

APPENDIX -

S/1771/08/0 - GAMLINGAY

Howard House . 17 Church Street . St Neots
Cambridgeshire . PE19 2BU . Tel: **01480 213811**
Fax: 01480 406911 . Web: www.barfords.co.uk
Email: general@barfords.co.uk

Mr P Sexton
Development Control Officer
Planning Services
South Cambridgeshire District Council
South Cambridgeshire Hall
Cambourne
Cambridge, CB3 6EA

Your ref: S/1771/08/0
Our ref: MLP/M-529/P
Date: 10th November 2008

E-MAIL & POST

Dear Mr Sexton

**RE: OUTLINE PLANNING APPLICATION FOR MIXED USE DEVELOPMENT - LAND
SOUTH OF STATION ROAD, GAMLINGAY**

I confirm the arrangements for our meeting at your offices at 11.00 am on Wednesday 19th November to review the application.

From our conversations you will be aware that the proposal has been the subject of two public meetings in the village, which have led to a number of issues being raised. Reviewing the issues, we are attaching our response which you will hopefully be able to consider ahead of our meeting.

Yours sincerely



MARTIN PAGE

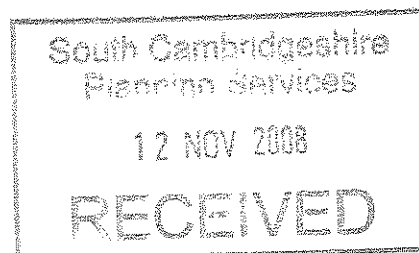
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Enc

cc Gamlingay Parish Council
Councillor Kindersley
Councillor Smith

MLP/M-529P SCDC Sexton4



**RESPONSE TO COMMENTS IN RESPECT OF PROPOSALS FOR MIXED USE
DEVELOPMENT – LAND SOUTH OF STATION ROAD, GAMLINGAY
PLANNING APPLICATION REF. S/1771/08/0**

1.0 PLANNING POLICY

- 1.1 Attention has been drawn to Policy ST/5 (2) *'Residential development ... will be permitted up to a maximum of 30 dwellings...'* The figure of 30 dwellings is an indicative one and allows for exceptions to be made. Where larger scale development is proposed, the Council will seek financial contributions from the landowner and/or developer to address improvements in local services and amenities that may be required and the proposal addresses these. The site is an existing employment land allocation within the village framework boundary and planning permission for B1 and B2 use have been granted. Government advice in PPS3 *Housing* recommends Local Planning Authorities should consider the re-designation of employment allocation sites for residential development where the land is unlikely to come forward. Furthermore government policy is aimed at achieving a minimum housing density of at least 30 dwellings per hectare. If the number of dwellings was restricted to 30 the housing density would not comply with the Council's policy and government advice.
- 1.2 The Site Specific DPD Inspectors have identified a need for an additional 2,200 houses. Although the Council has now published proposals to address some of this need it is envisaged windfall development opportunities - such as the application proposal, will contribute to meeting the housing requirement.
- 1.3 There has been reference to the strategic vision for the Cambridge Sub-Region area. We highlight the Cambridge Sub-Region area encompasses the entire South Cambridgeshire district and extends to parts of Huntingdonshire to the west and Hertfordshire to the south. The strategic vision therefore extends beyond the district boundaries. No restrictions can be placed on potential residents of the site in terms of the locations where they will travel to work and it would be unrealistic to assume no residents will travel outside of the district to their workplace(s). The Transport Assessment acknowledges this.
- 1.4 There has been reference to Policy DP/2 that the development would not preserve the character of the local area. It is considered that a high quality mixed use residential and employment scheme would integrate better in this location than a large industrial complex. The comments disregard the fact that the principle of development on the land has long been established and it remains an allocation in

the current development plan.

1.5 There has been comment the application site is detached from the village. The development will be coherent and logical in the context of the wider village framework boundary identified in the development plan and integrate the existing industrial and commercial development to the east (Station Road Industrial Estate) so that this can be 'knitted' into the overall built framework. The land adjacent to Millbridge Brook has been utilised as recreation land for the residents of the village and the wider area and is viewed as an asset to the village. This use would be maintained and enhanced with the proposal. The development would further reinforce the land as part of the village framework (to be used as a park typical of those found within towns and villages) and improve security and safety for users of the park by introducing surveillance.

1.6 It is suggested the proposal is contrary to Para 2.9 of the LDF and the comment '*This means a move away from cul-de-sac development.*' However, the complete sentence in Para 2.9 reads: *This means a move away from cul-de-sac development to more imaginative design solutions that deliver quality sustainable environments.*'

Taken in context, the whole paragraph encourages new housing developments to attain a high degree permeability and legibility whilst maintaining a high level of housing density. The Paragraph's real purpose is to expand upon Policy DP/2 *Design of New Development*, which contains ten recommendations on good design. One of the recommendations is that new development should be permeable and legible for all sectors of the community, and for all modes of transport. The development proposal at Station Road has been designed with this policy in mind, and can clearly demonstrate a good level of permeability, with links through and beyond the site.

1.7 There has been a comment the development is piecemeal, contrary to Policy DP/5. This proposal is for a mixed use development unconnected to other future schemes or proposals. It will 'knit' together the existing village with the large Station Road industrial estate to the east, with improved links. As such the proposal is not 'piecemeal' development. Policy DP/5 advises against small independent development proposals creating large developments as a method for avoiding planning obligation requirements or to restrict access to neighbouring plots of land. This proposal acknowledges the full contribution requirements. Furthermore the proposal will not prejudice potential growth of the KMG site. The site layout has been designed to minimise the impact of noise from the KMG site by placing non-

residential uses between the KMG factory and the proposed houses. The applicant has worked closely with KMG to ensure they are satisfied with the proposals and this accommodates the future growth at KMG, and therefore is not in breach of Policy DP/5.

1.8 There is a concern the proposal would cause light pollution. The housing development would be suitably designed to minimise light pollution and avoid excessive light emission from the site. The land benefits from extant permission for employment development, which would require large parking areas to be lit for security and safety purposes. The impact of lighting schemes can be satisfactorily addressed at the detailed stage.

1.9 There has been a comment that facilities are well beyond the walking distance of residents on the site. However PPG13 *Transport* states that walking is the most important transport mode for local trips and offers the opportunity to replace short car trips, particularly for trips under two kilometres. All of the facilities and services identified within the Transport Assessment are within this distance of the site. Furthermore existing footpaths and links will be improved between the site and the facilities and services within the village to allow for a safe and convenient level of access for walkers.

2.0 PREVIOUS LOCAL PLAN INSPECTOR'S ASSESSMENT

2.1 Reference has been made to the 1995 Local Plan Inspector's report. At that time the council had identified sufficient housing sites and the Inspector had concluded there was no necessity for additional residential development. However, to meet the future growth targets the Council currently needs to find more housing sites.

2.2 In relation to retaining employment land, since 1995 planning permissions have been granted for alternative employment development in the village – refer below.

2.3 Finally we point out that the Inspector identified no 'in principle' grounds to resist residential development on the land and he was considering a residential scheme only.

3.0 TRANSPORT/HIGHWAY ISSUES

3.1 It is suggested that the Transport Consultant's reference to Gamlingay's accessibility to Waresley, Potton and the A1 implies the development will serve those people

working south of Cambridgeshire. This is taken out of context as the section referred to is simply describing Gamlingay's accessibility to the local road network, public transport and surrounding settlements. For example there is reference to St Neots.

3.2 The application is supported by a detailed assessment covering all the points that emerged following a scoping exercise with Cambridgeshire County Council (CCC) Highways, including comprehensive junction modelling.

3.3 Gamlingay is clearly a rural settlement, but nevertheless it benefits from a good level of facilities that would all be accessible to residents of the proposed development without the need to travel via car. The Assessment looks in detail at pedestrian desirelines to the locations and found that adequate routes are available. As part of the development proposals a new footway will be provided along the south side of Station Road; bettering the existing situation and further improvements will no doubt emerge in the discussions with officers and highway authority.

4.0 NOISE ENVIRONMENT

4.1 It has been pointed out that the noise consultant's recording microphone was not positioned on the residential area. However, this was specially positioned to measure noise directly from the road, as well as background noise in the absence of noise from the industrial development. It was not used to measure or predict noise from the industrial estate. All of that was done using at-source noise measurements and noise modelling. This is the proper procedure.

4.2 There has been reference to the timing of the noise monitoring, which was carried out between Friday & Monday (inclusive) during summer holiday time. It should be emphasised that noise from road traffic is relatively insensitive to small changes in traffic volumes. For example, a 25 % increase in traffic volume results in a noise increase of less than 1 dB. It takes a doubling of traffic volume to effect a change of 3 dB.

4.3 It is suggested that the fact noise mitigation measures are proposed on the KMG site indicates the site is unsuitable for residential development. However, the consultant's report considers the noise environment falls within category NEC A where Planning Policy Guidance Note No. 24 states noise will not need to be considered for residential development. Nevertheless the noise consultant has examined the worst case scenario and 'at source' mitigation improvements have been agreed with KMG.

5.0 LOSS OF EMPLOYMENT LAND

- 5.1 It has been suggested the proposal is contrary to Policy ET/5. This is concerned with the protection of existing employment sites in rural areas and is geared towards retaining sites to provide for local employment opportunities and to reduce the need to travel to work in rural areas. However, this site's existing use is agricultural land.
- 5.2 It has been commented that the Station Road land represents 33% of all the B2 employment areas in south Cambridgeshire and this is clearly not the case. The Site Specific Policies DPD allocates a number of sites, but this represents only a small part of the existing employment areas and areas with planning permission.
- 5.3 A number of objectors have expressed concern that the proposal would reduce the amount of land that might be necessary for businesses currently on the R H Wale site at Green End, when leases come to an end in 2012. There are no proposals on the table to redevelop the R H Wale site and with the existing square footage and current values there is no certainty that a residential scheme will be economically viable or that the current tenants on the site could afford the rent those new premises would command. It is possible the leases will be extended.
- 5.4 The residential redevelopment on the R H Wale site would be contrary to Policy ET/6 of the Development Control Policies DPD, which states the loss of established employment areas in villages for other uses will generally be resisted. Consequently residential redevelopment of the R H Wale site would have to be treated as a policy departure. Furthermore, sustainable development policies encourage mixed use schemes and the retention of employment areas in accessible locations. Within this policy framework the redevelopment of the R H Wale site may now require a mixed use scheme that would retain some jobs on the site if it were to come forward.
- 5.5 The R H Wale site extends to approximately 4.46 ha. The Station Road mixed use proposal will retain an employment area of 1.5 ha (equivalent to approximately 30% of the R H Wale site).
- 5.6 We point out there is 2.93 ha of land on the Potton Road with planning permission for industrial and office buildings. Although originally granted for Potton Limited this site is not subject to restrictions and is available for general employment development. The Potton Road land, together with the employment area that will be retained on Station Road will therefore equate to the R H Wale site in area terms. Consequently

there is provision for new employment development within Gamlingay.

5.7 Retaining the Station Road land for employment development, as some argue, would involve double the amount of additional traffic on the village roads than the mixed use scheme. This would be in conflict with those who oppose the proposal on transport grounds.

5.8 There have been comments that Merton College has not been willing to sell the land for employment use during the 15 years of marketing. This is not the case. The difficulties have been the economics of bringing the land forward with services in a financially sound manner, against the limited number of enquiries. Officers will be aware that proposals for the comprehensive development of the site by an established local business were at one stage on the table and terms for the sale of the land were agreed and in the hands of solicitors, before the company withdrew.

6.0 KMG

6.1 There is concern that the proposal would prejudice the adjacent KMG site because of restrictions on the company's operating methods, contrary to Policy DP/5. The noise measures identified by the consultant involve the provision of 'at source' measures and enclosures that address the worst case scenario. These would have no impact on KMG's operational practices and the company is proposing some of the works irrespective of this development for the benefit of its employees.

6.2 The concerns relating to KMG do not reflect the views of the Company, who have written to the Council making this point.