

Objection
S/0276/15/OL- 8 Greenacres, Duxford

We have been invited by the planning officer to submit joint briefing documents as supplements of our individual objections.

Sustainability and Amenity impact
Briefing summary

Statement

We wish to object in the strongest possible terms to the proposed development on grounds of lack of sustainability, unacceptable loss of amenity and traffic impact and safety (in particular during construction).

This development is not sustainable economically, ecologically nor socially with the attendant lack of sufficient access, social and school facilities with all main facilities being based outside the village only accessible by car via congested major roads.

The impact on residential amenity of up to 40% of the villagers will be detrimental and due to the change of character of the village itself every single villager's amenity will be impacted to various degrees.

We request that the Council refuse the Application, amongst others, on grounds of conflict with the National Planning Policy Framework paragraphs cited below.

The following document provides evidence and references:

Baseline recognitions

- The Council cannot demonstrate a five year housing supply.
 - The Application must be decided within the context of the National Planning Policy Framework.
- 1) DUXFORD – An evidence-based description of facilities and infrastructure. The village has few facilities with the following serious and significant problems arising from the proposal. Fewer services and facilities allow only some of the basic day to day requirement of the residents to be met without the need to travel outside the village
- **NO** post office, secondary school, emergency services or library provision; no cash machine – these are only accessible by car via heavily congested main roads (Council's Services and Facilities Study of March 2014 and see Traffic supplement) i.e. use of sustainable modes of transport is unfeasible to access services.
 - **Oversubscription of local and cluster schools** – adverse social/ecological impact (in the current Primary / Secondary school place allocation a significant amount of children from Duxford and the surrounding villages will be sent to schools as far as Linton)
 - **Entrapment of in/out traffic** by traffic flow arrangements and heavy congestion on A505 diverting traffic away from above facilities (see Traffic supplement)
 - **All village roads** relevant for this Application are on-street parking and therefore in the majority of stretches are **single-lane with poor visibility affecting safety** and traffic flow
 - **Less sustainable location** for new development per SCDC's own information*
 - According to recent standards Duxford is **only expected to support developments with 8 dwellings** 'and limited development will help maintain remaining services and facilities' * - adverse social, economic and ecological impact

- 2) THE DEVELOPMENT SITE - The following comments have been previously made and fall counter to the current proposal with no change in circumstance
- **'site with limited development potential'**
 - 'Not allocated for development'
 - 'outside Development Framework' (Council's Strategic Housing Land Availability Assessment (SHLAA) App 7, August 2013)
 - 'green field site'
- 3) Summary of Traffic and Safety impact (see Traffic section below)
- Conversion of a quiet cul-de-sac with safe play area for children, into a through access road, destroying this amenity.
 - Main access via low capacity single-lane roads of the village centre and along Primary School and its pedestrian access routes
 - Existing bottlenecks at two exit junctions onto main roads (Two "pinchpoints" were identified by the traffic survey, to the East and the West of the entrance to Greenacres. Therefore irrespective of traffic flow for construction or eventual residential traffic, one of these points will have to be negotiated with significant impact on safety. Moorfield Road and Hunts Road safe egress onto A505 is difficult in rush hour).
 - Entrapped by chronically congested stretch of A505 between M11 and Sawston during rush hour
 - **Severe safety impact of construction traffic** through main parts of the village including Conservation Area.
- 4) Supporting regulations from the National Planning Policy Framework (NPPF) which we believe support our call to reject this proposal

Paragraph 14 states 'where the development plan is absent, silent or relevant policies are out of date, [this means] granting permission unless: any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole'.

The adverse impact to the character and setting of Duxford and to a large number of residents can be demonstrated significantly to outweigh any benefit of the Application. In particular there is clear evidence of the increase in traffic movement, risk to children and other pedestrians, risk to property through construction traffic damage in medieval streets and pressure on the poor infrastructure facilities in the village

Paragraph 17 (core planning principles) requires to 'always 'seek(ing) to secure high quality design and a good standard of amenity for all existing ...occupants of land and buildings' and to 'take account of the different...character of different areas'.

The proposal would fundamentally change the character of what is currently a quiet cul- de- sac into a through road for traffic from the proposed development into Duxford's historic centre. The sense of community and the village environment which attracted many of the current residents to the location is likely to be lost should the Council be minded to grant the Application. Rather than enhancing and improving the places in which people live, this Application would be severely detrimental to the ability of local residents to enjoy their homes and their immediate surroundings through increased traffic, higher levels of noise and removal of safe play space

Paragraph 32 states that 'Plans and decisions should take account of whether...suitable access to the site can be achieved for all people'.

As already documented under 2 and in the supplementary briefing note for Traffic impact and Safety, we do not consider that the proposed access is suitable and the severe increase in traffic build up within the quiet location of Greenacres raises clear safety concerns.

Paragraph 64 states 'Permission should be refused for development of poor design that fails to take the opportunities available for improving the character of the area'.

The Application would severely impact residential amenity of residents adjacent to the site but also right into the centre and across the village. The Design proposal would create a cramped layout and a feeling of being overlooked. The increase in light pollution, along with the severe increase in noise and traffic pollution, would destroy the quiet, peaceful and rural character of Greenacres and the areas in the immediate vicinity of Greenacres. The grant of the Application would damage the character of the area and would be severely detrimental to it.

Authors: Christof Kastner PhD FRCS(Urol), The Duxford Village Association and 35 individual villagers of Duxford (a list can provided upon request)

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Compilation of Errors
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To assist the SCDC Planning Committee we the undersigned residents of Duxford have compiled information in summary form as below. However, in consideration of this being a Major Application comprising access which significantly impacts upon a quiet cul-de-sac and the adjacent Conservation Area which will be affected by traffic, we expect Councillors to apply due diligence and review the detailed submissions made by residents in fulfilling their elected mandates.

Compilation of errors in planning documentation:

- 1) Citation of the 5yr land supply and Waterbeach cases, are not directly transferable to Duxford as Waterbeach is a Minor Rural Centre and the developments in question were proportionate to such a locale. To be treated equably only proportionate development should be assessed for Duxford as a Group Village.

Appendix 1, NPPF). The Local Plan classes Duxford as a Group Village, allowing a maximum of 8 houses in a development. The proposed development contravenes this. While the absence of a Local Plan means that the proposal cannot be rejected on this parameter alone, the classification of Duxford as a Group Village should be given some weight in the planning decision.

- 2) Savills Planning Statement includes a statement on the SHLAA assessment which was publically acknowledged to be incorrect at the public meeting 14 August 2014 when Mr Colin Campbell (Agent for the applicant (Application Co-ordinator) – Savills) conceded when questioned by Mr Stuart Bond that only the colour was changed in the SHLAA assessment, not the data therein. The Planning Statement therefore is factually incorrect on this point despite Savills/Countryside having more than four months to correct it. It can also be construed to be biased evidence.

We object to this misinformation being included in a document issued in January 2015 when C Campbell fully acknowledged in August 2014 that data had not changed. Inclusion of this statement must therefore have been a deliberate decision on the part of Savills. We object as it strongly misleads the reader to believe the site was considered positively in the SHLAA when in fact this was not the case, nor indeed was the site included in the proposed Local Plan by SCDC.

The Application site was previously described as being a 'site with limited development potential' and 'Not allocated for development; outside Development Framework' (Council's Strategic Housing Land Availability Assessment (SHLAA) App 7, August 2013)

- 3) Within the Section 4 Sustainability at Land to the Rear of Greenacres on page 23 (but erroneously numbered as Section 3.2 Promoting Sustainable Transport states: *"To mitigate the construction impacts of the development on the residents in Greenacres site access during construction will be achieved via a temporary access point on Moorfield Road linking the site to the main road via the neighbouring agricultural field."*

This is factually incorrect. The developers have not secured access and the submitted Outline Planning application does not show access except via Greenacres and hence St Johns Street including construction traffic.

- 4) The Transport Statement in Section 2.29 states "Finally, this TS demonstrates that a construction access strategy has been developed which will minimise the impact of any works on the amenity of adjacent residents, specifically along Greenacres."

There is no element of the submitted plan for access except exclusively from Greenacres and clearly the Transport Statement is erroneous and thus deliberately misleading the reader if care is not taken to review the bounded area subject of the application.

We object as the construction traffic cannot safely be accommodated in Greenacres, St John's Street and Moorfield Road. The proposal has clearly failed to mitigate the risks and harm arising from such vehicular movements upon residents, compounding the detrimental impact the proposal will have upon the village due to vehicle movements from the development if implemented. Likewise the applicants have failed to note this traffic will impact upon a Conservation Area.

- 5) Sustainability Statement 1133989-523528.pdf – March 2015 version Executive Summary states: "*The site is also within 2.5km of Sawston, located to the northeast of the development site which is accessible by bicycle and bus and provides a full range of services including health facilities, banks and food and non-food retail opportunities.*"

This is factually incorrect. There are no banks in Sawston following the closure of Barclays. This is grossly inaccurate as it is 5.2km by car and public transport – access by Bicycle is considerably further if safe routes want to be used as there is no cycle path or footpath between the end of Moorfield Road and Station Road East – so anyone getting there via Bicycle safely (with young children for example) – would either have to cycle into Whittlesford then pick up a cycle path into Sawston (approx. 7.7km) or have to cycle through to Hinxton and then along the cycle paths to Sawston (approx. 6.9km). But both these options mean that there is a difficult crossing at the A505 or the A1301 and they are considerably longer than 5km.

- 6) Sustainability Statement – March 2015: This document had been revised, yet still retains factual errors e.g. page 21 still suggests that there is a cashpoint within 800m of the site.
- 7) Page 32 "*The site does not contain any ponds and there are no ponds within 250m of the site making it highly unlikely that Great Crested Newts use the site.*" This is incorrect, there are several domestic ponds in the neighbouring properties, one in 10 Greenacres is 14m from the site and has two types of newt present and breeding in it. There is also one at 5 and another at 21 Greenacres.
- 8) Greenacres was designed with narrow pavements, for example only 140cm wide near 25 Greenacres, which contravenes the SCDC 2010 District Design Guide SPD recommendation for a 2m pedestrian surface on either side of a secondary road, a generally recommended pedestrian footway minimum for a roadway serving the proposed number of houses.
- 9) The developers are not providing a benefit to the wider community: they are unable to direct Section 106 money to a community centre as they incorrectly suggest in their proposal, and the local housing need they state exists in Duxford is disputed by Duxford Parish Council, who have more recent and relevant statistics showing that at a village level, there is no housing shortage.

10) For most daily aspects of life in Duxford, a car is required, as evidenced by the current residents of Greenacres possessing a car per adult driver in a recent straw poll of the street. There is no reason to think that car ownership distribution patterns will be different in the new development, which clearly is counter to the idea of sustainable methods of transport. Traffic will increase 1000% in front of those houses at the end of the cul-de-sac.

11) Section 7.59 The LVIA report submitted as part of the application analyses the potential impact of the development from a range of viewpoint locations, including local roads, landmarks and public vantage points. The report concludes that “the proposed development would not result in any harm to the tranquillity of the countryside or changes to the detriment of the landscape character area”.

The statement fails to recognise the harm imposed upon the tranquillity of the properties surrounding the proposed development, all of which will witness significant change from a quiet, rural greenfield with a range of wildlife to a housing estate with concomitant noise, pollution, excess lighting and hence the proposed development does harm the tranquillity of the countryside for existing residents.

12) Design Policy statement (The scheme has been designed using the South Cambridgeshire District Council District Design Guide and SCDC Development Control Policies DPD (2007) Summary). Bullets: Layout responds to the immediate context of the site by placing the most dense areas of the site closest to existing denser housing at Lacey Way/ Fairhaven Close whilst less dense housing responds to the existing site context on the north and east boundaries of the site where houses on The Firs and Moorfield Road are likewise less dense.

NO reference is made to the properties impacted to the South, particularly Number 9 & 10 Greenacres which have properties built closest to their boundary of the surrounding existing development.

13) At peak times, people tend to avoid the A505 as much as possible because it is always heavily congested. It can take half an hour to travel the ~4 miles from Duxford to Sawston at peak times. Avoidance of the A505 leads to Ickleton Road and Hunts Road being used as a ‘rat run’. An additional ~70 vehicles twice daily can only exacerbate these congestion issues

Authors: Stuart Bond, The Duxford Village Association and 35 individual villagers of Duxford (a list can be provided upon request)

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Response to Traffic Impact Assessment
Briefing summary

Statement

Following on from the publication of the Traffic Impact Assessment commissioned by the developer, we would like to take this opportunity to provide the context to the data that was not provided as part of the report. We feel that the Assessment is misleading and is missing vital information essential for forming a decision upon this planning application. Therefore, we urge the highways Agency and the Council to not rely solely upon the traffic Impact Assessment when deciding upon highway safety, and to ensure that this supplemental document is taken into consideration alongside all other information.

Villagers have also responded to the planning application and subsequent Traffic Impact Assessment through detailed letters, and we also recommend that these documents are also considered alongside the commissioning of an independent assessment over a longer time period.

- 1) The Traffic Survey
 - a) biased as commissioned by the Developers
 - b) inadequately accomplished being carried out on only one day
 - c) afternoon school rush period was not included
 - d) observers seen to be missing passing vehicles
 - e) under-estimation of the number of vehicles per household
 - f) no account has been taken of the service vehicles that can be expected as a regular feature of life in a thriving community
 - g) no data gathered on how many pedestrians may be impacted by the increased movement of traffic when a major concern is safety of children walking along narrow pathways
 - h) inaccurate count of 14 drop offs at Duxford School
 - i) width of St John's Street appear to be based on the assumption of where vehicles were parked during the observed period only (statistically unsound)

For these reasons, serious doubt must arise as to the statistical validity of the survey!

We would like to highlight that TWO "pinchpoints" were identified by the traffic survey. These "pinchpoints" lie both to the East and the West of the entrance to Greenacres, so no matter how traffic flow is directed for construction or eventual residential traffic one of these points will have to be negotiated with significant impact on safety.

2) Supplementary information

Traffic risk and safety

All traffic movement incurs risk, therefore more traffic – more risk. Residents have experienced or witnessed at least *ten* near misses at the St John's St/Hunts Road intersection, and incidents involving cyclists at the St John's St/Moorfield Rd junction. The Green Street/St John's St Intersection is completely blind in one direction, at the narrowest point of the road and this dangerous junction has not been considered in the Traffic Survey. At the best of St John's Street could be described as single lane due to the existing parking but a narrow single lane would be a more accurate description. This is particularly unsuitable for construction traffic.

As highlighted to SCDC at the Public Meeting on 23rd February the adjacent roads are unable to cope with the present traffic levels and are too narrow, with significant pedestrian traffic for the school etc. which will be compounded by the proposed development. This is the primary reason for Duxford Parish Council recommending rejection for this proposal, along with sustainability.

Given the points outlined above we cannot see how the movement of construction traffic both through Greenacres, down Moorfield Road and St John's Street go any way to alleviate the concerns of the Parish Council, residents and the Local School with regards to child safety when "commuting" to the Primary School.

The drop-off number at Duxford Primary is going to increase, with the obvious knock on effect to St John's Street if parents choose to, for safety reasons, take their kids to school in the car to avoid the construction traffic in St John's Street and Moorfield Road.

Overall, no consideration, in fact the situation is now worse with construction access through Greenacres rather than on Moorfield Road, has been given to the objections by the Parish Council, residents and Local School over safety of existing residents.

Overall, we strongly ask that the County Council undertake an independent assessment of the traffic over the course of a normal working week so that the concerns over traffic and pedestrian safety can be assessed.

Authors: Norman Foster, The Duxford Village Association and 35 individual villagers of Duxford (a list can provided upon request)