

LINTON PARISH COUNCIL

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S/1969/15/OL Mr J. Green, Ely Diocesan Board of Finance, 1 Horseheath Road – outline planning application with all matters reserved for up to 50 houses and 30 allotments. Amendment: Corrected application form, archaeological report, revised flood risk assessment, revised transport statement, health assessment & revised layout.

PC Decision: To NOT support:

In response to the recent reports and assessments, we have the following comments:

- PC comments submitted as objections and holding objections we now confirm to be full objections to the planning applications at Horseheath Road (S/1969/15/OL) and Bartlow Road (S/1963/15/OL).
- The site is outside of the village envelope and was rejected in the Strategic Housing Land Availability Assessment (SHLAA) as having no developmental potential. This view is further confirmed by the recent amendments.
- The number of allotments would not meet the recognised village needs. We have lost several allotment areas in the past. The allotments and adjacent parking would need to be granted Freehold to the village i.e. owned by the village in perpetuity.
- The children's play space (LEAP) would require ongoing maintenance and would cater for a small number and age-range, soon to be outgrown. It would potentially end up as a liability for the parish rather than an asset. Children from other parts of the village are unlikely to use the LEAP due to the distance to reach it. Linton is deficient in sports and leisure space and a small space in a distant part of the village does little to meet these needs.
- The pedestrian route would be a short additional length of pavement in an area of heavy traffic with a 50mph speed limit. The site remains over ¾ mile or 1km from the village centre and almost 2km from the recreation facilities and Village College so walking is unlikely to be the first option for access to these.
- The provision of good quality bungalows and small or affordable housing does not sufficiently reflect the expressed needs of the village as discussed with the applicant.
- This development contains no potential for employment within the village and would only attract incoming commuters, adding to the burden on the infrastructure. In the construction phase we have few local builders who are in need of work so the potential for local employment is limited.
- The site is 1km from the village centre and its shops meaning it is unlikely these will be accessed on foot and therefore add to the traffic and parking problems within the village. Residents might find it easier to shop on their way home from work, or in local towns, rather than park in the village centre thus giving little new trade to our existing businesses.
- The junction with the A1307 is difficult and dangerous and traffic from the site would potentially leave by the safer route through the village and Conservation Area. Traffic from the site would add to problems on Horseheath Road where new developments have already been built with insufficient parking.
- The site will be affected by the ever-increasing traffic on the A1307 with noise and pollution affecting residents. Tree and hedge barriers take a long time to effective.
- The Transport Assessment is inaccurate and does not reflect actual volume of traffic on the A1307.
- The impact on the landscape has been emphasised in previous comments. Hedging and tree buffer zones will take a long time to establish leaving neighbouring properties with reduced privacy and amenity. The maintenance of these will become another parish responsibility.
- Social cohesion: the effect of this development would be negative especially at envisaged prices, as local needs for bungalows, small and affordable homes would not be met. Another tranche of commuters isolated at the edge of the village is the expected result should this go ahead.
- Public services: we note that this does not address the utilities of water, sewage and other physical aspects. The infrastructure is already at or near capacity for schools and medical centre, water,

sewage and roads. The other infill developments being built in the village will absorb any current capacity.

- Nothing in the amendment mitigates the negative impact of the development on the village as in our previous objections. We note the comment on flood risk. Recent wet weather has made it clear that expected flooding resulting from this development is a threat to neighbouring houses and onto the Bartlow Road. The reserved area at the south west corner of the site is particularly wet. **The development remains unsustainable and undeliverable.**
- The archaeological statement confirms that this site has significant archaeological potential; we expect this to be the site of a Saxon cemetery with funeral remains. A cemetery site with 104 Saxon skeletons is known nearby on Linton Heath. We understand that the geophysical data might indicate further interesting finds. We are promoting Linton as an historic area and this statement supports the extent and antiquity of the site and our village. It is required that full field evaluation should take place prior to a determination being made owing to the presence of funerary evidence and other evidence that is present in geophysical survey data. The extent of archaeological evidence at the site and its conditions and significance has not been given sufficient weight in this application.
- The development means the loss of arable land.

The PC will also be submitting professional comments which are ~~being drafted~~ attached.

N2016 03 04 S/1969/15 HORSEHEATH ROAD

S/1969/15/OL Horseheath Road Linton. Mr J Green, Ely Diocesan Board of Finance. Outline planning application with all matters reserved for up to 50 houses and 30 allotments. Amendment: Corrected application form, archaeological report, revised flood risk assessment, revised transport statement, health assessment & revised layout.

PC decision: TO NOT support:

We have the following comments in response to the recent reports and assessments:

- **The PC holding objections of September 2015 are now full objections as they have not been addressed.**
- **The community was not consulted on either of the submitted proposals and the identified community concerns were not taken into account.**
- **The site is outside the village envelope and was rejected in the Strategic Housing Land Availability Assessment (SHLAA) as having no development potential. This view is further confirmed by the recent amendments.**
- **The scheme would still have a damaging impact on the archaeology, landscape, appearance and character of the locality and its Outstanding Conservation Area.**
- **The proposal still does not meet the identified needs of the village and the scheme would still exacerbate existing infrastructure, traffic and flooding problems for the community.**

Consultation

No developer consultation took place on the application schemes. As previously described by LPC, limited consultation took place on another scheme, but the application did not comply with the relevant Localism Act Section 122.

Changes

The changes do not address community concerns about the scheme and the lack of clarity about the scheme's benefits to outweigh harm. The amended plan shows fewer identified needs are met than they were in the previous scheme.

The play area missing in the original scheme has been provided on the amended plan, but the layout has become more cramped, housing types have changed and two of the allotments have been lost. The application description and relevant reports have not been updated. Stated benefits such as 30 allotments no longer apply.

There is no clarity about the new possible LEAP and whose responsibility it would be to maintain it. It is also too far from existing houses to benefit the existing community. Without a clear scheme for the LEAP and its ongoing maintenance at the decision-making stage, it fails to definitively deliver future community benefit, and potentially leaves the Parish with unbudgeted costs for the new development. It therefore does not comply with Policy NPPF 70 nor with the objectives of the Open Space SPD.

The proposed housing is more cramped than the previous scheme, with more large market houses and fewer bungalows. This edge of village location and mix will encourage commuters instead of local people and does not provide the types of housing identified as being needed by Linton. These

were predominately 1-bedroom houses and bungalows. As a result, the scheme still does not comply with Policies HG/1 and NPPF 50.

The road layout has been changed so the road leads directly to the allotments, so is more likely to lead to friction between the various uses and residents parking at the allotments.

The plan also shows more housing and less open land along the southern boundary where the site floods.

Flooding Assessment

The site is subject to surface water flooding as shown on the Environment Agency map. The most visible part of this is where the flooding from the upper field to this lower field crosses Horseheath Road, and this is not a 1-in-1000-year event; it occurs regularly after periods of prolonged rainfall. After heavy rainfall there is also flooding along the rest of the southern boundary and this run-off affects the existing properties below this southern part of the site.

The Flooding Assessment has not been updated to reflect the proposed layout of the site. It still proposes that the existing flood water will be able to run off into the allotments in the south west corner, but the plan does not show any allotments there. It also does not consider how viable allotments would be if also used as flood catchment areas.

The rate of failure of 3 out of 4 of the percolation tests shows that the field does not adequately absorb water, and therefore in principle relying on a reduced area of the field to absorb the flood water that the whole field already fails to do, is unrealistic. Additionally, this small undeveloped part of the south west corner is described as 'reserved' so any flood mitigation works there would be unenforceable.

Development and hard surfacing will significantly reduce the ability of this site to absorb rainfall once it is no longer an open field. The position and orientation of the proposed access makes it worse. This proposed central roadway meets Horseheath Road midway along the Environment Agency's identified road flood position. Instead of continuing along the road to the existing road drains, the floodwater would divert down the new roadway, following its slope and orientation to flood into the new houses at the bottom of the site and onto the existing houses on the lower land below this site.

In order to reach the mains drains at Lonsdale, the proposed foul drain would go through private property owned by third parties, and the application fails to demonstrate that the necessary consent has been given to make this deliverable in principle.

The village has minimal infrastructure capacity and where limited spare capacity was identified in the SHLAA, it has already been substantially used by recent infill developments. The proposed development of 50 houses and its cumulative impact with the 78 houses in the current application at Bartlow Road is expected to significantly exceed much of the available infrastructure, including mains drainage. Both developments are proposed to connect to the eastern edge of the village, where the existing demand on the minimal local mains pipe already exceeds capacity and where the drainage is defective.

The report still assumes that the drains at Lonsdale run to a separate and adequate surface water drain discharging to the River. But the large scale drainage maps for this part of Linton show that this is not the case and the Lonsdale surface water is also taken to the foul drain, adding to risks of blockages. The maps show that the houses on this edge of the village all go to a 1970s foul main

drain that was designed for the approx. 50 houses at Finchams Close, and is the smallest main drain size possible. It is currently serving double its designed capacity and the map shows significant defects along the route. The main route is also lower than the treatment works but has no pumps to discharge it, and the map unusually records internal floor levels alongside the pipe, indicating that problems with this main drain already affect people's homes.

Jointly the numbers of houses in the two current applications would take it to about 5 times the designed capacity of the pipe. Despite this, there is no assessment and no proposal to upgrade the infrastructure to deal with the additional loading, as should have been carried out to avoid making conditions worse for the existing community.

The Environment Agency notes the ground conditions on the site are inadequate for soakaways to deal with surface water. The report proposes alternatives of private soakaways (it calls sustainable SuDS drainage) and mains. It proposes possibly soakaways would work if dug into a chalky layer below the clay, but percolation tests into this chalky layer still failed. Any SuDS water retaining system suitable for 50 houses would be extensive and on the high ground immediately above the existing houses. Residents are aware that SuDS storage systems do fail and there is no good practice safety backup proposed, and therefore the existing housing would be at risk. In the other alternative, the report suggests that surface water could be diverted to the main drain at Lonsdale. This is not sustainable drainage and would increase the problems of the main drain, the issues of ownership and deliverability, and the risk to existing homes.

The proposals put existing housing at significant risk of surface water and foul water flooding. The scheme therefore fails to comply with Policies DP/3, DP/4 and DP/5, the Technical Guidance to the NPPF and Policies 100-103 of the NPPF.

Archaeological Report

Linton is promoted as an historic area and this character is an important part of its tourist economy. Although the Archaeological report is incomplete, and the report on above-ground Heritage assets is still missing, the findings are already significant and support the sensitivity and antiquity of the site and village.

The north-eastern side of Linton contains a group of barrows excavated during the 1850s by Sir Richard Cornwallis Neville (Lord Braybrooke), which reflected the barrows on the other side of the river at Bartlow Hills. The finds at Linton and Little Wilbraham formed the basis of his authoritative research and collection, which now form an important part of the Museum of Archaeology and Ethnology, at Cambridge University. Professor Howard Williams, a leading national authority on the period and on cemeteries, confirms:

"From their discovery to the present day, the collections and publications of Neville's excavations at Little Wilbraham and Linton Heath have persistently and fundamentally informed scholarship regarding the early Anglo-Saxon period in the Cambridge region."

He was provided with a copy of the Archaeological report and confirmed that the barrow found on the application site is part of the Linton Heath group, which are highly significant on numerous counts, including for their history as barrows, their history as community cemeteries, their importance as a complementary group; and also for their role in the history of archaeology.

Clearly there is typical funerary evidence and other significant evidence in the geophysical survey data, so a full field evaluation should be provided before determination. The site in Winchester was not one in which findings of the quality of a barrow had been discovered, so is not comparable.

The minimal survey and minimal protection being proposed for the archaeology on this site clearly does not reflect and respect its likely importance. The scheme as it stands is contrary to Policies ST/J, CH/2 and NPPF 128, 135 and 141.

Transport Assessment

The amended report does not address the previous concerns. It still does not reflect the actual traffic volume evidence on the A1307 and the impact on the existing village centre.

The proposed pavement and access to the site is still designed to suit a 30 mph speed limit, whereas the part of the road it is in, is within the 50 mph area. There is insufficient visibility for the speed of the road and that is reduced further by parked cars along this section of road.

Still no provision is made for sustainable travel. There is no public transport provision close by and the proposals still rely on an unlikely assumption residents will walk to the village facilities. All the houses on this site are beyond the IHT guidance for maximum walking distances to local shops and facilities. The measurements are still taken from the closest corner of the site, rather than from the actual houses to the village shops, so are unrealistic. The residents of this site are over 1 km from the village centre and almost 2 km from the recreational facilities and Village College. As a result, they would rely on cars, which adds to the existing identified traffic and parking problems in the village. The position of the site and the added congestion in the centre of the village will encourage out-of-town shopping further afield and discourage the use of local shops.

Together with the other application proposal for 78 houses, this major development proposal will add significantly to existing problems such as traffic congestion and parking on Horseheath Road and the High Street, accidents and difficulties in accessing the A1307 from the village, and the problems of traffic volumes, congestion, noise and pollution of the A1307 itself.

The existing Horseheath Road junction with the A1307 is difficult and dangerous, with poor visibility and traffic hazards such as local vehicles travelling at low speeds joining and crossing heavy commuter traffic travelling at much higher speeds. The limited proposed hatchings on the existing A1307 junction will not improve visibility, safety or any of the identified issues with this junction proportionate to the problems caused by the additional traffic from 50 new houses. It will also not deal with the traffic from this site using the High Street as a safer access onto the A1307 and more direct route to Cambridge, exacerbating the identified problems there. The scheme therefore does not comply with DP/3 (including 1b and 1f), and NPPF 35.

Summary of objection

The original concerns have not been overcome and we update our holding objection to a Full Objection on the following basis:

- 1. The site is outside the development Framework of the village;**
- 2. The proposal is not economically sustainable as it would not provide the infrastructure and growth in the right place at the right time for Linton;**

3. **The proposal is not socially sustainable as it would not provide the mix of housing identified as necessary for the community, does not provide housing in combination with accessible local services, and produces a serious drain on local infrastructure that would damage the existing community; and**
4. **The proposal is not environmentally sustainable as it does not preserve the character of the village and the archaeology on the site, and adds significantly the identified traffic, environmental and flooding problems, which would affect the well-being of the existing community.**
5. **The stated benefits in providing housing on this site are not deliverable.**

Taking each issue in turn:

1. Framework:

The site is outside the development Framework of the village;

The existing village envelope and restrictions on numbers of houses in the village are defined for planning reasons that all remain valid.

The Village Capacity Study and the SHLAA assessments both confirmed that the Linton sites outside the existing village envelope were not appropriate in principle. The SHLAA Assessment rejected the site in principle on numerous grounds which still apply, including traffic, character, landscape and infrastructure issues. The Village Capacity Study noted that Linton had limited environmental capacity for development and was only capable of absorbing very low levels of change, of a limited type and then only if it was sympathetic to the existing village character.

A proposal showing 50 houses is not a very low level of change and the submitted proposal is not sympathetic to the existing village amenity and character.

Whilst the NPPF directs that 'out of date' Local Development Frameworks are outweighed by the desirability of providing deliverable sustainable development, the application does not fulfil the basic NPPF principles of sustainable and deliverable development:

2. The scheme is not economically sustainable:

The site is a highest quality arable field in the open countryside. Its loss from farming would be a permanent loss to the farmstead and the wider agricultural economy of this rural area.

The existing quality, scale, character and tranquillity of the historic village, its Outstanding Conservation Area, large numbers of Listed buildings, history, archaeology and rural surroundings provide valuable tourism that benefits the local economy and local shops.

The local economy and local shops are reliant on the infrastructure and facilities of the village, and on adequate levels of access and parking in the village centre. Linton already has identified problems of traffic congestion and a shortage of car parking in the village centre, and of inadequate infrastructure.

The proposed development would not provide infrastructure in the right place to benefit the existing village and its economy. It is too remote from the existing village centre and is uphill from the existing village facilities. This distance and easier access to shops and facilities elsewhere would encourage the use of cars and greater reliance on out-of-village supermarkets rather than village

shops. The proposed development does not provide necessary strategic infrastructure upgrades such as school building and services that would be needed. They are not deliverable within the existing capacity, so will put an additional burden on the existing community.

The additional traffic needs from residents of 50 more houses will incrementally damage the character, tourism and accessibility of the centre of the village, without bringing proportionate benefits to the community.

As a result, the development does not comply with NPPF Policies 7, 17, 21, 23, 27, 28, 112, 131, 159 and 160, so is not economically sustainable.

3. It is not socially sustainable:

Linton's needs have been identified in local and District Housing Needs assessments as 1 and 2-bedroom starter homes and bungalows. No provision has been made in the application for 1-bedroom starter homes, there are few affordable 2-bedroom homes and the bungalows have been reduced. The majority of houses are large family market homes, which are likely to be unaffordable for local people. They are located on the edge of the village in an isolated cul-de-sac design which will discourage social cohesion and appeal instead to commuters. The scheme would therefore not provide the benefit and housing mix that Linton needs.

The proposed houses do not have accessible local services, because of their distance from the existing shops and facilities and because the village has an identified under-provision of facilities and open spaces. The LEAP now possibly being provided does not provide for older children and is too remote from the rest of the village to add significantly to open space provision for the existing community.

The additional demand of 50 new houses and the distance from existing facilities would provide a serious drain on the existing limited infrastructure. The infrastructure is already at and beyond capacity and the SHLAA identified that significant reinforcements and additional provision would be needed at least to the existing electrical, water and gas supplies, the sewerage network, health care facilities and schools for any of the major developments like this around Linton to be viable. Where limited spare capacity was identified in the SHLAA, it has already substantially been absorbed by the numerous current infill developments being built in the village.

The limited scope of S106 contributions or possible conditions will not be able to provide the strategic investment that is required to provide for the new houses in the two current applications and it cannot be provided in the short term to make these two major schemes deliverable. Neither the application nor the very short S106 list with the application provide assurance that the proposed development would be carried out, funded and phased not to result in hardship to the existing community.

As a result, the development does not comply with Policy HG/1 and NPPF Policies 7, 17, 50, 55, 58, 159 and 162, so is not socially sustainable.

4. It is not environmentally sustainable.

The application does not contribute to protecting and enhancing our natural, built and historic environment, as follows:

The landscape and rural approach to Linton and its Conservation Area, especially from the east, is an important part of the character and interest of the area. The long views across that countryside are identified as a significant part of that distinctiveness and include locally distinctive historic hedgerows with occasional deciduous trees. The proposed development would be on a prominent open part of the countryside on the most sensitive approach to the village and its location, spread and loss of rural character would be damaging. The proposed permanent screening of the eastern boundary would be uncharacteristic of the existing hedgerows and would take a long time to provide effective barriers to views and noise. We also do not believe the proposed development would provide a landscape benefit by being hidden by planting.

The application still fails to follow SHLAA direction, and consider the impact on the settings of Linton Outstanding Conservation Area and Listed Buildings. The visual and historic relationship between the historic assets and their countryside setting is strong. It is particularly visible in conjunction with the farmland to the east of the village. The proposed development does not preserve this.

The assessment and proposals for in-situ archaeology do not ensure their survival, as above.

The indicative plan of the development with its cul-de-sac layout emphasises the lack of social cohesion of this site and weakens the linear character of the village. This layout does not follow the design principles set out for the area in the Design Guide.

The additional traffic from these additional 50 houses, together with the further 78 houses in the current application for Bartlow Road, would add significantly to the volume of traffic and traffic problems of the A1307 and in Linton, as the site is well outside the specified walking distances to local shops and local facilities. Traffic noise already badly affects much of the village and is reverberated by the valley's topography. Houses at the Grip and near the High Street A1307 junction already experience traffic noise that is accepted by SCDC as persistently exceeding the maximum noise limits for viable outside amenity space. This incremental traffic, pollution and noise is at odds with the historic, tranquil, rural character of the village and damages its amenity, character and economy.

The proposed access has insufficient visibility to be safe, and adds to conflicts between traffic and cyclists and pedestrians.

The application does not deal with flooding issues on this site, and the development of the site, its access and roadway and proposed drainage schemes makes them worse. This will put the existing community and existing and proposed housing on lower lying land at greater risk of flooding.

As a result, the development does not comply with NPPF Policies 7, 17, 55, 58, 109, 113, 120, 126, 128, 129, 131, 132 and 159, so is not environmentally sustainable.

5. The development and stated benefits are not deliverable.

The heritage assessments including the setting of the Outstanding Conservation Area and the pre-application archaeological full field evaluation on the barrow and funerary remains have not been carried out and therefore the application and proposals should not be determined.

The site is under multiple ownership and involves development that is not deliverable without the agreement of further private landowners.

The documentation is inconsistent when describing critical elements of the development and stated benefits. The numbers and positions of houses and allotments on indicative plans do not correspond with the documentation, and the latest changes to the indicative plan show that the scheme does not include the benefit of the stated number of allotments. There is no certainty about the housing mix, none of the bungalows are shown on the eastern edge where the Design & Access Statement says they are located to reduce landscape problems, and none of the allotments are located in the south west corner where the Flooding Assessment says they are located to reduce flooding problems. If there are allotments being used as flood relief areas and archaeological screening areas, there is no assurance that they will also be deliverable for allotment use.

The drainage proposals are not deliverable, because the proposals consist of alternatives, flood relief areas are shown and described inconsistently, and those alternatives put existing houses and residents as well as new residents at risk of flooding. They are also not deliverable because the foul water proposals require the agreement of other land owners who have not agreed.

Upgrading the existing strategic infrastructure and schools that are at capacity is not assured and not deliverable in the short term to deal with the impact of the proposed development. In the meantime the existing problems of capacity for existing residents would become much worse.

The Transport Statement and access to the site relies on a 30 mph speed limit that does not currently exist and there is no assurance it would do so in future.

The Planning Obligations are unclear and there is no detail to establish how deliverable they are, in order to balance any benefit against harm when making a planning decision. For example, the Parish has consistently asked for permanent public allotments to cover the identified shortfall, but there is no assurance on numbers or permanence. Linton PC has been asked to provide a wish-list of potential S106/CIL items without any details and without any certainty these would be provided as needed and in the timescale when needed. Without detail and Heads of Terms being available as part of the decision, these are not deliverable, and fail on similar grounds to the Hauxton Appeal provided with the application.

As a result of the land ownership issues, strategic infrastructure issues, specific proposals and omissions within the application, there is no reasonable prospect that planned infrastructure and mitigation is deliverable in a timely fashion to ensure the development goes ahead quickly, without harm to the existing community and residents. The application therefore fails NPPF 176 and 177.

In summary:

The application is premature because it still does not provide the necessary pre-application heritage assessments.

The application would significantly harm the character, appearance and amenity of the existing area, and therefore fails the strategic policies of the Local Plan and the principles of the NPPF.

The application provides significant adverse impacts across all three NPPF principles of sustainable development, and therefore does not comply with the Core Strategy (including 1.14) and overriding NPPF Policies, including 7, 17, 151 and 152.

It does not comply with the strategic policies of the Local Plan and therefore also does not comply with NPPF 156.

It does not comply with the assessment and conclusions of the SHLAA and therefore also does not comply with NPPF 159.

The stated benefits and planning obligations are not sufficiently certain nor deliverable for decision-makers to balance against the unacceptable elements of the development. They do not comply with basic strategic planning obligation policies including NPPF 176.

The applicant has not demonstrated that the scheme is deliverable. Critical barriers to the short term delivery of the scheme include multiple site ownership, lack of consent from necessary landowners, lack of necessary pre-application evaluation, and failure to provide certainty about necessary critical infrastructure such as drainage, flood protection, open space and facilities to make the scheme practical and avoid significant harm to the existing community.

As a result there is no reasonable prospect that the scheme and its infrastructure and mitigation is deliverable in a timely fashion and sustainable way to meet the overarching principles of the NPPF. The NPPF directs that development that is not sustainable should be refused.