

The Parish Office,
Right Side Entrance, Community Centre,
250a High Street,
Cottenham,
Cambridge CB24 8XZ
Tel: 07503 328401
clerk@cottenhampc.org.uk

21st July 2017

FAO Julie Ayre
Planning & New Communities
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne Business Park
Cambourne
Cambridge,
CB23 6EA

Dear Julie,

Planning Application S/2413/17/OL - Development off Rampton Road, Cottenham

Following consideration, Cottenham Parish Council strongly recommends that this application is refused as unsustainable under National Planning Policy (NPPF) and inconsistent with key South Cambridgeshire District Council strategic planning policies and the policies within the adopted Local Development Framework.

The development offers a significant number of new houses, including affordable homes and residential places with care, but in a location which is sufficiently detached from the established settlement to limit severely the suggested social and economic benefits to Cottenham. It would create a significant amount of additional traffic both in the immediate neighbourhood, especially near the access through the site of 117 Rampton Road, and on the wider local network from the Oakington Road / Rampton Road roundabout and onwards as far as the A10 and A14. This increased traffic is of particular concern for noise, pollution and pedestrian safety wherever houses are only separated from the road by narrow, often uneven, pavements or are heritage assets inhabited by vulnerable elderly residents.

This application has all the advantages, disadvantages and misleading representations of S/1411/16/OL which, although approved on 23rd March 2017, is potentially subject to Judicial Review based on a number of procedural errors, any one of which should have led to referral back to the Planning Committee before the grant of permission on 19th May 2017. Several of those errors weighted the Officer's planning balance on that occasion in favour of approval, yet the Committee votes were tied, broken only by the Chair's casting vote in favour. All other things being equal, correction of those errors must lead to a planning balance against permission:

1. One of those errors related to discrepancies between the names on the certificate of ownership in the planning application and those signing the s.106 agreements, a potential breach of the **Town & Country Planning Act 1990**. This application also has an omission on the application certificates with no evidence that one of the parties has been served notice of the application.

2. The **Supreme Court Judgement in *Hopkins Homes Ltd v Cheshire East Borough Council* [2017] UKSC 37** narrows the range of development plan policies which can be considered as “relevant policies for the supply of housing”. Those policies, despite various assertions in this application, are now not to be considered out of date, even when a five-year housing land supply cannot be demonstrated. In respect of South Cambridgeshire this means that **SCDC Local Plan Policies ST/4, ST/5, ST/6, ST/7, DP1(a) and DP/7** are no longer held to be out of date. As a result, a development proposal that conflicts with these adopted, but previously ignored, policies should now be considered in principle to have an adverse impact.
- **ST/4, ST/5, ST/6 and ST/7** – Cottenham is currently a Minor Rural Centre (**ST/5**) which should lead to refusal of applications for more than 30 houses on a site, with s.106 financial contributions only able to mitigate burdens of sites with between 9 and 30 houses.
 - **DP1(a)** requires that development will only be permitted where it is demonstrated that it is consistent with the principles of sustainable development, as appropriate to its location, scale and form. Development should be consistent with the sequential approach, as set out in the Strategy chapter of the **Core Strategy DPD**. With the emerging Local Plan focusing development on “urban extensions to the built-up area of Cambridge and in a small new town north west of the city” “As part of a sequential policy of encouraging a more sustainable pattern of living, only limited development will take place within villages in the district, with most of that limited development focussed into those larger, more sustainable, Rural Centres where modest growth will bring about improvements in the relative sustainability of individual villages or groups of villages and the recycling of previously developed land.” Recent SCDC assertions, during the emerging Local Plan examination and subsequently confirmed by the SCDC Planning Portfolio Holder that development of so-called “omission sites” in the villages is not necessary to meet the housing needs of the emerging Local Plan, reinforce the view that this application for development in a Minor Rural Centre, should not be approved.
 - **DP/7** – Cottenham has a defined Development Framework and this application is outside that framework and therefore subject to rules applying to the open countryside. “Outside urban and village frameworks, only development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside will be permitted”. This application should be refused.
3. A third error relates to the continued inadequacy of consultation and consideration of potential harm on a designated heritage asset. **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 also requires the provision of “clear technical and illustrative material to allow that impact to be properly assessed”. The “Built Heritage Statement” provided with this application does not even include a photograph of the buildings or their setting, either before or after the proposed change and has misleading information about the current setting, does not mark the location of the John Morton Almshouses and some houses adjacent to the roundabout have been erased. Any assessment of “neutral impact” must be regarded as superficial, ill-informed and unreliable.
- In order to mitigate the congestion effects of the greatly increased traffic arising from the construction of up to 200 houses and 70 residential places with care, 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 John Morton

In addition:

Easier movement in/out/around the village: the development acknowledges that it will increase rush hour traffic by 20+% on an already busy road. Contrary to **NPPF 32, 34, 35, 37, 38 and 39:**

- Regarding the proposed new accesses the secondary access (117 Rampton Road), unless restricted by use of bollards, could become the “traffic desire line” and bear the burden of traffic, bringing traffic onto Rampton Road at a point which affects the amenity of the largest number of existing residents. The proposed primary access near 295 Rampton Road is on the crest of a hill reducing visibility. Emerging traffic will then flow onto junctions with known congestion problems.
- Pedestrian access relies 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. Several of the proposed benefits for pedestrians are already included in plans, funded from previous developments.
- The Gladman travel plan is flawed and it is not appropriate in a rural location. Access to public transport in this area of the village is restricted due to the way in which the Citi8 service to Cambridge only passes this area on its northbound journey back to Cottenham from Cambridge. Journeys into Cambridge are extended either by the need to walk across to the Village Green or accept a detour and possible wait at Lambs Lane before the onward journey. We lack confidence in the plan to decrease traffic movements.

Drainage: NPPF 102 and 103. The application has not taken into sufficient account the flood risk arising from additional surface water flowing into the ditches and drains that protect the low-lying land around Cottenham. Cottenham is a fen edge village and within the village is the Cottenham Lode, the main route from which surface water is taken from a large area (including Bar Hill, Oakington and, under some circumstances, Northstowe) via the Old West River (a.k.a. Ely Great Ouse) out to the Wash. Water levels in the Catchwater Drain, suggested as the main drain for this development, have to be maintained at safe levels by a number of limited capacity pumping stations that transfer water into the Great Ouse. We are particularly concerned about anything that adds water flow to the route and have serious concerns about the design – specifically the limited on-site retention capacity and control of mid-term release rate – and, given the limited Internal Drainage Board pumping capacity - long-term surface water management to counter any potential flood risk to the wider area.

Overloading of Primary School: Contrary to **NPPF 72** and a key issue for residents in Cottenham’s Neighbourhood Plan survey. The recent extension was built to cope with the current capacity. Any increase in capacity would need to be handled sensitively to limit damage to the cohesive role that the school plays in the village and avoid seriously compromising the provision of outdoor recreation space in the village. If built by the County Council, such an extension is likely to be on a substantial parcel of land currently leased by them to Cottenham Parish Council as a key part of the Recreation Ground. If that approach is pursued, there would be no immediate prospect of cost-effectively expanding the formal sports space to that identified as necessary, even for the village’s current needs, in Cottenham’s emerging Neighbourhood Plan. **NPPF 70, 73 and 74** refer.

Affordable housing: In principle, recognised in Cottenham’s emerging Neighbourhood Plan, Cottenham does need more affordable homes but not at the expense of an excessive number of market homes disconnected from the village environment. Due to their distance from the core of

Almshouses, has to be considered properly and thoroughly by both the developer and Local Planning Authority, as required by **NPPF 128 and 129**.

- The Built Heritage Statement does not describe adequately, **as required by NPPF128 and CH/4**, 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. It appears 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.
- There is no evidence that the **English Heritage methodology** for assessing “setting and social and economic impact” has been followed. The statement makes no mention of the purpose of the John Morton Almshouses as truly affordable homes in the community or how reduced amenity and safety for the elderly residents – a possible breach by SCDC and/or the County Council - of the **Equality Act 2010** - threatens the economic and social viability of the seven almshouses – truly affordable homes for those most in need, which are already suffering damage from the effects of traffic and poor road drainage.
- The modified Oakington Road / Rampton Road roundabout is within the setting of the Grade II listed John Morton Almshouses and would bring much more traffic closer to them with vibration likely to compromise these foundation-less buildings, while 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 the noise, pollution and safety threats posed, especially by larger articulated vehicles manoeuvring around, and often across, such a 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 primary 8 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. **NPPF 128-130 and 132-133 refer.**
- Under sections 16 and 66 of the **Town & Country Planning Act 1990** (cited in SCDC’s “Listed Buildings: Works to or affecting the setting of” paragraph 2.21) concern is expressed about the effect on the economic viability of an affected asset.
- Separate representations on this and related applications from the Almshouses Association, Trustees of the John Morton Almshouses and concerned residents of those almshouses all reinforce this concern.
- Independent research commissioned by Cottenham Parish Council provisionally indicates that the revised roundabout design, irrespective of other potential harms, will cause John Morton Almshouse residents, some of whom are already concerned about noise levels, to be subjected to noise levels that exceed those that The World Health Organisation considers detrimental to health. **NPPF 130** refers.
- 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 of the Listed Buildings.

the village the development fails to be sustainable, especially for the residential places with care (**DP/1b** – minimise the need to travel and reduce car dependency) and **NPPF 34, 35, 37 and 38**.

Pre-school places: the development fails to meet **NPPF 72**. Cottenham has a known excess of demand over places which will get worse with the change of rules later in 2017 and the proposal will increase that demand. S.106 financial contributions are not a sufficient solution, since the only apparently currently-available site on which to build a Nursery of adequate size is in the open countryside and falls foul of **DP/7** and its successor policy in the emerging Local Plan.

Medical/day care facilities: the development will not only increase the general population by approximately 10% but also have a bias towards the elderly which will increase demands on our already overburdened facilities. These facilities are located an unsustainable distance from the development site. The development fails to meet **DP/1m**.

Employment: the development fails to meet **NPPF 17 and 19**. Without local provision, beyond the construction phase, it will increase local commuter traffic.

Leisure: our current demand for leisure facilities outstrips supply. A 10% increase in population will only increase this problem. While the proposed development is located close to many of the outdoor facilities in the village it's an unsustainable distance away from the core of the village. There is no meaningfully sustainable way for residents from established areas of the village to use the facilities on-site due to its remoteness. **NPPF 58**.

Conservation/village core: **NPPF 131, 132, 134 and 138**. The distance of the development from the village core will increase traffic and parking; therefore damaging the character of the village core and the views approaching the village from Oakington or Rampton. The development is incongruous to the built development of Cottenham – a developed core with only linear development on arterial roads. Contrary to **NPPF 17** and the **Cottenham Village Design Statement**.

Permission should be refused.

Yours sincerely

A large black rectangular redaction box covering the signature area.

Frank Morris

Chair

