from this proposal is unacceptable.

Traffic - NPPF 34

NPPF 34 requires that plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.

Cottenham is already a congested place in rush hours with traffic flowing south into the village from Ely and East Cambridgeshire via Twenty Pence Road. That normal flow is amplified at the Village Green when traffic from Willingham, Earith and beyond joins the rush towards Histon and Cambridge. The usual heavy traffic flow reaches gridlock whenever the A10 or A14 is compromised.

The Travel Plan acknowledges that it will increase rush hour traffic by 20% on an already busy road. This traffic will then flow onto nine identified junctions with known congestion problems:

9.7.2 SJ2 Lambs Lane

9.8.2 SJ3 Rampton Road

9.8.3 SJ3 Rampton Road / Oakington Road

9.9.4 SJ4 High Street

9.10.4 SJ5 High Street

9.11.3 SJ6 B1049S

9.12.3 SJ7 Denmark Road

9.14.3 SJ9 Oakington

9.15.3 SJ10 Histon - Impington Lane / Water Lane

9.17.2 SJ11 A14 / B1049

We believe that traffic generation from this proposed estate will be much higher than estimated in the application for three main reasons:

- car ownership is likely to be considerably higher than in the mature Pelham Way estate used in the application, as demonstrated by independent measurement of Brenda Gautrey Way and Tenison Manor
- car usage will be higher than any of Brenda Gautrey Way, Pelham Way and Tenison Manor due to the increased distance from the village's core facilities, thus discouraging walking

The Travel Plan is flawed and inappropriate in a rural location with only limited public transport access to other locations beyond Cambridge City centre. We lack confidence in the plan to decrease the number of traffic movements and assert it is inconsistent with **NPPF 32, 34, and 35.**

Conservation Area

Cottenham's **Conservation Area** is a significant heritage asset with many features documented in the **Village Design Statement SPD**. 90% of 973 respondents to the recent Neighbourhood Plan survey considered that preserving the character of the village and conservation area is important. This very real perception of residents and the need for protection is supported by **NPPF 131, 132, 134 and 138**.

The development is incongruous to the built development of Cottenham – a developed core with only linear development on arterial roads - contrary to both NPPF 17, 131, 132, 134 and 138 and the Cottenham Village Design Statement and DP/1p, DP2/a and DP/3.2.

Public Open Space

Cottenham currently has an approximate 9 hA deficit in terms of public open space which this proposal does nothing to alleviate. The on-site space may be well-provisioned for residents of the site but the site itself is too far from the village's residential centres to be of benefit to most existing residents.

Loss of agricultural land; NPPF 112.

The site is good quality agricultural land.

2 Rampton Road is the wrong place for this development

NPPF 55 requires that housing should be located where it will enhance or maintain the vitality of rural communities so as to promote sustainable development in rural areas. The distance of the development from the village core will lead to an increase in traffic and parking, therefore damaging the character of the village core and the views approaching the village from Oakington or Rampton.

Cottenham's **Conservation Area** is a significant heritage asset with many features documented in the **Village Design Statement SPD**. 90% of 973 respondents to the recent Neighbourhood Plan survey considered that preserving the character of the village and conservation area is important. This very real perception of residents and the need for protection is supported by **NPPF 131, 132, 134 and 138**. The development is incongruous to the built development of Cottenham – a developed core with only linear development on arterial roads - contrary to both **NPPF 17, 131, 132, 134 and 138** and the **Cottenham Village Design Statement** and **DP/1p, DP2/a and DP/3.2**.

We also agree that, viewed from Rampton Road, the effect of extending the ridge line of the built environment of Cottenham village into open countryside would result in demonstrable and significant harm to the landscape character. This conflicts with the requirements of NPPF 59 and 61 policies DP/3 development criteria and NE/4 landscape character areas of the development control policies DPD, the adopted District Design Guide SPD and policies NH/2 Protecting and Enhancing Landscape Character of the emerging Local Plan. In the recent survey, conducted as part of the Neighbourhood Pan development, 90% of the 973 respondents considered that preserving the character of the village is important. This very real perception of residents and the need for protection is supported by NPPF 109, 113.

Traffic

The Neighbourhood Plan survey indicated that 45% of residents already have concerns about the volume of traffic and speeding in the village. 84% of respondents feel that development will bring more traffic and as such the additional traffic generated is sufficient in itself to refuse **DP/3 2k**.

The travel plan is flawed and it is not appropriate in a rural location. We lack confidence in the plan to decrease the number of traffic movements. Contrary to **NPPF 32, 34, 35, 37, 38 and 39**.

Rampton Road is a busy road with some 700 vehicles (800 by 2020) passing the site entrances at substantial speeds in the morning rush hour.

The Gladman Transport and Travel Plans, although suggesting predicted generated traffic levels of 0.518 (0.546 in Travel Plan) per household in the morning rush hour, only aspire to reduce the measured level by 10% over the first five years of the project. With 200 planned houses, this represents an additional 20% or more level of traffic flows.

That 0.5 level admits that more than 100 vehicles per hour (+15%) will be added every day to the current load.

However, independent measurement of actual trip generation measurements on two similar (and more representative estates than Pelham Way used in the reports) Cottenham estates in April 2016 suggest a figure between 0.7 and 0.8 (equivalent to 200 additional trips, a 25% increase) is more appropriate for an estate of this size in Cottenham where vehicle ownership and dependency is higher than might be the case elsewhere. A figure near the high end of this range is likely as the proposal is much further from the village core than any of these three estates, reducing the likelihood that residents will walk to the shops and other amenities in the core.

Reducing this increase, by increasing modal share of passenger transport, cycling and walking will be particularly challenging given the distance of the site from Cottenham's facilities, cyclist and pedestrian safety issues, the limited public transport options and the nature of employment in Cambridge.

Worryingly the Travel Plan only assumes a 10% reduction on "business as usual" The increased intensity of traffic and lack of adequate segregation between pedestrians, cycles and vehicles, especially at these access points, will significantly increase accident risk at these points.

Pedestrian access does rely on significant improvements to speed management on Rampton Road and also the quality of pavements between the site and Lambs Lane, including a safe crossing over Rampton Road.

The application states that there is footpath access available from the site coming out on Rampton Road between 83 and 85. (Transport Assessment 4.3.1) From previous discussions with the owners of 83 they have vehicular access rights over this single lane track. Also it sits outside of the Gladman plot and so is in different ownership. On these 2 grounds it should be discounted from any assessment which significantly impacts on the applicant's assessment of walking distances and feasibility to the village core. Other statements about distances to core village facilities on foot will have to be reassessed and increased where referenced in the application information.

Regarding the proposed new accesses:

- the secondary access (117 Rampton Road) would probably bear the burden of traffic, requiring some form of priority control.
- the main site access road has now been moved further along Rampton Road such that it is now half way down the hill just after Rampthill farm. With traffic rounding the bend at speed from Rampton and reduced the visibility for traffic coming down the hill from Cottenham, this location appears more dangerous than the earlier plan.

Noise/pollution: Contrary to **NPPF 58, 110 and 123**. Although Gladman have made efforts to lessen the acknowledged traffic noise on the design of the new build there is nothing to lessen effects on existing residents on Rampton Road or indeed the rest of the village.

Due to the proximity to the edge of the village the development fails to be sustainable (**DP/1b** – minimise the need to travel and reduce car dependency) and **NPPF 34, 35, 37 and 38**.

3 The scale of the development is wrong for Cottenham

Cottenham Parish Council strongly recommends refusal of this proposal. Cottenham is classified - ST/5 in the adopted Local Plan - as a minor rural centre incapable of sustaining a development of this scale. The adverse impacts of this development, particularly the flood risk NPPF 100-103, impact on landscape and traffic increase NPPF 39 and loss of agricultural land NPPF 112, significantly outweigh the benefits of up to 200 homes (40% "affordable") and 70 care places and represent grounds for refusal according to NPPF 14. In particular, rather than 'improving' as per NPPF 9, it will have a significant negative effect on the Cottenham community and should be rejected under NPPF 14.

- 1. Scale and Proximity: The recent survey, conducted as part of the development of Cottenham's Neighbourhood Plan received nearly 1,000 replies. Within this, 66% of residents were neither in favour of large developments nor of such developments when built on the periphery of the village environment. This development, being more than a sustainable 800 metre walking distance from the village core, fails to be sustainable as it will encourage car dependency (DP/1 1 b minimise the need to travel and reduce car dependency) and NPPF 34, 35, 37 and 38.
- 2. **Pre-school places:** Cottenham has a known excess of demand over places which will get worse with the change of rules from September 2017 and the proposed development will increase that demand without doing anything about the supply so the development fails to meet **NPPF 72**. In the recent Neighbourhood Plan survey, 44% of respondents identified the need to increase pre-school provision. Cottenham's proposed new Village Hall provisionally includes a £600,000 facility for 30 early years nursery places. The proposed developer contribution appears insufficient to implement such a facility.
- 1. Medical/day care facilities: the development will increase both the general population by approx. 10% but with a bias towards the elderly which will increase demands on our already overburdened facilities. Increased pressure on Medical facilities was identified as a significant problem by 75% of residents in the recent Neighbourhood Plan survey. As previously commented these facilities are currently located an unsustainable distance from the development site. The development fails to meet DP/1 1 m and DP/3 1f. In response to the survey, a new Medical Centre is already being considered to cope with Cottenham's current 6,500 population at a project cost of around £1,200,000. Large developments such as proposed here add nearly 10% to that unmet demand; the proposed developer contribution falls significantly short of the relevant cost.
- 2. Leisure: Leisure facilities were seen as inadequate by 68% of residents in the recent Neighbourhood Plan survey. A 10% increase in population will only exacerbate this problem. While the proposed development is located close to many of the outdoor facilities in the village it's an unsustainable walking distance from the core of the village. There is no meaningfully sustainable way for established residents to use the facilities onsite. The development fails to meet DP/1 1 m and DP/3 1f and NPPF 58 and 59. A feasibility study for a new Village Hall has projected a cost of around £2,500,000 including a possible £600,000 for an early years nursery facility or hub for small businesses. The suggested developer contribution is inadequate to ensure adequate funding for this project.
- 3. Overloading of Primary School: Contrary to NPPF 72 and DP/1 1m, DP/4 2 15, the development will overload the recently-extended Primary School, already one of the largest in Cambridgeshire. Any further increase in capacity risks damage to the cohesive role that the school plays in the village. A clear view (62%) from the recent Neighbourhood Plan survey is the value of having one primary school serving the whole village. The recently-completed extension was only built to cope with the current capacity of 630. Further expansion would inevitably, for child safety and traffic considerations, require a second access road leading to a loss of agricultural land and/or Public Open Space which, as mentioned before, is in deficit.

4. Employment: the development fails to meet NPPF 17 and 19 as well as DP/1 1b. Without local employment provision it will increase local commuter traffic. The recent Neighbourhood Plan survey identified that 57% saw the development of local employment as being important. Without local provision it will increase local commuter traffic. The new Village hall is being designed at a projected cost of around £2,500,000 including a possible £600,000 for an early years nursery facility or hub for small businesses; if constructed this will go some way towards closing the supply gap.

4 The development is unlikely to deliver 40% truly affordable homes for Cottenham

Affordable housing: In principle Cottenham needs more affordable homes but only if they are truly affordable and not built at the expense of an excessive number of market homes disconnected from the village environment. Unless they can be built within reach of a mortgage of 3.5x gross salary as recommended by DCLG (Land Registry and the Annual Survey of Hours & Earnings, ONS) and quoted in section 2.4.3 of the Affordable Homes ...) they will be out of reach of village residents most in need of them and cannot be considered as affordable NPPF Annex 2.

Another issue with the affordable homes is their distance from the village core; an 800 metre distance is regarded as truly sustainable whereas these will be over 1200 meters away encouraging rather than discouraging car use.

Due to the distance from the core of the village the development fails to be sustainable (**DP/1b** – minimise the need to travel and reduce car dependency) and **NPPF 34 and 35.**

Yours sincerely

Frank Morris

Chair

Appendix - Transport & Travel Plan

The **Transport and Travel Plans** have numerous errors or omissions with consequences for traffic volumes or road safety:

- 4.2.5.6 The speed surveys were conducted in March 2015; relying on measurements taken a non-neutral month is not in line with practice set by ...
- 4.2.5.7 The surveys indicate a considerable proportion of vehicles travelling at over 40mph near the 30mph limited area at the proposed site access.
- 4.2.6 The surveys indicate a considerable proportion of vehicles travelling at nearly 40mph within the 30mph limited area near the proposed site access. Achieving acceptable visibility requirements will need more than simple relocation of the 30mph boundary as has been found on Beach Road where an additional 40mph buffer zone has been introduced.
- 4.3 Given the prevailing road speeds it is likely that only a segregated cycle path would provide adequate safety for cyclists. The proposed internal cycle route depends on a possible future development by Persimmon and must be discounted here. Roads within Cottenham are not conducive to safe cycling due to frequent width constraints introduced in 1993 as part of the traffic-calming scheme; these chicanes force cyclists to dismount or cross into the path of motorists. The proposed Toucan crossing on Rampton road will help but appears not to be fully funded yet is only necessary as a result of the increased pedestrian and road traffic caused by the development.
- 4.4 No consideration has been given to mobility-impaired residents wishing to access facilities in the village core some considerable distance away.
- 5.1.1 Walking is the most important mode of travel at the local level BUT 2Km is an unsustainable walking distance for a substantial proportion of adult residents, especially those (most) with access to a car.
- 5.1.2 reinforces 2Km as the maximum walking distance, implying that 400m is much more sustainable.
- 5.1.3 Only the Primary School and a bus stop are within the 800m / 10 minute walk isochrones from the proposed site; all other village facilities are further away. Even the bus stops are the final stops on a 1-way journey around the village which terminates at Lambs Lane. Ongoing travel is often subject to considerable synchronisation delays at this stop. The legitimacy of using the suggested walk route alongside xxx Rampton Road is questioned. We note the s106 offer to improve the bus stop on Lambs Lane and provide electronic timetable information there but would point out that already exists at the terminus bus stop a little further along Lambs Lane.
- 5.1.4 While many village facilities are within 2km of the site, it is unlikely that many residents would choose to walk to places such as Travis Perkins, supermarket or greengrocer with all but the lightest of purchases. The Anglican Church is beyond 2Km from the site.
- 5.1.5 highlights how few village facilities are beyond 800m practical walking distance from the site. The Post Office distance appears not to be the distance to the current Post Office which is now about 1500m from the site.
- 5.1.8 Linkage with other village pedestrian infrastructure does not mitigate the effect of distances involved.
- 5.1.9 Linkage with other village pedestrian infrastructure does not mitigate the effect of distances involved, although the Toucan crossing will improve safety on Rampton road if implemented. Rampton Road is a busy road with some 700 vehicles (800 by 2020) passing the site entrances at substantial speeds in the morning rush hour.
- 5.2 While cycling opens up some more options, especially access to the Guided Busway, the small proportion of people willing or able to make 25 minute journeys (the Chartered Institute for Highways & Transportation guideline for maximum distance cyclable comfortably by a reasonably fit person) is limited as demonstrated by the relatively small number of commute journeys by Cottenham residents made by cycle.

- 5.3 appears completely unfounded. Future residents of the proposed development will not have good accessibility to services they might use daily or major employment locations without extensive use of a car. In addition, the nature of most Cambridge jobs precludes car-sharing.
- 6.2 The site is not well-served by public transport when its nearest bus stops, some 500m from the site centroid, are at the end of a bus route. Even after this discontinuity, the service only meanders to Cambridge City Centre. No improvements have been suggested
- 6.3.2 implies that Citi8 services still run beyond Cambridge City Centre not true.
- 6.3.3 implies that Citi8 services still run beyond Cambridge City Centre not true; a connection is required, adding considerably to the times required.
- 6.3.5 implies that Citi8 services still run beyond Cambridge City Centre not true; a connection is required, deterring commuters.
- 6.3.6 implies that Citi8 services still run beyond Cambridge City Centre not true; a connection is required to reach the railway station, deterring commuters.
- 6.4 Suggesting drivers access the Guided bus by parking at Longstanton is hardly a "desire line" when there are Park & Ride facilities within a shorter distance.
- 6.5.1 Waterbeach is beyond reasonable cycling distance and parking there is all but impossible after 8am on weekday mornings. Chartered Institution of Highways & Transportation advises that a distance of 5 miles is the limit for comfortable cycling by a reasonably fit person
- 6.6.3 Cambridge is beyond reasonable cycling distance and the Citi8 no longer reaches the station.
- 6.6 The site is not adequately served by public transport and no improvements have been suggested. In the recent Neighbourhood Plan survey, 63% of residents wanted to see improvements in public transport links to Cambridge with only 11% currently using the bus 4 or more times a week. Bus services run at 20 minute intervals and a shorter journey time to Cambridge was the single most-cited (78%) incentive to use bus services more. This issue is not sufficiently addressed by the Travel Plan.
- 5. At 7.1.2 of the new travel plan there is a proposal to add a cycle footpath between the accesses to the site and the junction with Lambs lane. This can not be accommodated with the narrow width of the path.
- 7.5 The Travel Plan target of a 2-way vehicle trip rate of 0.546 vehicles per hour per dwelling within 5 years appears ambitious if not impossible. Our own actual trip generation measurements, carried out by independent consultants, on two representative Cottenham estates in April this year and TRICS data suggest a figure between 0.7 and 0.8 is more appropriate for an estate of this size in Cottenham where vehicle ownership and dependency is higher than might be the case elsewhere. Increasing modal share of passenger transport, cycling and walking will be particularly challenging given the distance of the site from Cottenham's facilities, cyclist and pedestrian safety issues, the limited public transport options and the nature of employment in Cambridge. More worrying is the proposal to set a baseline after measurement then reduce it by just 10%.
- 8.3.1 We have serious reservations about the ability of the use of historic data, some as much as 15 years old, in the TRICS database to properly represent future travel conditions for an affluent village in such close proximity to a hyper-growth city like Cambridge. The TRICS data derived from the David Wilson Homes situation demonstrates the inaccuracy of these database approaches to trip rate prediction in Cottenham and similar locations. AHA assume some 17 two-way vehicle trips will be generated by the 47 homes (equivalent to 0.36 trips per household per hour) whereas real measurements commissioned by independent consultants for Cottenham Parish Council for the similarly-located Brenda Gautrey Way estate measured some 73 two-way trips from the 108 houses feeding that junction (equivalent to 0.68 trips per household per hour). Check 3 Nov as "neutral"
- 3. The use of Pelham Way as a baseline for measuring existing traffic flows (8.8.2.4 of Transport Assessment) is flawed as the housing in this area is in a different stage of maturity having been built in the 1970s. As such the age profile of the residents will generally be older than purchasers on a new estate that are likely

to have a higher percentage of families with working members. A more valid comparison would be to assess the traffic from the Tenison Manor estate - newer estate and more compatible in size.

- 8.5 Background traffic growth ignores any potential traffic growth from Endurance and other proposed developments in the vicinity The TRICS data derived from the David Wilson Homes situation demonstrates the inaccuracy of these database approaches to trip rate prediction in Cottenham and similar locations. AHA assume some 17 two-way vehicle trips will be generated by the 47 homes (equivalent to 0.36 trips per household per hour) whereas real measurements commissioned by independent consultants for Cottenham Parish Council for the similarly-located (although closer to the village core) Brenda Gautrey Way estate measured some 73 two-way trips from the 108 houses feeding that junction (equivalent to 0.68 trips per household per hour).
- 8.7.1 The modal split is likely to have changed since the 2011 census, particularly against the use of bus following the curtailment of the Citi 8 service at Cambridge city centre, forcing more people to use private car transport. The location of the site and its distance from core village facilities, combined with limited public transport options are likely to increase the proportion of such departures and arrivals that are made as single person car journeys.
- 8.8.1 We have serious reservations about the ability of the use of historic data, some as much as 15 years old, in the TRICS database to properly represent future travel conditions for an affluent village in such close proximity to a hyper-growth city like Cambridge. The TRICS data derived from the David Wilson Homes situation demonstrates the inaccuracy of these database approaches to trip rate prediction in Cottenham and similar locations. AHA assume some 17 two-way vehicle trips will be generated by the 47 homes (equivalent to 0.36 trips per household per hour)whereas real measurements commissioned by Cottenham Parish Council for the similarly-located Brenda Gautrey Way estate measured some 73 trips from the 108 houses feeding that junction (equivalent to 0.68 trips per household per hour).
- 8.8.2 The traffic generated by the proposed development will have a material effect on the local highway network for two reasons. The traffic likely to be generated will be around twice that suggested and more of that traffic, following the closure of direct access to the A14, will flow via Rampton Road and Histon Roads towards Cambridge.
- 8.10 We believe, following evidence from both the Brenda Gautrey Way and Tenison Manor estates that traffic generation will exceed 150 two-way trips in the morning rush hour, a material addition to the 800 vehicles passing the site, saturating the Oakington Road junction and taking the traffic entering Histon Road well above 1,000 vehicles per hour.
- 10.3 When most Cottenham residents commute to work in or around Cambridge it is implausible that significant amounts of rush-hour travel can be converted to cycling or walking.
- 10.5 When most Cottenham residents commute to work in or around Cambridge it is implausible that significant amounts of rush-hour travel can be converted to cycling or walking.

The meandering nature and extended journey time of the Citi8 limit its value as an alternative to single-person car journeys

- Cottenham does not host a full 6th form; students travel to Histon or Cambridge
- 10.7 When most Cottenham residents commute to work in or around Cambridge it is implausible that significant amounts of rush-hour travel can be converted to cycling or walking.
 - The meandering nature and extended journey time of the Citi8 limit its value as an alternative to single-person car journeys
- 10.8 When the existing road junctions appear to operate at capacity already it is inconceivable that adding some 150 vehicle trips in the morning rush hour will not saturate some or all of these junctions leading to serious congestion, pollution and safety hazards for everyone.
- 10.9 AHA's analysis is flawed and does not demonstrate that the proposed development is consistent with the sustainable development objectives of national and local planning guidance.