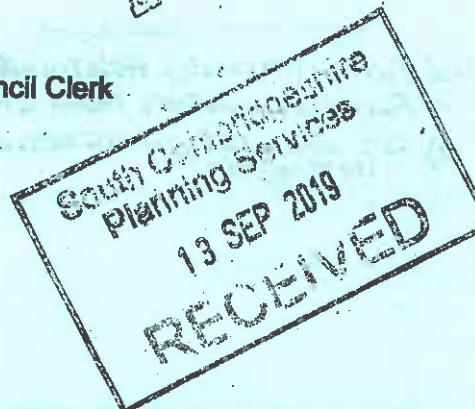


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South
 Cambridgeshire
 District Council

Kathryn Wiseman,
 Linton Parish Council Clerk
 Village Hall
 15, Coles Lane
 Linton
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Planning and New Communities

Contact: Rebecca Ward

Tel: 03450455215

Email: planningcomments@scambs.gov.uk

Our Ref: S/2501/19/RM

Your Ref:

Date 06 August 2019

This letter (with no plans attached) has been emailed to the Parish Council prior to sending out in the post, and for information, to the Ward Members

Dear Sir/Madam

Proposal: Approval of matters reserved for appearance, landscaping, layout and scale following outline planning permission S/1963/15/OL for residential development for up to 55 dwellings with landscape buffer and new vehicular access from Bartlow Road

Application Ref: S/2501/19/RM

Location: Land to the North and South of Bartlow Road, Linton, CB21 4LY

Applicant: Abbey Developments Ltd

Attached is a copy of the above application for your retention.

We welcome any comments your Parish Council wishes to make, but would ask that they are made using either the online web form available, or on the form below and returned no later than 21 days from the date of this letter. After the expiry of this period, the District Council may determine the application without receipt of your comments.

Below is a link for your convenience to view all copies of documents, plans and forms in respect of the above proposal. As the website updates overnight, these will be available to view the following day from the date of this letter. Please note your comments will be placed on the website.

<http://plan.scambs.gov.uk>

EXPLANATION OF APPLICATION SUFFIX

OL	Outline	LD	Lawful Development Certificate
FL	Full	PA	Prior Notification of Agricultural Development
RM	Reserved Matters	PD	Prior Notification of Demolition Works
LB	Listed Building Consent	PT	Prior Notification of Telecommunications Development
CA	Conservation Area Consent	HZ	Hazardous Substance Consent
AD	Advertisement Consent	DC	Discharge of Conditions
VC	Variation or Removal of Condition		

Should the Parish Council wish to request that the application be considered by the District Council's Planning Committee, please state the material considerations and planning reasons. Examples of material considerations can be found below. The Chairman of the District Council Planning Committee will respond to all reasonable requests.

The Parish Council: - (Please delete appropriately)

Supports

Objects

~~Has no recommendation.~~

Comments:

** PLEASE FIND ATTACHED ADDITIONAL COMMENTS ;*

1) 'FURTHER COMMENTS FROM LPC'

2) 'LPC COMMENTS ON THE DESIGN AND ACCESS STATEMENT'

The Parish Council does ~~does not~~ request that the application be referred to the

District Council Planning Committee *(please delete)

Planning reasons:

Note: Where a Parish Council requests that an application is determined by Planning

Committee there is real value and importance in Parish Council representatives attending Planning Committee to support their comments. Please note that the Parish Council can be represented at Planning Committee by any of its Councillors or the Parish Clerk (with the approval of their Parish Council).

Signed..... AB Date 22/08/19 - *HOLDING OBJECTION.*

Clerk to the Parish Council or Chairman of the Parish Meeting 12/09/19 - *ADDITIONAL COMMENTS*

Guidance:

What are Material Considerations?

A material consideration is a matter that should be taken into account in deciding a planning application or appeal against a planning decision.

Examples of material considerations can include (but are not limited to).

- Overlooking /loss of privacy
- Loss of light/overshadowing

EXPLANATION OF APPLICATION SUFFIX

OL	Outline	LD	Lawful Development Certificate
FL	Full	PA	Prior Notification of Agricultural Development
RM	Reserved Matters	PD	Prior Notification of Demolition Works
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VC	Variation or Removal of Condition		

Further comments on Planning Application s/2501/19/RM - Land off Bartlow Road, Linton.

The holding objection and initial comments still stand, these are further comments on the application, including comments on documents not available at the planning meeting of 21st August.

This application is very similar to the previous RM application, s/2487/18/RM, and again appears to have been submitted without having been reviewed by the independent design panel under category 1 (it is a medium to large scale development outside major growth sites).

This application contains no substantial or material changes from the previous submission and fails to address the objections of LPC and councillors. LPC's holding objection has commented on the items described as resolving the previous refusal - they do not (see LPC response to the D+A statement)

The Design and Access Statement was not available to LPC at the time of the planning meeting of 21st August. This has now been received and see that the D and A Statement lists conditions wished to discharge, but the information has not been provided and the discharge of conditions are not included on the application form.

Many reports are missing, as noted in the holding objection, and wildlife surveys that are a requirement have still not been completed. By recent SCDC policy criteria regarding revisions, the omission of reports means that the application is incomplete. This is grounds in itself for refusal.

Missing Reports include: Statement of Community Involvement, Statement of Sustainable Design and Construction, Flood Risk Assessment, Surface Water Drainage Strategy (this is too important at this site to be left to conditioning) Heritage Statement (Archaeology report is also missing, following excavation work), Landscape Impact Assessment, Complete Ecological Survey (including required amphibian survey), The Health Impact Assessment (including Noise, Vibration and Air Quality Assessments) Lighting Assessment, Contaminated Land Assessment.

This is not a sustainable development, does not meet village needs, does not protect or enhance the valued landscape and does not meet the criteria of the NPPF. LPC objects to this application.

Planning Comments

- The site is outside the village framework boundary and, judged against the Local Development Plan, should be refused on those grounds alone.
- The application is for more than 30 houses in a minor rural centre, again grounds for refusal
- The site is not part of the allocation in the LDP and not included in calculations for housing land supply (reviewed by the LDP Inspector). In the hierarchy of development there are many more suitable sites.
- An incomplete application was submitted, and in line with the new SCDC policy, is another reason why this application should be refused from the outset.
- The application is very different from the indicative OL submission, outside its extent and scope, as described in our consultant's response (Consultant comments sent separately).
- The existing landscape is acknowledged to be a **Valued Landscape** by the Inspector assessing the Appeal at Back Road (APP/W0530/W/17/3174153)
- NPPF criteria **require** valued landscapes to be protected and enhanced.
- The effect on the wider landscape and setting of the village has not been assessed under these criteria.
- The proposed housing mix does not meet the needs of the village as assessed in the Housing Need Survey of June 2019 (Cambridgeshire ACRE), particularly the need for bungalows.
- The proposed tall housing will overlook and overshadow current housing along Bartlow Road and within the development sites, with loss of privacy being of particular concern.
- The site is in the floodplain, over the aquifer, in a groundwater protection zone and adjacent to a rare and protected Chalk Stream in a sensitive valley corridor. Water issues - flooding, drought and water supply in a changing climate - need serious consideration.

- The housing proposed is in sub-optimal locations, including being too far from amenities and services for sustainability. Residents would have to travel to work and further than the Design Guide recommended distances to schools, health services and other amenities predominantly by car. This is not a "zero carbon community" from the outset.
- Groundworks have taken place without planning permission and before conditions in the OL have been complied with. These mounds are alien in the landscape and now appear as features of the scheme. They must be removed before the expected heavy winter rain as they would cause silting of the protected Chalk Stream.

Landscape

- In this application, as before, the developer has failed to take into account our major objections to the design of this site - the land is built up to higher profiles, the houses themselves are too high, prominent in the landscape and with designs insensitive to the nature of the rural site and entrance to the village.
- The developer has not submitted a Landscape Impact Assessment.
- The landscape around Linton and the Granta Valley has been assessed as Valued (see appeal for Back Road development) and this development at this site does not respect the character and value of that landscape.
- The development will be seen over the wide views and across the valley, on the brow of the hill when approaching from Haverhill, occupying the valley looked down upon from the A1307 and on the skyline from the village. This against the District Design Guide (section 5.2) which states that buildings should not intrude upon the skyline except specifically agreed features - towering housing on rising ground would not meet this criterion.
- The effect of this development on the wider landscape, the surrounding fields and public open spaces, the setting of and views from the village, the river Granta, etc., has not been evaluated. There has still been no evaluation of the effect of housing on the northern site and no evaluation of the effects on the skyline from identified key view points.
- The Granta is a rare and protected Chalk Stream, with Pocket Park across the river, a much used village-owned area for leisure and wildlife. Viewed from along the river, the houses will be seen on rising ground, magnifying their impact and overbearing on the key view from the valley (see overlay provided)
- From the village, the houses will be prominent along the Bartlow Road and on the skyline. This is at odds with the rest of the village, which nestles into the contours and is hardly noticeable from outside - unlike the impact of this site.
- The views shown are not representative and misleading; significant views have been omitted. In particular the reality of the views across the river from the public open space, with housing rising in terraces with platforms and steps, with car and parking prominent in the street scene.
- The aerial illustration is unrealistic in that it shows an apparently flat field, rather than the slopes of the actual site.
- The street elevation views do not include the comparator of current buildings from which to judge the height, bulk and dominance of the proposed dwellings.
- Linton nestles into the valley and has low impact on the wider views. Nearby housing is set low or single storey. Tall, 2- 2½ - 3 storey housing is too dominant and overbearing. This development would be prominent from all views and across the valued, character landscape
- Housing here would be very visible on the skylines and approaches, adversely affecting the views and setting of Linton in the open landscape and the wider valued landscape (contrary to Policy HQ/1). Building here will neither conserve nor enhance the amenity of the village's natural, built or historic environment and resources.
- LPC reasons for objection include similar reasons for refusal of planning applications for Flemings Field, the next field along the river (refused 9 times by SCDC since 1959), *that further development would progressively detract from the rural appearance of the area.*
- Please note - The Planning Statement, 5.15 refers to reasons for reduction in housing numbers of s/1963/15/OL as being due to landscape issues. The next paragraphs then describe proposed

landscaping. One reason for refusal was the impact on the landscape, a very different matter and one that cannot be addressed at a later stage by planting; the countryside, the views and landscape form do not change

- Para 5.16 also refers to the creation of a rural setting - we already have this, which would be harmed by this development.
- The landscape of the Granta Valley has been assessed as valued (Back Road application s/0096/17/OL) and to be preserved and enhanced, not what is proposed here.

Housing mix and needs

- Linton quadrupled in size since 1970s, and has taken its share of new estates
- Since a recent Housing Need Survey (ACRE, June 2019) we know that there is a need for some housing in Linton, particularly for future rather than current needs. This housing is being created within the village envelope by infill and replacement housing.
- Linton has a high proportion of older people - a village of 4,800 people with around 3000 over 45 at the last census. The housing needs for the village are predominantly for bungalows and smaller/affordable homes, including some rental, as described in a recent housing needs report. If there were bungalows, this would free larger homes for families - we do not need more large homes. The outlined housing mix here does not reflect the needs, and budgets, of our current population, nor the needs for the future.
- Linton has a higher than average older population and the growth within the over 65's is expected to increase by almost 50% to 2036 across the District. This application does not make provision in its range of tenure for the housing needs of older or disabled people.
- How many homes will be built to minimum M4 (2) standards?
- Linton has a significantly lower population of adults aged 20-35 years, yet most of this housing appears to be targeted towards them without provision for vulnerable groups.
- We noticed that in larger houses the study/office will be bedrooms - the houses might be described as having 4 bedrooms plus office, but have been advertised as 5 bedroom homes.
- This development has no potential for employment within the village, even in building - developers have their own supply chain.
- This range of housing would mainly attract incoming commuters, adding to the problems of the overburdened infrastructure.
- In particular the schools (LIS and LHS) are full - being a minor rural centre they must take those from other villages, too.
- Linton is providing its own housing by means of infill housing, replacing large houses and gardens with small developments, and conversion of properties. Since the OL application around 110 houses have been built or are in the planning pipeline (not including this application). Of these, only OL Horseheath Road is outside the village envelope.
- Several other homes have been extended, some considerably, adding to the housing stock.
- None of these sites were part of the LDP, so there are now around 110 windfall dwellings, not including this application, counting towards the 5-year housing numbers - all this in a village which was not allocated any housing in the LDPs. This application is not needed, will not be critical to 5-year housing land supply nor in the longer term, and is beyond the capacity of the village infrastructure. This development is not required.
- The cumulative effect of development on Linton must now be a consideration, and this application should be refused as not sustainable.

Housing layout

- The illustrative plans do not show the true nature of the development. The site is to be built substantially above the original ground levels, completely re-configuring the landscape with retaining walls, platforms, steps and other engineering structures.
- The site sections (e.g. site section 3) partly show the issue, and should also show the profile of the existing site for comparison. The sections where overlooking is likely to occur should also be

shown through the staircases, where users would have panoramic visibility of homes and amenity spaces below.

- The current housing along Bartlow Road will be overlooked by new houses opposite them, with the loss of their human right to privacy.
- The terraced nature of the development remains - 16 houses have terraces - shortened but still a prominent feature. The built up platforms are not shown and careful fading misleadingly minimise their effect on the views and landscape.
- From Pocket Park (Southern edge) the view from the village wildlife and leisure site will be totally urban, with parked cars and driveways dominating.
- Recent decisions have considered the dominance of cars to be detrimental to the street scene, but cars and parking will dominate this site and along both sides of Bartlow Road
- The gradient, along with steps and no resting places, makes site outside the bounds of accessibility for many disabled people.
- There is no demonstration the design has taken into account being next to a proposed Park and Ride site. This hub is needed to reduce congestion in the village centre and allow parking for commerce; it cannot be compromised
- We note that the banks of soil are still shown in the contour plans, with houses or gardens over them. These are alien features in the landscape and do not have planning permission to remain. The original ground levels should be re-instated.
- The site section plans show a green line as denoting the existing ground level. The ground has been denuded of topsoil and subsoil for the archaeological investigation, and the chalk layer is exposed - the chalk appears to be the new ground level. This is directly above and detrimental to the aquifer in a Groundwater Protection Zone - SPZ2. The OL surveys showed the water supply is likely to be only about 1 – 2 metres below current ground level, so would easily be breached by the new development.
- There appears to be no allowance in the levels for top soil for the gardens or public areas.
- The steepness of the drives from plots in the southern site up to the Bartlow Road is considerable, and now increased by lowering slabs.
- We calculate that the gradient of the main road entrance to the site is around 1:8.7. This is even steeper than the last RM and definitely not accessible
- Access to the road could be compromised particularly in poor weather, and the drives will channel rainwater down towards the houses and garages (Bartlow Road is well known for flooding and freezing in winter).
- Current housing is set back from Bartlow Road to give gentler gradient and to set the housing into the contours, reducing the detrimental effect on the landscape.
- The rise in levels are likely to be generally greater than 2m across the centre of the development with a substantial further build-up to create these platforms - potentially up to 6.5m across the area where the platforms are most prominent. Plot 45 down to plot 15 has a height difference of around 7.6m in the first floor level. Dropping some slab levels by 40cm will be minimal compared to other height differences, and not address the overall problems of the cramped layout.
- The height differences between housing means that ground floor levels of some plots are at first floor (or higher) level to neighbours, with potential loss of privacy and overshadowing e.g. plot 1 is 3.9 m higher than plots 7,8,9. Plot 4 is around 3m above plot 21.
- The aerial illustration is unrealistic in that it shows an apparently flat field, rather than the slopes of the actual site.

Development outside permitted areas

- This is seen at the boundaries of the southern site, the proposed soakaways, and many gardens extend outside of the developable area. At the western edge, housing and gardens and the pumping station encroach upon the boundary ditch, fence and mature hedge.

- The northern LEAP with play equipment has been lost, will there be "play boulders" as previously? The glaciers did not deposit this type of surface boulders on our terminal morain
- Woodland planting appears to be over the no-dig/no-plant protection area of the gas main which crosses the northern site.
- Variation of the developable area is not a Reserved Matter, and needs new planning permission.

Designs

- We are aware that the indicative scheme was not approved and was identified as being flawed. These designs are cramped, bulky and too high for the site, an erosion in design standards.
- Proposed housing will overshadow and overlook neighbours on Bartlow Road and within the site, with loss of amenity and privacy. See overlay which illustrates this.
- The architectural styles remain unacceptable, particularly the taller buildings of 2½ and 3 storeys which will be unduly prominent on the roadside and particularly on the skyline. The site should be viewed from the village and from across the river to judge the effect of these houses on the rising ground, not on a flat site as suggested by the illustrations
- Again, these are urban "anywhere" designs with little relationship to the existing village and the character of the area. They remain generic designs, not tailored to this site, and do not support the character of Linton, but rather are antagonistic to the rural aspect.
- The "Farmstead" designs are unlike any farmhouses in this area, and many houses have black boarded effects. In this area only barns have black (Tar or Creosote) timber
- The flats on top of car parks are still in the scheme. They provide a poor quality inactive street scene, dominated by car parking, and unlike the character of this village (Design Guide e.g. para 6.82-84 pages 120 onwards).
- However, the residents of the flats will remain dry when surface water floods below them...
- There is no provision of accessible housing for the disabled. The accessibility of the affordable homes is seriously questionable, with only 1 ground floor maisonette on the site and this without accessible doorways. All affordable homes on the northern site are type B with a novel chicane in the hallway around the bottom of the stairs. Being 2 storey, they are unsuited for those in a wheelchair or with limited mobility (the downstairs cloakroom appears not to be wheelchair accessible). On the southern site there are only 3 affordable homes without steps to access either the house or the garden or both (the maisonette mentioned above and 2 house type B).
- Good design is innovative, aesthetic, shaping and contributing to surroundings, to give a sense of wellbeing. These designs do not meet these principles nor those of the Design Guide.

Flooding - This includes flooding from the river (Fluvial) and surface water flooding (Pluvial)

- An updated flood risk assessment has not been submitted, and resilience to climate change has not been addressed at current required levels.
- Open land acts as a sponge to slow the flow of pluvial water downstream; to lose this land to building (and unmanageable future projects by householders - paving, extensions, etc.) puts at risk the areas downstream, including our historic and commercial village centre.
- The southern site is part of the floodplain. Reference to the updated EA maps and the SCDC flood maps in the LDP of 2010 (provided), show that part of the "developable area" of the site remains liable to flooding (Flood Zone 2). The ditches along the western edge of the southern site and behind Finchams are in Flood Zone 2, with the pumping station shown in area prone to this flooding.
- The maps used by the developer do not show the true extent of flooding, nor the nature of the flooding - water accumulates in the Ashdon area and comes downriver as flash flooding.
- We note that in the Rossi Long report on drainage strategy, the comments by the EA refer to the previous application and a completely different drainage scheme.

- The Statutory Consultee (LLFA) response to this scheme is to recommend refusal due to an unacceptable risk of flooding downstream. This is similar to the reasons for refusal for Flemings Field, the next field and in the same floodplain (refused 9 times since 1959), that further development would aggravate the existing flooding problem.
- This site is affected by the extremes of weather, ranging from severe flooding from the river and surface water from the road and hill north of the site, to the current drought where the river must be kept flowing using drinking water from the aquifer upstream.
- The stress on the aquifers to supply housing development must be considered as a serious issue. Building over an aquifer in a Groundwater Protection Zone - SPZ2 - would not be seen to be protection of our water supply.
- The surface water flooding has been known since Mediaeval times following the removal of woodland up the slopes. This was revealed by the Archaeological investigations, with housing in the centre of the site (including social housing) vulnerable to pluvial flooding
- The archaeology also revealed how the road across the site had moved up the contours over the centuries to avoid mud and flood.
- The loss of land for soakaway would result in more flow into the river, which can flood rapidly and with great volume putting the centre of the village under greater threat, increasingly more frequently. The thesis written after the 2001 floods and local knowledge confirm there is more flooding than indicated in the submission.
- The LVIA by Bidwells notes that "the sensitivity of the River Granta is assessed as "High" because of its high value and susceptibility". It bounds the southern site and will be impacted by development onto or abutting the floodplain
- Previous applications did not provide a workable SuDS scheme, and now the plans are for surface water flooding to be dealt with by soakaways only, many in the un-developable area or in private grounds where their maintenance cannot be controlled.
- Suitable peak season porosity testing has not been completed. Infiltration and porosity tests failed despite the exceptionally dry weather at the time they were performed.
- Now, reliable porosity and infiltration testing cannot be done as the top soil and subsoil has been removed.

Health, noise, air quality, light pollution

Please refer to the Health Specialist reports in s/2073/19/OL which refers to this site and the CPRE response to the application.

- The Health Impact Assessment is not present. However, that in the OL application is misleadingly optimistic in its evaluation and accessibility of services. Access to Health Care and Services are now in the hands of Granta group surgery. Linton residents find it problematic to get appointments as there is a considerable waiting list and are likely to be sent to other surgeries - Sawston, Barley, etc. - which are difficult to get to by public transport. Haverhill and Cambridge have similar pressure and do not take Granta patients. Additional patients will add to the pressure on our village facilities.
- Addenbrookes might be a renowned hospital but it is an *international* referral centre with concomitant pressure on its facilities and services. Access to its many services is optimistic.
- The dental surgery has been moved toward the A1307/High Street junction around 1800m from the site and with difficult parking. There are no NHS places available.
- There is no adequate noise assessment, despite the site being very close to and below the A1307 which is above most of the site (and so named the Causeway)
- The issue regarding noise levels exceeding EU regulations in external spaces has not been overcome, nor has the likelihood of people wanting to open their windows.
- The stress caused by loud noise, and particularly low-level constant noise, is well documented as having detrimental health effects, particularly on cortisol levels (a typical marker of stress). These

sites suffer from both loud and constant road noise, so noise impact from this is a major consideration for healthy living.

- Noise amelioration is essential for the site. In the previous application it is felt that the noise levels had been underestimated due to the dates and times that these were measured (especially the re-test data). An updated noise report has not been submitted
- Planting trees, which take an appreciable time to grow and will not become tall enough to protect bedrooms from the noise, is insufficient noise amelioration.
- There is no assessment of vibration levels for the site, despite the HGV traffic from distribution hubs in Haverhill and other sources.
- Being close to the A1307 and busy Bartlow Road there has been no air quality assessment
- There is no assessment of light pollution from the site and no lighting scheme. This would affect neighbours, wildlife in Pocket Park/Leadwell Meadow as well as being a distraction to traffic on A1307.

Archaeology

- There is no Archaeology report in the submission.
- Following recent investigations, we now know that the site is of greater archaeological importance than expected by desk top review or test pits.
- This is not a designated site because its existence was expected, but not known.
- There are designated sites nearby at the Roman Villa and Linton Heath, along with a Cursus on Horseheath Road so that the area is of greater importance than described in the OL
- The site has been active since the Stone Ages but with few built remains - evidence of large scale flint working, Anglo Saxon workshops, but no houses - after all who would want to build their houses on a flood plain?
- The development would involve almost total destruction of archaeology. Some of it, like the well and the Neolithic fireplace, without having had appropriate survey before it is lost.
- It is noted that the existing archaeology mounds are not authorised engineering works, so would need separate planning consent. These now appear on updated contour drawings, indicating that they would be permanent structures. This is not described nor forms part of a report; for example as part of a strategy for 'overcoming' noise and visual problems.
- The mounds are not in accordance with the outline approval, are outside of the Developable Area of the site and have no planning permission.

Soft landscape

- Important hedges along Bartlow Road are to be lost and replaced with drives and urban shrubs. The retention of these hedges was part of OL approval.
- The green frontage onto Bartlow Road, a buffer and soft entrance to the village will be lost due to replacement of mature hedge with an urban one "trimmed to residential size" and vulnerable to removal by residents.
- Without the hedge the rural character of the area is lost - at a major entrance to the village and part of its historic and landscape setting.
- The mature hedges - vegetation at the bottom, woody shrubs that make the structure and trees that form the canopy - all play a role for wildlife and rural context. This is lost and cannot be substituted for by the urban hedging proposed. Significant wildlife habitat and wildlife corridor will be lost.
- Historic hedges and mature trees along the western edge of both sites cannot be guaranteed to be preserved, as they will be large items in small gardens.
- These mature trees are significant in the skyline, particularly as seen from the village.
- Parts of the site are in the frost pocket, on a site that has extremes of water, so survival of some plants is dubious.
- There still appears to be planting in the "no-dig, no-plant" zone over the gas main in the northern site.

Ecology and Biodiversity

We are very concerned about the effect of the proposed development on its surrounding zone of influence, particularly our Public Amenity and wildlife area and river- the ecological impacts will be significant on areas that are important to the village.

There is a different Ecology report from the previous RM - this is largely a re-iteration of the original assessment, with similar omissions.

A full reptile survey has again not been completed, despite this being an EU requirement. Again this report states that **"a full reptile survey will be necessary"**.

Policy NH/4.4 requires that where there are grounds to believe that a proposal may affect a Protected Species, Priority Species or Priority Habitat, applicants will be expected to provide an adequate level of survey information and site assessment to establish the extent of a potential impact, **prior to the determination of an application**. The applicant's own report notes there are numerous ponds that have not been surveyed, and there are newts within the specified 250 metres of the site. It is not appropriate to design a scheme including landscaping, drainage, earth moving and substantial excavations in close proximity without having first assessed where the newts and other amphibians and reptiles need protecting, and how that is appropriately addressed in the design and maintenance schemes.

Comments on the **Construction Environmental Management Plan**

- 2.2 Condition 18 refers to a Construction Environmental Management Plan and states that:
"No development shall take place (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. Groundworks have already taken place - removal of soils and the creation of mounds, without permission.
- In the plan, attention has been drawn to several omissions in wildlife surveys, e.g. there has still been no otter survey, although otter spraint has been seen under the bridge. Proposals to protect the wildlife are questionable in their efficacy and retention
- Habitats, page 8, we note "The site predominantly comprises heavily grazed semi-improved grassland". It was actually arable land, with annual crops and not grazed.
- Also that *"The species rich hedgerows will be retained and protected with suitable root protection area and heras fencing. The sections of hedgerow lost will be replaced with species rich planting within the development "*. The current proposals will almost totally remove existing hedges - mature, well grown and providing a diverse range of tree species, food sources wildlife habitat and migration corridors - to be replaced by urban hedging *"cut to residential height"*. This is not protection of the natural environment.
- Defensive planting to *"deter animals like cats from accessing the river corridor"* (3.13), is a rather optimistic means to help protect the number of red-list and BAP bird species and other species that were recorded on site during both surveys.
- *"In order to protect the river banks from degradation by public access and dog walking, it is recommended that thick barrier planting is installed"* (3.17). Again this is hopeful and future management and retention cannot be assured.
- 3.19 *"A full presence/absence reptile survey is recommended to avoid the risk of discovering reptiles during site preparation work which would lead to a costly delay. This will be carried out between March and October under suitable weather conditions"*. This has not been done, although it is an EU necessity.
- 3.20 *"There have been no dormice surveys conducted and there is potential for them to be present on site within boundary hedgerows"*
- 3.21 *"Dense, prickly bushes should be planted between the development site and River Granta to deter domestic animals and people from accessing the river corridor, which is very sensitive to disturbance"*. Again this is optimistic and future management and retention cannot be assured.

- The dense rows of prickly bushes being proposed are not typical planting for a river meadow, and are not as conducive to wildlife as native riverside plants, particularly alongside a protected chalk stream

Comments on the Ecological Design Strategy

- Development of this site will affect zones of influence, including the Public Amenity Area of Leadwell Meadows/Pocket Park/ Hogsholme (across the river and natural areas managed for the village and with significant flora and wildlife habitat) and Flemings Field an open un-tilled area adjacent to the site and now a wildlife habitat.
- The reports all fail to recognise that Leadwell Meadows/Pocket Park/Hogsholme is also a County Wildlife area. It has been omitted from the list of County Wildlife areas described in the Ecological Design Strategy (EDS) section 2.3
- On the Southern site, the recent removal of topsoil for the Archaeological investigations precludes a full survey being undertaken. The floodplain and lower areas still have soil, vegetation, ponds, etc.
- 2.10 *"All boundary hedgerows are species-rich, mature and have associated features, therefore, could be classified as important under the ecological criteria of the Hedgerow Regulations"*. The loss of these along Bartlow Road, the incorporation into gardens along the western edge where they cannot be protected is regrettable to say the least...
- 2.13 *"No evidence of otters recorded in 2018"*. A full otter survey has not been completed. Otters have been seen along the river since then and spraint recorded.
- 2.22 *"The Applied Ecology report states that there are no ponds within 250m of the Application Site, however we have identified five ponds within 250m and seven within 500m. The nearest two ponds were visited during the 2018 survey and one was found to be dry. The other is a large, deep pond surrounded by good terrestrial habitat within a wet plantation woodland to the south, which links to the site via the river corridor (via underpass under the road)"*.
- Page 9 *"It is possible that the site has become more suitable for reptiles since the original ecology survey in 2014 as the grassland field has been left unmanaged"*.
- A full reptile survey has **still not** been conducted despite being recommended here and in two previous Ecology Reports.

The River Granta and wildlife

- The EIA fails to recognise that this river, The Granta, is a rare Designated Chalk Stream with EU designation and international protected status, designated Main River with restrictions on proximity of building. The LVIA by Bidwells notes that "the sensitivity of the River Granta is assessed as "High" because of its high value and susceptibility". It bounds the southern site and will be impacted by development onto or abutting the floodplain
- The river was used as an example of a rare chalk stream in a BBC programme on 22nd August
- The river holds brown trout and has been proposed for work to improve their protection and enhancement, as advised by the Wild Trout Trust.
- Pollution in water run-off and when the river overflows the swales and balancing ponds would be detrimental to the plant, fish and invertebrate life in the river and the land downstream
- The use of industrial herbicides, during maintenance of the site and its planting, could run off and affect fish and invertebrate stocks in the river
- Otters have been seen in recent years from the Recreation Ground to Pocket Park.
- The lack of badgers and other mammals is explained by the amount of roadkill on the A1307
- Section 2.22 of this EDS has identified five ponds within 250m and seven within 500m.
- There is a large pond in Pocket Park, our village wildlife and leisure area, well stocked with several types of amphibians, invertebrates, etc. This appears not to have been reported.
- It is also documented that there are around 20-30 small ponds on the surrounding floodplain. These have not been surveyed, although recent dry weather might have affected these.

- We are confident that there has not been sufficient investigation and insufficient surveying to properly inform the ecological status and effect of development on this area. (Policy NH/4.4)

Roads, traffic and Transport Hub

- The Traffic Report is 8 years old, so well out of date and not based on data for the amount and type of traffic now using the A1307.
- Since that report, the amount of traffic from the ever-expanding Haverhill has increased considerably, particularly the HGV traffic from distribution centres such as Culina; these were not evident in 2011.
- Traffic from development at Saffron Walden now also joins the A1307 near Ashdon, Bartlow and at The Grip, adding to congestion through Linton at the top of the High Street.
- Bartlow Road is a known rat run for drivers wanting to avoid the delays on that part of the road. The rat runs are also used by commuters going to Science Parks, Fulbourn and the north of Cambridge, areas of increasing commercial and research activity.
- The triangle of land between the southern site and Bartlow Road is part of the GCP/City Deal project, to provide a transport hub and Park and Ride site. This development could impact on the safe access to this, compromising a wider sustainable transport scheme.
- These issues are relevant to the design of the development. The number of additional drives being proposed in this RM scheme increases the potential hazards for through traffic and those accessing Bartlow Road.
- There is no Highways report that includes the additional accesses, highways effects inside and outside the site, nor the cumulative impact of this on the proposed GCP/ City Deal transport hub. This hub is necessary to relieve the P+R parking in the village centre.
- The exits onto Bartlow Road remain more numerous than in the approved OL application.
- The green link path crosses what will be a busy access point and in the 50mph zone.
- The route of the internal road at the southern site does not reflect historic routes across the site and that these changed over time to accommodate the changing route of the river. Historic and practical integrity of the site has been lost.

Sustainability and connectivity

- The site has footways through it, but there is only connection to the village via Bartlow Road denying genuine connectivity to a wider area.
- The site is far from the amenities and services of the village centre - outside the sustainable walking distances in the Design Guide.
- It is unlikely that residents would walk or cycle to the village, sports facilities, schools, church, library, shops, pubs, etc. It is more convenient to drive (adding to central village parking problems) or to go to nearby towns, especially for shopping.
- There will be very little commercial benefit for the village from this development, but a large negative impact on infrastructure and services.
- Even during construction, developers have their own supply chain so there will be no work for the village associated with this development
- This will be another isolated, introverted development with little connection to the village, meant mainly for young commuters and not meeting local housing needs.
- Will there be solar panels, air source heat pumps, local CHP, plug in points for electric cars, or any other energy producing aspects to this development?
- This is not a sustainable development; the adverse impacts outweigh any supposed benefits for our already thriving village.

Other concerns

- Conditions from the OL application have still not been met, nor does it comply with outline consent

- The foul sewage has not been addressed. The re-cycling centre might have capacity but the main sewer through Linton (a 6 inch Victorian sewer) does not. Pumping foul waste up to the sewer is another problem not solved.
- The previous s106 agreement is notably poor, and would in no way mitigate for the harm done by the development. In particular, there was no s106 for educational need.
- The schooling need assessment does not relate to the situation in the local schools involved, seemingly being based only on current birth rates within the village - and Linton has a very high proportion of older people (over 3000 are over 45 in a village of 4,800 at last census - we are much older now). No account has been taken of incoming children or the needs of outlying villages in the catchment.
- The schools assessment in the new OL application s/2073/19/OL acknowledges the changing needs and the capacity of schools
- The agreement also takes money from the village to fund GCP/City Deal initiatives that are already funded by their government grant.
- It raises the ground levels substantially above the adjoining land and homes and creates a significantly more dominant development;
- It does not preserve or enhance the landscape and rural local vernacular village character;
- It increases dominance of key views and skyline views;
- It increases the risk of flooding (river, surface water and foul water);
- It increases risk to the environment and fails to carry out survey of protected species required by law;
- It fails to mitigate noise levels that are above EU regulations;
- It fails to provide linkage to the existing village; and
- It is a cramped development, where private amenity is overlooked and dominated.

Conclusion

The approval of the OL and previous RM application was set against a very different planning background; the Local Development plan was not in place, village boundaries could not be protected and the whole area was vulnerable to speculative developers.

Even then, had the sequential approach been applied as required, this was a very poor and problematic site with many difficult constraints compared to others. The developer is proposing the maximum number of houses, which exacerbates these problems. The problems of the original RM have not been resolved by the revised design and new problems are apparent. Our objections have been disregarded by the developer.

We are aware of the harm that this design will inflict on our valued landscape.

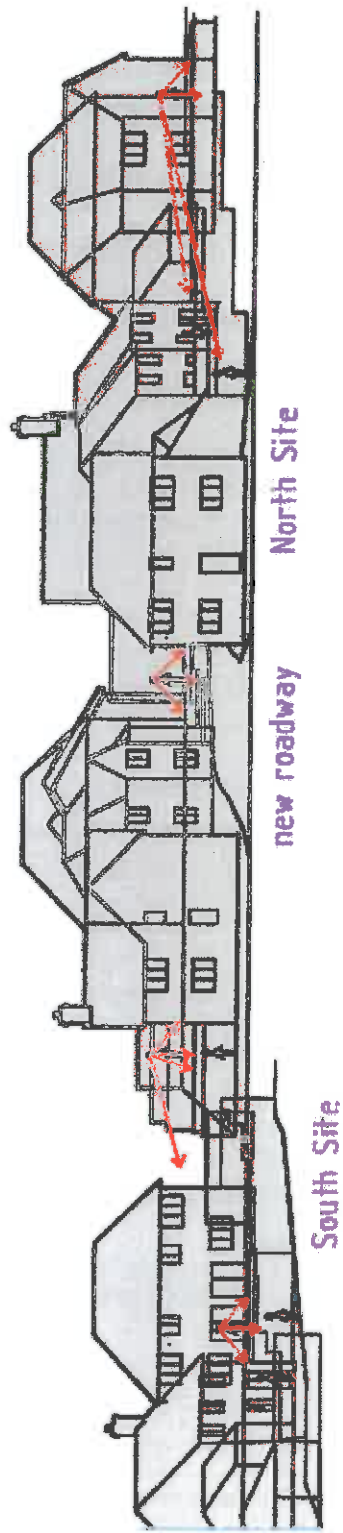
Currently there are unauthorised works and enforcement for removal is urgently required. These works are an eyesore on the approach to the village and the unstabilised mounds are likely to jeopardise the protected river and flood management scheme once the rain starts again.

The application is incomplete (see holding objection as well as these comments) and we await the missing information. An incomplete application is, in itself, grounds for refusal.

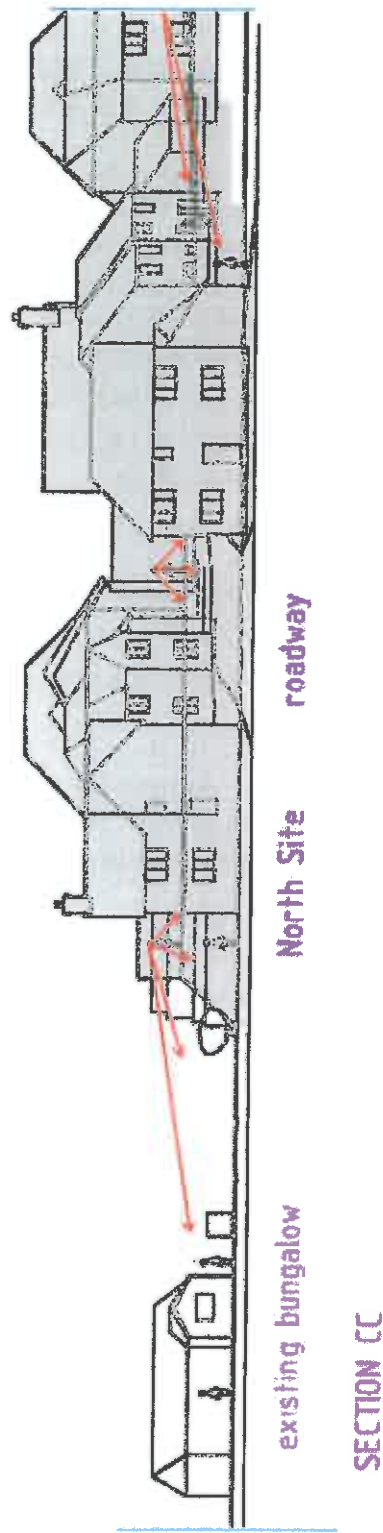
The issues raised are major and we have doubts that some can be overcome at all. It is not safe to assume that these can be dealt with through conditioning - flooding being a particular consideration due to the potential effect on the village centre.

This development would not normally have been considered acceptable as a result of its size, being outside of the village framework boundary, not allocated in the LDP, not considered suitable for development in the SHLAA assessments, being in a minor rural centre, etc.

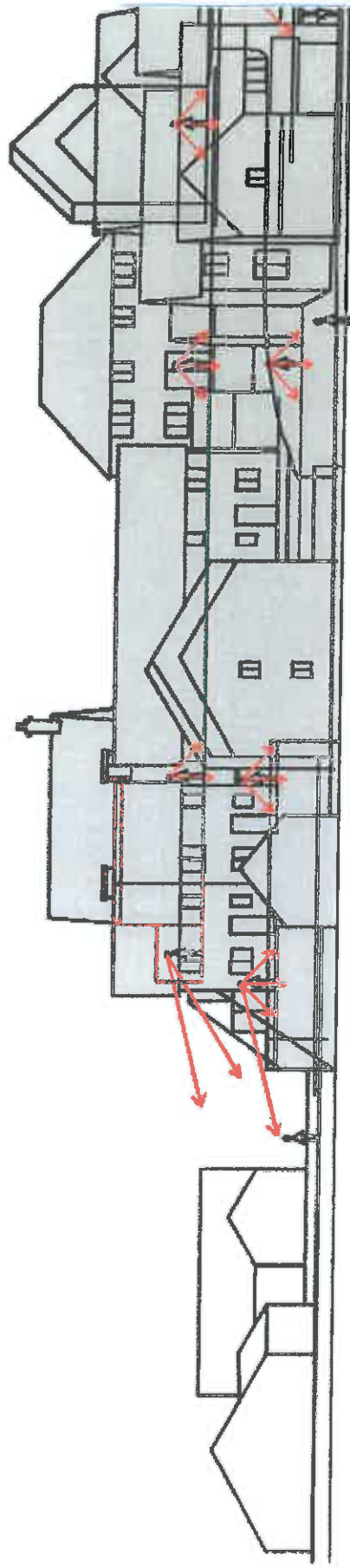
With the LDP now in place, and this not being part of the housing allocation, local objections can be taken into account and given due weight. It is clearly not a sustainable development by the criteria applied in the NPPF and has not proved to be deliverable.



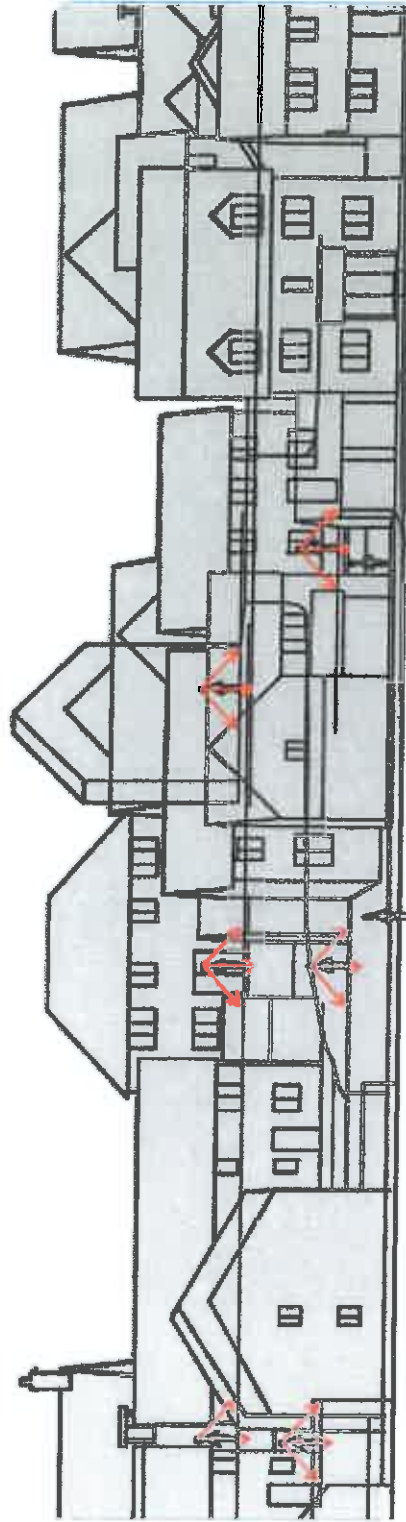
RELATIONSHIP OF THE TWO SITES, OVERLAYING SECTIONS CC AND FF



BARTLOW ROAD RM2 - LPC 6

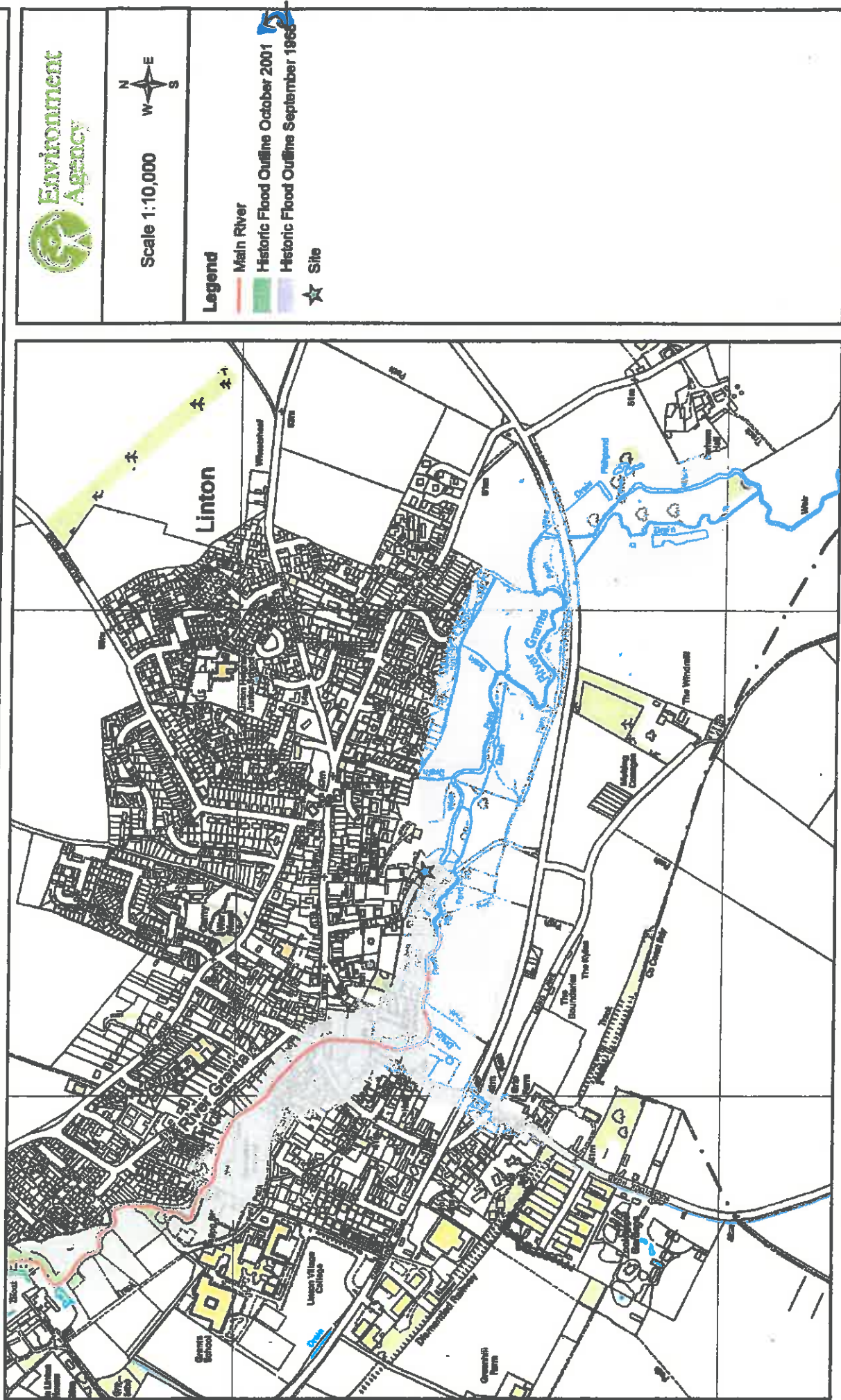


Existing bungalows



CROSS SECTION F-F WITH EXISTING HOUSES ADDED - BARTLOW ROAD RM2 - LPC 5

**Recorded Flood Event Outlines centred on Mill Lane, Linton, Cambridgeshire.
NGR TL 56463 46613. Ref 34305. Created on 16 January 2017.**



**TO BE CONSIDERED WITH ADDITIONAL COMMENTS SUBMITTED BY
LPC ON 12/09/19**

Linton Parish Council comments on The Design and Access Statement -

This document was not available to LPC at the meeting on 21st August. We send our comments now

It is clear from this Statement that the developer has not understood the reasons for the refusal of the previous RM application - see 6.2 Refusal Reason number 1" *The reasons given reflect concerns made plain by the Parish Council and Ward councillor and other members of committee regarding the House Levels on the Bartlow Road frontage on the southern parcel and their resulting relationship to each other*". The councillors are said to be "wanting to find reasons for refusal". In fact the reasons for refusal are clear - the refusal is due to the effect on the landscape contrary to Policy HQ/1.

The developer has then amended the previous RM, slightly changing the levels on Bartlow Road, but not addressing the real issues. This application remains unsuited to the location, the previous objections remain, more reasons for objection have resulted, the submission is incomplete and contrary to the Local Development Plan. The application should be rejected.

Comments on the Design and Access Statement

Introduction - The reasons for refusal are given here, indicating that the comments of LPC and councillors were given their due weight. The changes in this application do not meet the major issues for refusal, as described in LPC holding objection. The proposed housing is too high, prominent in the landscape and not appropriate for such a sensitive site at the entrance to our village. These issues have not been dealt with and remain as reasons for objection.

It is stated that "This Design & Access Statement deals only with matters relevant to the new Reserved Matters application" and proposes only to provide Design and Access information from the date of the refusal at Planning Committee and then refers to documents no longer in the public domain. Each application needs to be stand-alone and therefore the D&A Statement and the application is incomplete.

1.3 -The outline consent was current to 01 September 2019, with approval for *up to* 55 houses, many of the conditions not yet having been addressed. There are considerable discrepancies between the OL and this RM application, including the developable area, the number of site accesses, etc.

4.1 - Location and accessibility - the site is at the far edge of the village outside of the Design Guide sustainable distances for facilities. There are bus stops for twice hourly services, but the "superior connectivity" to the A11, M11 and rail is by way of a busy, dangerous and over capacity (especially at peak times) A1307. There is no Traffic Report based on up-to-date data on the amount of traffic using A1307 and traffic conditions. The report is over 8 years old and takes no account of the traffic generated from the ever-expanding Haverhill - including the impact of HGVs from transport hubs.

4.2 - Until recently both fields have been used for arable crops, not grassland. As yet the land has no consent for change of use from farmland. As demonstrated by Key View 1, both parcels were agricultural farmland at the time of the OL application. The photo was taken on 28/7/2016.

Despite being used for intensive arable agriculture there has not been a contaminated land report

4.3 - Surface water drainage - a suitable scheme has not been submitted, (see above) with the LLFA rejecting soakaways and permeable paving. The soakaways are outside of the developable area.

4.3 - States that infiltration into the subsoil is common practice. This might be so on other sites, but not when that chalk is the aquifer and the scheme has not demonstrated that there is the required clearance of at least 1 metre from any groundwater level as required by CCC in their response to the OL application. The Rossi report was designed around storage tanks and did not conclude that soakaways were suitable for the southern site (Rossi Report 6.10).

4.4 - Foul Sewage - This says the drainage is proposed to go to manhole 7501. It does not do this. Drawing E17-084-141 P7 shows the designed drainage scheme goes to the old village drain heading west from Bartlow Road. Connecting drainage (to manhole 1502) on the Victorian 6" main was

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specifically not approved due to the environmental damage likely to be caused to the village and Conservation Area. Manhole 7501, is on the newer 375mm pipe is further away and requires landowner consent to access this. Also, the proposed pumping station is within a flood zone, outside of the developable area.

4.5 - Topography - this has been changed with the removal of topsoils. There is greater site fall across the site, taken from the height of the Bartlow Road which is the level of drives and access.

4.6 - The site is directly above the aquifer, with foundations and site contamination (fuel, domestic waste, garden herbicides, etc.), impacting upon our water supply.

4.7 - The OL only allows 2 accesses from Bartlow Road.

4.8 - This notes that the slab levels have been raised 'following modelling' i.e. the houses have been raised up on platforms. This affects the appearance of the site and potentially also the percolation capability of the site would be less than designed because of the additional platforms (Rossi designed at 1.39 hectares impermeable area, which now appears to be well exceeded).

5.1 "Opportunities" - Linton is at capacity and does not need a village edge commuter estate to meet housing needs. There is already a soft entrance to the village provided by the mature hedging which will be lost to urban low hedges which cannot be protected. Steep roof pitches give a higher profile to already tall houses, dominant on the skyline and across the wider landscape. Housing designs are the "anywhere" type, not sympathetic to the village with materials and finishes out of character with the vernacular. 5.1 says the houses are wide fronted and narrow gabled which is not correct for the 'affordable' units i.e. for a substantial proportion of the houses on the site.

There are "enhancements" mentioned for the River Grant and "flood protection for the river and downstream". We do not see these in the plans, and are particularly concerned as the Granta is a protected Chalk Stream, recently reviewed for LPC by an Ecologist for the Wild Trout Trust, part of a Flood Management Area

Ecology reports refer to the sensitivity of the river and its corridor, and the need to deter domestic animals and people from accessing the river corridor. The Granta was used as an example of a chalk stream by the BBC Look East and is recognised in Ecology reports as a sensitive area.

Previous applications in the area have been refused due to the increased potential for flooding downstream.

5.2 - Constraints - There are more constraints than noted here, the SHLAA assessment being that it was not suitable for development. These include:

That more of the site is in historic flood zones than has been acknowledged

The flood risk downstream will be increased by loss of green space and increased impermeable area

The surface water flooding and location of housing in flood paths

The 10m each side "no dig/no plant" zone on the northern site

The impact on the sensitive river corridor and protected chalk stream

There is mention of "flood protection measures" as "improvements to the river", but details are not provided, and need to be clarified as this is part of a Flood Management Area.

The loss of rural soft landscaping and hedgerow along Bartlow road due to the many accesses and replacement by urban hedging, driveways and the sight of parked cars. It says the existing hedge is to be retained, but there is no certainty on the drawings (i.e. no annotation) and the width of the coloured line on the soft landscaping plan does not resemble the existing hedge. Clarification of protection of the hedge is required as ground levels are being substantially changed.

Probable loss of other boundary hedges and trees which will be large features in small gardens are within areas where land levels are being raised and terraced.

The effect of more traffic on a busy through road + more traffic accessing the over capacity A1307

It is stated that the levels are very steep on the northern part of the Southern site and that sections will be needed to show how these have been achieved. This has not been done as the sections do not show comparison with the existing levels.

There is reference to off-site land being used for landscape, woodland, Public Open Space, etc.

The application needs to stand on its own, and should not be reliant on another application that has no certainty of approval, especially as this development is contrary to the new Local Plan. The land has no consent to change from farmland. The other uses that are stated would have a significant and detrimental change of character.

6 - Designs, layout, heights, housing mix, parking, etc., have already been commented upon above, and in the professional comments from the LPC consultant. The concerns and objections made by LPC regarding the previous application have not been addressed.

The public consultation was for a different layout and masterplan. Of the dozens of comments sent to the developer, only a handful had favourable comments regarding development here. With whom were the other "extensive negotiations"? There has been no consultation on the current application.

6.1 - LPC's accompanying statement demonstrates the development does not reflect the density and style of the area, nor the vernacular character of the historic village centre and Conservation Area.

6.1 Clarification is needed of the "extensive pedestrian routes through the site linking with the wider area" as it appears only to be uphill or downhill, down the main roads and 1 path, all 3 leading only to the busy Bartlow Road. The "strong village edge" appears to be brick retaining walls which would not be appropriate for the prominent rural position.

6.2 The 2 storey and 2 ½ storey houses do not reflect the character and scale of the edge of village location, where they are 1-2 storey. It is noted that the designated "undeveloped area" has been included in the figures to illustrate density, which obscures the clusters of very tightly packed 'affordable' housing.

6.3 Layout. The OL masterplan was not approved. The open space is now predominately on the far edge of the development, rather than provided where it would encourage integration with the existing village.

6.7 also intimates that the OL masterplan was approved, but it was illustrative only and has no material planning status.

6.8 proposes only to provide Design and Access information from the date of the refusal at Planning Committee and then refers to documents no longer in the public domain. This D and A should be on issues regarding the current scheme, not raising historic issues. Each application needs to be stand-alone and therefore the D&A Statement and the application is incomplete. The application is also incomplete due to the omission of reports, as stated in LPC holding objection and here.

The comments made by LPC are valid and have not been satisfactorily addressed; there remain many reasons to object to this development.

6.9 States that the Bidwells LVIA has been re-submitted, but it has not been received in hard copy and is not available on the website. Reference is made to the existing historic terrace as being C20. These houses are on the C19 Ordnance Survey maps and are therefore historic assets that should have been properly assessed and taken into account. (See attached map). The housing adjacent to the north site are high quality bungalows, set low and with minimal impact in the wider landscape. The ex-council houses are similarly set low and back from Bartlow Road, unlike the proposed houses which are tall, close to the road and over look current housing with concomitant loss of privacy. The bungalows in Finchams are built well back from the river and raised to avoid flooding. Gardens have been flooded in recent years, but not the bungalows, showing the wisdom of this policy. Proposed houses are within flood risk zones.

6.10 - Planning Committees - these refer to the previous application and which was the subject of detailed comments by LPC, submitted to SCDC within the permitted consultation period - not "belatedly" as the developer refers to this in the appeal document.

A development of this size and sensitivity would be decided by the SCDC Planning Committee as standard, and not delegated to officers. As commented at a planning committee meeting "who makes the decisions, councillors or officers" It was conceded that councillors made these decisions.

6.11 Parish Council Objections - LPC objections are based on an understanding of the site, the objective knowledge of our village and are supported by evidence. LPC are allowed opinions and

subjective statements just as much as the developer has done, but in our case we have to live with the consequences of unwanted speculative development that will affect our village and our lives.

Landscape -

6.11.1 The Bidwells LVIA referred to the masterplan in the OL application; this has been changed materially in this and the previous RM applications. The review of the RM application, commissioned by LPC from Liz Lake Associates, concludes that *"This report demonstrates that the detailed design, subject to this reserved matters application, is materially different to the Outline approval S/1963/15/OL to which it is linked. The changes to the layout have eroded the principals of the landscape mitigation which formed the basis of the approved outline application with increased effects on the character of the landscape and the settlement of Linton, including key landscape views on the approach to the village and from the river valley. As a result, it is a materially different scheme and is considered less sustainable and contrary to the policy presumption to grant approval under NPPF 2018 paragraph 11"*

It is amusing that the developer states that *"Parish Objections are an attempt to revisit something that has already been dealt with in the Outline Approval. It is therefore inappropriate to resurrect matters that have already been decided upon"*.

The developer is referring to a LVIA and landscape assessment for an OL plan which is very different from that submitted at RM and so cannot be considered as having been decided upon.

This landscape has been assessed as **Valued**, and *"the effects of the development on the residential views along Bartlow Road (VP1 and 2) are considered Major/Moderate Adverse in the LVIA due to the loss of the open views across the Granta Valley (see Liz Lake Associates Landscape report)* This also notes that key views have been omitted by Bidwells. It is correct to raise the issue of landscape and its importance, due to the adverse effects of this development upon it.

6.11.2 Thank you for details of technology used. However, the aerial views still show the site as being flat. Our concerns regarding levels and sections have already been stated and that these submissions do not include either the full extent of the site nor the current ground levels. We are aware of the need for terracing, but this will be very prominent in the views. We referred to "Hard Terracing" - is this so very different to the developer description as "paved patios"? These and 4ft brick walls appear to be rather impermeable. The retaining vertical log structures described are rather prone to rot - who will be responsible for the maintenance of these? The surface water scheme has NOT been approved by the LLFA. The approval in Rossi Long even refers to a scheme in an earlier application. The scheme referred to is a SUDs scheme, but the scheme for this RM is by infiltration mainly into areas that cannot be managed or are outside of the developable area. 30% mitigation for Climate Change should now be 40%.

6.11.4 The housing on sloping ground will allow overlooking to neighbouring properties (see cross section F-F submitted by LPC). More concerning is that the tall housing will overshadow and overlook current housing, particularly that along the Bartlow Road. This infringes the neighbours human right to privacy.

The retention of screening landscape cannot be ensured.

6.11.5 The siting of the pumping station in a flood zone, into our drinking water aquifer and outside of the developable area, should be given due concern. This proposed design is of considerable concern to the parish.

There has not been a contaminated land survey despite this having been a longstanding intensively farmed field. Another omitted report.

6 - Other concerns

i We have drawn attention to structures outside of the developable area in previous comments.

ii The area around the pipeline is a no-dig and also *no-plant* zone. There appears to be tree planting.

iii We have commented upon the single link of a path crossing several drives alongside a busy road. The link between sites is in a 50mph zone and near the proposed transport hub - a busy area.

iv Noise -As commented upon in the Health Impact response, there is no designed noise mitigation, which is likely to be required, and no demonstration that the design and layout is based on an adequate noise assessment, despite the site being very close to and below the A1307 which is above most of the site. During peak hours, when the A1307 is running freely, the noise at the sites is considerable. The noise levels in the previous application were taken at times outside of peak road traffic and were collected from the wrong sites to adequately capture actual noise levels affecting the site. Planting trees, which take an appreciable time to grow and will not become tall enough to protect bedrooms from the noise, is insufficient noise amelioration. That noise levels exceed EU regulations in external spaces has not been overcome, nor has the likelihood of people wanting to open their windows.

The stress caused by noise, and particularly low-level constant noise, is well documented as having detrimental health effects, particularly on cortisol levels (a typical marker of stress). These sites suffer from both loud and constant road noise.

Appropriate noise data and a suitable protection scheme has not been submitted

There is no assessment of vibration levels for the site, despite the HGV traffic from distribution hubs in Haverhill and other sources. Increasingly weight is being given to noise, vibration and air quality issues associated with such close proximity to a major road.

v - We await Highways comments upon splays and sightlines but question the lawfulness of these additional accesses in principle on a RM scheme for only 2 accesses.

vi- The gradients of access still remain a concern, both across the site for pedestrians and for driveways, with the dropping of slab levels along Bartlow Road increasing the gradient. This road is known for flooding and freezing. We note that no grit bins are included in this submission.

vii Hedges - it will be interesting to see how the hedges will be maintained when they form part of tended gardens, and how it demonstrates that this can provide a co-ordinated means of maintenance, as is required.

7 - Flats over garages are not particularly appealing, but we suppose that will keep residents dry when the surface water flooding passes beneath them...

6.12 Redesign of scheme to overcome reasons for refusal.

LPC has commented upon this in our holding objection - the re-design is insufficient to overcome the objections to the development and its design.

The councillors were quite clear in why the application should be refused, the form of words is also clear. The developer has obviously not grasped the intent of the committee, that the development, designs, height of housing and impact on the landscape are unacceptable; the whole site is at the entrance to our village, a sensitive and valued landscape area. Also, the grouping of affordable housing was unacceptable. There were many other reasons, but these were the two that they chose.

Reason 1 -

- The terraced nature of the dwellings has not been addressed - there are now more terraces (16 against 13 previously) along with retaining walls, platforms, steps and other engineering structures. The terraced nature remains as visible and intrusive features (although judicious shading of the illustrative drawings seeks to minimise this).
- The terraced nature of the dwellings does not impact on Bartlow Road nor from within the site, but on how the development will be seen in the landscape, over the wide views, across the river valley, and occupying the valley as seen from the A1307.
- (We cannot find mention here of all the properties that have been raised since the last iteration, so are higher in the river views).
- Dropping slab levels creates difficult gradients for traffic between Bartlow Road and their drives - around a 1:9 slope.
- This slope also making flooding from the road into garages and homes much more likely.

- Lowering a few plots has minimal impact on a site that has a build-up to create these platforms - potentially up to 6.5m across the area where the platforms are most prominent.
- Lowering the slabs two plots by 400mm (not 400m, as in the submission...) will have little effect on the prominence of the housing in the landscape - they remain as 2/2¹/₂/3 storey houses, out of character with the area and context and very visible in the wider landscape. They would remain very obtrusive, including on the skyline from the village. This against the Design Guide which states that buildings should not intrude upon the skyline except specifically agreed features - towering housing on rising ground would not meet this criterion and the character of the area.
- The gradient of the gardens would not impact on the terracing. The gradients of public paths is more concerning for reasons of accessibility for pedestrians, the disabled and for road safety.
- In this application, as before, the developer has failed to take into account our major objections to the design of this site - the houses are too high, prominent in the landscape and with designs insensitive to the nature of the rural site and entrance to the village.
- The effect of this development on the wider landscape, the surrounding fields and public open spaces, the setting of and views from the village, from across the river Granta, etc., has not been evaluated. There has still been no evaluation of the effect of housing on the northern site and no evaluation of the effects on the skyline from significant view points.
- A "Green Link" is a path to the other site, not a feature to reduce impact, crossing the road in the 50mph zone and too near to the entrance to the GCP/City Deal transport hub.

Reason 2 -

- The affordable housing remains clumped in the centre of sites.
- Those in the southern site are in the areas most affected by surface water run-off.
- The surface water flooding has been known since Mediaeval times following the removal of woodland up the slopes. This was revealed by the channels found in the Archaeological investigations. Housing in the centre of the site is most vulnerable to pluvial flooding.
- The designs and grouping makes it fairly clear which is the affordable housing.

LPC does not consider that the reasons for refusal have been overcome. Indeed, the re-design and this submission have raised more issues for refusal.

6.13 - conditions. Many of these have already been commented upon.

The D and A Statement lists conditions wished to discharge, but the information has not been provided and the discharge of conditions are not included on the application form.

Condition 5 - the LVIA for the original scheme has not been re-submitted. The Ecological design is incomplete.

Condition 9 - No submission and condition not met.

Condition 10 - Drainage and flood risk. Scheme has been rejected by LLFA - condition not met

Condition 11 - Foul water drains. See comments on 6.11.5 and 4.4 - condition not met

Conditions 13-15 - No submission and conditions not met

Condition 16 - see "6 - other concerns" iv Noise and as commented upon in the Health Impact response, there is no adequate noise assessment - condition not met.

Conditions 17-18 - see LPC additional comments. Survey requirements have not been met - conditions not met

Condition 19 - Archaeology - Archaeology – most of the investigative work has been done, but there is no report despite/because this is a more important site than the desk top review would expect. No submission and condition not met. We understand at least the well and Neolithic hearth have not been investigated prior to their loss.

Conditions 20- 22 - No submission and conditions not met.

Condition 23 - Housing Mix - see LPC additional comments regarding demographics, Housing Need Survey and Linton's contribution to the 5YHLS - Reports not submitted and condition not met.

10 -Context. The illustrations show a village that has developed over centuries, within the sustainable limits of the village boundaries, reflecting its history, materials available and needs of residents.

The houses near the site are set low in the landscape, are of modest height and are not overly intrusive in the valued landscape. The same cannot be said of the tall houses, further raised on platforms, which dominate the current houses, the skyline and are too prominent over the wider landscape.

The "strengthening of the entrance" of the village is the opposite of what is needed - we have a soft entrance, hedged and rural, sensitive to the landscape and natural skyline, which we wish to retain.

The proposed designs are rather a pastiche of farmhouses (which in this area are not black) and barns, with balconies, porches and fussy detail. These designs are out of keeping with the rural setting and character of the area.

11 - Secured by Design.

Linton is not known as an unsafe area for current residents.

11.4 - Boundaries -It is noted that boundaries between public and private areas are "*defined with car parking and 1.8m high screen walls...trellis topped...*". This sounds like a way to create isolation and insularity. Also, fences along public footways need to be 1.2m height.

11.5 and 11.6 - Layout/Gable walls - "*gives the opportunity for natural surveillance*". In other words, a lack of privacy through overlooking.

11.7 to 11.9 - The expected dominance of cars in the streetscape is obvious, with much lighting, surveillance defensive planting, etc., out of keeping with a rural village set in wildlife areas.

12 - Surface water

The proposals for managing this have been commented upon above and in LPC additional comments. The soakaway chambers are in private areas or outside of the developable area and have been rejected as a suitable means of handling drainage by the LLFA.

There is no certainty that "*soakaways will be adopted and maintained by Cambs CC*".

Mitigation depends on infiltration into crated soakaways, but these will be into the chalk aquifer. It has not been demonstrated that there is the required clearance of at least 1 metre from any groundwater level as required by CCC in their response to the OL application.

The soakaways cannot "be taken down into the permeable ground and verified by in-situ infiltration testing" as this testing is no longer possible. Earlier infiltration and porosity tests failed despite the exceptionally dry weather at the time they were performed. Now, reliable porosity and infiltration testing cannot be done as the top soil and subsoil has been removed.

The proposals for dealing with overland flow are only to protect properties with no thought for the effect on the river and downstream.

Statutory consultee responses

These all refer to previous applications with different schemes, not relevant to this application. This application - a slightly revised version of s/2487/18/RM - does not answer the reasons for previous refusal and raises further matters of concern.

