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10th March 2017

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 S/2876/16/OL - Development off Rampton Road, Cottenham

Cottenham Parish Council has considered the recently submitted revised **Transport Assessment, Travel Plan** and **Heritage Impact Statement** and offers these comments in support of its continued strong objection to the development.

Transport Assessment

All the comments we made in our submission of 18th November 2016, especially **Appendix 1** that deals with traffic assessment, still apply.

In particular we note that this **Transport Assessment** still attempts to under-estimate predicted traffic flows by citing TRICS data from a suburb of Liverpool that is well served by public transport, and not in any way comparable to Cottenham.

No real choice of travel mode

Contrary to **NPPF4**, the proposal does not give people a “real choice on how to travel” with the only viable options for most people being a choice between accepting isolation, likely to increase demand for home deliveries, and using a car or possibly, for shorter journeys, cycling – contrary to **SCDC core strategy** and **SCDC Policy TI/2** promoting sustainable travel. Contrary to multiple assertions that the Applicant is “negotiating with the Parish Council (owners of the land required)” in the pedestrian/cycle link, no such negotiations have taken place. This option must be discounted from any distance calculations as such a link is not deliverable.

- Being located more than 400 metres from any well-served public transport stop, the development cannot claim to give “access to high quality public transport facilities” as required by **NPPF35**. Discussions with Stagecoach to extend scheduled bus services beyond the existing Citi8 route have exposed a series of commercial and logistical challenges that cannot be readily resolved.
- Being more than 1,200 metres from almost all Cottenham facilities, the village centre is beyond easy walking distance for able-bodied people as defined by the **Chartered Institute of Highways & Infrastructure** so does not give priority to pedestrian movements as required by **NPPF35**. The

inference in **section 5** that the site is “close to Cottenham” is false, especially the ludicrous suggestion that a 2,000 metre walk to the Primary School is either safe or feasible for children.

The scope to improve cycle access between the site and village centre is acknowledged **(4.2.5)** to be limited, doing little to minimize car usage or isolation. We believe that the suggested pavement / cycleway improvements are not deliverable due to limitations of highway width and should be discounted.

The distance of the site from Cottenham’s facilities, including public transport connections, severely limit options for modal shift to more sustainable forms of travel and undermine any attempted **Travel Plan**. The Travel Plan has to rely mostly on information and encouragement about walking, cycling and car-sharing so can only have limited effect on car usage in a village – like many others in South Cambridgeshire - with an established pattern of necessarily higher than average car ownership and usage. Only a radical improvement in transit times to Cambridge could affect this, as was shown by ineffectiveness of the recent experimental 10-minute service frequency and results from Cottenham’s Neighbourhood Plan survey.

Under-estimated trip generation

This analysis ignores the Gladman acknowledgement of the validity of trip generation rates based on CPC’s real measurements in Brenda Gautrey Way and Tenison Manor and quoted in **Appendix H: Technical File Note 2**.

A Actual Car trips per house	Arrivals	Departures
AM peak hour	0.185	0.491
PM peak hour	0.342	0.183

Table 5.1 summarises the acceptable walking distances suggested by the **Chartered Institute of Highways & Infrastructure** with distance to “town centre” having a preferred maximum of 800 metres. However **Table 5.2** shows every local amenity in Cottenham is beyond a **1,200 metre** walk from this site. Such a distance disincentivises walking as an alternative, reinforcing our view that this site, if developed, will not integrate within the local community but become a separate village similar in size to Rampton.

Our Brenda Gautrey Way and Tenison Manor comparator sites are both within a very easy walking distance of 400 metres of the centre, suggesting a considerable uplift (possibly +100%, although some might be able to cycle) factor should be applied even to our estimates quoted in appendix 1 and accepted by Gladman’s consultants and County Highways.

B Car trips per house	Arrivals (with 100% uplift)	Departures (with 100% uplift)
AM peak hour	0.37	1.00
PM peak hour	0.68	0.36

C Car trips (154 houses)	Arrivals (without – with uplift)	Departures (without – with uplift)
AM peak hour	28-56	77-154
PM peak hour	53-105	27-55

It is ludicrous to suggest that National Planning Policy regards short car journeys as sustainable now we understand the health issues raised by NOX pollution from short car journeys by diesel-engined vehicles.

Nevertheless the proposal accepts **(3.3)** the need to re-engineer the Oakington Road / Rampton Road roundabout using the Gladman-proposed solution.

Mitigation of increased traffic flows

There is no evidence to suggest **(6.2.7 and 7.4.6)** that improvements to the A14 will reduce established through traffic in Cottenham. The suggestion that the various proposed adjacent sites can be inter-linked to improve permeability and reduce traffic on the Oakington Road / Rampton Road roundabout is, by bringing traffic into closer proximity to pedestrians and cyclists, both dangerous and in conflict with **NPPF35**.

The Gladman-proposed solution has serious consequences for residents of Rampton Road, some of Oakington Road – especially #2 and #4 whose driveways would enter the new roundabout directly – and the Grade II Listed Buildings - the John Moreton 1853 Almshouses.

The modelling undertaken does not appear to take full account of CPC-based predictions of traffic generation for the aggregate effect of all four proposals **S/1818/15/OL, S/1952/15/OL, S/1606/16/OL and S/2876/16/OL** nor does it appear to extend beyond 2020 – when building will scarcely have started, so the residual cumulative impacts of development must be assumed as **severe** and, under **NPPF32**, the application should be refused.

Heritage Statement

In order to mitigate the congestion effects of the greatly increased traffic arising from the construction of up to 154 houses significant changes have been proposed to Rampton Road and, in particular the roundabout linking Oakington Road with Rampton Road. The significance of those changes to the setting of Grade II Listed Buildings, namely 25 - 39 (odds) Rampton Road, known collectively as the Moreton Almshouses, has now to be considered properly and thoroughly by both the developer and Local Planning Authority, as required by **NPPF 128 and 129**.

The Heritage Impact Assessment does not describe adequately, **as required by NPPF128**, but rather downplays the significance of the heritage asset, including any contribution made by its setting, effect on views to and from the buildings and the potential economic and social impact of the enlarged roundabout on the economic and social viability of the almshouses. The setting itself with a distinctively designed Victorian terrace set set back on its own village green from a road junction has not been mentioned. It appears from the barely 100 words **(5.2 to 5.4)** that inadequate evaluation methodology and expertise have been applied to the assessment since only minimal illustrative or technical material has been provided, and then dispersed within information about other less-affected assets.

This roundabout is within the setting of the **Grade II listed 1853 Moreton almshouses** and, with the loss of its village green, would bring much more traffic closer. Increased vibration will compromise these foundation-less buildings. Cyclists and residents, especially the elderly residents of the almshouses (#25-#39 Rampton Road) but also the properties that front directly onto the existing roundabout (#40, #42, and #43 Rampton Road, #2 and #4 (Oakington Road) will be exposed more intimately to more noise, pollution, and safety threats. especially by larger articulated vehicles manoeuvring around, and often across the roundabout. The number of elderly neighbours to the roundabout must require a higher than usual standard of road safety, otherwise these seven, otherwise truly affordable, homes will become impossible to let to those who most need them, nullifying any supposed benefit from the handful of affordable homes possibly deliverable within 5 years as part of the proposal. The long-term social and economic viability of the almshouses themselves is threatened. These buildings are not a just historic work of art to be conserved and admired at a distance, they are homes to some of our most vulnerable residents whose quality of life is threatened.

Under sections 16 and 66 of the **Town & Country Planning Act 1990** (cited in **SCDC's SPD "Listed Buildings: Works to or affecting the setting of"** paragraph 2.21) concern is expressed about the effect on the economic viability of the affected asset, yet this has not been considered.

SCDC policy CH/4 requires that permission will not be granted for an application that “adversely affects the wider setting of a listed building”; this policy requires the provision of “clear technical and illustrative material to allow that impact to be properly assessed”. The “**Heritage Impact Assessment**” does not even include a photograph of the buildings, has misleading information about the setting, does not mark the location of the Almshouses and some houses adjacent to the roundabout have been erased. There is no evidence that the **English Heritage** methodology for assessing “setting and social and economic impact” has been used. The cursory treatment (**5.2 to 5.4**) makes no mention of the purpose of the almshouses as truly affordable homes for those most in need within the community or how reduced amenity and safety for the elderly residents threatens the economic and social viability of the seven almshouses, which are already suffering damage from the effects of traffic and poor road drainage. Any assessment of “neutral impact” must be regarded as superficial, ill-informed and unreliable.

The most recent **Building Survey Report** prepared by Hugo Prime (a **Chartered Building Surveyor** with a University of Cambridge Certificate in Historic Building Conservation) attributed damage to the window surround bricks of #25 and #27 to frost action and erosion following acidic water being splashed up by passing vehicles from standing puddles. The rainwater gullies in this area and along to the Village Green need significant augmentation if this problem is not to get much worse as traffic increases substantially as a result of this development. The County Council policy on surface water flooding allows local flooding to remain for several hours before any intervention is deemed appropriate, hours in which nearly 200 vehicles already pass per hour in the evening, each potentially splashing several litres of acidic water towards these fragile buildings. The reduced permeable surface area will increase surface water run-off rates into the Rampton Road gullies exacerbating the flooding issue. The suggested developments are likely to double the rate of erosion by the combination of 50% increased flows and bringing vehicles near to the buildings. This surface water issue on Rampton Road has been recognised but not remedied by the County Council for many years and is even cited as a problem in the **Cottenham Village Design Statement**.

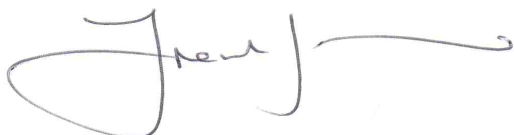
There is no evidence that the Local Planning authority – SCDC – has adequately complied with its duty under **section 67** of the **Planning (Listed Buildings & Conservation Areas) Act 1990** or the **Town & Country Planning (Development Management Procedure)(England) Order 2015 (As Amended)** to publicise this planning application **S/2876/16/OL** in the principal and long-established local newspaper - the **Cambridge News** - or on **Public-Notices.co.uk** as one that affects the “setting of a listed building”.

Together these omissions and oversights make it impossible for SCDC to comply with **NPPF129** in coming to anything less than an “adverse” conclusion as to the effects of the proposed roundabout on the wider setting and viability of the Listed Buildings.

Conclusion

All other points we have previously raised continue to apply. Permission should be refused.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Frank Morris', with a long horizontal flourish extending to the right.

Frank Morris
Chair

Appendix: Some illustrative information



Fig. 1 John Moreton 1853 Almshouses – operated by Cottenham Charities

“Almshouses, dated 1853 on stone panel to front wall. Gault brick with red brick door and window arches and terracotta band. Embattled hipped roof of fishscale pattern slate to centre, with lower flanking wings with end parapets on kneelers. Moulded brick eaves cornice and five end and ridge stacks with projecting capping, string courses and splayed offsets to bases. Plan of higher centre block with flanking wings. Two storeys with frieze of terracotta between. Centre block has canted front and alternating red and yellow bricks to pointed two centred arches to two-light casement with Y glazing bars. Similar arch to boarded door with cover strips. Wings have drip moulds with return stops to three casements in square heads, the centre window is blind. At ground floor two similar window flanks two adjacent doorways. The wing to the left hand has six window openings, with two blind windows.” Listing NGR: TL4457367150

NB Note the uncluttered view, including the relative absence of street furniture.

#2 and #4 Oakington Road hidden under table

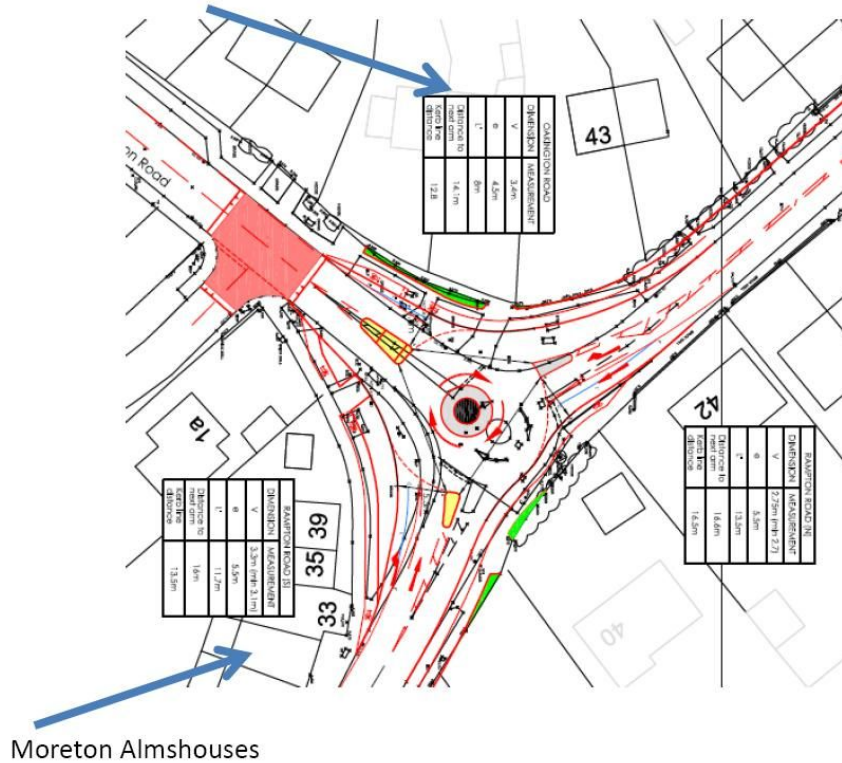


Fig 2: Proposed "improvement" to Oakington Road / Rampton Road roundabout

The proposed changes inherently affect the views to and from the Listed Buildings (4.38 of the SDC SPD "Listed Buildings: Works to or affecting the setting of"



Fig 3: The missing #2 and #4 Oakington Road re-instated



Fig 4: Illustrative view of the effect on the setting of the almshouses (on left of diagram)

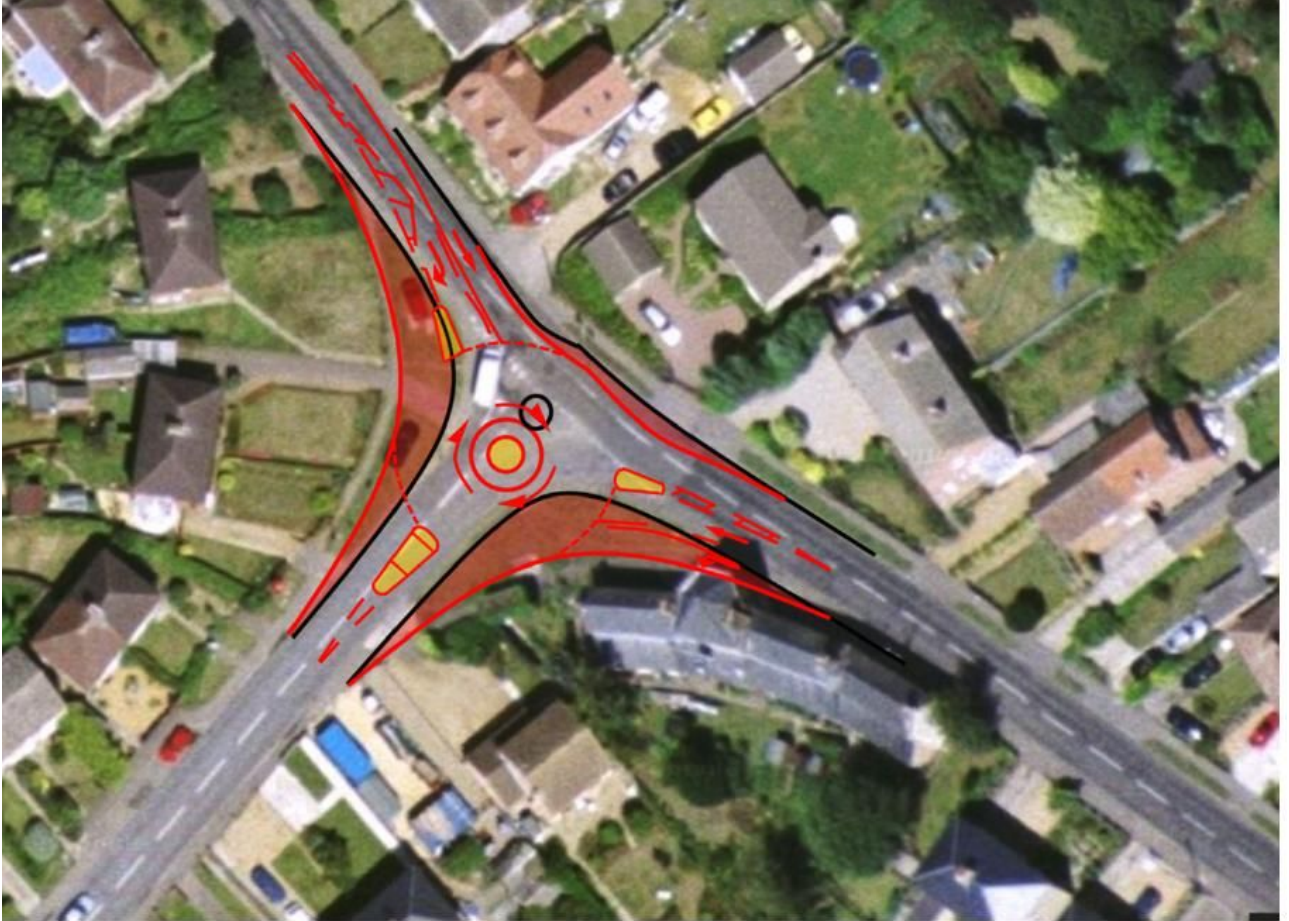


Fig 5: Artist's impression of the proposed roundabout, almshouses and their setting