Dear Ms Ayre,

Application reference: S/2413/17/OL

Site: Land off Rampton Road, Cottenham, Cambridgeshire

Proposal: Resubmission of application S/2413/17/OL - Outline application for the erection of up to 200 residential dwellings (including up to 40% affordable housing) and up to 70 apartments with care (C2), demolition of no.117 Rampton Road, introduction of structural planting and landscaping, informal public open space and children’s play area, surface water flood mitigation and attenuation, vehicular access points from Rampton Road and associated ancillary works. All matters reserved with the exception of the main site accesses.

Thank you for your letter dated 10th July regarding the submission an outline application based on amendments received in respect of application S/1411/16/OL.

I note that the applicant has proposed an amendment by providing more landscaping on site. However, I do not consider that this is sufficient to overcome one of the previous reasons for refusal that relate to the detrimental impact the proposal would have on the landscape character or any of the other reasons for refusal that I have previously detailed to South Cambridgeshire District Council.

Rather than addressing the fundamental and wide ranging flaws that have been outlined by various third parties, the applicant appears to be merely ‘tinkering around the edges’ of a wholly unacceptable scheme.

For ease of reference, I detail below the previous comments that I have raised in respect of the current (S/2413/17/OL) and previously submitted application (S/1411/16/OL) and would ask that you give all these comments careful consideration in the determination of the planning application.

Yours sincerely,

Louise Smith and Marcus Stamp

We would like to raise the following objections in respect of the amended information submitted in respect of the above planning application. We have added further comments below each point made in my initial objection letter dated 3rd July 2016. However, the one point we would like to make before making any further comments is the amended information in respect of the highways information has not been properly indexed on the web site with a title making it very difficult to access and understand the information that has been submitted. The highways information that has
been submitted is very important in order to assess the application and we feel that third parties have been put at a disadvantage by the way the Council has put the additional information on the web site. You may want to consider extending the time period for third parties to comment on the amended information given the way it has been presented and to re-index this information accordingly.

I note the points made by the applicant in respect of the weight to be given to the emerging policies, the existing out of date housing policies and the resultant weight to be given to housing in the overall planning balance.

I agree with the Council's previous reasons for refusal in respect of application S/1818/15/OL which focused on the following issues:

-Detrimental impact on highway safety
-Detrimental impact on landscape character and openness

I would contend that on their own these reasons for refusal still outweigh the benefits of the scheme. This is particularly the case given that the number of houses has been reduced which must have a commensurate reduction in the level of benefits. The applicant has not clearly demonstrated in any way how the previous reasons for refusal have been overcome. In addition, although not in the previous reasons for refusal specified by the council, I also consider that the following points should also be given consideration and placed in the overall planning balance:

- **Loss of Best and Most Versatile Agricultural land**: The proposal will result in the loss of Grade 1 and Grade 2 Best and Most Versatile Agricultural Land. The NPPF is very clear in respect that this agricultural land should be protected. In light of this the loss of this land should be given significant weight in assessing this planning application. I would contend that the applicants planning statement underplays considerably the negative impact of the loss of this land. The fact that the application site is part of a larger field of Best and Most Versatile Agricultural Land is not an argument for its loss and significantly underplays this issue.

**Response to submission of amended information**

The amendments that have been submitted by the applicant do not address our concerns in respect of this matter. The proposal will result in the loss of best and most versatile agricultural land and therefore our objection on this ground still stands.

**Detrimental Impact on the character of the area and visual amenity of the area.** The applicants landscape and visual impact assessment significantly underplays the impact of the development. The proposal is wholly out of keeping with the character of the area which will be exacerbated by not only the built form but also the associated works such as the attenuation basin which is a feature wholly out of keeping with the area. Add in other features such as street lighting and the whole rural area feel of the area is significantly changed and will in effect urbanise this area.
I acknowledge that the application is in outline form and that therefore the framework plan is indicative. However, the framework plan that has been submitted is extremely crude in its form whereby there are effectively two buffer areas either side of the main built form with absolutely no integration of the built form and landscaping. The play areas are not integrated into the built form with a cursory small landscape buffer to the boundary with open countryside which provides no integration between the two areas. The open space may be there in quantity but it lacks any quality and as such is ineffective in providing an acceptable development.

An indicative masterplan should be requested clearly showing how the quantum of development proposed will be accommodated on site even at outline stage. The framework lacks detail and offers no indication as to how, and more important whether, the proposed development can effectively be accommodated whilst protecting the area.

The development is effectively a speculative ‘bolt on’ rather than a properly considered and integrated extension to the built form which incorporates an effective degree of landscaping to integrate the development with the countryside. To this effect the proposal will have a significantly detrimental impact to the visual amenity of the area.

The landscape reason for refusal in respect of the 1989 permission still clearly has some relevance.

**Response to submission of amended information**

We note the applicant has tried to address the objections/concerned expressed in the response from Huskisson Brown Associates. We have carefully read the point by point response to the Hus consultation response and also the amended Design and Access Statement. We do not consider that the response from the applicant adequately addresses the concerns in my previous objection detailed above or to the points of objection/concern raised by Huskisson Brown Associates. The proposal will clearly be harmful to the character and visual amenity of the area.

The landscaping proposal that has been put forward will not assimilate the development into the existing character of the area rather it will be seen as an alien feature that will be at total odds to the character of the area. The point of landscaping is not to hide a development rather to enhance and assimilate it in into the existing character of the area. The application fails on both points.
- **Ecology**: The proposal will have a detrimental impact on the ecology of the area. I note that a Biodiversity Impact Assessment has not been submitted in order to quantify and demonstrate whether there will be any ecological benefits from the proposed development. Without the submission of this information I am of the opinion that it cannot be satisfactorily demonstrated that the application would not have a detrimental impact on the ecology of the area. Additional evidence needs to be submitted by the applicant in this respect.

  - **Response to submission of amended information**

  The proposal will still have a detrimental impact on the ecology of the area. We are still of the opinion that a Biodiversity Impact Assessment needs to be submitted to properly evaluate the proposal.

- **Highways**: The proposal will result in significant increase in traffic in the area which will have a detrimental impact in terms of highway safety. At present there are issues with the speed of vehicles (i.e. going too fast) along Rampton Road in the vicinity of the proposed access. The location of the proposed access together with the geometry of the existing road will exacerbate the possibility of accidents with vehicles using the proposed new accesses.

  The access plans that have been submitted are not clear in demonstrating whether satisfactory visibility splays can be provided or whether any control over land not in the applicants control is required to keep the visibility splays clear i.e. will there need to be any hedge trimming undertaken on land outside the applicants control in order that visibility can be achieved. If third party land is required then this cannot be guaranteed and safe accesses cannot therefore be provided. This needs to be carefully considered. The information that has been submitted is insufficient to demonstrate this.

  In addition to this I think that the transport assessment overplays the modal shift to public transport and cycle /pedestrian access to and from the site to the surrounding area meaning that the traffic generated to and from the site has probably been underestimated.

**Response to submission of amended information**

Notwithstanding the additional highways information that has been submitted (and poorly labelled on the web site as detailed above) we are still of the opinion that the proposal will have a detrimental impact on highways safety. As stated previously there are issues with the speed of vehicles (i.e. going too fast) along Rampton Road in the vicinity of the proposed access. The location of the proposed access together with the geometry of the existing road will exacerbate the possibility of accidents with vehicles using the proposed new accesses.
In addition there is still an over estimate in terms of the modal shift put forward by the applicant which in turn will mean that the traffic generated to and from the site has probably been underestimated.

- **Impact on residential amenity**: The location of the proposed accesses will be in close proximity to existing residential properties. I acknowledge that a noise assessment has been submitted with the application. However, noise levels in general are very different to an assessment of impact on amenity of residents from frequent car movements adjacent to their property and the level of noise and disturbance that this will result in. The proposed access between 113/115 and 119 Rampton Road will be in close proximity to these three houses and will travel the length of their gardens meaning that there will be effectively no escape from vehicular noise. In addition to vehicular noise there is also the potential for noise and disturbance from pedestrians using the access routes also. The same applies to 159 Rampton Road.

- **Response to submission of amended information**

We do not consider that the proposed amendments have made any difference in respect of the detrimental impact on residential amenity in terms of noise and disturbance from vehicular noise and from use of the pedestrian routes also. These sources of noise have not been properly assessed by the applicant in their submission. In addition there is the prospect of a significant increase in localised air pollution from the increase in the number of vehicles using both Rampton Road and the new access especially to properties either side of the access. Again, this has not been properly assessed by the applicant.

- **Foul Water drainage** – Insufficient information has been submitted to demonstrate that the foul water drainage system can cope with the proposed development. This was clearly identified as an area of concern in the 1989 refusal and an approach to how this will be addressed needs to be clearly defined.

**Response to submission of amended information**

The amended information fails to demonstrate that the foul water drainage system can cope with the proposed development. This was a fundamental reason for refusal previously. This needs to be fully addressed before a conclusion can be reached in respect of the application.

- **Infrastructure**: There will be an increase in pressure upon the existing local services particularly in respect of education and doctor’s surgery. I do not consider that sufficient
evidence has been submitted to demonstrate how these will be able to cope effectively with the proposed development added.

**Response to submission of amended information**

The amended information fails to provide any evidence to demonstrate how the pressure on the infrastructure of the surrounding area will be addressed in respect of the application. It is not case of just allocating money and hoping that will address the problem. A comprehensive assessment and robust assessment needs to be undertaken and this is not the case in terms of the submitted application.

**Conclusion**

I accept that there is not a current 5 year land supply and as such the provision of housing is a considerable benefit and should be given significant weight. However, in order for the proposal to be sustainable the three arms of sustainable development as defined in the NPPF need to be engaged – Social, Economic and Environmental. I have carefully considered the benefits put forward by the applicant and it is clear that the benefits **do not** clearly outweigh the harm of the proposal as identified above and as such the planning application should be refused planning permission without delay.

**Conclusion in respect of the amended information**

We do not consider that the amended information that has been submitted overcomes our previous objections. The proposal does not constitute sustainable development and planning permission should be refused accordingly.

I would be grateful if you could take the above points into consideration of the above planning application.

Yours faithfully

Louise Smith and Marcus Stamp