

**BARTLOW ROAD S/1963/15/OL**

S/1963/15/OL Pembroke College, University of Cambridge & G.W. Balaam & Sons Ltd, land to north and south of, and immediate, Linton – residential development for up to 78 dwellings with landscape buffer and new vehicular accesses from Bartlow Road.

**Amendment 30<sup>th</sup> June 2016: Reduction in scale of development and revised site layout.**

**PC Decision: To NOT support**

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

**Holding Objection**

We respond with a holding objection for the following reasons:

- The Landscape and Visual Impact Assessment is incomplete and contains significant errors which mislead. Its Heritage Assessment is incomplete.
- The Flooding Assessment is out of date and incomplete.
- The Ecology Assessment is incomplete.
- The Traffic Assessment is incomplete.
- The assessment of impact on local Facilities is incomplete.
- The Noise Assessment is incomplete and the mitigation of traffic noise on external amenity would in principle would have an impact on appearance and landscape which is not assessed.
- Previous missing information we noted nearly a year ago is still outstanding.

We expand on this as follows:

**Landscape and Visual Impact Assessment.**

The site is on sloping ground down to the River Granta and is prominent from high ground and from low ground in and around the village. It is therefore important that the impacts are properly assessed in accordance with good practice.

It is also a landscape significantly less screened and more undulating than the examples submitted as Planning Appeal precedents, and therefore the implications of the differing landscape and appearance characteristic of Linton should be provided.

A number of main viewpoints of high sensitivity have been omitted. They are:

- The Bartlow Road junction with the A1307, which is highly sensitive because it is one of the three main approaches to the village and Conservation Area, it is on higher ground than the site, and viewers are frequently stopped at the junction, looking ahead at the application fields and Linton beyond.
- The high ground on the A1307 directly to the east of the site, which is highly sensitive because it provides long views of the village in its rural setting. The proportions of the fields and their role in separating the village from the busy A1307 is important here.
- The valley floor, which is highly sensitive because it is lower than the site and is public land heavily used by local people and visitors alike seeking a restful rural environment. It is a haven for wildflowers and wildlife and the two open fields in this application are a significant part of its visual tranquillity and setting.

- Barham Hall, which is highly sensitive to change of its rural setting and of its relationship with the historic eastern side of Linton.

Example photographs are attached to show the prominence of the application site in these views.

There is no assessment of impact on significant landscape features including:

- The loss of visual separation between the village and A1307, and
- The visual impact of the development on skylines.

There is no assessment of the impact on the most significant Heritage features:

- The impact on Barham Hall (Grade II\*) and its setting, including the separately listed grade II wall. English Heritage should be consulted due to the high grade of the Hall.

A number of other viewpoints need clarification and revision:

- Rivey Hill provides significant open views of the village in its rural context. There are well used public footpaths that go through open land as well as through wooded sections and through Chilford Hall. Most of the routes are along open land and are particularly significant where users of the paths reach the open countryside after an enclosed section of path, displaying Linton in its characteristic rural valley context. Viewpoint Location 14 worryingly misses the views completely and is misleading as it is chosen where the buildings at Chilford Hall screen the countryside, village and development.
- Local people and respondents rely on illustrations to give an idea of the likely impact, but a number of photographs worryingly do not appear to reflect real views. The viewpoints give no indication of height and photographic conditions and limits. This is contrary to good practice. Good practice is critical to ensure that illustrative photographs are as close as practical to the real view experienced by users and any deviation from the real view is known so it can be allowed for. The section explaining the photographic basis used shows a typical tripod setup that would produce a distorted view well below normal eye level. In Figure B on page 86, the tripod is shown set up part way up the far side of a bank, with an eye level nearly a third lower than the camera taking Figure B. The low viewpoint would exaggerate the foreground and the foreground screening, and minimise the middle and far ground, which is the position of the development. As an example, it gives the appearance of wall-like hedges screening the potential development in Viewpoint Location 2, a highly sensitive viewpoint where the development of the field would have a substantial effect.
- The photomontages indicate that local deciduous trees would grow approximately 10 metres high in 15 years on chalky river edge soil, sufficient to hide the proposed development from the A1307. None of the twentieth century developments have been as successfully hidden and we ask that the Council's Tree Officer comments on Viewpoint Location 6 and what would happen during the winter months.
- The treatment of views from footpaths is contrary to guidance and the report's own Methodology in Appendix A (page 76). As the criteria states, users of footpaths are amongst the most highly sensitive of receptors. It is therefore inappropriate to downgrade the footpath receptors in Landscape Table 1 from High to Medium because "views from the footpath are transient in nature". All the assessments of views from rural footpaths should be corrected to a sensitivity that is High and the conclusions revised accordingly.
- The updated conclusions of Development Recommendations in section 7.2 are also incorrect and comply with neither the Methodology nor good practice. A sensitivity of Medium and an effect of Medium would lead to a conclusion of Medium for the impact.

Medium plus Medium cannot equal Minor using this process. All the assessments in this chart should be corrected.

- The Visual Mitigation section is out of date as it is not relevant to the amended scheme.
- Figure 19 is misleading as the landscape edge buffers are not now within the site area.

## Flooding Assessment

Linton is particularly sensitive to flooding and the records and photographs of flooding show that the risk is considerably greater than 1:100 event (see examples from two floods attached). As a result a number of affected villages along this part of the Granta / Cam have devised joint strategic approaches over the last few years in collaboration with the Environment Agency and South Cambridgeshire District Council. The land around Pocket Park and the eastern reaches of the Granta is critical to the success of the strategy, to flood the water meadows and fields upstream of the settlements to relieve flooding of the villages downstream. So far the strategy has proved successful as the houses in Linton did not flood during the most recent flood warning period. Linton Parish Council has invested substantially in the project and the recent works have changed the flood conditions significantly across the settlement and adjoining land. In future, it is expected that the fields to the east of the village (including the application site) may see greater flooding, and the village less.

The Flooding Assessment is out of date and should be revised to include:

- The 2016 Environment Agency revised Flood Map, and
- The Granta village strategy in light of NPPF Core Policy 17, 94 and 100, especially: (100) *•safeguarding land from development that is required for current and future flood management;*

It should also be updated to include:

- The positioning, impact and management of the proposed balancing pond, and impact of a potential headwall identified by the Ecology Officers, on the application site, adjacent meadows and the existing community and historic village downstream.
- The impact of raised flood levels on the housing on the site, which is closer than the other modern developments to the river, and to address the Ecology Officers' repeated objection to the 5 houses close to the balancing pond.
- The impact, mitigation and management of surface water. The Environment Agency Surface Water Flooding map shows flooding along the western boundary of the site and along Bartlow Road above the site. Once the numerous road accesses are made, that road flooding is likely to divert through the application site down to the river.
- The impact, mitigation and management of foul water. The application proposes to connect to manhole 1502. That manhole is on the old Linton 6 inch main and in April last year it was confirmed by Anglian Water to the applicant that the connection point did not have capacity to deal with demand. The Assessment has not been updated and nor has the implications of this. It was proposed by Anglian Water that the connection point be revised to manhole 7501 which is on the newer 375mm pipe, but that is some considerable distance away through many private gardens and under buildings, and the application site is lower than the land levels of the pipework to which it would link. The viability of the drainage proposal should be assessed, as well as the implications on the rest of the community, because the drainage plan shows that the newer section of 375mm pipe reduces in size in the centre of the village and appears to later reconnect to the old inadequate 6 inch pipe.

## Ecology Assessment

The application should be updated to address:

1. The application site is within historic field enclosures, which include mature hedges which are ecologically diverse and important. The historic hedges along the frontages of both sites will be heavily cut by numerous openings for about 14 vehicular accesses onto Barlow Road and the visual and ecological continuity of the existing roadside hedges will be permanently lost. The Ecology Officer predicts up to 90 metres of species rich hedgerow would be removed. Some of the proposed accesses are indicated without visibility splays, so the likely result would involve less than half the frontage hedge being retained, the natural verge being lost, and much greater risk to wildlife attempting to follow historic routes along the former hedgerows.
2. The application site is next to the ecologically important river meadows, including Leadwell Meadows, where significant ecological and flood relief strategies have been made over the last few years in conjunction with South Cambridgeshire District Council. As a result more rare and protected species are colonising the area. Recent finds close to the proposed development site include newts and Roman Snails.

The Ecology Assessment should therefore be updated to assess the impact and provide mitigation, to include:

- The management of public access, water management and flooding to protect existing ecology as again requested by the Ecology Officers, and
- The local ecological strategy in light of NPPF Core Policy 17 and 117, especially:  
(117) *•promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;*

## Transport Assessment

Whilst the Transport Assessment has been updated, it is not based on an up to date traffic assessment. The previous Highways response confirmed this was unacceptable.

The report appears only to include an accident map within the centre of the village. We attach an extract from Crashmap to show the reported accidents are widespread around the village, including at the Bartlow Junction and Bartlow Road. The centre of the village has a lower speed limit than elsewhere so accidents here would not be representative of the extent and severity of the issues.

The 14 additional road accesses to the Bartlow Road are very much a part of the principle of the scheme, and therefore their implications so close to the awkward junction with the A1307 should also be addressed in the Transport report.

The Assessment should also deal with the impact on the historic village and community, and the result of residents using the High Street as the safest access onto the A1307. We attach some typical photographs showing the existing very difficult traffic and parking situation in the centre of Linton, and the damage that it is causing the fabric of the village.

The report does not appear to include the previously requested cumulative impact assessment as directed by the SHLAA and NPPF 32.

As the existing facilities are not within walking distance, there should have also been deliverable proposals to reduce and mitigate the dependence on cars. Instead, the site links to the existing local network routes appear less than before.

### **Facilities Assessment**

The application report and advice from Cambridgeshire County Council should be updated to recognise the confirmation given to Planning Committee on 11 May 2016 by the County Council representative. He confirmed the County Council S106 statement that sufficient school places could be provided by removing those existing students who were outside their catchment areas, was only based on Linton Village College. He confirmed that no assessment had been made of the Infants and Junior Schools, yet the advice to the S106 Officer erroneously stated that this applied to all Linton schools. No assessment was made of the implications and practicality of removing students who had already been committed to.

The Assessment and CC response should be updated to take into account:

- Realistic proposals to manage the demand for schooling and other local facilities, and the cumulative demand of the local sites (in Linton and satellite villages) and sites elsewhere (e.g. in Haverhill) spilling over to Linton through lack of adequate local provision and a failure to provide adequate infrastructure for new housing.
- The statements from both the Infants' and Junior Schools' Head Teachers and the Governors of the Village College that all schools were at capacity and could not take these proposed students.
- That at least the Infants' School has already been extended to capacity on its current site and a new school would need to be provided to accommodate additional pupils. An assessment should be made to include realistic timescales and costs for these works, which are unlikely to be achieved within the NPPF directed plan period of 5 years.

The National Grid has confirmed that a high pressure gas main does run across the northern part of the application site. See attached map. The implications should be assessed and mitigation provided.

### **Noise Assessment**

The noise assessment at the Linton Police Houses site concluded a level of traffic noise in outdoor amenity spaces of 66dB, which significantly exceeds the maximum acceptable level of 50dB. That site was on the A1307 within the reduced speed area and built-up village, and was located above the road level. This site is on the A1307 where the national speed limit applies and where the traffic noise would be more intrusive because of the rural surroundings. The largest part of this application site is also well below the A1307 road level. The effect will therefore be significant. Noise level readings should have been taken to assess whether this site is practical for the sensitive receptor type being proposed, and whether the external amenity spaces can be made practical in principle without the significant impact of noise barriers on the landscape and appearance of the area.

### **Archaeological Assessment**

The application has not been updated to include the Roman Road and Anglo Saxon village.

## **Planning Obligation**

The Planning Obligation has not been updated to include resolution of the infrastructure and flooding issues, provision of affordable housing, publicly accessible footpaths and facilities on and off site, highways and drainage mitigations that are required or offered by the applicant to make otherwise unacceptable development and cumulative impacts acceptable. The submission still proposes only to decide these later in the process, but they are essential to understand the full implications of the planning balance and should be provided with sufficient certainty to ensure compliance with NPPF 203 and 204 and demonstrate that the Obligation is deliverable.

Our initial request is for the applicant to be asked to provide the material clarification and information above, for re-consultation. The request is in accordance with NPPF 192 and 193, and relevant and necessary to this application.

The amended submissions have not overcome any of the Parish Council's previous concerns about this application. The reduction of site area does not address the in-principle issues and results in additional issues in carrying out the proposed screening of the development.

Linton Parish Council has sent some preliminary objections to the application proposals, dated 14<sup>th</sup> July 2016. These will be updated once the missing information above has been received.



## BARTLOW ROAD JUNCTION VIEWPOINT



## A1307 VIEWPOINT AT SIGNPOST





## VIEWS AT POCKET PARK / VALLEY FLOOR



## FLOODING







**Left, the river reaches just below floor level at the Dog & Duck**

Picture taken by David Champion

**Right, the ducks take advantage of the high water level at the bottom of Church Lane**

Picture taken by Sarah Hurcum

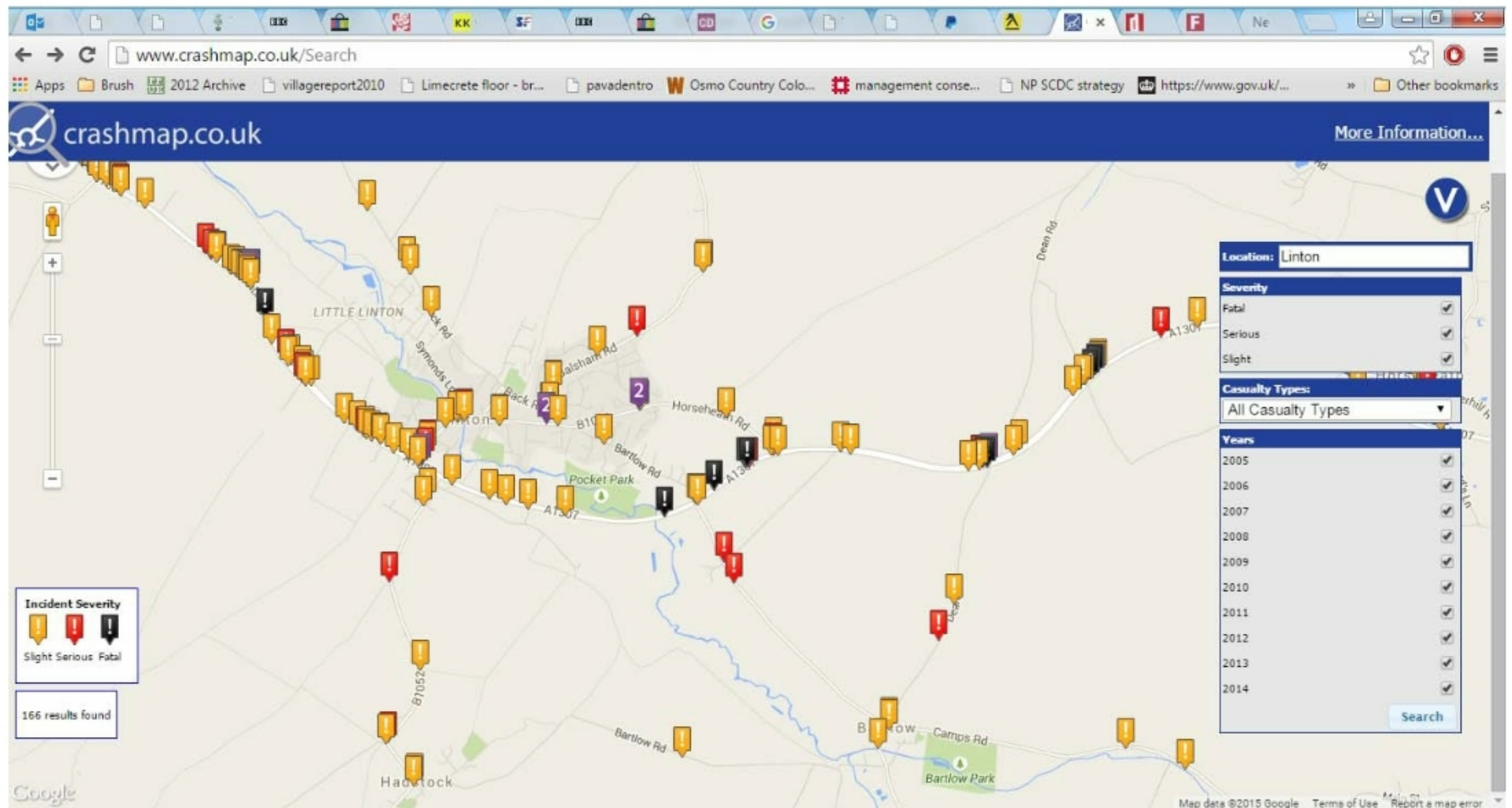


**Left, the pavilion feels the effect of the high water and right, the playground also suffers.**

Pictures taken by Brain Manley and Mike Judge



## LINTON CRASH MAP EVIDENCE





## VILLAGE CENTRE PARKING ISSUES





