

Impington Parish Council (IPC) objects to the Planning application S/1356/08/F and **strongly recommends refusal**

Our recommendation is based on two distinct sets of reasons. The first concerns the current allocation of the site for employment purposes and the other set relates to the design details submitted for residential properties.

1 Loss of an Employment Site

The site is currently allocated for employment purposes, and the Parish Council strongly seeks to preserve this use. We note that the refusal for the previous application for the site included the following as a reason for refusal:-

"It is concluded that the marketing fails to establish that this part of the site is no longer suitable or capable of being made suitable for continued employment use and has not reflected the lawful use and condition of the site. The proposals are therefore, contrary to Policy EM/8 Of the South Cambridgeshire Local Development Framework 2007 which seeks to avoid the loss of rural employment sites due to their scarcity, need to reduce pressure for the development of new employment sites for example in the countryside and to provide local employment opportunities."

Histon and Impington are a designated Rural Centre. The policy on Rural Centres recognises that a Rural Centre needs to be a sustainable mixture of residential and employment development. Within the Local Development framework there are no sites in Impington and Histon for employment but there are sites for residential development. There are policies for exception sites outside the village framework for them to be considered for residential development (for affordable homes only) but no such policy exists for employment sites.

By seeking to change the use of an employment site to residential, this application completely undermines the Rural Centre policy and the status of Impington and Histon as a Rural Centre: Although the application claims that the application is sustainable, there is no evidence for this claim; conversely the loss of an employment site undermines the sustainability of Histon and Impington as a Rural Centre. The developer refers to the approval of residential development of a former employment site in Milton but Milton is not a Rural Centre so the comparison is erroneous.

IPC concludes that to allow residential development on this site not only removes a potential employment site but also removes the possibility of any employment site in the joint settlement for the foreseeable future.

The previous refusal notice cast doubt upon the evidence provided by the Developer in relation to the marketing of the site for employment purposes and hence rejected their claims. At IPC planning committee meeting of 26th August 08 representatives from the Applicants were present, and they noted that:-

- They have not been marketing the site since the last application, so have no additional or recent data;
- Their marketing, since acquisition, was entirely of the site as is, with the dilapidated existing premises: buildings that are now partially demolished and contain asbestos;

- NO attempt was made to market the site with potential for small 'start up' businesses.

It is clear to the IPC that these efforts at marketing the site have been of limited scope and it is not surprising that they generated no interest. IPC maintains that there is considerable need for small premises to house local businesses which are currently run from home (spare room or garage) that wish both to expand and to keep the business within the settlement. The Parish Council Offices have, over recent months received several requests for information on sites offering such start up opportunities. The Council feels that having such facilities is an essential part of the mix necessary for a sustainable settlement, as is required for a Rural Centre under the policy. The applicants have made no attempt to market the site for development for commercial properties of the type which is needed.

Rather, according to the applicant's agents, their 'mission' is to develop residential properties, as this is the aim of their parent venture capital company, and why they failed to consider alternative approaches.

Relevant policies:

ET/d To reduce commuting distances and the need to travel, particularly by car, by bringing home and workplace closer together, and by encouraging employment opportunities in accessible locations, or accessible by sustainable modes of travel.

ET/6 Para 5.17 Employment sites within village frameworks are a scarce resource, which should be retained.

Relevant application: S/1017/06/F - change of use to B1(C) and B8

In summary, the Applicants have **not** considered a development that provides some commercial accommodation for local businesses. Their continuing focus on one solution for the site has restricted the opportunities for the use of the site for its designated purpose. **On this basis alone, IPC would strongly recommend refusal.**

If however SCDC is minded to consider the application for residential development only. IPC also contends that the application is fundamentally flawed and should be refused.

IPC notes that the Developer has reduced the density of the development from 39 per hectare in the previous application to 32 per hectare in this part of the overall site, but we have been unable to check these figures without a survey of the site. The applicant has also undertaken to allocate the affordable housing, where possible, to local residents. These assertions are welcomed but do not offset the strongly negative aspects of the development.

IPC recommends rejection for the following reasons

2. The complete **destruction of the "heritage" buildings** to the western edge of the site. The previous application acknowledged the importance of these buildings to the local history and culture. Truly innovative developments occurred in these premises and their loss would be detrimental to the understanding of the roots and history of this community.
3. **Poor design.** The lists of the finishes provided ("Brick, render and wood cladding") without details, but supported by drawings, show that the **designs are**

totally at odds with the street vernacular: the use of particular bricks, finishes and woods should have been specified without the need to rely on the developers' assurances.

4. The five buildings facing Impington lane are **identical and of a height not matched in the rest of the road**. The design is therefore out of keeping with a mixed residential area including many individual and more modest dwellings, some of which are directly opposite the proposed large houses. Impington Lane is a typical ribbon development that has grown over time to develop a rich mix of housing styles - conventional two storeys, chalet and bungalow. Only in one area is there any repetition. Those properties are well set back from the road, and are themselves at varying distances of set back. The proposed houses fronting Impington Lane are out of style and character - both by their uniformity, bulk, and proximity to the road edge. The design quality is also questionable.
5. The proposed development would result in a **five dwellings deep development** from Impington Lane, as opposed to the current two level streetscape. In the absence of definite proposals for Impington 1, this would be an unacceptable layout if implemented on its own. This development would then be visible across the green belt from the Impington Conservation area.

The following Policies are relevant:

Policy DP/2 1. All new development must be of high quality design and, as appropriate to the scale and nature of the development, should:

f. Be compatible with its location and appropriate in terms of scale, mass, form, siting, design, proportion, materials, texture and colour in relation to the surrounding area;

POLICY GB/3 Mitigating the Impact of Development Adjoining the Green Belt

1. Where development proposals are in the vicinity of the Green Belt, account will be taken of any adverse impact on the Green Belt.

2. Development on the edges of settlements which are surrounded by the Green Belt must include careful landscaping and design measures of a high quality in order to protect the purposes of the Green Belt.

Note 3.8 However, account will also need to be taken of the impact of proposals on the adjoining Green Belt, including views from the Green Belt.

6. We have not found a Flood Risk Assessment in the papers and the developers claim this is not necessary as this parcel of land is just outside the flood plain. We note however that, paradoxically, the scheme proposes to use an open grassed area as a flood containment measure.

This is undoubtedly included to service the later development of the adjacent "Impington 1" land area and its inclusion indicates the need to be mindful of local conditions and flooding history. It is well known that all the properties on the northern side of Impington Lane to the west of this site report that their rear gardens are waterlogged during the winter months. The drainage from across Impington Lane into the ditch at the western edge of this site often backs up and locally floods. The proposed development, by increasing the speed of run off from the dwellings will only exacerbate the situation.

We therefore fundamentally disagree that the area of land designated as flood containment can not be included in the assessment of public open space as it will be unusable in periods of heavy rainfall (i.e. the normal year in, year out heavy rain periods) when this land will be unusable, and thus a full compensation for off site public open space will be required.

7. No archaeological report has been provided, despite the site being known to be of archaeological interest.
8. The traffic assessment uses the same survey data from 24th October 2007 quoted in the previous application but now labelled as from November 2007 but with exactly the same data. No new traffic survey has been carried out since then, despite the fact that the original data was collected on a day which was:
 - During the school half term, which reduced the level of local traffic significantly, and
 - When the Cambridge Guided Bus development had closed Park Lane in Histon thus removing a considerable volume of through traffic from Oakington, Longstanton and Girton from Impington Lane.
9. The traffic safety measures are unacceptable as:
 - The most dangerous, close offset junction layout has been retained despite the professional advice given at the time of the previous application.
 - The narrow pavement opposite means that almost all pedestrian traffic, including three schools and a nursery facility, with buggies etc. will all need to cross the entrance to the site, which if residential would have many vehicles leaving during the morning peak pedestrian time.
 - Narrowing the throat of the vehicle entrance to the development is an improvement for pedestrians but will also encourage "cross lane" driving in order to accelerate out and filter into the traffic flow, which already backs up past this junction from the B1049 traffic lights.
 - None of the proposals mitigate the assessment made on the last application that led to a refusal on the grounds that "*The proposed junction with Impington lane is too narrow and will require heavy vehicles to mount the pavement in order to access the site*": indeed in this application the entrance is even narrower.
 - The location of the two bus stops, one in front of the adjacent "Red House" will, at ten minute intervals, shield visibility for cars leaving the proposed site.
 - The access for car parking to four of the frontage houses also crosses the pedestrian path. There is, however, scope for these houses to be accessed from the rear, thus reducing the risk to pedestrians. This would also enable retention of the full, mature hedge along the frontage and thus preserve an important feature of the street scene.
 - IPC would expect SCDC to obtain a written assessment from the Highways Authority, which should comment on the scope and/or restrictions for any further development feeding traffic through this entrance to Impington 1.
10. The previous application was judged to have provided inadequate car parking space. The new application has a higher proportion of car parking spaces, but

many of these are private spaces within grounds of the large houses at the front. Thus the spaces available to the remaining 30 dwellings is 41 may still lead to the expressed concern on the last refusal, of the possibility of cars being parked off the site, on a road that is of minimum width and heavily used. IPC Noted last time:

Policy TR/2 gives the adopted standard for car parking is an average of 1.5 spaces per dwelling (Development Control Policies Appendix 1).

The Cambridgeshire Design Guide for Streets and Public Realm identifies that for parking *an inadequate provision ... result in high levels of inappropriate parking to the detriment of the streetscape* and specifies both minimum and maximum levels.

There is clear evidence from the Arbury Park development that inadequate provision does not constrain car ownership, and that the results forecast by the Design Guide are coming to fruition.

11. The Auto Tracking Movements (drawing 11/642/SK002 rev 001) shows that for a Refuse Collection Vehicle to be able to turn, one of the allocated car park positions must be empty
12. Ecological and Environmental Statements – Biodiversity enhancement recommendations are made, potential impacts are discussed, The Hedgerow Regulations 1997 and reference to the Cambridgeshire Biodiversity Action Plan (and any relevant HAPs and SAPs contained within) are referred to; however there is little or no evidence to support positive implementation of these and other items referred to within PPS9.
 - The general character of Impington Lane is a mix of trees and hedges; the Southern boundary of the site is defined by an important mix of ornamental trees and Hawthorn hedge. Hedges are a feature of the local streetscene and part of the Unwins history. The creation of two new access roads would impact considerably on the visual aspect and destroy the overall value this currently offers – This is unacceptable; an alternative access is available.
 - No commitment is given to the statements in section 5 of the Ecological Appraisal submitted - Impact assessments for all wildlife (both on site and on adjacent sites) must be submitted and suitable remedial action taken before any activities are undertaken on site. Eg. Changes to drainage will have a knock on effect and can significantly alter existing habitats supporting protected species such as water voles.
 - Overall planting scheme - Insufficient details of the planting schemes submitted. Proportions, locations and quantities of each species are required. It is important that 'ornamentals and hybrids' which are more suitable for the gardens and POS are not included in the indigenous planting areas.
 - Green Belt buffer screen - A suitable planting scheme is required; details submitted are insufficient. Planting preference would be for 2 year old bare rooted trees and shrubs (rather than mature plants) for the mixed indigenous hedge and indigenous buffer zone. Larger feature specimen trees would be more suitable within the development site where they can be planted for immediate impact.
 - The Landscape Statement includes in it's objectives to "*increase the opportunity for greater biodiversity*" - The planting submission does not provide significant evidence of this. There is an opportunity within the site to

look at a new habitat creation, such as a pond, in the flood plain area. Adjacent to the brook, indigenous planting and open grassland, this would significantly enhance biodiversity within the site.

- Existing leylandii hedge on the western boundary - Preference would be for this to be removed and replaced with native species. As this is adjacent to the brook and the POS/open flood plain area species such as willow mixed with other species would be more appropriate.

13. The application makes reference to renewable energy approaches, but makes no commitment.

14. Inadequate provision for cycle storage.

Structure Plan Policy P8/8 is a requirement for the provision of adequate cycle facility provision, including cycle parking.

Development Control Policies Appendix 2 para 2 states: In the villages most homes, whether existing or yet to be built, have appropriate areas such as garages where cycles can be kept securely and under cover

This development does not provide most homes with a garage.

Having under-provided car parking, with the aspiration that alternative means would be used, the provision of cycle storage at the bare minimum is unacceptable.

The Council would wish to see the standards adopted by Cambridge City Council (1 per bedroom up to 3 bedrooms) applied.

15. Policy HG/2 requires that a proportion of new buildings *should be designed to lifetime mobility standards* - it is not clear which buildings have been so designed.

Issues relating to the split applications

IPC notes that

- The full site would require a flood risk assessment, and this is reflected in the drainage provisions in this application which are only required for the full site.
- The traffic assessment and the safety of the entrance to the site will need a different treatment for the full site. Making an inadequate entrance for this application will either severely restrict the numbers of dwellings that would be acceptable on the rest of the site, or require a re-design

Conditions

Without prejudice to our previous comments requesting refusal, if SCDC were minded to grant acceptance of this proposal, IPC would require:-

1. Agreement of finishes to the buildings to be in keeping with the street scene, and in particular the use of buff or light coloured brick, and that IPC is included in the consultation process on these design features

Reason: Inadequate definition in the application does not permit an assessment of the suitability for inclusion within the current street scene

2. Definitive proposals for alternative renewable energy sources.

Reason: Vague promises must be replaced by enforceable commitments.

3. All construction traffic to and from the site be restricted to accessing Impington Lane from the B1049 junction. No such traffic to use Burgoynes Road/Clay Close Lane/Milton Road, or New Road

Reason: Burgoynes Road/Clay Close Lane are narrow, have tight bends, and no footpaths. They are unsuitable for heavy traffic.

New Road is the site of IVC and has student pedestrian traffic much of the day.

4. All construction traffic is restricted from entering or leaving site between 7:30 and 9:00 in the morning peak, and 15:00 and 16:30 in the afternoon.

Reason: to avoid pedestrian and cyclist conflict, especially schoolchildren.

5. A contribution for improvement to the Public Drain draining the site, particularly where it passes under the B1049, as proposed in the Planning Obligations Paper, item 3:

Reason: Where the drain passes under the B1049 is a choke point which therefore limits the capacity of the drain to deal with flooding events

6. The developer enter into a section 106 agreement with the Parish Council:

1. The Council's reasonable legal bills to be met;
2. A contribution made towards the development of offsite recreation and open space facilities - at the level of the previous application, indexed appropriately;
3. A contribution made towards the development of community facilities, specifically for youth work and a community meeting place
4. A contribution to public art, and one which recognises the historical nature of the site and the innovations performed in plant breeding at the site by permanent information boards and a contribution to archiving the historical material.

Reason: To contribute to meeting the reasonable expectations of new residents for such facilities, and provide the necessary off site public open space.

7. Highways matters

Vehicular access to the properties facing Impington Lane should be from the rear

The footpath on the south side of Impington Lane should be widened (together with whatever necessary alterations are necessary to the north side to maintain road width)

A bus bay should be provided to mitigate the danger at the junction

The access road junction be redesigned to improve pedestrian safety, including some formal pedestrian crossing feature

Reason: To improve safety for pedestrians, particularly school pupils using this route

8. Provision of detailed planting schemes to include replacement of all plant losses within the various planting schemes (for a period of 5 years) and to

ensure unimpeded access to the full length of the buffer screen planting,

Reason: To ensure the overall success of the biodiversity and amenity values of all landscaping and planting and to ensure it's maintenance.

9. Retention of existing hedge, adjacent to proposed buffer zone and all new planting to be done sensitively,

Reason: To ensure survival of the hedge and ensure that it is not shaded out.

10. Retention of trees and hedges to the front of the site.

Reason: To retain consistency with treatment elsewhere on the northern side of Impington Lane, to retain mature trees.

11. Creation of new habitat, such as a pond, in the flood plain area and the installation of suitable bird and bat roosting sites.

Reason: To maximise the enhancement of biodiversity within the site.

12. Provision of a full Archaeological and Heritage Report

Reason: This should include a detailed examination of the situation of the iconic building facing Impington Lane which the developers propose to demolish, as well as the examination of the full history of the site.

13. Provision of a full Ecological and Environmental Report including Impact assessments and Action Plans

Reason: to ensure the protection of many protected species (such as bats, water voles and badgers) which utilise the site and adjacent sites. Some works will have a knock on effect both and need to be addressed.