

S/2487/18/RM. LAND TO THE NORTH AND SOUTH OF BARTLOW ROAD, LINTON, CB21 4LY.

Thank you for your consultation on the above application. Our response is as follows:

Holding Objection

We respond with a holding objection for the following reasons:

The application is premature:

- The submission does not provide sufficient clarity to fully assess the impact of the development. Our comments are therefore pending receipt of this information.
- A number of significant reports were omitted from the submission. Some have been added more recently but we appear not to have had the necessary formal consultation. The information submitted does not appear to have included critical reports which are on the basic checklist, such as an Affordable Housing Statement, a Transport Assessment and an Air Quality Assessment. Our previous responses have provided a list of missing reports that are required in order to show the impact of the scheme.
- Most of the reports that have been submitted are from the 2015 application. They have not been updated to take into account changes to the context and to the scheme.
- The submission fails to relate the site and the development to its surrounding context and to the existing village and landscape. There is insufficient information regarding the impact of the proposed development, including;
 - sections through the site (before and after),
 - changes to the frontages along Bartlow Road (before and after),
 - excavation to deal with levels and swales, banks, steps, ramps and other structures to deal with the substantial changes in level,
 - ancillary structures and buildings such as the pumping station, the swales, boundaries, safety fencing, garages, cycle sheds, provision for maintenance, the LEAP, road surfaces and pavements,
 - Accesses and transport provision including the new bus stop, driveways, footpaths, highways changes and upgrading of the junction with the A1307,
 - Lighting in this rural location,
 - mitigation of noise issues, and
 - management and maintenance of ecological, landscape, drainage and amenity elements of the scheme.
- There was no pre-application community consultation process, so the application does not comply with the criteria of the Localism Act and is uninformed about the local context, constraints and local needs.

The application is materially different to the Outline approval S/1963/15/OL to which it is linked:

- It extends beyond the development boundary of that approval (it was reduced during the progress of the Outline Application),
- The extended area proposes development that is located in an area where land disturbance is prohibited, and

- It proposes development in an area at risk of flooding, and therefore footnote 6 of NPPF 2018 is triggered.

As a result, it is a materially different scheme. It is less sustainable and does not comply with the policy presumption to grant approval under NPPF 2018 paragraph 11.

As it does not comply, it is inappropriate development in principle because it is outside the village framework.

The proposals do not deal with the outstanding issues raised by Linton Parish Council which are relevant to the Reserved Matters.

These concerns are listed in the accompanying letters from LPC and should be read in conjunction with our comments on S/1963/15/OL.

They include the following issues of principle which apply specifically to the RM application-

- Lack of consultation,
- Lack of sustainability,
- Highways issues including the Bus Hub location and additional vehicular accesses,
- Flood risk,
- Proximity to A1307,
- Noise and noise mitigation,
- Development above a national high pressure gas main,
- Lack of clarity about sections through this sloping site,
- Loss of amenity for those using the public park, and
- Character and landscape impact, including key landscape views on the approach to the village and from the river valley.

Subject to the principle of development, LPC notes that the position, extent, layout, design and details of this specific development are not appropriate –

- The landscape harm is increased by additional spread of the development into the countryside,
- The scheme does not respect the prominent gateway position,
- It would create and add to the previous significant flood risks,
- It exacerbates issues of noise by being closer to the A1307.
- The scheme is a generic one, not relating to Linton, and reuses house designs from elsewhere, and
- The proposals comprise over-development, taking into account the numerous constraints of this site.

LANDSCAPE AND CHARACTER

Context

The site comprises 2 fields at the junction of the A1307 and Bartlow Road. They abut the existing settlement of Linton but are outside the village envelope. The Northern field slopes up from Bartlow Road and the Southern field slopes down to include meadowland in the floodplain alongside the River Granta.

The two fields are highly significant to provide separation of the village from the busy A1307. From the viewpoints along the main approaches to the village from the east and south-east,

the two fields provide the most prominent countryside context to the village at the tightest point. This relationship of village to the countryside is close, historic, economic and current.

The sites are very prominent in the approach to Linton and in the long rural views identified in the Design SPD as key characteristic features of the locality. These long views and sky-lines demonstrate and provide the settlement with its significant rural countryside context.

The historic village of Linton is highly significant. It is the District's only Outstanding Conservation Area and has more listed buildings than any other village in the District. The application fields contribute to provide highly significant context, separation and setting to the village. Evidence from the previous applications demonstrate that the southern field in particular, its Roman Road and Anglo Saxon settlement have been strong contributors to the character of Linton for over a thousand years.

Policies

Linton Parish Council's comments on landscape issues are to be updated when LPC and local people are consulted on the additional landscape documents -

LVIA

- The LVIA dates from 2016 and was submitted as part of the Outline application S/1963/15/OL.
- It predates reserved matters relating to the landscape and does not deal with conditions of the Outline consent.
- It does not resolve the issues relating to the previous report and scheme (e.g. that the viewpoint photographs were taken in a ditch and behind buildings).
- The landscape assessment relates to a different scheme.
- The enhancements and mitigation relate to a different scheme.

The photomontages in this LVIA, on which the planning decision S/1963/15/OL was based, are materially different to this current application. In particular, the Councillors made their decision on Outline application S/1963/15/OL with Figures 19 and the Photomontage of Viewpoint 6 displayed in front of them. Neither of these is representative of the current layout.

Page 14 of the LVIA promises compliance of the then NPPF design policy 17, through "a range of landscape enhancements and mitigation measures, including new native buffer planting, footpath linkages, nature conservation features and well considered housing units". But that does not apply to the submitted scheme and information, which generally omits all of those enhancements and mitigation measures shown in the Outline plan and reports.

The Soft Landscape Management and Maintenance plan and the Soft Landscape Specification are both generic, and do not relate to the conditions and constraints specific to this site.

There is no townscape assessment, which should be necessary as the southern part of the development is attached to the existing village, and this site forms one of the major approaches to the village.

There is no submission to deal with the impact of lighting in this prominent rural location at the entrance to the village. It is particularly important that separation between the A1307 and this site is maintained during both night and day.

The proposals increase the likely harm to the landscape and character of the area -

- The extent of the development has spread significantly towards key views and sensitive locations we identified.
- It spreads more into the countryside at the important village approach and it spreads closer towards the sensitive river valley floor and public open space.
- The development will be very prominent on the skyline, especially in the key views.
- The development is contrary to the settlement form and landscape characteristics as defined in the Design Guide.

Lack of clarity over the development and townscape proposals gives cause for concern, including insufficient information on:

- comparisons between existing and proposed street frontages onto Bartlow Road,
- sections through the site & development,
- effect on neighbours
- impact on skylines,
- excavations to deal with ground levels,
- design and appearance of swales,
- design and appearance of the pumping station,
- boundaries,
- garages,
- the LEAP,
- lighting, and
- landscape mitigation for noise (such as bunds).

As a result, the proposal does not comply with NPPF 2018 paragraphs 170 and 185, Local Plan Policy NE/4 and emerging Plan policy NH/2.

ARCHAEOLOGY

The submission is out of date and it comprises the initial reports from S/1963/15/OL and the Archaeological brief. It shows that significant finds were found, which confirms LPC's previous interpretation of the finds, and also shows that the submitted report does not comply with the brief. It has not addressed LPC's previous comments about partial survey, missing drawings and missing conclusions.

As a result, it still fails CH/2 of the Local Plan.

ECOLOGY

There is no Ecological Design Strategy (a requirement of condition 17 of the Outline consent). There is no report and mitigation despite the site being next to a local public open space, a County Wildlife Site, SSSI and where there are likely protected species as identified in S/1963/15/OL.

The previous report dates from June 2014 so is over 4 years out of date. It did not include species such as the Roman Snails subsequently found by local people and specifically included in Condition 17. It also should be updated as other reinstatement of the natural environment have been carried in the locality since 2014.

The species rich hedgerows appear to be removed, and the layout plan shows these are replaced with intermittent indicative trees without hedging. The numerous vehicular accesses would remove the continuity of the most prominent of these hedges. The maintenance proposals are generic and generally refer to maintenance of new planting and trees. There is no certainty for future control and management of any remaining species rich hedging, so it would be vulnerable to loss.

The natural areas and natural buffers are substantially reduced from S/1963/15/OL. Accessible natural areas are also much reduced. The elevations indicate numerous generic trees that on plan are minimal with no provision for future growth. The proposal has no commitment to the provision and protection of species rich areas, wildflower meadows and other biodiversity measures indicated and conditioned in the previous application, and there is no realistic management structure proposed for the future retention of any ecological features on this site.

There is no public access provision to the woodland and The LEAP is minimal, with a very small area alongside dominated by an approx 3M wide swale and its likely fencing.

FLOODING

This site is “an area at risk of flooding or coastal change” and therefore a site to which footnote 6 of NPPF 2018 policy 11 refers. It is also within a River Management Plan Area.

The scheme does not take into account the conclusion of the Planning Committee considering S/1963/15/OL that flood risk would constrain the development and reduce the developable area, so that 55 houses may not be possible on this site.

There is insufficient information to assess the impact of flooding, and particularly the increase in likely risk of flooding arising from the changes to the scheme –

- There is no Flood report and the submission does not deal with conditions attached to S/1963/15/OL,
- The previous Flood Report is out of date and does not take into account the flood risk measures in this part of the river,
- The surface water reports appear generic and based on statistics from the whole of England and Wales, rather than this application site,
- There is no evidence of percolation tests having been carried out to assess the actual porosity of the soil, and
- The assessment fails to take into account that the EA maps are not representative of the actual flood risk and of the highest flood levels reached in this locality, as evidenced by local photographs and mapping provided in S/1963/15/OL.
- There is no clarity about bunding for homes and the swales. These are likely to have a significant impact on the appearance of the development.

The proposed development is likely to exacerbate the flood risk –

- There is a significant increase in built development over the site and a significant reduction in the planting of trees,
- There are additional obstructions proposed within the lowest part of the site, including a Pumping House, which if it floods, is likely to contaminate the river and the SSSI,

- The location of the swales in the lowest part of the site results in the swales being ineffective when most needed and is likely to cause river surge and greater damage to properties and people downstream,
- There is no certain provision for the management and maintenance of the pumping house, swales and other drainage on the site,

NPPF 2018 paragraph 163 requires that decisions should ensure that flood risk is not increased elsewhere. Paragraph 170e requires planning decisions to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels water pollution. It also requires development to improve the local environmental conditions wherever possible and to take into account river basin management plans. Local Plan DPD policy DP/1 requires that in order that development be sustainable, it should also minimise flood risk. The proposed development fails to do this. It also fails Policies 4.3, 4.6, 4.8 and 5.1 of the Cambridgeshire Flood and Water SPD.

HIGHWAYS

There is no Highways report. The one relied on for the Outline consent dates from 2011, so is considerably out of date. The traffic levels have increased substantially in the last 8 years, and especially since the 2016 Planning Committee decision as roads such as Bartlow Road are used as rat runs to avoid the A1307.

There is no clarity over proposals for the promised works to the A1307 junction, to mitigate towards the impact of additional traffic. Certainty is needed about the extent of junction improvements as mitigation towards the increased car journeys, traffic and other highways impacts of this development.

There is no assessment of the impact of the 14 additional entrances, and there is inadequate description of these, and of their visibility splays. These were specifically excluded from consideration in the Outline scheme, but are relevant now.

Most of these are outside the 30mph area. Some of these are very close to the major road junction and are likely to add to the hazard of accessing the A1307 at this point.

There is no assessment of the cumulative impact of this being the location of the proposed City Deal Bus Hub. This is a new but substantial future risk that should have been properly assessed and dealt with as part of this application.

There is no clarity about cycle storage and other relevant transport implications.

There is insufficient clarity about the appearance of the changes, the effect of land slopes, steps and ramps on the numerous driveways and on visibility within the development. Scale sections through the site are critical to understanding how the substantial change in level is dealt with and whether (as is likely) and of the roads and paths are exceeding 1:12. The scheme also needs to take into account the needs of people with reduced mobility, and also the effect of icy weather on the sloping driveways and sloping footpaths proposed as part of this development.

We note additional concerns by the Highway respondent regarding internal layouts, and agree.

The scheme therefore does not comply with the requirements of NPPF 2018 policy 110 b, c and d.

Most of the houses on the site would be over 1km from the nearest village shop and schools, and other village amenities, so these would be unlikely to be accessed on foot. The removal of linkage paths from the scheme ensure that there is no direct connection between the site and local facilities, that the development is isolated by being self-contained and inward looking and that the distances exceed the IHT guidance for maximum walking distances. As a result, the proposal is less sustainable than the Outline scheme.

NOISE

The Noise survey was carried out in 2015 and is out of date. This is essentially the same report as produced over three years ago for the Outline application. We also note that traffic on the A1307 is the main cause identified for the noise, and that traffic has increased substantially since the report was written in 2015.

Insufficient information is given about the receptor positions, and the individual findings at each position, and our previous comments and concerns remain.

Page 5 paragraph confirms the report findings that “Areas of the development at the eastern and southern edges of the site that are closest to the A1307 will be subject to the highest noise levels. The noise survey results show that noise levels at these positions are as follows:

- Average noise levels during the daytime - 57 dB LAeq,0700-2300hrs;
- Average noise levels during the night-time - 54 dB LAeq,2300-0700hrs;
- Typical maximum noise levels during the night-time - 68 dB LAm_{ax}.”

As the baseline of BS8233 is 50 dB, the noise levels on this site are considerably in excess of these. We understand that every increase of 3dB represents a doubling of sound intensity. So it is likely that the levels surveyed are more than 4 times the BS acceptable level.

The World Health Organization's Night Noise Guidelines for Europe presents evidence of the health damage of night-time noise exposure and recommends threshold values above which adverse effects on human health are observed. An annual average night exposure not exceeding 40 decibel (dB) has been recommended in the Guidelines. The EU has accepted this as the maximum safe level. The levels surveyed are substantially in excess of this. The night time levels on this site are at the levels that the WHO concluded can trigger elevated blood pressure and lead to ischaemic heart disease.

The report with this application proposes that these levels be accepted because greater levels are accepted under BS8233 “in city centres or urban areas adjoining main roads or other transport sources”. However, this is a rural location, where the new residents would have a reasonable expectation of being able to live in rural conditions, to be able to open their windows, and to use their gardens, and of not being made ill by the location of their new homes.

There is no clarity in the report about the proposed mitigation, which for external spaces is likely to have a visual impact, which should be confirmed before any decision is made about the acceptability of this application.

NPPF 2018 paragraph 170e requires planning decisions to prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely

affected by, unacceptable levels of soil, air, water or noise pollution. It also requires development to improve the local environmental conditions wherever possible.

The proposed development would therefore not comply with these policy requirements.

DESIGN

The Design and Access Statement was submitted late, so these are initial comments.

The Statement does not comply with the Planning Portal's basic requirements for a Design and Access statement to contain a description relating to the buildings, site layout and access. It does not explain how the proposed development is a suitable response to the site and its setting.

The development is poor quality design and is not designed for the site -

- The houses are a generic design.
- The plan is based on a flat site.
- The development is isolated from the village and has no integration with the rest of the village.
- The Outline scheme showed paths which could have potentially been connections, but these have been removed and the publicly accessible spaces they were in have been reduced to increase the amount of developed area.

The site plan proposal is designed as if there is no slope to the site. There is no space allocated for embankments, steps, ramps etc, associated with the practicalities of building on a sloping site. These are all issues found with previous sloping sites in Linton, such as at the Police Houses, which constrain the developable area and increase the visual bulk and massing of the development.

The houses are unrelated to the scale and type of houses in Linton. For example house type P1 is a three storey black weatherboarded house, which is advertised in Abbey Homes' brochures as 'The Balfour', "a 3 bedroom townhouse with en-suite and carport parking". Linton is not a town and townhouses are not the characteristic of this locality. Black weatherboard houses are not characteristic of Linton, and nor are isolated tower houses. It competes with the two real tower buildings in Linton, which are both listed buildings and are both functional buildings.

The houses over car parking areas (FOG1 and FOG2) are particularly uncharacteristic of the locality and the rural location. They are not attractive and their security railings and car park frontage would be prominent at street level.

There appear to be no bungalows and more information is required about the housing mix as the types of houses produced do not appear to correspond with the identified local need and the level of provision in the Outline scheme.

The drawings do not present the materials with any clarity. Each house type states the materials are 'for illustrative purposes only'. The proposed materials and combinations are not characteristic of Linton, especially the houses with black weatherboard, the brick lower storey with weatherboard above, the 3-storey black tower, and the red executive style homes.

As such they do not comply with the District Design Guide and do not comply with NPPF 110c, which requires proposals to “create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards”.

SAFETY AND AMENITY

There is currently insufficient information to fully clarify the impact. However, the layout would create significant safety risks, including-

- 14 additional entrances in close proximity to the junction with the A1307,
- Lack of sustainable pedestrian provision and linkages to the village,
- Failure to take into account the slope of the site,
- Failure to take into account the national gas main, and it is likely that a house and garden as well as tree planting would take place within the prohibited zones, and
- Unprotected water swales including one next to a child’s play area.

The slopes of the roads and paths are likely to exceed the 1:12 maximum slope required for waste collection, and it is likely that the excessive slopes would make the roads, driveways and paths unsafe in icy weather.

As a result, the proposal would not comply with NPPF 2018 policy 110c which requires development to create places that are safe, secure and attractive.

OVERDEVELOPMENT

LPC consistently raised concerns about the capacity of this site to accommodate 55 houses, taking into account the distinct constraints of this location and site. The submitted layout demonstrates that the concern was correct and that 55 houses cannot be reasonably accommodated in the space previously allocated.

There are further identified constraints whose impacts still need to be clarified, and whose impact is likely to further affect the developable area and the number of houses this area could reasonably accommodate, should all other issues of principle be resolved.

SUMMARY

The application is premature and does not include sufficient relevant up-to-date assessment to establish its optimum viability.

Once the missing assessments are provided, LPC will comment further.