

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

19th 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 S1606/OL - Development off Oakington 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, especially beyond easy walking distance of the village core. The adverse impacts, particularly the severe consequences of traffic increase and incapacity of the local road network **NPPF32**, flood risk **NPPF 100-103**, impact on landscape **NPPF 81**, especially when efforts are made to comply with **NE/3** and loss of agricultural land **NPPF 112**, significantly outweigh the benefits of up to 126 homes (40% "affordable") and represent grounds for refusal according to **NPPF 14**. In particular, rather than 'improving' the quality of the built environment as per **NPPF 9**, it will have a significant negative effect on both the Cottenham community and the community within this detached estate **NPPF61**.

- a) We have grave misgivings about the access onto Oakington Road. This is a busy road feeding traffic to the rest of the village and beyond via very busy roundabouts. Those roundabouts, especially the one at the junction of Oakington Road and Rampton Road, are acknowledged to operate at, or beyond, capacity already. If this or other nearby development proposals proceed, there will be serious pollution, safety and traffic management issues in this area of the village and beyond. The traffic generation has, based on independent local measurements, been under-estimated due to a combination of factors - vehicle ownership and use and the distance of the proposed estate from the village core. The proposed travel plan offers nothing to mitigate this increase; relying more on improvements to the A14 and A10 and modal shifts to impractical car-sharing or inadequate bus services. Given Cottenham's role in the local traffic network with west Cambridge-bound traffic converging from Ely and East Cambridgeshire in the north, Willingham and Rampton in the west, and Landbeach and Waterbeach in the east, these effects will spread as queue lengths increase in and beyond neighbouring villages. The increased intensity of traffic and lack of adequate segregation 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 policies DPD and must be regarded as severe in the context of **NPPF32**.

- b) Viewed from Oakington 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. The suggested planting of additional poplars to screen the development acknowledges this damage. This conflicts with the requirements of **NPPF 59** and **61**, policies **DP/3** development criteria, **NE/3** related to solar energy, 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, despite its extensive approach to on-site Sustainable Urban Drainage, will expose Cottenham and neighbouring villages to a serious flood threat. Cottenham relies on the Cottenham Lode to carry surface water away from the village, neighbouring farmland and, indeed, from neighbouring villages to the south-east – including Northstowe under heavy rain conditions. However, due to the low-lying land, that excess surface water has to be pumped by the Old West Internal Drainage Board from the drainage ditches into the embanked Cottenham Lode, whose embankments are already below the 1 in 100 year flood risk. The application acknowledges that development will reduce the site permeability and includes dispersion measures and a retention pond whose capacity is questioned. In the hopefully rare event that the site and pond cannot retain the surface flood water, that pond overflows into a low-capacity ditch alongside Oakington Road. The surface water attenuation being proposed for this development, while extensive, 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 whenever the retention pond's capacity is exceeded and excess flows into the roadside ditch along Oakington Road. A flood event in this scenario would have devastating consequences for Cottenham environmentally, economically and socially. The Old West Internal Drainage Board has a clearly stated acceptable run-off rate of 1.1 litres/second per hectare and their approval must be 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 under NPPF balancing of benefit and disbenefit, that 40% of the homes will be "affordable". The DCLG specification (Land Registry and the Annual Survey of Hours & Earnings, ONS) of affordability requires purchase to be possible with a **mortgage 3.5x gross income** (compared to the Cambridgeshire average of 7.7x). With local construction worker wages around £28,000 gross, a mortgage of £100,000 plus a 10% deposit implies that these houses will be sold at £110,000 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 developer 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. Oakington 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, especially one that is beyond easy walking distance of the village core. The adverse impacts of this development, particularly the severe consequences of traffic increase and incapacity of the local road network **NPPF32**, flood risk **NPPF 100-103**, impact on landscape **NPPF 81** and loss of agricultural land **NPPF 112**, significantly outweigh the benefits of up to 126 homes (40% “affordable”) and represent grounds for refusal according to **NPPF 14**. In particular, rather than ‘improving’ the quality of the built environment as per **NPPF 9**, it will have a significant negative effect on both the Cottenham community and the community within this detached estate **NPPF61**. It should be noted that many of the arguments contributing to the “sustainability” of Cottenham are based on inaccurate or dated information as will be seen from the appendices commenting on the Planning Statement, the Design & Access statement and the Traffic statement.

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 and its integrity is occasionally threatened by the activities of badgers and loose horses. 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 300mm 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 5 litres / second, 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 Oakington Road ditch, on its way to the Cottenham Lode.

Extensive design measures have been applied to maintain on-site permeability. 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 and other elements of a sustainable drainage system, is a challenge as demonstrated by the poor maintenance state of the balancing pond and outfall at the nearby Tenison Manor estate, itself a Persimmon development.

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, and measures taken to limited permitted development rights and inform potential residents of their role in maintaining the flood integrity of the site 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 significantly on an already busy road, some of whose junctions are already overloaded, but offers no solutions. This traffic will then flow onto nine identified junctions with known congestion and/or overloading problems especially with the possibility of other development proceeding problems:

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, given the distance from the village core, this proposal does nothing to alleviate. The on-site space may be well-provisioned for residents of the site but the site itself is not within an easy 800 metre walking distance from the village's residential centres to be of benefit to most existing residents as required by **NPPF**.

Loss of agricultural land: NPPF 112.

The site is good quality agricultural land. Its threatened loss, without demonstrating sequential analysis of poorer quality land elsewhere – not just in Cottenham – is against **NPPF112**.

2 Oakington 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 primarily 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 Oakington 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. These effects are likely to be exacerbated in order to comply with **NE/3** on use of PV solar cells. In the recent survey, conducted as part of the Neighbourhood Plan 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**.

Oakington Road is a busy road with some 700 vehicles (around 1,000 by 2020) passing the site entrances at substantial speeds in the morning rush hour.

The Persimmon Transport and Travel Plans, although suggesting predicted generated traffic levels of over 0.5 trips per household in the morning rush hour, have no specific reduction target. With 126 planned houses, this represents an additional 10% or more level of traffic flows without accounting for the approved Endurance development nearby.

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 100 additional trips, a 15% 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.

The increased intensity of traffic and lack of adequate segregation between pedestrians, cycles and vehicles, especially at the access point, will significantly increase accident risk.

Pedestrian access does rely on significant improvements to speed management on Oakington Road and also the quality of pavements between the site and Lambs Lane, including a safe crossing over Oakington 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 Persimmon plot and so is in different ownership. On these two 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.

Noise/pollution: Contrary to **NPPF 58, 110 and 123**. Although Persimmon 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 Oakington Road or indeed the rest of the village nor minimise the use of “muckaway” transfers during construction. 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, especially one that is beyond easy walking distance of the village core. The adverse impacts of this development, particularly the severe consequences of traffic increase and incapacity of the local road network **NPPF32**, flood risk **NPPF 100-103**, impact on landscape **NPPF 81** and loss of agricultural land **NPPF 112**, significantly outweigh the benefits of up to 126 homes (40% “affordable”) and represent grounds for refusal according to **NPPF 14**. In particular, rather than ‘improving’ the quality of the built environment as per **NPPF 9**, it will have a significant negative effect on both the Cottenham community and the community within this detached estate **NPPF61**.

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 easy 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 rights to free day-care places from September 2017 and the proposed development will increase that demand without doing anything about the supply. 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.
3. **Medical/day care facilities:** the development will increase the general population by approx. 5% which will increase demands on already overburdened facilities. Increased pressure on Medical facilities was identified as a significant problem by 75% of residents in the recent Neighbourhood Plan survey. 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 in excess of £1,200,000. Large developments such as proposed here add nearly 5% to that unmet demand.
4. **Leisure:** Leisure facilities were considered inadequate by 68% of residents in the recent Neighbourhood Plan survey. A 5% 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 is beyond an easy walking distance from the core of the village. There is no meaningfully sustainable way for established residents to use the facilities on-site. 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.

5. **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 the largest in Cambridgeshire. Any further increase in capacity risks damage to the cohesive role 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 a 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.
6. **Noise & Pollution:** Apart from issues caused during rush hours, “muckaway” transfers by haulage contractors all too frequently route through Cottenham as a shorter and more reliable alternative to use of the A10; more can be done by planning conditions to enforce retention on site and avoidance of village routes.
7. **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. 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.

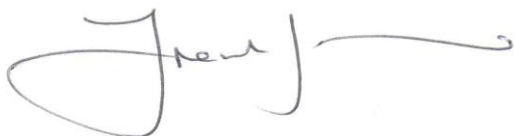
4 The development is unlikely to deliver 40% truly affordable homes for Cottenham

Affordable housing: In principle Cottenham needs more affordable homes if it is to retain a good mix of young families and older residents. The emerging Neighbourhood Plan is promoting use of Community Land Trusts to develop these homes as a sustainable asset for the local community. Developments as proposed here consume available land but usually fail to deliver truly affordable homes and are built at the expense of an excessive number of market homes disconnected from the village environment. Unless the affordable homes 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) 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 easy walking distance by the Chartered Institute for Highways & Infrastructure and truly sustainable whereas these will be over 1200 metres 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**. It should be refused.

Yours sincerely



Frank Morris

Chair

Appendix 1 Critique of Carter Jonas Planning Statement

2.3 The site lies outside the Cottenham Development Framework boundary and is yet another encroachment into the countryside. The entire site is more than a sustainable 800 metres / 10 minute easy walking distance from the village core and therefore likely to be a satellite settlement reliant on cars.

2.4 The surrounding development cannot be “predominantly residential” when this is a village edge development encroaching into the countryside. Contrary to the statement the Grade II listed “Little London” almshouses are nearby and likely to be seriously affected by the increased traffic from the site. Cottenham’s Conservation Area begins just a few hundred metres from the site.

2.5 Cottenham, as a Minor Rural Centre, is fairly well served but almost all Cottenham’s facilities are further from this site than a sustainable easy walking distance of 800 metres leading to increased use of cars and isolation of the settlement from the rest of Cottenham.

3.3 The site, although assessed as having potential under the SHLAA process was not rejected solely for being outside the development framework; a major consideration was the limited capacity of the already large primary School and the potentially damaging effect of its expansion.

NPPF response 1 – we challenge whether the affordable housing can be provided at a truly affordable cost (3.5x salary mortgage) as recommended by DCLG (Land Registry and the Annual Survey of Hours & Earnings, ONS) and be retained for the benefit of housing local people in perpetuity. We also challenge how the provision of on-site open / play space can meet community needs when they will be located so far from the core community as to require a cycle or car journey as would any increase in the use of local community facilities and services.

NPPF response 2 – we maintain that the development’s likely detrimental effect on traffic and flood risk are alone significantly and demonstrably detrimental to outweigh any benefits of the development.

NPPF response 3 Cottenham has expanded by some 500 homes over little more than a decade with no significant improvement in village facilities beyond expansion of the Primary School so it is now one of the very largest in Cambridgeshire. Provision of early years education, health, leisure and recreation facilities are now seriously stretched and traffic issues have become very serious. All require improvement before further expansion is approved.

4.13 NPPF32 requires safe and suitable access to the site for all people NPPF. The distance of the estate from the core and the quality of the connecting pavements will discriminate against the elderly and less mobile as well as the young.

4.14 The distance of the site from the village core clearly does not “give priority to pedestrian and cycle movements” as required by NPPF35. Nor does the site have access to the necessary high quality public transport services.

NPPF response 4 – we challenge the description of the development as being “within the settlement of Cottenham” when it is both outside the established development framework and further than easy walking distance away from the village core. Many of the “facts” presented in Appendix A to support this assertion are false or misleading. PPG13 has been blatantly ignored and most of Cottenham’s facilities are not within reasonable walking distance for most potential residents; few of whom will be able to commit, for example, to a 40-minute round trip to the Post Office. The site’s distance from the Cottenham community is prejudicial to older children, young people, the elderly and less-mobile, people with low income and faith groups.

NPPF response 5 – while South Cambridgeshire may have an inadequate record of building houses in recent years, this is mostly caused by the insatiable demand for housing of increasing numbers employed in the Cambridge economy. Applied more locally, houses are being built in Cottenham far more quickly than jobs are being created in the local economy. This is not sustainable.

4.18 Healthy communities are unlikely to extend across the distance between the satellite community proposed and Cottenham’s established community. Recent developments have all been much closer to the core than this proposal.

NPPF response 7 – we challenge how this development can “bring together those who work, live and play in the vicinity” especially for those who work in Cottenham due to the physical separation mitigating against walking. The site’s distance from the Cottenham community is prejudicial to older children, young people, the elderly and less-mobile, people with low income and faith groups.

4.19 We are not convinced that the development does not increase flood risk; Cottenham is vulnerable to flood hazards and the SuDS does not meet NPPF99 by bringing surface run-off rates down sufficiently. In this case, to a level consistent with development in a low-lying area whose surface water has to be pumped into the embanked Cottenham Lode.

4.20 While the development area itself does not appear unduly prone to flood, the measures taken in the development appear to increase flood risk elsewhere contrary to NPPF 100.

NPPF response 8 - the flood protection design is elaborate but has two weak links – the last resort overflow into the ditch alongside Oakington Road which in turn appears to depend on the pumps of the Old West Internal Drainage Board and long-term maintenance of the integrity of such sophisticated schemes.

NPPF response 10 – the site is not “significantly divorced” from the Conservation Area and has Grade II listed building within just few hundred metres. The views from the Grade II listed Tower are prized by many residents when this is open to the public during local events so it is untrue to say there is no inter-visibility between the two.

CS response 1 We challenge the assertion that the development is “squarely in line with the definition of sustainable development” especially a most of Cottenham’s facilities that the estate would depend upon are located more than 800 metres easy walking distance from the site.

DP/1 “minimising the need to travel” – not met when the inter-community distance is so high.

DP/3 “appropriate access to the highway network”, “unacceptable adverse effect from traffic generated”, “undue environmental disturbance from pollution arising from traffic congestion” – none of these appear to be met

DP/7 The site is “outside the village framework”

GB/3 The site is “within the vicinity of the green belt” and would irrevocably alter the appearance of the village on the approach from Oakington.

NE/3 Further to GB/3 attempts to meet NE/3 re likely to have an unacceptable effect on the Green Belt.

NE/11 We believe this development as proposed will cause an unacceptable increase in flood risk to the surrounding area of lower land.

TR/1 The development will inevitably give rise to a material increase in travel demands due to its distance from the village core and limited quality of public transport connections.

TR/3 No effective mitigation of the increased traffic has been proposed

5.4 The Landscape & Visual assessment takes no account of the effect that extensive fitting of photo-voltaic solar panels will have on the appearance of the site on the Oakington Road approach.

5.7 The level of facilities available to residents falls short of a “good level of facilities” and “sustainable transport options” due to the intervening distances and weak public transport infrastructure.

5.8 This paragraph may be suitable for Cambridge, but does not describe Cottenham realistically.

5.9 The traffic generated will lead to a considerable number of bottlenecks and traffic queues before dispersal into the local network after considerable disruption to Cottenham residents.

5.10 We believe the traffic impact will extend considerably beyond the immediate and recognised problem of the Oakington road / Rampton Road junction, especially if other neighbouring developments are allowed.

5.11 No safe improvement scheme appears to have been proposed for the Oakington Road / Rampton road junction.

5.23 The proposed SuDS increases flood risk and will be difficult to maintain.

5.24 The run-off rates are not those applicable to low-lying land whose drainage is ultimately dependent on pumps that are designed to handle rates of 1.1litres / second per hectare - much lower than those proposed here.

5.36 NPPF55 requires housing to be located “where it will enhance or maintain the vitality of rural communities” – this development may disperse benefits around the area but any benefits accruing to Cottenham are likely to be at the expense of increase traffic.

5.41 We trust this assertion to be based on a truly affordable cost of around £100,000 (3.5xsalary mortgage) as recommended by DCLG (Land Registry and the Annual Survey of Hours & Earnings, ONS) and be retained for the benefit of housing local people in perpetuity.

5.42 We trust this assertion to be based on a truly affordable cost of around £100,000 (3.5xsalary mortgage) as recommended by DCLG (Land Registry and the Annual Survey of Hours & Earnings, ONS) and be retained for the benefit of housing local people in perpetuity.

5.43 The development is likely to see the emergence of two communities due to the intervening distance and nature of Oakington Road.

5.44 The good range of community services are all located more than 800 metres easy walking distance for the proposed settlement.

5.45 Opportunities for regular social interaction will be diminished by the intervening distance

5.46 We are surprised that the Health Impact Assessment takes no account of the pollution caused by the increased traffic; NOX pollution is increasingly recognised as a serious health issue arising from queuing vehicles.

5.47 The development will not be socially sustainable - this is a false conclusion based on the lack of evidence produced.

5.48 There are two serious environmental concerns from this development – the increased flood risk from a poorly-designed drainage system prone to poor future maintenance and the dangerous pollution caused by queuing cars in the Conservation Area where narrow pavements do little to separate houses from the pollution.

6.1 We trust this assertion to be based on a truly affordable cost of around £100,000 (3.5xsalary mortgage) as recommended by DCLG (Land Registry and the Annual Survey of Hours & Earnings, ONS) and be retained for the benefit of housing local people in perpetuity.

6.5 effective flood mitigation measures are needed “up-front” of this development and will slow down the rate of development. We note the developer has still not made adequate arrangements for the effective maintenance of a previous development in Cottenham more than ten years since its completion.

8.3 Just because SCDC has an under-met need for housing should not automatically make Cottenham a target for unsustainable development.

8.4 In Cottenham, the adverse impacts of this proposed development on traffic, landscape, flood risk etc demonstrably outweigh the claimed, but often fanciful, benefits.

8.5 The proposal does not meet the requirements of sustainable development

8.6 The technical appraisals, especially those related to flood risk and traffic generation are flawed and undermine any case for consideration as sustainable.

8.7 Adverse impacts, such as flood risk and traffic generated, are numerous and claimed benefits questionable, mostly because of the distance between the site and the established community. Such distances lead to social issues that are difficult to manage.

8.8 As expressed, this statement is untrue.

Appendix A errors

- The 106 bus service ceased to run two or more years ago.
- Journey durations are longer than those quoted due to a recent change on the timetable
- Cottenham's Post Office has moved and is now further away up the High Street
- Cottenham does not have a true Sixth Form; scholars travel to Impington or Cambridge.
- Peter Giddens, a solicitor, retired several years ago
- The Village Hall no longer houses Changing Rooms; these have moved.

Appendix Health errors

2.3 The site is outside the village development framework

2.4 The surrounding development is not predominantly residential as the site is outside the village development framework and is not surrounded.

The Assessment makes no mention of the effect of generated traffic and consequent noise and air pollution.

The construction phase is likely to lead to a considerable number of Muckaway operations whose movements through Cottenham should be restricted in the event of planning approval.

3.7 There is a flood risk to those in the neighbouring community

3.14 The various employment opportunities quoted all require use of a car, contrary to PPG13.

3.16 Distances generally preclude cycling and bus services, where they exist, add a significant duration to any journey.

3.17 Any benefit to local business is likely to be at the expense of additional pressure on parking locally.

3.19 It is not true to claim that the village's services are within "easy walking distance" of the site and that new residents will have a high propensity to walk"

3.20 There is no bus service to Waterbeach, the main access point – by car- for rail travel.

3.21 it will be interesting to review the sustainable transport options for rail travel via Waterbeach which has no bus service and its carpark fills shortly after 8am each morning.

3.23 "Easy" walking distance should only apply to distances of less than 800 metres not almost twice that distance.

3.34 We are concerned about extensive use of PV arrays on a site beyond the village framework and whose rooftop panels are likely to be visible for some considerable distance changing the visual appearance significantly.

Appendix 2 Comments on the Design & Access statement

2.1 Location& Land use While the site edge may be around 0.5 miles or just 800 metres from the village centre, the site extends away from the village so all residents will live more significantly further than 800 metres from the village centre. It should be noted that the Chartered Institute for Highways & Infrastructure regard within 800 metres as easy walking distance and therefore sustainable. Development of the site will have a detrimental effect on the approach from the southwest, especially if solar panels are fitted on this side to maximise their efficiency. Extending the line of poplar trees, while reducing the visual impact, compromises the energy efficiency measures.

2.2 Surroundings The diagram showing the location of the proposed site demonstrates that , far from complementing the form, scale and appearance of existing dwellings along the western edge of Cottenham, the site is a huge backfill behind the existing ribbon development of Cottenham's arterial roads. Cottenham is not a "town" and we are not aware of any shops at the top of Oakington Road or Rampton Road and the Longhorn Farm shop appears to be placed erroneously close to the development. No shops are within 800 metres of the site. Indeed only a few bus stops, the schools and recreation ground can be regarded as within sustainable walking distance of the site. We have no medical centre and the Post Office has recently moved further north along the High Street.

2.5 Planning history The Gladman application was not only rejected on the grounds of traffic and safety but also the detrimental visual impact on the approach from Rampton.

2.6 NPPF As this is only an application for outline planning permission NPPF 56 and 58 will apply to reserved matters only. We believe the South Cambridgeshire's Design Guide and Cottenham's Village Design Statement are better guides to the local context.

2.7 PPG We note that a development detached from the built settlement can hardly be described as sustainable.

2.9 DP/2 We welcome recognition of the validity of the South Cambridgeshire's Design Guide and note that Cottenham's Village Design Statement SPD adds better guidance for the local context.

2.10 District Design Guide We fail to see how the proposed development maintains the distinctive settlement pattern of the area or the linear form of the settlement.

2.11 Cambridgeshire Design Guide We understand that South Cambridgeshire District Council is the Local Planning Authority here.

2.12 Cottenham Village Design Statement SPD Although this is only an application for outline permission, we welcome recognition of the validity of Cottenham's Village Design Statement SPD as a better guidance for the local context.

2.13.3 Accessibility We understand that the proposed alternate access via Rampton Road may not be available for use. The Transport Assessment admits there are overloaded roundabouts; the existing road infrastructure is already acknowledged to be overloaded especially in the vicinity of the Oakington Road / Rampton Road junction. Since much of the problem traffic originates west of Ely and terminates west of Cambridge and tends to avoid the A10, the A14 improvements are not expected to offer much relief to Cottenham's serious traffic flows.

2.13.4 Flood risk & drainage The SuDS design is sophisticated and flawed. The sophistication is likely to lead to deterioration over time and the run-off rate does not appear to be controlled down to the 1.1 litre per second per hectare greenfield run-off rate that the Old West Internal Drainage Board can handle (and they drain the "overflow" ditch from the SuDs into the embanked Cottenham Lode).

2.13.6 Landscape the development will have a material effect on the Fen Edge landscape Character of the area, especially rows of solar-panelled roofs where there were previously green field or poplar trees.

3.1 Principles – connectivity and permeability Distance and the risks involved in crossing the busy Rampton road deter pedestrian traffic, especially children to the Primary school

3.4 Consultation We have no recollection of regular meetings with Cottenham Parish Council. There was a single “fact-finding” meeting between representatives of the two parties. Thus the developer has not complied with NPPF66 as claimed. As to responding to the concerns raised, little has been offered in respect of six of the nine principles we discussed:

- 2 More pre-school places
- 3 Better medical and day care facilities
- 4 More local employment
- 5 Improved leisure and recreation facilities
- 6 Easier movement into, out from, and around the village
- 9 avoiding Overloading our Primary School

3.5 Pre-application advice We note the need to demonstrate compliance with the final three points in particular:

- a) Site needs better connectivity to adjacent dwellings
- b) South-west boundary is too solid / harsh
- c) Need to demonstrate that the SuDS feature works

3.6 Final master plan We retain concerns about:

- a) Site needs better connectivity– the Rampton Road access does not appear to have been secured
- b) South-west boundary is too solid / harsh – an undesirable encroachment into the countryside, especially with solar panels.
- c) Need to demonstrate that the SuDS feature works – as described it does not with considerable flood risk to low-lying parts of Cottenham. There are still issues with the SuDs design of the previous Persimmon estate in Cottenham.

4.1 Amount 126 houses is more than Cottenham can add sustainably. Cottenham has expanded considerably in the past 15 years while its facilities, including bus services have deteriorated while traffic has intensified. The location being more than 800 metres from any village core facilities will lead to increased use of cars. The Endurance proposal is substantially smaller in scale but does itself present issues due to its village edge location on a busy road.

4.2 Scale the larger houses represent a particular threat to the visual appearance of the village as seen from the south-west. Some references to the Village Design Guide principles would be useful here.

4.3 Hierarchy of streets We note the intent to have primary and secondary roads adopted for public maintenance but must point out Persimmon’ failure to achieve this on the previous development in Cottenham due to problems with maintenance of the SuDs.

4.4 Layout We trust that the Village Design Statement will also be consulted at this stage.

4.5 Landscape strategy We trust that the Village Design Statement will also be consulted at this stage.

4.7 Car parking While recognising consistency with the SCDC Design Guide setting a standard of 1.5 to 2 spaces per house will ensure that on-street car parking will dominate the street scene as can be seen by a visit to any of the estates in Cottenham.

4.8 Boundary treatments A 1.8 metre high brick wall may provide screening but cannot be described as an attractive residential environment.

5 Sustainability This estate detracts from the “urban form” of the area. The public transport is barely adequate and not accessible so cannot be considered to decrease car dependency. The development cannot readily be considered as respecting the surrounding natural environment.

6 Building for life Local services are mostly beyond easy walking distance and the public transport service is limited.

Appendix 3 Comments on the Traffic Plan

3.2

B1049 Histon Road / High Street / Twenty Pence Road It should be noted that, although there are pavements on both sides of this road, many stretches in the Conservation Area are quite narrow and uneven despite the houses themselves opening directly onto the pavements. This combination amplifies the effects of congestion, noise and pollution and reduces perceived safety for local residents.

Denmark Road / Beach Road Subsequent to the development known as Racecourse View, the 30mph area has been extended and supplemented with a 40mph buffer zone in an attempt to control speeds along this arterial road.

A14 Improvement Works The assertion that much of the traffic through Cottenham is rat-running between the A14 and A10 at peak congestion times is unfounded. We believe the “desire line” for traffic between the expanding west of Ely and west of Cambridge has moved west on to the B1049 and, to an extent, the B1050 following recent developments in those areas. Disruption of the A10 or A14 add significantly to the flows.

3.3 Pedestrian network Cottenham’s pedestrian network is aged and, in places, inadequate with narrow, uneven pavements compromising pedestrian safety, especially for the elderly and less-mobile. The problem is extensive and a small-scale pilot pavement improvement project, funded by the Parish Council, is under way with County Highways.

3.4 Cycle network Chicanes within Cottenham’s traffic-calming measures introduced in 1997 are a hazard to cyclists who often have no choice but to stop and dismount rather than be squeezed into the path of a vehicle.

3.5 Public transport We question whether the bus stops are “easily accessed” when the path cited appears to be a private road. Cambridge is an attractive commuter destination but bus utilisation will have fallen since Stagecoach terminated their services in the centre of Cambridge leaving many commuters little choice than to mode-switch to the car. Buses have become less attractive and the Guided Busway is not readily accessed other than by cycle.

3.6 Multi-modal transport The nearest rail station is at Waterbeach but only accessible by car and then only before 8am due to the limited capacity of its car park. Multi-modal travel decreases in reliability the more mode changes are introduced, so several of the suggested options while theoretically available are not practicable.

3.7 Existing traffic conditions We note that the traffic measurements for the remote junctions were made in late November which is not regarded as a “neutral month” by the Department for Transport due to weather effects.

4.1.1 Oakington Road We question the safety of designing an access for 50mph, a speed exceeded by 15% of the passing vehicles on the basis of speed measurements taken on a single day. In addition, we argue that DMRB rules should be applied strictly as the development is not within a built-up area but on the edge of it. Our experience on our arterial roads indicates that solely moving a 30mph sign does little to manage speeds.

4.1.2 Rampton Road We question the developer’s right of access over this track which appears to be a private access road, making access-limiting features difficult to employ.

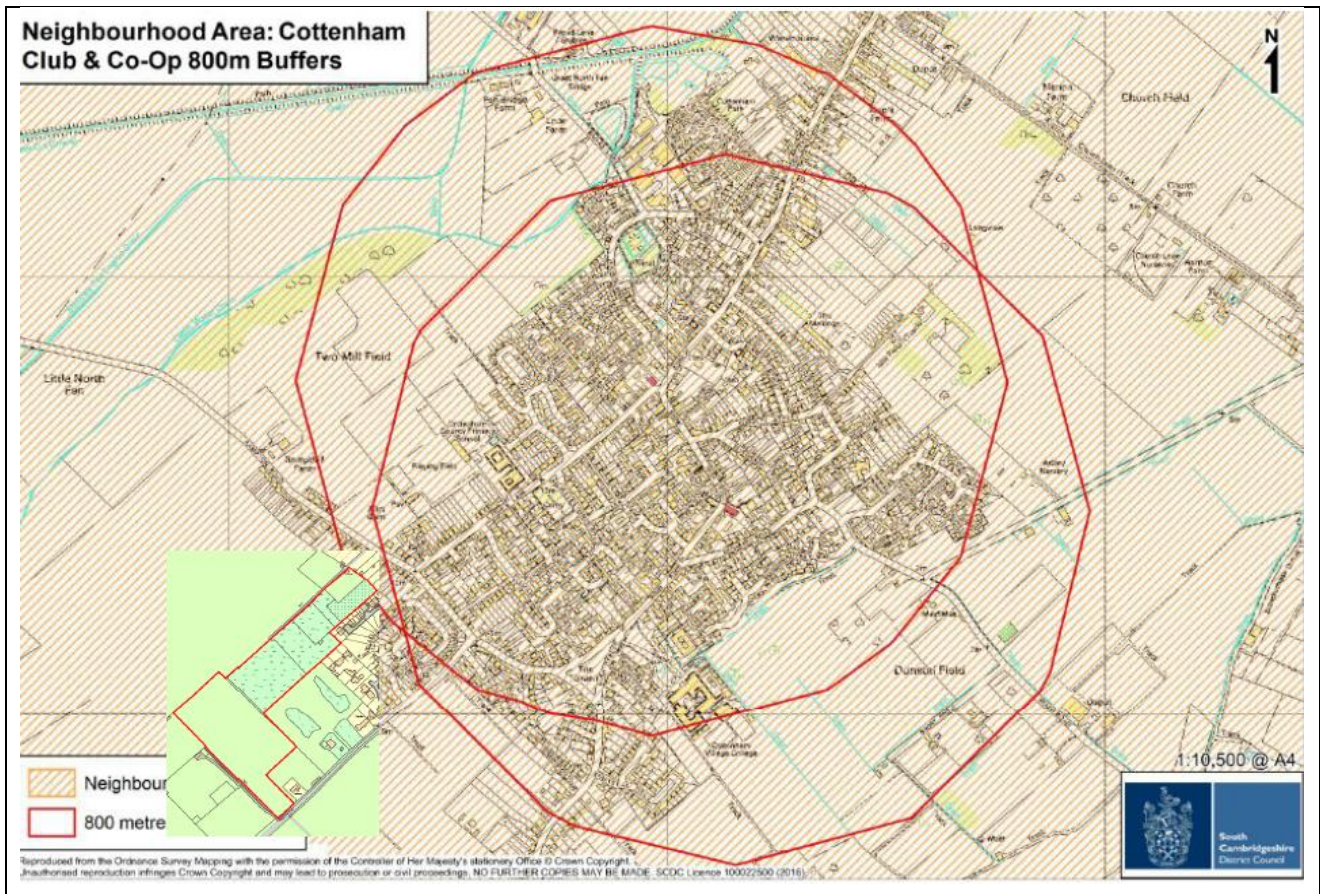
4.1.3 Off-site improvements Contrary to the Design & Access statement and Planning Statement the local traffic network is overloaded and the overload will be aggravated by any development in this area. This section claims to offer an improved design for one of the roundabouts but it is not included in the report.

5 Local accessibility a maximum walk distance of 2Km / 25 minutes is not within easy walking distance most people, especially the elderly or less-mobile. Very little of the village is within a truly easy to reach distance – except for the elderly and less-mobile – of 800 metres / 10 minutes. This distance will have discriminatory effects on which residents can inter-mix freely and sustainably. Cycling ranges are longer but this is Cottenham not Cambridge and the use of a cycle is much lower.

5.1 Services and amenities almost all the listed facilities are beyond a sustainable 800 meters from the site.

5.2 Pedestrianised access Residents will walk or even cycle within the village as parking spaces are very limited. However the distance and time involved implies that further modal shift is unlikely without significant incentives.

5.2.1 Village centre The 700 metre distance quoted is misleading; it appears to use the exit of the private pathway onto Rampton Road as the datum. Our own 800meter radii developed as part of our emerging Neighbourhood Development Plan clearly show the greater extent of the site as beyond 800metres from the village core.



5.2.2 Primary School Again measurements are taken from the Rampton Road exit to the site – assuming this exit will actually be available.

6.1 Trip rate prediction The rates predicted are lower than should be expected here for several reasons:

- The TRICS database is only as good as its data and the data used here is from suburban areas of cities
- A village-edge development in Cottenham is likely to have larger trip rate generation due to the greater car dependency when so few facilities are within easy walking distance and the bus services only connect to central Cambridge
- Since the 2011 census there has been a significant deterioration in the range and frequency of bus services serving Cottenham

7.2 Trip distribution This prediction is an inaccuracy built on an inaccuracy as seen by differences between this model and those used on other proposed developments nearby.

8 Junction capacity assessments The predictions here bear little correlation to the real experience of Cottenham people every weekday. The underlying data is faulty or unrepresentative so a simulation can be made to give whatever answer you want.

9 Summary Because the site is further than a sustainable walking distance from Cottenham's facilities, more traffic will be generated than predicted by inappropriate models. Much of that traffic has to flow via roundabouts that are at or nearly at capacity so cannot readily disperse into the local transport network increasing congestion and pollution for homes in the Conservation Area. Changing patterns in the underlying through traffic render improvements to the A14 and A10 less effective in diverting traffic from Cottenham, leading to a severe impact on the local economy, environment and society.