

This is what entering Comberton from the Green Belt to the west was....
Typically rural in nature, soft boundaries, treescaped, natural.



And views into the 'recreational area' in the prior application that would get transformed by this application into a harsh urban landscape.



Comberton Parish Council response to the proposed erection of 45 multi-storey dwellings which would impact not only this entrance to our rural village but much more importantly further strain our facilities and generate traffic and impact safety.

OBJECT !

Preliminary Comments

Comberton Parish Council (CPC) is incensed that it was never notified about this application, and others relating to, or near to the adjacent development to the East, so that it can comment, in a measured and balanced way on behalf of its parishioners.

CPC heard about it only by chance, when there were only a few days to respond and so had no time to ascertain parishioner's views across the whole Parish as is its normal policy.

This was despite the application being within the Comberton Development Framework according to the SCDC adopted local plan, irrespective that it is historically (and wrongly in the opinion of CPC) in the Parish of Toft.

This omission on the part of SCDC demonstrates that it is no longer supporting local democracy and transparency or that related policies aren't being fully implemented.

CPC has had ZERO communications/discussions with the applicant, nor its agent, in the intervening 10 months.

No meetings/emails at all even to discuss important matters like: - layout, access, community needs, landscaping, environment, education, healthcare impact, recreation and transport needs for Comberton.

CPC is concerned not only that it wasn't involved by SCDC but also not by the applicant/agent themselves.

CPC refers to a strong suggestion on this application from the SCDC Planning Case Officer on 27th August 2019 (*an extract from the applicants own planning statement*):

Moving Forward

I would suggest early engagement with Toft and Comberton Parish Councils on the proposed scheme.

CPC do appreciate that the SCDC Planning Case Officer kindly allowing it to submit its comments by 26th June 2020, following its request for a few more days hurried preparation.

Comberton Parish Council (CPC), supported by residents, strongly objects to this application.

As it did repeatedly for the neighbouring development from the same applicant to no avail, on the following grounds:

A - 'Application rationale'

The primary premise of the addition of 45 dwellings within the extended Comberton Development Framework of 90 dwellings as defined in the SCDC adopted local plan is that the number of dwellings is not constrained.

The site lies immediately west of Comberton village although it physically lies within the Parish of Toft, and is some 0.9 miles from the centre of Toft village along the B1046 road.

Comberton has been re-defined as a Minor Rural Centre under Policy S/9 of the Local Plan in which residential development up to an indicative maximum scheme size of 30 dwellings could be permitted.

The prior proposal exceeded even this number, however for the village the land has, unfortunately, been allocated for housing with an indicative number of 90 dwellings as stated in Policy H/1h and had been approved under consent S/1812/17/OL. This is referred herein as Bennell Farm East.

Policy H/1 states that the number of homes granted planning permission on the H/1h site may be higher or lower than the indicative capacity of 30 for a Minor Rural Centre (which applies to Comberton), but this application is in Toft, whose indicative capacity is only 8!

Whilst not binding they are clearly 'indicative' and so are far exceeded in the application irrespective of the Parish involved.

In any case 'this should be determined through a 'design led approach'.

CPC contest that the proposed development exceeds the indicative capacity and does not meet the criteria of a 'design-led' approach but that it seeks simply to be an expansion derivation of the Bennell Farm East development.

B - Not "Design led"

No elevations (3d projections) of this development from the B1046 viewpoint have been shown in the application. This is from where villagers and most visitors see Comberton, not from inside an 'estate'.

If the applicant/agents had provided these projections, then the public could see the impact of high rise flats just at the entrance to our rural village.

This isn't Cambourne – a new development - but a rural village in the wider Cambridgeshire countryside.

Design-led implies that any development should mirror/adopt /adapt other aspect of historic and contemporary housing in the village.

(We exclude Bennell Farm East as this also totally fails in this respect, as CPC have repeatedly noted)

This proposal fails to do this.

Its rectangular road structure does not adopt the flowing roads within Comberton – Harbour Avenue etc. But just try to get the maximum dwellings accessible via a roadway.

‘Welcoming site’ 1-2 is only seen when entering the site; *good for marketing*.

The site elevations [PL-3-01] are shown for the low houses (section 3-3) from the south, but the higher ones (1-1 and (2-2) are shown from east to west thus not a true view from the village access road.

Why is not a 3D visage or flyby provided as per other developments of this size in SCDC ?

So from the west, one could approach Comberton only to be confronted with multi-storey residential buildings that are –not compatible with the rest of the village where one sees a variety of houses on either side of the roads - some small, some bungalows, some larger with frontages onto the road. Later on we see historic houses, some larger with frontages onto the road. One does not see multiple multi height dwellings.

One could describe this proposed development, even the existing Bennell Farm East was, as one parishioner said ‘just another carbuncle on an otherwise delightful village’.

From a design perspective it is also sad to see cityscape boundaries like high brick walls being incorporated into a site within a village that has minimal such boundaries. It is the norm within Comberton that boundaries are soft – hedging, wooden and lower walls.

C - Foul and Surface water

There appears to be no sustainable SUDS provision explicit in the design statement, leading CPC to worry that the ditch to the south of the site will flood (if it gets there) leading to downstream issues.

Furthermore, given that for months this area has been the site for parking and storage of a major development (Bennell Farm East) without any mitigating precaution, there will have been severe soil compaction and subsequent lack of rain water absorption, let alone subsoil damage to the environment (tree and shrub root impacts).

Any wildlife will have been forced to leave what should have been left as ‘agricultural land’ (applicants map).

It is uncertain how foul water is being discharged into main sewerage.

- Is it via the Bennell Farm East pumping station, or as implied direct into the inadequate main sewer under the main road?
- What mitigation has been provided so that the pumped sewage from Bennell Farm East/West does not impact the already overloaded pumping station at Bush Close?
- Why is there not going to be a secondary sewer put into West Street/Barton Road to link up with the station near the Woodland Burial site?

What is happening in respect to the surface water drainage in the future – Who is responsible – Toft Parish Council or the Bennell Farm West residents?

D - Facilities (or lack thereof)

The applicant makes great play on the facilities of the neighbouring/adjacent village of Comberton.

BUT the precept for this development has, legally, had to be allocated to Toft Parish Council.

There has been no informal agreement between Toft and Comberton Parish Councils to share the Toft precept according to impact on the two villages pro-ratio.

Thus like the adjacent development, CPC would lose and additional £2,905 per annum (at 2019 rate) precept income, in addition to the lost £5,811 from the Bennell Farm East development to Toft Parish Council.

This sum would have allowed CPC, for example, to fund the Connections Bus project annually to the benefit of Comberton specifically, and obviously other local parishes.

CPC's understanding is that all of its village health and educational facilities are currently oversubscribed, albeit that the surgery is still accepting patients; the lack of advance consultation has prevented it canvassing the Pre-school Playgroup, Meridian County Primary School, Comberton Village College, Dental Practice and Doctors Surgery to provide specific numbers.

Two residents review of the surgery.

"I have been waiting 26.04 minutes to speak to Comberton surgery for an appointment I was counted down from 4 people waiting to connect and then never connecting. I tried Eversden surgery twice holding for 10 and 15 minutes each time So I have now given up! What a waste of time! I recognise NHS shortages but it is disappointing when you actually can't even get to speak to someone let alone an appointment. "

"Unless you say it is an emergency and must be seen that day, it takes 2-3 weeks minimum to get an appointment with your own doctor and another week after that if you can't make the single day and time available to you. If you are prepared to see any doctor this wait is sometimes reduced to as little as a week, but there is no continuity of care."

Likewise CPC notes that the applicant has not researched, nor given quantitative data that might support its contention that Comberton has enough spare facilities capacity to accommodate the addition load that an additional 45 dwellings might impose. It didn't do this for the prior, unfortunately approved, application for 90 dwellings ('Bennell Farm East').

The demand from the latter site (as yet unsold/unoccupied) hasn't even begun to start to saturate Comberton Village facilities.

S106 Contribution deficits

So let us look at the S106 contributions from this developer for the adjacent site (S/1812/17/OL Section 106 Agreement Dated 21 December 2017 refers).

- **£150k to CVC for 3g Pitch (not actually Comberton Village)**
- £67k towards extension to Comberton pavilion
- £10k to refurbish Comberton tennis courts
- £7.5k towards drainage improvement sat Comberton Primary School
- **£20k to improve Toft Rec, not Comberton Village**
- £53,251 towards drainage of sport pitch at Comberton Rec

Total=£307.75k of which only **£237k** are **directly** supporting Comberton Village.

Let us now compare this to another recent large development within a few Kms of Comberton.

Barrington Parish Council secured £5m or so in S106 monies for a development of 220 dwellings.

Pro-rata that would be £5,000 k / 220 x 90 for the existing Bennell Farm East (noted above) and £5000k /220 x 45 for Bennell Farm West. i.e. £2,045k for BFE and £1022.72k for BFW.

.... So let's be pragmatic and say that the Barrington S106 contribution was inflated by a huge 50% for 'exceptional factors' ...

Prorated and deflated CPC should have expected £2,045K * 50% = £1022.72k for the developing Bennell Farm East and for the proposed Bennell Farm West = £511.36k.

NOTHING that was offered for BFE came near that sum nor, as yet for BFW.

To compensate CPC asks for S106 amounts under its jurisdiction pro-rata (dwelling count) of one half of Barrington's S106 monies over the pair of sites as the contribution to Comberton community facility improvements.

E - Traffic and Safety

The site road layout being rectangular with little splays would impact deliveries and also refuse collections, apart from its lack of aesthetics.

There are no obvious cycleways and pedestrian access roads other than the roads. There is no mitigation in providing cycleways to Cambridge. There are no cycleways through Comberton Village, simple a pedestrian footpath. There are no considerations shown to improve the protection of children and cyclists using the Village College or Sports and Recreation Centre opposite. This is particularly true of children aged 5 or below.

There appears to be no mitigation of the impact of vehicular traffic, the majority of which (prior submissions to LDF from CPC refers) goes to Cambridge in the morning and back in the afternoon period.

Highways assumptions say that traffic movements are 4.5 per new dwelling per day. This would amount to over 202 per day for this site plus 405 for the adjoining site, as yet to be occupied. These additional 607 traffic movements are generated at one end of a relatively narrow road through a village which has school children and residents at key stages of the day.

There has been no documentation of proposed beneficial highway improvements – like, for example utilising the applicant's own land at the entrance to Bennell Court commercial offices access to build a (traffic calming) roundabout to match that at the east of Comberton. Nor even to provide proper pedestrian crossing (pelican style) to replace the old simple drop kerb crossing at the Village College entrance.

Residents have complained about the number of contractor vehicles and wagons using the current building site. CPC requests that as part of the highways response that they mandate that ALL site traffic should enter and exit from the B1046 west, **not** through Comberton, during weekdays only.

This apparently 'design-led approach' fails miserably – visibly unsustainable and more importantly unsafe.

F - Affordable Housing

The Parish Council was dismayed that the affordable housing was shown clustered at the front of the development. This has meant that high rise flats appear to be the prominent feature from the road entering what is otherwise a one/two storey frontage through the village.

CPC suspects that, had the high rise flats been at the north of the site, or intermingled with the rest of the development that would not have been the preferred viewpoint of the applicant (literally).

Secondly, this cluster of affordable dwellings goes against what has become colloquially known as the 'PepperPot approach' to mixing such housing within market-led dwellings. This had been encouraged by SCDC in prior years and instantiated in the local plan.

The local plan policy H/10 states that affordable housing shall be provided 'in small groups or clusters distributed through the site'. This policy is clearly not adopted by this development.

"There are clear indications that high quality, mixed tenure developments can be delivered successfully. Introducing tenure mix into new developments does not itself reduce the value and affect the saleability of these developments." **Joseph Rowntree Foundation March 2006**

www.jrf.org.uk/report/developer-and-purchaser-attitudes-new-build-mixed-tenure-housing

G - Environmental

There is no visualisation, landscape character study, nor documentation on the possible effects posed by a building site of this scale in close proximity to the adjacent Green Belt and attested rural edge of the village of Comberton.

As a result we see the application does not respect, retain nor enhance our village local landscape character and so would have adverse effects upon the wider landscape and visual amenities.

This would then be contrary to SCDC Policy NH/8: Mitigating the Impact of Development In and Adjoining the Green Belt and so have an adverse effect on the rural character and openness of the Green Belt.

In addition this would be contrary to SDC Policy S/2: Objectives of the Local Plan, HQ/1: Design Principles and Policy NH/2: Protecting and Enhancing Landscape Character.

The proposed development is also not apparently in line with the OxCam Natural Capital Plan nor even the Cambridgeshire and Peterborough Doubling Nature Investment Plan. These are supposed to give importance to natural capital protection through protecting or enhancing the natural environment.

The development actually does nothing for the environment; indeed it is totally negative for the environment, turning one of the few pasturelands in and around Comberton into a hard-surfaced and dense housing development.

Dr. Francine Adams

We note the lack of any current tree survey – possibly because they have been trashed by the contractor vehicles parking and storage site – Comparison with the earlier tree survey for Bennell Farm East might be somewhat embarrassing to the developers.

Conclusion

Comberton Parish Council strongly objects to this application, and in doing so is supported by its residents (see below).

It is not needed by Comberton;

CPC, responding to its residents, has never sought further major developments around the village in the past decade.

The applicant has demonstrably under researched in regard to its impact on educational and health capacities (or lack thereof), lack of village facilities, village housing needs; it does not meet traffic and environmental guidelines and is not a 'Design led' development, contrary to any potential expansion inside the Comberton Development Framework of the SCDC local plan.

This application does not provide mitigating options to compensate for traffic increases, healthcare expansion, primary educational expansion nor local (non CVC related) recreational activities.

It seems to be encouraged by SCDC purely to meet SCDC's objectives of new dwellings, self-build and affordable housing targets across the District.

Furthermore:

Given the precept imbalance between Toft and itself, CPC wish that all Section 106 monies be allocated to it, to be used for the benefit of Comberton, and by its wider community.

It wishes that its comments above, followed by downstream discussions chaired by its SCDC councillor(s) be incorporated in any derivations of this application, should it not be withdrawn, and await the ability to comment upon anything related, at a later stage.

Comberton Parish Council June 25th 2020

This objection is supported by our County Councillor, Lina Nieto

A sample of Comberton Residents' Comments

Disenfranchised as they were by the lack of prior publicity to Comberton Parish Council and themselves, outraged residents have contacted CPC; a sample of which are included below - as they may have been prevented from commenting online given the lack of time.

- 1 *X and I are amazed that the parish Council were not informed of this proposal. It sounds rather devious of the District Council to me or perhaps it is the County Council.*

The pressures on the village by way of schools. Doctors surgery, traffic congestion as well as utilities, if a further 45 houses are to be built, will cause all sorts of problems and change the nature of our small village I fear.

I don't suppose any objections to a further development will make any difference in the long run as these things are predecided at a higher level I think.

- 2 *We would vehemently oppose further development to the West of Bennell Farm. It is outrageous that the PC was not notified and due process was not followed and disingenuous of the developers.*

We note that Toft will be credited with providing extra housing whereas Comberton will bear the brunt of increased traffic etc.

- 3 *I saw the planning at Bennels Farm on Friday when walking past. I was pretty sure we hadn't heard about it!*

I just cannot believe the PC was not consulted. Is this because it is officially Toft?

I had some difficulty seeing exactly what was planned except it did include some flats this time. However, any benefit of this, to maybe people like myself, is far outweighed by the detrimental effect on village traffic and infrastructure.

I can envisage that we will now have 3 separate areas to our village making it even less of a community. Overall, not good and very 'underhand' to slip it in in this way.

Our doctors, schools etc can obviously not continue to cope especially with all the development at Hardwick and Caldecote and no public transport or extra facilities in any of these 3 villages. We are rapidly becoming a suburb of Cambridge without any of the advantages of a bigger city.

- 4 *Everyone I mention it to when I am dog walking is dead against the idea.*

**Others are documented in the Comments section of the Planning Portal.
To date there have been no supportive comments, merely objections.**