



East Cambridgeshire District Council

Meeting: Planning Committee

Time: 2:00pm

Date: Wednesday 15 November 2023

Venue: Council Chamber, The Grange, Nutholt Lane, Ely, CB7 4EE

Enquiries regarding this agenda: Jane Webb

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Committee membership

Quorum: 5 members

Conservative members

Cllr Christine Ambrose Smith
Cllr David Brown (Vice-Chairman)
Cllr Lavinia Edwards
Cllr Martin Goodearl
Cllr Bill Hunt (Chairman)
Cllr James Lay

Conservative substitutes

Cllr Keith Horgan
Cllr Julia Huffer
Cllr Alan Sharp

Liberal Democrat members

Cllr Chika Akinwale
Cllr Kathrin Holtzmann
Cllr John Trapp
Cllr Christine Whelan
Cllr Gareth Wilson (Lead Member)

Liberal Democrat substitutes

Cllr Christine Colbert
Cllr Lorna Dupré
Cllr Mary Wade

Lead Officer: Simon Ellis, Planning Manager

11:45am: Planning Committee members meet at The Grange reception for site visits.

AGENDA

- 1. Apologies and substitutions** [oral]
- 2. Declarations of interests** [oral]

To receive declarations of interests from Members for any items on the agenda in accordance with the Members Code of Conduct.

3. Chairman's announcements

[oral]

4. 20/01238/FUM

Hybrid planning application seeking full planning permission for 180 dwellings, access, landscaping, sustainable urban drainage, public open space and associated primary infrastructure; and outline planning permission for up to 217 dwellings with all matters reserved except access

Location: Land To North of Saxon Business Park Woodfen Road Littleport

Applicant: BDW Trading Ltd and Mr David Watson

Public access link: <http://pa.eastcambs.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QI31T5GG0CT00>

5. 22/01291/ESF

Installation of a Renewable Energy Park comprising ground mounted solar panels; access tracks; inverters, transformers; substation and battery energy storage system; customer cabin; underground cables and conduits; perimeter fence; CCTV equipment; temporary construction compound; and associated infrastructure and planting scheme

Location: Six Oaks Renewable Energy Park Newmarket Road Bottisham

Applicant: Six Oaks Renewable Energy Park Ltd

Public access link: <http://pa.eastcambs.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=RKQ8HXGGN0R00>

Notes

1. Members of the public are welcome to attend this meeting. Please report to the main reception desk on arrival at The Grange. Visitor car parking on-site is limited to 1h but there are several [free public car parks close by](https://www.eastcambs.gov.uk/parking/car-parks-ely) (<https://www.eastcambs.gov.uk/parking/car-parks-ely>). The maximum capacity for meetings in the Council Chamber has been set by the Fire Officer at 100 persons. Allowing for Member/Officer attendance and room layout constraints this will normally give a capacity for public attendance of 30 seated people and 20 standing. Public access to the Council Chamber will be from 30 minutes before the start of the meeting and, apart from for registered public speakers, is on a "first come, first served" basis.

The livestream of this meeting will be available on [the committee meeting's webpage](https://www.eastcambs.gov.uk/meetings/planning-committee-151123) (<https://www.eastcambs.gov.uk/meetings/planning-committee-151123>). Please be aware that all attendees, including those in the public gallery, will be visible on the livestream.

2. The Council has a scheme to allow [public speaking at Planning Committee](https://www.eastcambs.gov.uk/committees/public-speaking-planning-committee) (<https://www.eastcambs.gov.uk/committees/public-speaking-planning-committee>). If you wish to speak on an application being considered at the Planning Committee please contact Democratic Services democratic.services@eastcambs.gov.uk, to **register by 10am on Tuesday 14th November**. Alternatively, you may wish to send a statement to be read at the Planning Committee meeting if you are not able to attend in person. Please note that public speaking, including a statement being read on your behalf, is limited to 5 minutes in total for each of the following groups:

- Objectors
 - Applicant/agent or supporters
 - Local Parish/Town Council
 - National/Statutory Bodies
3. The Council has adopted a 'Purge on Plastics' strategy and is working towards the removal of all consumer single-use plastics in our workplace. Therefore, we do not provide disposable cups in our building or at our meetings and would ask members of the public to bring their own drink to the meeting if required.
 4. Fire instructions for meetings:
 - if the fire alarm sounds, please make your way out of the building by the nearest available exit, which is usually the back staircase or the fire escape in the Chamber and do not attempt to use the lifts
 - the fire assembly point is in the front staff car park by the exit barrier
 - the building has an auto-call system to the fire services so there is no need for anyone to call the fire services
 - the Committee Officer will sweep the area to ensure that everyone is out
 5. Reports are attached for each agenda item unless marked "oral".
 6. If required, all items on the agenda can be provided in different formats (such as large type, Braille or audio tape, or translated into other languages), on request, by calling main reception on (01353) 665555 or e-mail: translate@eastcambs.gov.uk
 7. If the Committee wishes to exclude the public and press from the meeting, a resolution in the following terms will need to be passed:

"That the press and public be excluded during the consideration of the remaining item no(s). X because it is likely, in view of the nature of the business to be transacted or the nature of the proceedings, that if members of the public were present during the item(s) there would be disclosure to them of exempt information of Category X of Part I Schedule 12A to the Local Government Act 1972 (as amended)."
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20/01238/FUM

Land To North Of Saxon Business Park

Woodfen Road

Littleport

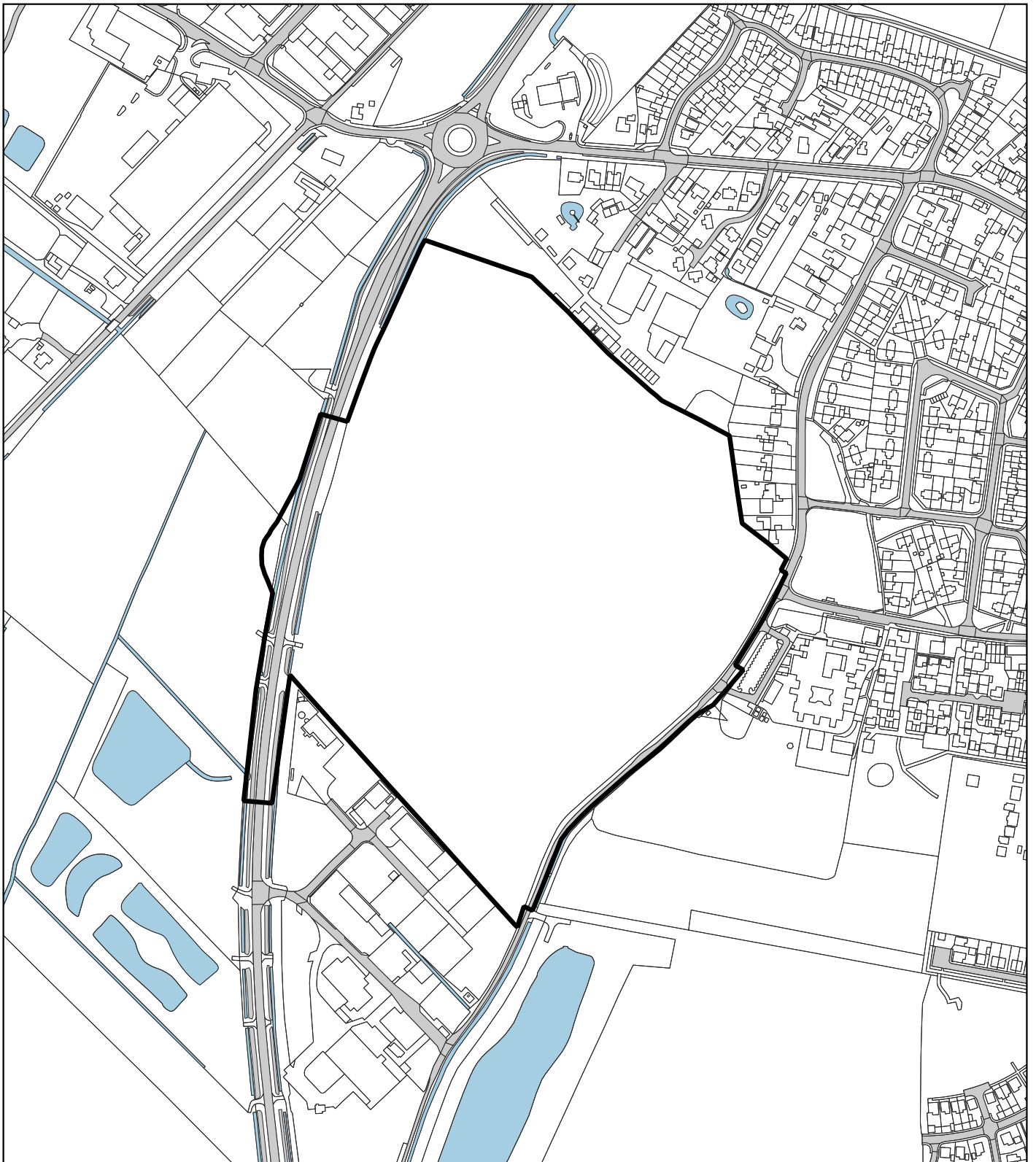
Cambridgeshire

Hybrid planning application seeking full planning permission for 180 dwellings, access, landscaping, sustainable urban drainage, public open space and associated primary infrastructure; and outline planning permission for up to 217 dwellings with all matters reserved except access

To view all of the public access documents relating to this application please use the following web address or scan the QR code:

<http://pa.eastcambs.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=QI31T5GG0CT00>





20/01238/FUM

Land to North of Saxon
Business Park
Woodfen Road
Littleport



East Cambridgeshire
District Council

Date: 31/10/2023
Scale: 1:5,000



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TITLE: 20/01238/FUM

Committee: Planning Committee

Date: 15 November 2023

Author: Planning Team Leader

Report No: Y92

Contact Officer: Andrew Phillips, Planning Team Leader
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01353 616359
Room No 011 The Grange Ely

**Site Address: Land To North of Saxon Business Park Woodfen Road Littleport
Cambridgeshire**

Proposal: Hybrid planning application seeking full planning permission for 180 dwellings, access, landscaping, sustainable urban drainage, public open space and associated primary infrastructure; and outline planning permission for up to 217 dwellings with all matters reserved except access

Applicant: BDW Trading Ltd and Mr David Watson

Parish: Littleport

Ward: Littleport

Ward Councillor/s: Christine Ambrose-Smith
Martin Goodearl
David Miller

Date Received: 16 October 2020

Expiry Date: 17 November 2023

1.0 RECOMMENDATION

1.1 Members are recommended to grant delegated powers to:

1. Approve the application subject to the recommended conditions (with delegated allowance to amend conditions if required to reflect S106) summarised below:
The conditions can be read in full on the attached Appendix 1.
2. To require the applicant to agree any further extensions to the statutory determination period to allow the completion of the S106 agreement or if the applicant is not willing to agree any further extensions to:

3. Refuse planning permission on the basis of the absence of a completed and signed S106 agreement.

- 1 Approved Plans

Full application

- 2 Time frame for commencement
- 3 A10 site access
- 4 Improvements to Woodfen Road
- 5 Gilbert Road bus stop improvements
- 6 Wisbech Road bus stop improvements
- 7 A10/Downham Road improvements
- 8 Residential Travel Plan
- 9 Bind course road construction
- 10 Removal of gate/fence/wall PD rights
- 11 Requirement to allow cars to enter and leave in a forward gear
- 12 Visibility splays
- 13 Future road management
- 14 External materials
- 15 Boundary treatment
- 16 Hard landscaping
- 17 Soft landscaping
- 18 LEMP
- 19 Surface water drainage
- 20 Construction water management
- 21 Surface water drainage survey
- 22 Biodiversity improvements
- 23 Fire hydrants
- 24 Piling
- 25 Construction times
- 26 CEMP
- 27 Bund
- 28 Contamination
- 29 Contamination
- 30 Unexpected contamination
- 31 LAP, LEAP and NEAP details
- 32 Archaeological investigation
- 33 Waste Management Minimisation Plan
- 34 Cycle Storage
- 35 PV panel details
- 36 ASHP details
- 37 Lighting

Outline

- 38 Reserved matters
- 39 Timeframe
- 40 Market housing mix
- 41 Piling
- 42 Construction times
- 43 CEMP
- 44 Road manage

- 45 Surface water drainage
- 46 Construction water drainage
- 47 Biodiversity improvements
- 48 Fire hydrants
- 49 Contamination
- 50 Contamination
- 51 Unexpected contamination
- 52 Noise report
- 53 Archaeological investigation
- 54 Waste Management Minimisation Plan
- 55 Sustainability
- 56 Residential Travel Plan

2.0 SUMMARY OF APPLICATION

- 2.1 The site measures 17.4 hectares, which equates to 43 acres. The hybrid planning application seeking full planning permission for 180 dwellings (Phase 1) and outline planning permission for up to 217 dwellings (Phase 2) with all matters reserved except access. The proposal has a gross density on the full element is 15 dwellings per hectare (gross) and 40 dwellings per hectare (gross) on the outline element. This gives an overall gross density of 22.8 dwellings per hectare or 9.2 dwellings per acre.
- 2.2 The application has been amended over the past 3 years several times with substantial amendments required since the original submission due to the design of the dwellings and layout being of such poor quality and amendments have reduced the overall number of dwellings. The final sets of amendments in 2023 amended the market housing mix to better reflect the requirements of the Strategic Housing Market Assessment (SHMA), change in public open space to provide more equipped play areas and to provide safer pedestrian links along Woodfen Road.
- 2.3 The hybrid planning application, plans and documents submitted by the Applicant can be viewed online via East Cambridgeshire District Council's Public Access online service, via the following link <http://pa.eastcambs.gov.uk/online-applications/>.

3.0 PLANNING HISTORY

3.1

15/01296/ESO	Outline planning application for 250 houses, 8,000 square metres of B1, B2 and B8 commercial space and associated access, landscaping, parking and open space	Withdrawn	16.06.2017
19/00972/SCRE EN	SCREENING OPINION - Up to 450 residential dwellings, provision of a new roundabout access, secondary access for emergency vehicles	Env Statement Not Required	30.09.2019

4.0 THE SITE AND ITS ENVIRONMENT

4.1 The site is located between the A10 (located to the West) and Woodfen Road (located to the east). The site's primary entrance will be onto the A10, and this has not been designed as a through road to Woodfen Road. In addition, there are minor road/driveway entrances onto Woodfen Road and these are expected to serve the self-build plots. The road access of Woodfen Road joins onto Wisbech Road and this junction is known to being relatively dangerous. To the north and south of the site business/industrial parks. To the east of the site is the Littleport Community Primary School.

5.0 RESPONSES FROM CONSULTEES

5.1 Responses were received from the following consultees, and these are summarised below. The full responses are available on the Council's web site.

Littleport Parish/Town Council - 9 November 2020

"Approved"

21 March 2022

"The Parish has concerns about the application.

LPC believes the roundabout could be built first and all construction traffic should come off the A10. The Council have concerns over construction traffic passing the adjacent school."

25 July 2022

"No concerns"

28 February 2023

"Littleport Town Council has recommended approval for this application."

6 June 2023

"Littleport Town Council resolved to support this application with the condition that a cycle way is included within the development linking in with cycle routes planned within Littleport, and from Littleport to Ely."

16 August 2023

"Littleport Town Council has recommended supporting the approval of this application, however it does have concerns about the potential for anti-social behaviour if the 2 social houses are sited in the cul-de-sac. The concerns are historical in that the council has had issues in the past with social housing 'tucked away'"

Urban Designer (Place Services) - 15 September 2022

"Background

This design review is based on Paragraph 126 of the NPPF.

126. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities

The requirements of 'Beautiful' are explored in the NPPF Section 12 and the National Design Guide.

The National Planning Policy Framework Section 12 requires that developments:

- Function well
- Are visually attractive as a result of good architecture, layout and appropriate landscaping.
- Are sympathetic to local character, including the historic built character, while not preventing increased densities.
- Create a strong sense of place through definition of streets and distinctive forms.
- Optimise the potential of the site to create an appropriate amount and mix of development.
- Create places that are safe, inclusive, and accessible.
- Are consistent with the principles set out in the National Design Guide.

The following National Design Guide sections are considered applicable:

- C1 calls for designs which understand and relate well to local built environment character, views, layout, form, scale, and appearance.
- I1 encourages buildings which respond well to local character and identity through appreciation of existing built form, height scale, massing, and relationships between buildings. This includes the scale and proportions of proposals, façade design, patterns and proportions of fenestration and their details.
- B2 encourages well defined streets with consistent building lines, heights related to street widths, and plenty of active frontage consistent with local character.
- M1 calls for a clear hierarchy in the streets and other routes so that people can easily find their way around.”

Provides detailed advice on house design and layout.

22 March 2023

“Conclusion

Further to our previous design advice, a number of positive moves have been made including:

- Strong but subtle definition of character areas in terms of massing, materiality, highlighting of corners, increase in definition of built form where appropriate and increased variety of materials where appropriate.
- In the case of the Green Edge and the Central Spine/Central Open Space, this is also backed up by a strong landscape scheme which is appropriately formal along the primary route, and subtly incorporates acoustic measures, and SuDs so that the latter becomes part of the landscape along the Green Edge. We look forward to further detailing of an appropriately timber detailed play area by condition.
- A definite improvement in house types, with many of the latest round of comments being incorporated, and overall, a step-change from where the

house types were when Place Services first got involved, in terms of legibility, proportion, balance, highlighting of corners, and active frontage.

However, there are still several remaining issues which we encourage to be resolved:

- Incorporation of NPPF Paragraph 131 street trees along the Street character area and to end vistas where appropriate.
- Modulation of height around corners from the supported three storey to the general two storey in the Green Edge.
- Further consideration on how brick soldier lintels will be detailed in render to avoid an awkward relationship
- Further consideration of the house types - we consider that the comments made do not require considerable revision but nevertheless are important to remove niggling issues with the scheme.
- The sustainability strategy needs to be refreshed in the light of recent revisions.”

8 June 2023

“Background

This design review is based on Paragraph 126 of the NPPF.

126. The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities

The requirements of ‘Beautiful’ are explored in the NPPF Section 12 and the National Design Guide. The National Planning Policy Framework Section 12 requires that developments:

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- Are consistent with the principles set out in the National Design Guide.

Relevant Local Policy

Guidance & Principles East Cambridgeshire Local Plan (2015)

East Cambridgeshire Design Guide (2012)

In particular, the East Cambridgeshire Local Plan Policy ENV2 requires:

- Detailed masterplans to be prepared for sites, and for other large-scale developments and developments in sensitive areas and submit these

alongside an outline or initial application. In addition to key design principles, masterplans should include details on infrastructure delivery and phasing.

- Variety and mix of, uses, heights and types of buildings, public spaces paths and routes, and landscaping, and provide variety and visual richness.
- Structure and legibility to navigate through developments by making use of existing views, vistas, landmarks and built and natural landscapes and creating new ones.
- Enclosure to streets and spaces through the grouping, positioning and height of buildings and landscape features, and road layouts.
- A clear distinction between public and private spaces, to enhance the public realm.
- The location, layout, scale, form, massing, materials, and colour of buildings that relate sympathetically to the surrounding area and each other.

Part 1: Layout & Access

The National Design Guide Section C1 calls for designs which understand and relate well to local built environment character, views, layout, form, scale, and appearance. B2 encourages well defined streets with consistent building lines, heights related to street widths, and plenty of active frontage consistent with local character. Sections M1 and M2 encourage a connected network of streets for all forms of travel including walking and cycling. M1 calls for a clear hierarchy in the streets and other routes so that people can easily find their way around. M3 encourages well considered parking, and servicing which is convenient but does not undermine the streetscape. P2 encourages proposals that produce safe and secure public spaces through the definition of spaces by buildings, active frontages, and natural surveillance.

In outlining appropriate characters for development, the East Cambs Design Guide SPD 2012 encourages linking of areas with a movement network of streets and paths, areas of public space which are defined, overlooked and functional, care in designing corners, and ensuring the development is not vehicle dominated.

We note masterplan documents have been submitted with the application including a framework plan and phasing.

We note the following positive attributes of the masterplan strategy:

- The character area strategy is logical with:
 - A Central Spine character area covering the east-west Central Spine and the central open space. This relates well to the built form and the landscaping which is distinct and relevant to areas at the top of the route/spatial hierarchy.
 - Green Edge character area at the landscaped edges of the site. This also relates well to the strategy of larger detached houses, varied materiality and larger front gardens.
 - Street Character Area covers the remaining areas, although this might be considered an over- simplification, it is nevertheless appropriate as a broad approach. As an improvement to this, the secondary public open space could be given its own character area in a future application

- The associated Framework Plan has a logical route hierarchy, with:
 - An East-West Route connecting the entrance with Parsons Lane,
 - A central open space leading off this,
 - Landscape and SuDs buffering to the A10 to provide screening, drainage at the lowest point of the site and some acoustic protection
 - A network of landscaped pedestrian/cycle paths along this, and also running along the Main Street and then connecting into Parsons Lane to the school and further east.
 - Secondary routes leading to private drives in a permeable route framework north and south of the Main Street.
 - Perimeter blocks of development appropriately defined between these.
 - Two secondary open spaces- one as a buffer to Parsons Lane and the other as a pocket park for the second phase north of the Main Street.
- It is considered that the above is an appropriate route and spatial hierarchy relating to context, providing the opportunity for the scheme to be legible and connected, and to encourage walking and cycling.

Low Parking Dominance

- Parking has been proposed generally between the dwellings, rather than front of dwelling meaning that parking dominance has been reduced.
- We are also particularly pleased regarding the removal of front of dwelling parking from the corners and the end of the vista to the east of the Central Spine. This improves the connection between the street and the dwellings, and focusses on the landscaping of the tree lined verges.
- At corners, care should be taken to relate parking to each plot as there are a few examples where allocated parking abuts a completely different dwelling. There is a missed opportunity for proposals to fully utilise both aspects of the corner turner dwellings so that parking can be located on the other street at the end of the garden to allow for a more direct relationship (eg plots 94 & 95).
- We do however recognise that frontage parking and integral parking dwellings are part of an overall strategy of providing a variety of typologies across the site. We therefore regard as positive the proposal for front of dwelling parking only on one side of the suburban streets in the street character area, directly related to the dwellings and broken up by landscaping, to allow for these typologies.

Woodfen Road Green Edge Layout

- We regard as positive the introduction of this green edge landscaping and associated SuDs to provide screening to the road and an appropriate amenity space.
- The arrangement of private drives to front this space is also an appropriate strategy.
- However, we regard the proposal for parking access off these private drives into the landscaped space as detrimental to space, eroding it, and severing the connection between the landscape and housing. This will inevitably lead to a vehicle dominant environment and risks undoing the good work associated with the rest of the development and therefore we cannot support this part of the proposal.

- The arrangement of detached houses with parking tucked between them, and larger front gardens is appropriate to the setting, allowing the opportunity for a slightly more permeable frontage
- Also appropriate is the grouping of higher dwellings at corners legibly signposting routes into the development.

Central Spine Layout

- As part of the Central Spine character area strategy, continuous verges are on both sides of the east-west Main Street, and the associated tree lined avenue befitting of a road at the top of the route hierarchy, facilitating an east-west green link with good use of private drives to minimise crossing points at the verges
- A Cycle route is proposed behind this continuous verge, with priority crossings at a minimum number of vehicular access points, all aligning with the latest government guidance summarised in LTN1/20.
- We are however still concerned about the directness of the cycle route as it connects into Parsons Lane. This appears to have an unnecessary amount of doglegs, all of which will discourage cycling. Corners will be cut, possibly leading to safety issues.
- It is particularly positive that no parking is in front of the dwellings along the east-west Central Spine and the main public open space, and only part of one aspect of the secondary public space. This means that dwellings have a direct relationship to these spaces without being cut off by parking.
- We have worked with the applicant to improve permeability north of the Central Spine with three routes leading north but only one of them interrupting the verge.
- Opportunities appear to have been taken to provide raised table crossing points along the Main Street to slow down traffic and to ensure that the scheme is not severed by this street into two halves. However, it is disappointing that these do not appear to be indicated in a contrasting (eg paviour) material which would encourage pedestrian connectivity. Perhaps this issue could be conditioned.

Legibility Generally

- The scheme is also legible by nature of its building height strategy, in particular:
 - The concentration of 2.5 and 3 storey buildings along the east-west route and around the public open space, adds to legibility, relating to and expressing the importance of this route and space.
 - The focus on higher buildings at corners relative to their immediate context.
 - o Ensuring 3 storey buildings to end the vista to the east of the main street.
 - The grouping of matching corner buildings to frame entrances, particularly to the southeast gateway
 - We are however concerned that the northern part of the site entrance to main street has a different building typology for the future phase. More detail is required regarding this, and we would want to see this as a proposal that matches the appropriate three storey height of plots 1 & 2.
- Occasionally ends of vistas are marked with an expressed gable (eg. plot 175) or increased height (eg Plots 126-127 and 173-175). It is positive that a three-storey corner turner with an expressed gable appears at plot 94, the north-east

corner of the central open space. Plot 17 also managed to turn the corner and end a vista to the west of the public space.

- There are, however, a number of missed opportunities to end vistas with expressed gables.

Definition of Space with Built Form and Active Frontage

- The continuous building line to perimeter blocks on the layout drawing is positive, reflecting the strategy on the Framework Plan.
- There are still a few examples of lack of definition of small lengths of road – the most prominent being that of the east-west road connecting Main Street with Parsons Lane (plots 175-176 and opposite). It is a missed opportunity not to insert a small plot on the north and south side of this street, which means that this small length of street is unduly dominated by garden walls.
- The introduction of private drives parallel to Woodfen Road to minimise points of access and to allow for a screen of street trees lined with houses to this boundary.
- The increase in permeability to form a street parallel to Woodfen Road, further into the scheme, and perpendicular footpath connection into this from Woodfen Road.
- The proposal for detached and semi-detached dwellings to the edges of the scheme, along the Main Street, and the main Public Open Space.
- Changes of scale appear to be handled sensitively subject to submission of street scenes. In particular 2.5 storey dwellings in terraces with two storey end stop dwellings with hipped roofs have been avoided.

Part 2: Character Areas

The National Design Guide Section I1 encourages buildings which respond well to local character and identity through appreciation of existing built form, height scale, massing, and relationships between buildings. This includes the scale and proportions of proposals, façade design, patterns and proportions of fenestration and their details. I3 encourages the siting of buildings within the landscape, the arrangement of layout and grain, landscape spaces, movement network, development blocks, scale, form, proportions, and materials to create distinct characters and a memorable sense of place.

The following comments are made regarding character areas:

The Gateway/Green Edge

It is encouraging to note that larger houses and semi-detached houses are proposed here. A mix of brickwork types, roof colours, and render colours according to local context provides a suitably organic variety in relation to the open landscape these houses will address. Particularly positive is the use of render to highlight corners and the care taken to gradually step up to 3 storeys at the corners via 2.5 storey dwellings as shown in the street scene. Materials should be conditioned so that the highest quality locally matching materials can be chosen.

Main Street/Central Spine

As previously stated, the boulevards of trees, taller buildings and continuous verges are positive in this proposal. Linking some of buildings together with carports is positive as it increases the formality of the space in line with its importance in the route

hierarchy. Generally, we support the limited palette of a locally matched buff brick and grey tile roof to add to the formality. Corners are an opportunity to express houses in a different material such as render, and this is what has occurred. Materials should be conditioned so that the highest quality locally matching materials can be chosen.

Central Green Space

The taller buildings relating to this space, together with the direct relationship with the space unencumbered by carparking is positive. Linking some of buildings together with carports is positive as it increases the formality and definition of the space, and corner buildings have again been positively expressed in render to increase legibility.

Suburban Streets

This is a chance for terraces and some integral garage housetypes, as currently proposed. Corners are again be highlighted in a contrasting material. However, in terms of the materiality strategy and the architecture, this is least convincing character area. It is a missed opportunity not to provide a modulated step down from plots 173 to 172, which is considered quite abrupt.

Part 3: Housetypes

Overall, we set out and the applicant has largely followed the following principles, employing the positive local characteristics:

- The use of a single predominant material for each house type.
- The use of expressed gables.
- The use of simple vertically proportioned windows, avoiding excessive horizontal emphasis
- Reduction of scale with height.
- The use of defined plinths to the public elevations.
- It is suggested where render is employed, this is dressed down to plinth level.

The following issues still present themselves:

Generally, we would encourage adapting the house types according to the character area: The use of classically framed front entrance doors for example should not be universal; changes in materiality, while ensuring a maintained simple use of materials, will be required per character area. As currently presented, the whole site would be too uniform and lack distinctiveness and legibility.

Corner Turner Housetypes

Parkin

- This works as a well resolved 3 storey plot for corners to be highlighted
- An expressed gable roof on the narrow width allows for a reduction in the bulk of the roof. Any proposal for a front to back roof will raise concerns about proportion.
- The window proportions are good and show diminishing scale with height.
- Overall, however, the dwelling is rather narrow in proportion and the width of the and it is a missed opportunity not to propose a dwelling that is slightly wider in line with our previous comments.

Hertford

- This has a strong front elevation with a three- window range and diminishing scale with height
- The plan form is not deep and therefore the roof is in scale with the rest of the house.
- It is positive that there is a bay window and a small window above on the return elevation. However, it is a missed opportunity not to provide more active frontage on this aspect.

Hadley

- This has a strong front elevation with a three- window range and diminishing scale with height
- The plan form is not deep and therefore the roof is in scale with the rest of the house.
- It is positive that there is a bay window and a small window above on the return elevation. However, it is a missed opportunity not to provide more active frontage on this aspect.

Avondale

- This looks good from the front- with a three- window range and a bay window to one side providing the diminishing scale.
- The side elevation is less successful, and it is a missed opportunity not to provide more generous fenestration. We understand that this is due to limitations of the plan, but it is missed opportunity not to adapt the plan accordingly.

YH58/59

- This house type is a good exercise in providing two maisonettes which pose as a corner turning house with a three- window range.
- The proposal for a projecting entrance on Front Elevation 1 is rather stark and it is a missed opportunity not to provide further active frontage to soften this.
- The long plan form does not relate well to the proportions of the widows with too much wall in-between.
- It is a missed opportunity not to resolve this with bay windows added to the ground floor either side of the entrance, or wider double sash square windows.

Other House Types

Archford

- There has been a missed opportunity to ensure the door and the window above to line up which unfortunately is leading to an unbalanced elevation. Other than this, this house manages to follow our other positive principles well.

Cannington

- As this house is deep in plan, we recognise the attempt to reduce roof dominance with a slack roof pitch. These houses have not been proposed on corners and therefore is this acceptable as the gable will not be exposed.
- However, it is a missed opportunity not to provide an arrangement similar to the Parkin with an expressed gable on the narrow dimension and centred windows and doors symmetrical to the gable.

- The front door is shifted over and does not line up with window above. It is a missed opportunity to not address this as our previous comments.

Holden

- This has an excessively deep plan leading to a slack roof to avoid roof dominance out of proportion to the elevations. The solution is acceptable as long as it is not visible from the side. Unfortunately plots 26, 86 and 129 appear to have exposed gables due to the arrangement or proximity of dwellings which less tall, and therefore we have difficulty in supporting these. Plots 135 to 136 is a far better arrangement. The front door is offset. Ingleby This house type is supported in general terms but is rather plain in its execution. A bay window on the ground floor may help.

Kennett

- This is a reasonably proportioned 2.5 storey house which should easily be able to be combined with the expressed 3 storey gable of the Cannington or Parkin.
- Unfortunately, the front door is offset, unbalancing the elevation and it is a missed opportunity not to address this.

Wilford

- It is a missed opportunity not to ensure the windows are not too close together as is currently the case. In particular, the rubbed brick arch is too close to the door. Windows and doors should be centred up on the bay. We cannot support this housetype.

SH50

- This housetype suffers from an overly wide window on the first floor. However, in other senses it is a well- balanced elevation.

Conclusion

In this response we have analysed the scheme under paragraph 126 of the NPPF. We have defined 'Beautiful' in terms of the further guidance the NPPF offers, including paragraph 130, and the supplementary guidance contained in the National Design Guide. In addition, locally the scheme should follow Policy ENV2 of the local plan. We have identified a number of local positive characteristics (as set out in our earlier letters) which the housetypes should follow, and in our view further elaborate on a definition of 'Beautiful'.

The Framework Plan and Masterplan have been greatly improved from the initial iteration, and with a few reservations, we are able to support these, finding them in line with paragraph 130 of the NPPF, the guidance given in the National Design Guide and Policy ENV2 of the local plan. However, we cannot support the arrangement of parking along the Green Edge, which is insensitively located.

The submitted proposed house types are an improvement on those previously proposed. These house types generally follow the identified positive local characteristics set out in the introduction to Part 3 of this letter, the relevant guidance of the National Design Guide and the relevant section of Policy ENV2. There are however a number of comments which remain unaddressed from our earlier consultations. We therefore cannot support the Holden house type at plots 26, 86 and

129. We cannot support the Wilford house type in any location without revision. With the exception of these concerns, the house types, although not exemplary, are acceptable and fit our definition of paragraph 126 of the NPPF.

Overall, as the masterplan strategy is so strong, we consider this scheme to be acceptable, and compliant with the principles of paragraphs 126 and 130 of the NPPF, the National Design Guide and Policy ENV2 of the local plan. We would recommend conditions regarding materiality, landscaping, and boundary treatments (the latter has not been analysed here).”

National Highways - 25 July 2023

“Referring to the consultation on a planning application dated 10 July 2023 referenced above, in the vicinity of the A14 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

a) offer no objection (see reasons at Annex A)”

15 September 2023

“We have reviewed the amended plans, and we have no further comments to add to our no objection issued on 27th July 2023.”

20 October 2023

“have reviewed the amended plans and we have no further comments to add to our no objection issued on 27th July 2023.”

Local Highways Authority - 27 January 2021

“The Highway Authority objects to this application in its current form and would recommend refusal for the following reasons:

1. The application is not supported by sufficient highways and transport information to demonstrate that the proposed development would not be prejudicial to the satisfactory functioning of the highway or highway safety

No RSA has been submitted with this application. The CCC TA team have requested further information, and a road safety audit cannot be completed until this has been agreed / approved.

2. There is a secondary link on to Woodfen Road. The planning and highways authority have been in discussions with the applicant for a number of years on this matter. Both Woodfen Road and the junction of Woodfen Road / Wisbech Road is not suitable for any further increase in traffic. It is also located opposite an existing junction which would create a crossroads. This is unacceptable to the highways authority. If permitted this would be detrimental to highways safety.

3. The western section of Woodfen Road has properties proposed to be accessed off it. This section of road is a single-track road with no footways, lighting and has a 60mph speed limit. If permitted this would be detrimental to highway safety.

I also note there is a pedestrian link at the bottom of this road, but I am unaware of any pedestrian public right of way in this location. Again, this would therefore be detrimental to highways safety if permitted.

4. Internal estate roads should be designed to a 20mph speed limit. There is no adequate features or measures proposed that would enforce these speeds should it be permitted.

Additional Notes

I am concerned with the banks of parking spaces in front of the properties side by side. These are very long sections for pedestrian to pass and visibility will be extremely restricted if available at all. This arrangement would mean that vehicles would reverse out over the footways with no visibility of on-coming pedestrian when the next space over is occupied. Or it would require vehicles to stop and manoeuvre on the highway to reverse into the space which is equally detrimental to highways safety.”

2 September 2021

“The revised submission is in response to comments made by Cambridgeshire County

Council's Transport Assessment Team. Comments made by the HDM team 27th January 2021 is outstanding but will need to wait until TA team comments are first addressed to an accepted standard.

However, in the interest of collaboration I would suggest that the applicant adhere to the County Council's document 'Highway development management - General principles for development' when considering any changes to the proposed access and layout. A copy can be downloaded from the link below.

<https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/roads-andpathways/highways-development>

At the appropriate time, I would also strongly suggest for a proposed development of this scale, that the applicant engage the HDM team for pre-application discussions prior to modifying access arrangements or the internal layout. Information relating to preapplication advice can be found below.”

23 March 2022

“A10 Access

Following consultation with the LHA, the primary site access has been revised so that it is now via a three-arm roundabout on the A10 as opposed to the previous four-arm layout. This strategy is acceptable as is the layout shown on the drawings LP-STN_GN-A10-DR-CD-0101.1, 0102.1 & 103.1 Revision P01. This should be the approved drawing rather than the alternative four-arm option.

A four-arm roundabout has been submitted for review in the interest of safeguarding future development opportunities west of the A10. Based on the information supplied to me, I am confident that a four-arm roundabout is viable with a pedestrian and cycle crossing (exact nature to be confirmed at later date in context of the anticipated development and current policy/guidance). However, I stress that

this in principle acceptance is based on the current information available and is said without prejudice to any future planning application for the site west of the A10, which will need to be assessed on its own merits.

Forward visibility to the roundabout is achievable but it may result in the loss of some trees within the highway verge. This may have some screening impacts upon the development, but County policy is that where a highway tree is removed, two more shall take its place. This can be investigated further during detailed design post planning.

The circulatory of the roundabout crosses outside the highway boundary on the west side of the A10. The application redline should therefore be updated to include this land.

Where the circulatory passes over the existing highway drain, the applicant has proposed that the drain be culverted underneath the carriageway. This is not acceptable as it would make any maintenance activity costly, disruptive, and potentially unsafe. Instead, the drain should be diverted around the circulatory on the west side. I am content to address this post planning, but the LPA may wish to consider this now as the footprint of the access would change as a result of the diverted drain which would further impact the application redline boundary.

The Framework Plan (drawing CA-05-18B) indicates that the A10 is a pedestrian and cycle link but there is no pedestrian provision or dedicated cycle infrastructure along this length of the A10.

I am aware that a Stage 1 Road Safety Audit has been carried out for the proposed scheme, and subsequently reviewed by the County's Road Safety Auditors. This RSA, the review and a response should be included in this application for consideration.

Woodfen Road Access / Works

A secondary emergency access has been proposed for Woodfen Road which will, under normal circumstances, function as a pedestrian and cycle access. This is acceptable.

A 3m wide shared use path has also been included along the length of development frontage on Woodfen Road and connects to the existing footway in the north. While the inclusion of pedestrian and cycle infrastructure is welcome, I note that the broader impact on cycling may be limited as this does not connect to any wider cycle network within Littleport.

I would recommend that in the interest of compliance with LP Policy COM 7, the footway along the south side of Parson's Lane be extended from the existing Littleport Community Primary School entrance along Woodfen Road to the new proposed crossing and shared use path south of the school grounds. However, I will defer this to the LPA. In any case, an uncontrolled pedestrian crossing of Woodfen Road is required immediately north of Parson's Lane to connect the new path to the existing footway network. The specifics of this can be agreed post planning or suitably conditioned.

Where the shared use path extends into the site towards the south of Woodfen Road, it's alignment should be staggered from the crossing point to discourage cyclists from exiting the development and crossing Woodfen Road without first pausing.

Vehicle tracking for a refuse vehicle has been provided but the vehicle used is small (7.9m) and it is my understanding that this is notably smaller than the vehicle used by East Cambridgeshire's Waste Team. The applicant should seek confirmation from ECDC Waste Team regarding the vehicle they use and provide suitable vehicle tracking and turning as required.

Construction Traffic Management

The strategy to initially use Woodfen Road as a construction traffic route only until the A10 roundabout is constructed (prior to first occupation of the site) and then use the roundabout as a construction access is broadly accepted from a highway safety perspective although this must be agreed with CCC's Safer Routes to School team too and confirmation submitted as part of this application. They must also agree times to restrict construction traffic around school opening and closing, at a minimum 30 minutes before and after start/finish times.

Woodfen Road is a minor road with various existing constraints so mitigating measures have been proposed in the Construction Traffic Management Plan, but further work is needed to ensure that the impact of construction traffic on the highway is mitigated:

- A banksman is proposed at the Wisbech Road / Woodfen Road junction. A banksman will also be needed at the construction access onto Woodfen Road.
- Large delivery vehicles should be timed/managed so that the risk of large vehicles arriving and departing at the same time is minimised.
- A pre-commencement condition survey of Woodfen Road is proposed but this should also include Wisbech Road up to the A10.
- Inspection and wheel washing is needed for vehicles prior to them departing site.
- Any gates across the access need to be set back at least 15m and the initial length of the construction access hard paved.
- All contractors/visitors should receive a site induction which highlights the sensitivity of Woodfen Road, and a means of reporting dangerous/inconsiderate driving be made available to the public.

The CTMP proposes 7:30am – 6pm delivery times for the site and while this does not necessarily have direct highway safety implications there will be amenity impacts that the LPA may wish to consider.

The self-build plots along Woodfen Road have been excluded from the CTMP but these are subject to separate reserved matters applications. Should any mitigating measures be needed for their construction they can be secured as part of future applications but due to the nature of development, construction impacts are expected to be modest.

Cycle Strategy

Dedicated cycle infrastructure has been provided around the perimeter of the development site and east-west from Woodfen Road to just short of the A10. The east-west provision takes the form of a 3m shared use path. While not unsafe and therefore not a basis for an objection, I note that the cycle route is indirect which could limit its attractiveness.

Frontage access across the cycle route is limited which is welcome. But where driveways or shared private accesses cross the path, there is insufficient visibility. There should be 2m x 2m pedestrian visibility splays and 2.4m x 25m visibility splays included for cycle route crossings, both measured to the nearside of the path.

Layout

All new estate roads should be designed so that they are self-enforcing of a 20mph design speed. To achieve this a feature to change the vertical or horizontal alignment of a carriageway should be included every 80m. Gradual bends do not have the desired impact, meaning the roads between Plot 81 and 111 and between 161 and 188 are unlikely to be sufficiently traffic calmed. Additional features are needed which could include raised tables, road narrowing, (sharp) horizontal deflection etc.

The location of car parking for Plots 67 and 140 is not acceptable if the road is proposed for adoption. The parking is located at an ambiguous point of conflict with pedestrians and other motorised vehicles. To access the parking space, vehicles would be required to drive along a linear length of footway. To access the parking space vehicles will need to regularly drive/reverse over a 90-degree corner which will also lead to excessive wear and tear of the kerb.

All private roads and parking courts should be a minimum width of 5m for the first 8m length to minimise the risk of reversing onto the highway proposed for adoption.

The transition to the shared surface between Plots 87 and 98 is not as per CCC's specification (HERCS Appendix 6). The initial carriageway should be 6m wide to avoid the taper in carriageway width.

Note that raised tables should be block paved (gradients permitting), a detail which can be amended post planning.

Regarding the Framework Plan and the section of the site seeking outline approval, the applicant may wish to consider the above comment regarding gradual bends and their limitations in managing vehicle speeds as the plan indicates long cul-de-sacs with little deflection. The applicant should also note that no more than 100 homes may be served off a single traditional road and no more than 12 off an adoptable shared surface.

Visibility

Inter-vehicular and forward visibility splays are shown on the submitted general arrangement plans (drawing 19445-RLL-20-XX-DR-C-202 & 203 Revision F). These are accepted, but no visibility has been provided in relation to the shared use path

as described above. These splays should be included, and the layout modified as needed.

While 2m x 2m pedestrian visibility splays have not been shown for private parking spaces and shared drives which front onto roads proposed for adoption, they do largely appear achievable. Such splays should be shown and conveyed to the future property owners with the restriction that they be kept free from obstruction from at least a height of 0.6m in perpetuity.

Vehicle Tracking

Refuse vehicle tracking has been provided which is acceptable.

I do however recommend that the applicant also be asked to provide vehicle tracking for a modest sized delivery vehicle (box or panel van) serving all private roads and parking courts (except where the length of road is less than 12m). Such roads should be designed with appropriate turning provision for regular day-to-day use e.g., grocery or parcel delivery. This is of particular importance where private roads front onto shared surface streets or traditional streets at points of conflict. Turning provision has been provided on some private roads but not others leading to an inconsistent approach across the site.

Surface Water

The Flood Risk Assessment states that the highway will be used for exceedance flow routing and that during the 1 in 100-year event, flood water will sit within the highway. The LHA preference is that no exceedance occurs but accept that this is not always possible. Where the highway is used for flood routing, the below requirements must be met for the roads to be considered adoptable:

- Flood flows cannot be routed from the highway to private property
- Shared surface streets may not be used for flood routing

The flood routing plan 19445-RLL-20-XX-DR-C-204 Revision E takes the above into account, but I query the accuracy of the routing as the flows and contours do not appear to take into consideration the impact of raised tables.

The applicant will need to provide certainty that the flood water would be contained within the carriageway for the roads to be considered for adoption and that the storage time limited. This can be done post planning.

Permeable surfaces are used throughout on private roads. The LHA does not consider permeable surfaces a suitable drainage solution in isolation. If these areas don't fall away from the highway, surface water interception will be required at the boundary of the adoptable highway. This can also be addressed post planning."

1 July 2022

"A10 Access

The revisions to the proposed roundabout access as shown on the drawings LP-STN-GN-A10-DR-CD-0102.1, 0102.1 & 0103.1 Revision P02, have addresses my previous comments regarding the design. But there are two outstanding comments from my previous consultation response which remain outstanding. These are repeated below for convenience:

- o The Framework Plan (drawing CA-05-18C) indicates that the A10 is a pedestrian and cycle link but there is no pedestrian provision or dedicated cycle infrastructure along this length of the A10.
- o I am aware that a Stage 1 Road Safety Audit has been carried out for the proposed scheme, and subsequently reviewed by the County's Road Safety Auditors. This RSA, the review and a response needs to be included in this application for consideration and transparency.

Woodfen Road Access / Works

The inclusion of a 3m path on the south side of Parson's Lane between the Primary School entrance and the new proposed crossing is welcome.

Two new raised crossings are proposed on the existing public highway. Prior to implementation, the applicant will be required to comply with The Highways (Road Humps) Regulations 1999 which includes a mandatory consultation and advertising process. Should this process be unsuccessful, the crossing may not be raised. The LPA should be satisfied that the raised nature of the crossing cannot be guaranteed until this process has been completed.

As per my previous comments, the refuse vehicle tracking utilises a small vehicle (7.9m) which is notably smaller than vehicles typically used by the East Cambridgeshire's District Council Waste Team, noting an 11.18m refused vehicle has been tracked for the internal layout. If a larger refuse vehicle (or fire tender, delivery truck etc.) were to drive down Woodfen Road to serve the new properties, it is probable they would need to reverse long distances, placing other road users at risk. In any case, the turning head needs to be included as part of the land being dedicated as public highway and not part of a shared private drive.

Private accesses to single dwellings are shown as 4.5m where two car parking spaces are placed side by side. However, as a single car parking space is 2.5m wide, the driveway width appears too narrow for convenient use.

Construction Traffic Management Plan

I note within the Construction Traffic Management Plan, that short-term construction routing along Woodfen Road has been discussed with Littleport Community Primary School and the County's Road Safety Officer for School Travel Plans and Sustainable School Travel and delivery time restrictions agreed. On the basis that they have arrived at a mutual agreement, I don't object to this strategy in principle. However, the CTMP appendices do not appear to have been submitted with the application documents so I cannot carry out a comprehensive review.

As previously stated, a pre-commencement condition survey of Woodfen Road is proposed but this should also include Wisbech Road up to the A10, the nearest A or B classified road.

Layout

Driveway crossovers between footway and carriageway need asphalt surfacing, not block paving. This applies to the primary roads within the site where a verge is placed between carriageway and footway. I am content for this detail to be amended post planning as part of any S38 Agreement, provided the LPA agree.

It is unclear how the parking bay for Plot 161 can be accessed in such a way which doesn't require the vehicle to manoeuvre over the full height footway or place passing pedestrians at risk. The applicant should provide vehicle tracking to demonstrate that the parking space can be accessed without driving over the opposing footway or else move the parking space.

Visibility

As previously stated, there should be 2m x 2m pedestrian visibility splays and 2.4m x 25m visibility splays included for cycle route crossings, both measured to the nearside of the path. On exit from the shared private road which serves Plots 29-34, this visibility isn't achievable as the splay intersects parking bays.

Any boundary wall/fences which fall within the 25m visibility splays at the cycle path must be kept below 0.6m in height, above the shared use path level.

Vehicle Tracking

Vehicle tracking has been provided for small delivery vehicles which demonstrates appropriately sized turning heads are needed on the following private roads to minimise the risk of vehicles reversing long distances which is a hazard to other road users, including pedestrians and cyclists:

- Road serving Plots 1-6
- Road serving Plots 19-23
- Road serving Plots 24-28
- Road serving Plots 46-51
- Road serving Plots 52-57
- Road serving Plots 93-97

In the case of the road which serves Plots 19-23, a turning head can be omitted if a through connection is provided to the road which services Plots 13-18. The same applies for the roads serving Plots 24-28 and 29-34.

For the roads which serve Plots 46-51 and 52-57, to achieve turning which does not encroach the LEAP, the parking for Plots 50-53 can be set back to facilitate a small turning head but this would reduce the available garden size for the four plots. Alternatively, a connection can be provided between the two roads to eliminate the need for a turning head. While this does create some rat-running potential, in light of the site layout, access location and nature of the road, I consider the risk minimal.

Landscaping

While it does not form the basis of an objection, I would recommend that the narrow green strip on the south side of the primary road be removed. It is not of sufficient width for any meaningful vegetation growth, and it will need to be privately maintained.

Adoption

The proposed extent of adoptable highway is shown on the drawing CA-05-08E but I recommend that this is omitted from the list of approved plans as adoption will take place via a S38 Agreement of the Highways Act 1980, upon which planning permission has no bearing.

In any case a few small changes are required, albeit not necessarily as part of this application.

- The footpath in front of Plots 162-166 would not be considered for adoption unless a buffer was provided between the footpath and the adjacent parking court e.g., private landscape buffer / knee rail
- The crossovers between footway and carriageway on Woodfen Road needs to be included in the dedication

Should the applicant be granted consent, I recommend that no construction take place on the highway proposed for adoption until such a time as they have entered into a S38 Agreement with the Local Highway Authority. This is to ensure no abortive construction takes place and any necessary refinements are picked up e.g., block paving surfaces on raised tables.”

11 August 2022

“I am in principle ok with the proposed access onto the A10 (but they should upload the Stage 1 RSA and a response for transparency as per my last reply), and the construction access/CEMP (bar the addition of a pre-commencement condition survey).

I have issues with the internal layout, none of which will substantiate an objection but if left unanswered will impede the LHAs ability to adopt the internal roads.

My main concern is Woodfen Road and the lack of a suitable turning head. Until an appropriate turning head, contained within the public highway/highway to be dedicated, is included, I recommend a holding objection to this application on highway safety grounds.”

20 February 2023

“On the 11th August 2022, I requested a holding objection for this application on the basis of inappropriate vehicle turning along Woodfen Road. While some provision has been made for the turning of a refuse vehicle (as shown on the drawing LP-STN-00-WR-DR-C-0110 Revision P03), it is insufficient to address the objection.

Any turning area needs to be to an adoptable standard, to avoid the risk of refuse freighters refusing to enter private streets and thus reversing long distances along Woodfen Road. The following changes are needed:

- In order to safeguard against vehicle overrun and to provide sufficient conspicuity for other road users, the turning area must be accessed via a bellmouth junction of 6m (desirable) to 8m corner radii.
- The swept path of a manoeuvring refuse freighter must not pass over the raised pedestrian and cycle crossing. Such conflict with vulnerable road users should always be designed out in the first instance, and in any case, the heavy vehicle turning on the raised crossing will result in excessive wear to the highway which could lead to surface damage which would endanger other road users in time.
- The refuse swept path must be contained within the adoptable highway extent (as opposed to the private drives), which needs to take the form of a simple hammerhead.
- If turning is via a shared space, a 0.5m paved maintenance strip is needed around the full perimeter of the turning area in order to allow the LHA future access to the kerb & sub-surface kerb bracing for maintenance purposes.

The vehicle tracking utilises a 12.3m refuse freighter. While used in Cambridge, to the best of my knowledge, no such vehicle exists in the ECDC fleet. The turning area can therefore be designed for a 11.2m long refuse freighter - subject to ECDC waste team confirmation of acceptance.

To aid future revisions, I have appended to this response some generic turning areas which are suitable for 11.2m long vehicles. This is not an exhaustive list and spur length will vary with road widths, alignments, and corner radii changes.

Otherwise, the proposals for Woodfen Road are acceptable. It would be preferable if there were a 3m shared use path continuous on the east side across the frontage of Littleport Community Primary School to connect the segments north and south, but as an alternative on the west side has been provided, the cycle provision is safe and therefore not in my view objectionable.

I would reiterate that separate highways consents (e.g., Road Humps) will be required prior to any implementation. While these consents sit outside of the planning system, I consider it unlikely that they would be refused. However, should they be refused, a variation to the approved scheme will be needed.

A10 Access

The proposed roundabout on the A10 is acceptable but for completeness I recommend the following comments (repeated from previous consultation responses) be addressed.

- o The Framework Plan (drawing CA-05-18D) indicates that the A10 is a pedestrian and cycle link but there is no pedestrian provision or dedicated cycle infrastructure along this length of the A10.
- o A Stage 1 Road Safety Audit has been carried out for the proposed scheme, and subsequently reviewed by the County's Road Safety Auditors. This RSA, the review and a response should be included in this application for consideration and transparency.

Woodfen Road Construction Access

The proposed construction access as shown on the drawing LP-STN-GN-WFN-DR-CD-0501 and supporting drawings is acceptable but will be subject to separate highway consents, should the application be approved i.e., S278 Agreement.

My previous comments regarding the CTMP remain valid; namely, some of the appendices are missing and the pre-commencement condition survey should be extended to include Wisbech Road.

Site Layout

The following comments are not objectionable but may hinder the LHA's ability to adopt internal roads. I am however content for these details to be amended post planning as part of any S38 Agreement, provided the LPA agree.

- Driveway crossovers between footway and carriageway need asphalt surfacing, not block paving, and raised tables should have blockwork surfacing (where levels permit).
- Along the Spine Road / Primary Road, breaks should be provided in the verge with footway spurs to allow for pedestrian crossings of the road at main junctions, particularly at staggered crossroads between Plot 55 / 101 and

Plot 117 / 168. Otherwise, from a pedestrian viewpoint, the Primary Road will act as a permeability barrier, segregating the site in two and / or will encourage pedestrians to cross the road by traversing soft verge.

- Road south of Plots 101 & 102 - The asphalt footway on the south-side of the road needs to continue along the entire length.
- Road between Plots 124 and 128 - The footway on the north-side opposite Plot 125 needs to continue along the entire length.
- Shared space street between Plots 115 & 120 - The 0.5m paved maintenance strip needs to pass between the carriageway and private visitor parking bays, rather than to the rear of the bays.
- Parking for Plots 145 and 150 clash with ramps, prohibiting access. In the case of Plot 83/161 the ramp isn't needed as the horizontal bend acts as sufficient traffic calming.

There would be benefit to cyclists if the alignment of the shared use path could be made more direct between Plots 116 and Woodfen Road as this would increase its attractiveness. A direct route is technically feasible but would likely impact upon the Phase 2 layout which is outside the scope of this current application. The LPA may wish to consider this in the context of Local Plan policy Com 7 (b).

While indicative, the detail of the Phase 2 layout is not accepted in its current form. As such, I recommend that the applicant engage the LHA in pre-application advice prior to submitting a reserved matters application for this phase.

Visibility

The updated layout does not include visibility information, so I am unable to comment on the suitability of the proposals in this regard. I recommend that the applicant supply a plan which details the following for the latest internal layout and the proposals for Woodfen Road:

- 2m x 2m pedestrian visibility splays, measured to the nearside footway / shared path edge, for all vehicular crossover onto roads proposed for adoption.
- 2.4m x 25m inter-vehicular visibility splays for crossover of the shared use path, measured to the nearside path edge.
- 2.4m x 25m inter-vehicular visibility splays for internal priority junctions

Adoption

The proposed extent of adoptable highway is shown on the drawing CA-05-08F but I recommend that this is omitted from the list of approved plans as adoption will take place via a S38 Agreement of the Highways Act 1980, upon which planning permission has no bearing.

In any case, incorrect assumptions have been made regarding LHA adoption extents:

- Where a verge is placed between carriageway and footway, any crossovers must also be included in the dedication.
- Any road to be dedicated must be accessed via bellmouth, meaning the two shared drives on Woodfen Road would need to remain private.

Should the applicant be granted consent, I recommend that no construction take place on the highway proposed for adoption until such a time as they have entered into a S38 Agreement with the Local Highway Authority. This is to ensure no abortive construction takes place and any necessary refinements are picked up.”

8 August 2023

A10 Roundabout

It is unclear why S278 drawings (gully catchment areas and highway surface water drainage) are submitted as part of the planning application. Engineering and construction detail will not be vetted as part of the planning application process and any permission will have no bearing on the subsequent S278 Agreement. I recommend that the following drawings are not included in the list of approved plans:

- LP-STN-GN-A10-DR-CD-0501 P01
- LP-STN-GN-A10-DR-CD-0502 P01
- LP-STN-GN-A10-DR-CD-0503 P01
- LP-STN-GN-A10-DR-CD-0551 P01
- LP-STN-GN-A10-DR-CD-0552 P01

Woodfen Road

The proposals to widen Woodfen Road to include a 5m carriageway, 2m footway and 3m shared cycle track are acceptable to offset the impact of this development. While it does not have a direct bearing on this scheme, it has come to light that the proposals will result in a gap of circa 35m pedestrian / cycle provision along Woodfen Road between LIT1 development and the proposed northern pedestrian access to LIT2. This would result in pedestrians and cyclists from LIT2 walking on carriageway (where they are placed at risk) to access Littleport Community Primary School or to walk between the two development sites. It would also subject residents of LIT1 to the same risk if they were to use Woodfen Road and LIT2 as a means of accessing Grange Lane or other destinations in the south side of the village. This is something which the LPA may wish to take into consideration.

I must also highlight that the current proposals, while technically feasible, may result in unexpected costs for the applicant which they should factor into their scheme viability assessment. The construction of a shared use path with knee rail fence in close proximity to an existing ditch could result in its destabilisation; while the ditch is existing, it will likely not respond favourably to the disruption associated with the highway works, an issue recently encountered on a similar scheme in the area. To mitigate the risk of highway collapse, additional structural retention could be required. In addition to the upfront construction costs, the LHA would also require a substantial commuted maintenance sum for future upkeep and replacement of any structure.

Construction Traffic Management Plan

As far as I can determine, the applicant has not submitted a revised CEMP / CTMP and therefore my previous comments relating to pre-commencement condition surveys remain applicable.

Site Layout

As per my previous response, there are some residual matters which may hinder the LHA's ability to adopt the internal roads, but they are not in themselves

objectionable in planning terms. These items, listed below, can be addressed via a subsequent S38 vetting process, provided the LPA are content with the approach:

- Raised tables must have blockwork surfacing (where levels permit).
- Along the Spine Road / Primary Road, breaks should be provided in the verge with footway spurs to allow for pedestrian crossings of the road at main junctions, particularly at staggered crossroads between Plot 59 / 105 and Plot 89 / 120. Otherwise, from a pedestrian viewpoint, the Primary Road will act as a permeability barrier, segregating the site in two and / or will encourage pedestrians to cross the road by traversing soft verge.
- Permeable paving is not accepted by the LHA as an acceptable means of surface water drainage in isolation. Where private drives surfaced in permeable paving fall towards the roads proposed for adoption, a secondary means of surface water drainage is needed at the boundary e.g., channel drains.
- Where trees are planted within 5m of highway proposed for adoption, a root protection barrier to a depth of 1.5m is needed.

While I do not consider it to be a reason for refusal, I would reiterate that the cycle route between Plot 120 and Woodfen Road could be made more direct. The current route is parallel to the carriageway and in navigating two turning heads, the result is an indirect and perhaps unattractive route.

Adoption

The proposed extent of adoptable highway is shown on the drawing CA-05-08K but I recommend that this is omitted from the list of approved plans as adoption will take place via a S38 Agreement of the Highways Act 1980, upon which planning permission has no bearing.

Conclusion

I do not object to the application as the applicant has made appropriate provisions to eliminate or mitigate adverse safety implications on the public highway. However, in the interest of safeguarding public finances, I recommend that the CTMP is amended to include Wisbech Road in the pre-commencement condition survey.

I also recommend that the developer, at their discretion, consider an alternative to the Woodfen Road highway mitigation which could both reduce their costs and provide better connectivity. The LHA is happy to work with the developer and their consultant to reach a solution.

The internal layout requires minor changes to bring it up to a standard which would be considered for adoption by the LHA. Should the LPA agree, the changes could be addressed as part of a S38 process.

Should the LPA be minded to approve the application, I recommend that the following Conditions and Informatives be appended:

Conditions

HW2A: Prior to the first occupation of any dwelling the road(s), footway(s) and cycleway(s) required to access that dwelling shall be constructed to at least binder course surfacing level from the dwelling to the adjoining County road in accordance with the details approved on 19445-RLL-20-XX-DR-C-202 Rev S and 19445-RLL-20-XX-DR-C-203 Rev N in writing by the Local Planning Authority.

HW8A (amended): Notwithstanding the provision of Class A of Schedule 2, Part 2 of the Town and Country Planning (General Permitted Development) Order 2015, (or any order revoking, amending or re-enacting that order) no gates, fences or walls shall be erected across any vehicle access serving more than one dwelling, as shown on 19445-RLL-20-XX-DR-C-202 Rev S and 19445-RLL-20-XX-DR-C-203 Rev N.

HW14A: Prior to first occupation or commencement of use of the development sufficient space shall be provided within the site to enable vehicles to enter, turn and leave the site in forward gear and to park clear of the public highway. The area shall be levelled, surfaced and drained and thereafter retained for that specific use.

HW18A (amended): Prior to the occupation of a dwelling the visibility splays associated with its vehicle access (single or shared) shall be provided in full accordance with the details approved on 19445-RLL-20-XX-DR-C-202 Rev S and 19445-RLL-20-XX-DR-C-203 Rev N. The splays shall therefore be maintained free from any obstruction exceeding 0.6m above the level of the adjacent highway carriageway (inter-vehicular visibility splays) or the adjacent highway footway / shared use path (pedestrian visibility splays and cycle visibility splays).

HW23A: No development shall commence until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the Local Planning Authority. (The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an Agreement has been entered into unto Section 38 of the Highways Act 1980 or a Private Management and Maintenance Company has been established).”

22 September 2023

“A10 Roundabout

The proposed design of the access roundabout on the A10 is accepted but it is unclear why S278 drawings (gully catchment areas and highway surface water drainage) are submitted as part of the planning application. Engineering and construction detail will not be vetted as part of the planning application process and any permission will have no bearing on the subsequent S278 Agreement. I recommend that the following drawings are not included in the list of approved plans: • LP-STN-GN-A10-DR-CD-0501 P01 • LP-STN-GN-A10-DR-CD-0502 P01 • LP-STN-GN-A10-DR-CD-0503 P01 • LP-STN-GN-A10-DR-CD-0551 P01 • LP-STN-GN-A10-DR-CD-0552 P01

Woodfen Road The revised proposals for Woodfen Road as shown on the drawing LP-STN-00-WR_DR-C-0110 Revision P06 are acceptable. A 3m wide shared use path is provided on the western side of the widened carriageway and provision for a future connection into the LIT2 development to the south has been provided in addition to pedestrian and cycle connectivity to Littleport Community Primary School, all the while providing appropriate levels of vehicular access to the frontage dwellings.

Site Layout My previous comments relating to the internal site layout remain unchanged. I have no objection to the layout, but some minor changes will be required should the applicant wish for the internal roads to be considered for adoption by the LHA. Provided the LPA agree, these minor changes can be addressed as part of any subsequent S38 Agreement technical vetting process.

Adoption The proposed extent of adoptable highway is shown on the drawing CA-05-08L but I recommend that this is omitted from the list of approved plans as adoption will take place via a S38 Agreement of the Highways Act 1980, upon which planning permission has no bearing. Conclusion I do not object to the application as the applicant has made appropriate provisions to eliminate or mitigate adverse safety implications on the public highway. Should the LPA be minded to approve the application, I recommend that the following Conditions and Informatives be appended:

Conditions

HW2A: Prior to the first occupation of any dwelling the road(s), footway(s) and cycleway(s) required to access that dwelling shall be constructed to at least binder course surfacing level from the dwelling to the adjoining County road in accordance with the details approved on 19445-RLL-20-XX-DR-C-202 Rev T and 19445-RLL-20-XX-DR-C-203 Rev N in writing by the Local Planning Authority.

HW8A (amended): Notwithstanding the provision of Class A of Schedule 2, Part 2 of the Town and Country Planning (General Permitted Development) Order 2015, (or any order revoking, amending or re-enacting that order) no gates, fences or walls shall be erected across any vehicle access serving more than one dwelling, as shown on 19445-RLL-20-XX-DR-C-202 Rev T and 19445-RLL-20-XX-DR-C-203 Rev N

HW14A: Prior to first occupation or commencement of use of the development sufficient space shall be provided within the site to enable vehicles to enter, turn and leave the site in forward gear and to park clear of the public highway. The area shall be levelled, surfaced and drained and thereafter retained for that specific use.

HW18A (amended): Prior to the occupation of a dwelling the visibility splays associated with its vehicle access (single or shared) shall be provided in full accordance with the details approved on 19445-RLL-20-XX-DR-C-202 Rev T and 19445-RLL-20-XX-DR-C-203 Rev N. The splays shall therefore be maintained free from any obstruction exceeding 0.6m above the level of the adjacent highway carriageway (inter-vehicular visibility splays) or the adjacent highway footway / shared use path (pedestrian visibility splays and cycle visibility splays).

HW23A: No development shall commence until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the Local Planning Authority. (The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an Agreement has been entered into unto Section 38 of the Highways Act 1980 or a Private Management and Maintenance Company has been established)."

27 October 2023

"It is my understanding that the sole purpose of the latest submission is to regularise discrepancies across submission documents in so far as to reflect the amended highway scheme for Woodfen Road as shown on drawing LP-STN-00-WR-DR-C_0110 P06. On this basis, I have no objection to the application any my previous comments made 22nd September remain valid."

County Highways Transport Team - 24 November 2020

“Background

The document reviewed is the Transport Assessment dated October 2020 produced by Stantec to accompany the hybrid planning application for 450 dwellings on the land to the north of Saxon Business Park, Woodfen Road, Littleport.

Transport Assessment Review

Walking and Cycling

It is noted a number of key facilities and amenities within Littleport are located within acceptable walking and cycling distance to the proposed site. Both the walking and cycling isochrone maps are not acceptable. These should be measured as distance rather than time as time varies between users of different mobilities.

Heading south from Wisbech Road, 1.3m-1.8m wide footways are present along both sides of Woodfen Road. The footway on the eastern side of Woodfen Road terminates circa 140m north of the site, whilst the footway on the site side of the carriageway continues to the location of the proposed secondary site access where it currently terminates. An informal crossing point in the form of dropped kerbs with tactile paving is provided here which facilitates crossing over Woodfen Road to Parsons Lane which in turn provides a direct route into Littleport centre. There are currently no dedicated footways on Woodfen Road south of Parsons Lane. Footways are present along both sides of Parsons Lane with the exception of a circa 40m stretch on the southern side of Parsons Lane between the pedestrian entrance to Littleport Community Pre-School and Woodfen Road. An informal crossing in the form of dropped kerbs with tactile paving is provided across Parsons Lane adjacent to the pedestrian entrance to the school to allow pedestrians to access the footway on the southern side of Parsons Lane from Woodfen Road. The footways along Parsons Lane are noted to vary in width between 1.5m and 2m. Furthermore, footways are available along both sides of Wisbech Road with a toucan crossing situated where the segregated cycleway from Longfield Road meets Wisbech Road. In addition, traffic calming measures in the form of speed cushions and raised junction tables are present along Wisbech road to the east of Woodfen Road.

Public Transport

The two bus stops closest to the site are located on Gilbert Road and Wisbech Road circa 400m and 800m respectively from the centre of the site. Both stops serve the No.9 and X9 bus services which operate Monday to Saturday between Littleport and Cambridge at a two-hourly frequency between 06:22 and 20:02 with two peak period departure and arrival services. It is noted there is a gap in the existing pedestrian network on the southern side of Gilbert Road between the site and the existing bus stop here. A minimum 2m wide footway should be delivered on the southern side of Gilbert Road between the existing bus stop and the Woodfen Road footway improvements to be delivered as part of the development proposals. The applicant would need to demonstrate such works can be accommodated within the highway boundary. The existing infrastructure at the nearest bus stops comprise a shelter, and a layby at the Gilbert Road bus stop; and a flag and pole and bus cage at the Wisbech Road bus stop. The bus stops should be upgraded to comprise

a flag and pole, and RTPI at the Gilbert Road stop; and a shelter with seating, and RTPI at the Wisbech Road stop. These bus stop improvement works will be subject to planning conditions should approval be given and will include a maintenance contribution.

Littleport Railway Station is the nearest train station to the site situated circa 2.2km to the northeast of the site. The station provides frequent services to destinations including Kings Lynn, Ely, Waterbeach, Cambridge, and London Kings Cross. It is noted the station has recently been upgraded and now comprises 119 car parking spaces inclusive of 7 accessible bays, and 50 cycle parking spaces. The applicant should demonstrate the recent upgrades to car and cycle parking provision at the station will also be able to accommodate this development. Whilst it is noted a site visit was undertaken post-station improvement works counting the number of available car and cycle spaces after 9am, it should be outlined when such site visit undertaken and exactly how many car and cycle parking spaces were available after 9am. It is noted extended platforms are currently being constructed at the station to allow eight carriageway trains to stop and therefore increase passenger capacity.

Highway Network

The audit of the surrounding highway network is acceptable for use. It is noted Woodfen Road, Longfield Road and Parson's Lane experience drop-off and pick-up parking associated with Littleport Community Pre-School.

Existing vehicular access to the site comprises two simple gated priority junctions; one off the A10 and the other off Woodfen Road in the southeastern corner of the site boundary.

Road Safety

The latest 60 months accident data obtained from CCC has been provided for the area comprising Woodfen Road, Parson's Lane, and Wisbech Road. No cluster sites have been identified.

As per our pre-app advice, the latest 60 months accident data, obtained from CCC, should be provided for the entire study area, not just for the areas comprising Woodfen Road, Parson's Lane, and Wisbech Road. This should also include the following junctions:

- A10/A1101/New River Bank roundabout
- A10/Wisbech Road roundabout
- A10/Grange Lane/Oak Lane roundabout
- A10/B1411 roundabout
- A10/Witchford Road roundabout (BP roundabout)

The road safety assessment cannot be accepted until the whole study area has been assessed as requested in our pre-application comments.

Development Proposals

The development proposals comprise the erection of 450 dwellings. It is noted the application site is currently identified within the East Cambridgeshire Local Plan (2015) as Policy LIT 1 and is identified as a potential area for housing and employment development.

The development is proposed to be phased over a 4-year period at an estimated build out rate of 120 dwellings per year.

Site Access and Layout

Vehicular access into the site is proposed to comprise a new roundabout onto the A10 which will serve 427 dwellings. A secondary access is also proposed off Woodfen Road. This secondary access is noted to form an emergency, pedestrian, and cycle only access. It is noted a bollard will be provided on the secondary access to prevent unauthorised vehicles from using this access. Other than for emergency access, vehicles will not be able to pass through the site between the A10 roundabout access and Woodfen Road. The remaining 24 dwellings are proposed to be accessed off Woodfen Road via a series of private driveways which will each serve 4-5 dwellings and will not link to the wider site.

The primary pedestrian and cycle access point into the site is to be taken off Woodfen Road via the secondary access junction in the form of a 3.7m wide carriageway for pedestrians, cycles, and emergency vehicles. Pedestrian and cycle access into the site will also be achieved via a cycle link off Woodfen Road at the southeastern corner of the site, and via a 3-4m wide footway/cycle link and crossing points provided across the northern and eastern arms of the proposed site access roundabout to facilitate pedestrian and cycle access to/from the site to future development off the western arm of the new access roundabout.

Site access, layout and servicing details should be agreed with Highways Development Management who will provide separate comments.

Parking Provision

Both car and cycle parking provision are proposed to accord to the parking standards outlined within the East Cambridgeshire Local Plan (2015). It will be up to the Local Planning Authority to agree the car and cycle parking provision for the proposals.

Management of Construction Traffic

It is noted a Construction Traffic Management Plan (CTMP) will be produced for the development site. Details of the CTMP should be agreed with Highways Development Management. The CTMP will be subject to a condition should approval be given.

Trip Generation

The methodology used to determine the peak hours is acceptable. It is noted for the A10 junctions, the AM network peak is 07:45 - 08:45 and the PM network peak is 16:30 - 17:30, whilst for the local roads, the AM peak is 08:00 - 09:00 and the PM peak is 16:15 - 17:15.

TRICS software has been used to determine the multi-modal trip generation for the development. The methodology used to determine the development trip generation is agreed. Full TRICS outputs have been provided.

The development is anticipated to generate 319 vehicle trips in the AM peak and 281 vehicle trips in the PM peak. This is agreed.

It is noted the Residential Travel Plan seeks to reduce the single occupancy vehicle mode share generated by the development by 6%. Given, the site's location in proximity to Littleport Railway Station which is currently undergoing works to increase passenger capacity, it is considered such mode share target should be more ambitious. Additionally, it is unclear why all the mode shares have been reduced in Table 7-2; including the sustainable travel mode shares. We cannot review Section 7 of the Transport Assessment until this has been revised.

Trip Distribution and Assignment

The use of 2011 Census origin/destination data to determine the distribution of development trips is agreed. The methodology used to assign development traffic onto the surrounding highway network is acceptable for use. It is anticipated 9% of development traffic will travel to/from the A10 North, 75% will travel to/from the A10 South, and 15% will travel to/from Littleport Village Centre.

Baseline Traffic Data

The study area included within the assessment is agreed.

The traffic surveys for all junctions included within the study area were carried out on 28th February 2019 during school term time. The surveys were undertaken during a neutral time period and are acceptable for use with this assessment.

The ATC and speed surveys included within the assessment are acceptable for use.

Assessment Scenarios

The following scenarios have been assessed for the AM and PM peak periods:

- 2019 Base Year
- 2024 Development Year (year of full occupation) = Base + TEMPRO Growth + Committed Development + with/without Development
- 2029 Design Year (5 years post full occupation) = Base + TEMPRO Growth + Committed Development + with/without Development

The above assessment scenarios are not acceptable for use. Whilst it is noted the above assessment scenarios were agreed as part of pre-application discussions held in early 2019, it is considered the development will not realistically be built out and fully occupied by 2024 given it is now late 2020. The assessment scenarios should therefore be revised.

The TEMPRO growth rates will need revising to reflect the new assessment scenarios. Furthermore, the inputs provided into TEMPRO must be appended to the TA for the Highway Authority to review before the growth rates can be agreed.

Committed Developments

The Highway Authority are satisfied with the committed developments included within the assessment. The committed development traffic flow diagrams however, are not acceptable for use. The traffic flows for the Grange Lane (17/00757/ESO) committed development have been underestimated and do not match the traffic flow diagrams which were agreed and provided within the September 2017 TA. The traffic flow diagrams for the Wider Ely Development sites (11/01077/ESO and 13/00785/OUM) are also not agreed. Furthermore, the Highway Authority are aware of a large residential site adjacent to the Grange Lane site, which is not yet fully built

out. The unbuilt houses should be included as committed development within this assessment. Contact should be made with the LPA to obtain the figure of unbuilt houses. Trip generation for these unbuilt houses should be calculated and distributed onto the surrounding highway network as committed development traffic. The committed development traffic flow diagrams should be revised.

Percentage Impact Assessment

Whilst the Highway Authority note the percentage impact assessment submitted, we assess the impact of a development on the capacity of the surrounding highway network through junction capacity assessments. This is because capacity issues will occur at junctions where vehicles slow down and congregate, not on a straight section of road and as such, junction capacity assessments provide an in-depth assessment of a development's impact on junction capacity.

Junction Capacity Assessment

The future year traffic flow diagrams and thus junction capacity assessments cannot be reviewed until such a time as the Highway Authority are satisfied with the assessment year scenarios, traffic growth rates, and committed development flows submitted as part of this application. These will need to be redone once such works have been revised.

Given 241 vehicles generated by the development are anticipated to use the A10/B1411 and A10/Witchford Road (BP) roundabouts, a capacity assessment should also be undertaken for both these junctions. It should be noted we will not accept a percentage impact assessment for these junctions.

Junction modelling should be undertaken using a DIRECT profile type as this will give the most accurate results and does not rely on assumptions to be made. ONE HOUR is the least accurate method and should only be used if only a limited amount of traffic data is available. A dimensioned plan should be also be submitted for each junction showing the inputs used in ARCADY/PICADY.

Mitigation Strategy

At this stage, with no agreement on what impact the development will have on the highway network, it is not possible to determine what mitigation is needed to make the development acceptable. Once the full impact of the development is known, mitigation measures can be assessed. Mitigation should be in line with Policy LIT 1 of the East Cambridgeshire Local Plan (2015).

Residential Travel Plan

A draft Residential Travel Plan has been submitted alongside the TA. The Highway Authority have not reviewed any detail of the Travel Plan at this stage. The final Residential Travel Plan will be subject to a condition should approval be given. The final Residential Travel Plan should include suitable measures and incentives inclusive of bus taster and/or cycle discount vouchers to promote sustainable travel.

Conclusion

The application as submitted does not include sufficient information to properly determine the highway impact of the proposed development. Were the above issues addressed the Highway Authority would reconsider the application.

The Highway Authority therefore requests that this application not be determined until such time as the additional information above has been submitted and reviewed.”

25 November 2020

“Upon further review of the queue length survey data used within the assessment for Woodfen Road (ref: 20/01238/FUM), we've spotted several of the recorded queue lengths extend past the extent of the camera view. This impacts the validity of such data. Therefore, we are unhappy with the queue length surveys used within the assessment.”

2 September 2021

“Conclusion

The application as submitted does not include sufficient information to properly determine the highway impact of the proposed development. Were the above issues addressed the Highway Authority would reconsider the application. The Highway Authority therefore requests that this application not be determined until such time as the additional information above has been submitted and reviewed.”

11 October 2021

“Our holding objection still remains.”

31 May 2023

“I do not object to the application as the applicant has made appropriate provisions to eliminate or mitigate adverse safety implications on the public highway. However, in the interest of safeguarding public finances, I recommend that the CTMP is amended to include Wisbech Road in the pre-commencement condition survey. The internal layout requires minor changes to bring it up to a standard which would be considered for adoption by the LHA. Should the LPA agree, the changes could be addressed as part of a S38 process, but they will have some knock-on implication for drainage and landscape strategies. Should the LPA be minded to approve the application...

To clarify on my response, I do not object to the development on the basis that the impact on the existing highway network is acceptable (accesses, highway mitigation, construction traffic).

However, I do not consider the internal road layout to be a standard suited for adoption as it falls short on safety grounds, primarily due to trees obstructing necessary visibility splays. Should the application be permitted, the roads would not be considered for adoption unless design changes were made as per my comments dated 30th May.”

6 March 2023

“Conclusion

The Transport Assessment as submitted does not include sufficient information. Were the above issues addressed the Highway Authority would reconsider the application.

The Highway Authority therefore requests that this application not be determined until such time as the additional information as requested above has been submitted and reviewed.”

17 July 2023

“Background

The document reviewed is the Transport Assessment Addendum dated April 2023 produced by Stantec to accompany the hybrid planning application for 397 dwellings on the land to the north of Saxon Business Park, Woodfen Road, Littleport.

Transport Assessment Review

Site Access

Site access, vehicle turning, and internal layout details should be agreed with Highways Development Management who have provided separate comments dated 30th May 2023.

Bus Service Contribution

Discussions have been ongoing to agree the bus service contribution amount. Following these discussions, a S106 contribution amount of £190,570 towards the bus service enhancements within Littleport was agreed. This contribution will go towards enhancing the frequency of the No.9 bus service over 2 years.

A10/Downham Road Roundabout Mitigation

The A10/Downham Road mitigation scheme set out in drawing no. 43030_5501_2801 P01 is acceptable. It is agreed that BDW will deliver the scheme via a S278 agreement.

A10/Witchford Road Roundabout Mitigation

A S106 contribution of £126,107.05 towards the A10/Witchford Road roundabout junction improvement scheme is acceptable.

Mitigation Strategy

The following off-site mitigation package is proposed to be delivered by the developer:

- A pedestrian and cycle only access onto Woodfen Road doubling as an emergency access. The developer will also provide a 3m wide cycleway from the northern side of the access carriageway to the existing footway provision on Woodfen Road just north of the junction.
- A dedicated pedestrian/cycle access into the development off Woodfen Road at the southeast corner of the site.
- A 3m wide cycleway with raised table crossing points along the eastern side of Woodfen Road between the dedicated cycle access at the southeast corner of the site and the school car park. Here, a raised table crossing will facilitate access to the western side of the carriageway where a the 3m wide cycleway will continue to the pedestrian and cycle only access.

- Woodfen Road carriageway widening works adjacent to the site boundary to allow for two-way vehicle movements where Woodfen Road is currently less than 3m wide.
 - Bus stop improvement works comprising a flag and pole, and RTPI with maintenance contribution at the Gilbert Road stop; and a shelter with seating, and RTPI with maintenance contribution at the Wisbech Road stop.
 - S106 monetary contribution of £190,570 towards bus service enhancements.
- S106 monetary contribution of a £126,107.05 towards the A10/Witchford Road roundabout capacity improvement scheme.
- Capacity improvement works at the A10/Downham Road roundabout.
 - Residential Travel Plan.

Conclusion

The Highway Authority do not object to the proposals subject to the following:

Condition

1. Prior to first occupation, the developer shall deliver the A10/Site Access roundabout as shown indicatively in drawing nos.LP-STN-GN-A10-DR-CD-0101.1 Rev P04, LP-STN-GN-A10-DR-CD-0102.1 Rev P04, and LP-STN-GN-A10-DR-CD-0103.1 Rev P04. Details to be submitted to and approved by the Local Planning Authority and works to be carried out by the developer.
2. Prior to first occupation, the developer shall deliver the off-site highway improvement works on Woodfen Road as shown indicatively in drawing no.LP-STN-00-WR-DR-C-0110 Rev P03. Details to be submitted to and approved by the Local Planning Authority and works to be carried out by the developer.
3. Prior to first occupation, the developer shall upgrade the existing bus stop on Gilbert Road within the vicinity of the site to include a bus flag and pole, and RTPI unit. Details to be submitted to and approved by the Local Planning Authority and works to be carried out by the developer.
4. Prior to first occupation, the developer shall upgrade the existing bus stop on Wisbech Road within the vicinity of the site to include a bus shelter with seating, and RTPI unit. Details to be submitted to and approved by the Local Planning Authority and works to be carried out by the developer.
5. Prior to first occupation, the developer shall deliver the junction capacity improvement works at the A10/Downham Road roundabout as shown indicatively on drawing no.43030_5501_2801 Rev P01. Details to be submitted to and approved by the Local Planning Authority and works to be carried out by the developer.
6. Prior to first occupation, the developer shall be responsible for the provision and implementation of a Residential Travel Plan to be agreed in writing with the Local Planning Authority. The Residential Travel Plan shall include suitable measures and incentives inclusive of bus taster and/or cycle discount vouchers to promote sustainable travel. The Residential Travel Plan is to be monitored annually with all measures reviewed to ensure targets are met.

S106

1. Prior to first occupation, the developer shall pay a S106 monetary sum of £10,000 (ten thousand pounds) to the County Council towards the maintenance of the bus shelter to be installed at the Wisbech Road bus stop within the vicinity of the site.
2. Prior to first occupation, the developer shall pay a S106 monetary sum of £21,000 (twenty one thousand pounds) to the County Council towards the

maintenance of the two RTPI units to be installed at the Gilbert Road bus stop and Wisbech Road bus stop, both within the vicinity of the site.

Prior to occupation of the 200th dwelling, the developer shall pay a S106 monetary sum of £190,570 (one hundred and ninety thousand, five hundred and seventy pounds) to the County Council towards bus service enhancements within Littleport.

4. Prior to first occupation, the developer shall pay a S106 monetary sum of £123,565.85 (one hundred and twenty three thousand, five hundred and sixty five pounds and eighty five pence) to the County Council towards funding the delivery of the A10/Witchford Road roundabout improvement scheme.”

26 September 2023

“Whilst the amended plans do not change the conclusions set out in our final recommendation dated 17th July 2023 (attached for reference), the wording of Condition 2 within our recommendation will need to be amended to reflect the latest Woodfen Road improvement works drawing. As such, our Condition 2 recommendation is now the following to refer to the latest Woodfen Road improvement drawing: 2. Prior to first occupation, the developer shall deliver the off-site highway improvement works on Woodfen Road as shown indicatively in drawing no.LP-STN-00-WR-DR-C-0110 Rev P06. Details to be submitted to and approved by the Local Planning Authority and works to be carried out by the developer.”

Technical Officer Access - 2 November 2020

“1) There needs to be pavement on both sides of roads throughout the development. There is a moratorium on shared space. Shared space is dangerous for blind and partially sighted people, people with learning disabilities and other disabilities. Even if a car is going slowly, if the driver can't see a blind pedestrian, the blind pedestrian won't be able to see the car, and someone may then get injured.

2) Where there are shared pedestrian and cycle ways, for instance on the entrance to the site off the A10, there needs to be the correct corduroy tactile paving on the cycle way and foot way to demarcate the difference in the paths for blind and partially sighted people. Vertical corduroy paving for the cycle path and horizontal corduroy tactile paving for the foot path.

3) There needs to be a good level of street lighting throughout the development to support visually impaired people travelling through the development.

4) There needs to be a designated bin collection area that is off the main highways through the development to allow for easy access through the site for disabled pedestrians.

5) A traffic island in the middle of a road such as the A10 is not an appropriate crossing point for blind and partially sighted pedestrians. Visually impaired people will not use this because it is too dangerous.

6) Please ensure level access is possible to all front doors for wheelchair access. Some properties are up tight to the public footpath.

7) No accessible parking bays shown even though accessible units provided.

8) All the visitor parking seems to be centred around the "Local Equipped Area of Play", (LEAP) and to the southside of the site. A problem for wheelchair bound visitors.

9) Please remove all shared surfaces. Where people and cars share the same space. This is a problem for those with visual impairments, guide dogs and those with learning difficulties.

10) Consider the distance involved between wheelie bin storage and collection points, especially for the elderly and disabled.

11) House type, "Kenley End" has an inward opening door to the ground floor toilet. A problem if someone collapses within the toilet.

12) Excellent that there appears to be 37 units that are described "Accessible and adaptable dwelling compliant". Unfortunately, there is no provision for a bedroom on the ground floor. Which means someone who uses a wheelchair is unable to access the bedrooms on the first floor."

Ely Cycle Campaign – 10 November 2020

"Our strong objection is based on: 1) Being contrary to policies: 2) Highway safety and 3) Residential amenity The minutes of the Local Highway Authority Pre-Application Advice meeting 15 January 2019 noted a commitment to provide access at the proposed new roundabout to planned employment allocation to the west of the A10. The Residential Travel Plan S4.3.2 states that walking and cycling access will be provided across the A10 but Appendix B (Site Layout) and the Site Location Plan fail to show such access despite cycling and walking access being a mandated component. The regulatory requirements include: The National Planning Policy Framework 2019, Paragraph 110, The Cambridgeshire and Peterborough Combined Authority's Local Transport Plan 2020 overarching strategy that requires all new highway infrastructure be designed to include parallel cycling and walking corridors with suitable access and crossing points and the East Cambridgeshire District Council's Local Plan 2015 Spatial Strategy and Policy of improving pedestrian and cycle networks between settlements. The District Council online map of proposed cycle routes includes one that starts in the vicinity of the proposed development site and heads south to link with Little Downham Road, Ely. Instead, we believe the best cycle route to the west would include a cycle crossing at the proposed roundabout with a continuation to Black Bank Road. The applicant's Residential Travel Plan does not consider this proposed route. The Cambridgeshire Transport Investment Plan has a cycle track running along the western side of the proposed development, providing access from Wisbech Road, continuing in an eastbound loop to connect with first Ely Road and then PRow 148/21 (footpath on the west bank of the Great Ouse). The Site Location Plan shows no cycle access from the northern part of the development to Wisbech Road and does not show any eastbound loop. A cycle link to Wisbech Road near the A10 roundabout would be a priority because it could provide safe and direct access to the facilities in Littleport for residents at the northern end of the development. The continuation of the proposed cycle track beyond the southern end of the development to link up with Ely Road Littleport is also a priority because it would provide access between these residents and Ely, which provides a commercial retail and leisure amenity that is not acknowledged in the planning application.

The Department for Transport 2011 publication Creating Growth, Cutting Carbon, Making Sustainable Local Transport Happen states that the short-distance local trip provides the biggest opportunity for people to make sustainable travel choices. Around two out of every three trips we make are less than five miles in length, many of which could be easily cycled, walked, or undertaken by public transport. Since 2011 electric-powered cycles have become widely used; these machines make trips

of five miles and more readily achievable by cycle. The centre of Ely is four miles from the planned roundabout so access by cycle must be taken into account in the Residential Travel Plan. The County Transport Investment Plan has a cycle route running between the centres of Littleport and Ely. The National Planning Policy Framework 2019, Paragraph 110, requires that applications for development give priority first to pedestrian and cycle movements with neighbouring areas. The Combined Authority's Local Transport Plan 2020 overarching strategy requires all new highway infrastructure be designed to include parallel cycling and walking corridors with suitable access and crossing points and the District Council's Local Plan 2015 has a Spatial Strategy and Policy of improving pedestrian and cycle networks between settlements, in this instance between Littleport and Ely. The developer needs to acknowledge that active travel between Littleport and Ely must be facilitated to reduce the use of cars for short journeys.

The developer proposes a shared pedestrian cyclist path on Woodfen Road. Local Transport Note 1/20 S1.6.2 states that on urban streets, cyclists must be physically separated from pedestrians and should not share space with pedestrians. If this development proceeds, Woodfen Road will be an urban street rather than a rural road so separate infrastructure needs to be provided. The proposed reduction in the speed limit to 30 mph does not affect the Local Transport Note 1/20 requirement (Figure 4.1) for segregated cycling infrastructure. The developer deems Wisbech Road (30 mph speed restriction) in its current state is safe for cycling (Residential Transport Plan S3.4.3). Local Transport Note 1/20 Figure 4.1 requires roads with a 30-mph speed restriction to have a protected cycleway. The developer doesn't address cycling infrastructure east of Wisbech Road that will allow access to the facilities in Littleport. The District Council has a plan for a cycle route along Wisbech Road continuing along Wellington Street on to Station Road. Although noting the number of cycle parking spaces in the commercial centre of Littleport and at Littleport Railway Station, the developer does not acknowledge the need for coherent, direct, safe, comfortable, and attractive cycling route(s) between its proposed development and these facilities (Residential Transport Plan Figure 3.2). There is no plan for any cycling infrastructure within the proposed development. The proposal implies that there will be a 30-mph speed limit on the roads within the development so segregated cycling infrastructure for cycling is mandated (Local Transport Note 1/20, Figure 4.1). The developer proposes that cycling infrastructure be provided 'prior to occupation' (Residential Transport Plan Section 8.1.1). This commitment is not clear enough. The infrastructure needs to be available before anybody moves into any house because once a travel habit is adopted it is hard to break. The Residential Plan does not appear to have included an accurate, expert assessment of the cycling needs that would be generated by their proposed development. In addition to the above technical points, the documents assert that there is currently no cycling infrastructure in Littleport. There is a short one at the leisure centre.

The National Planning Policy Framework, published in February 2019, paragraph 110 requires that applications for development give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas. The National Planning Policy Framework policies are a material consideration in planning decisions. The Combined Authority's Local Transport Plan, adopted in February 2020, has an overarching strategy that requires all new highway infrastructure be designed to include parallel cycling and walking corridors with

suitable access and crossing points. The District Council's Local Plan April 2015 has a Spatial Strategy and Policy of improving pedestrian and cycle networks between settlements. The cycling proposals and the opinions of cycle safety in this application comply neither with these requirements nor Local Transport Note 1/20 in the various ways documented above but most importantly, the developer has not offered to contribute to coherent, direct, safe, comfortable, and attractive cycling infrastructure. Residents will want to cycle to the facilities in Littleport, including the railway station. They will also want to cycle to Ely. Travel between the proposed development and Ely needs to be factored into active travel provisions. The developer has made insufficient planning and provision for modes of travel other than car. The Residential Travel Plan does not adequately address sustainable modes of travel to and from the proposed development."

26 November 2021

"East Cambridgeshire District Council (ECDC) adopted its Cycling and Walking Strategy 26 November. The top priority in this document is a [safe] Littleport-Chesttisham-Ely cycling and walking route. Ely is important to Littleport residents for work, shopping, education, and leisure. It could readily be cycled by the majority, if the route were safe. We expect that the ECDC Strategy is a relevant document for Planning when considering developer's contributions to this CCC Integrated Transport Block Fund/Investment Plan route."

9 March 2022

"We note the recently submitted plans for an access junction that either has no crossing or an at grade crossing of the A10. An at-grade crossing would be dangerous at this point on this road, even if it were signalised. We recommend an underpass be installed while this junction is under construction because it will be less expensive to do it now rather than building a safe crossing when the land on the west side of the A10 is developed."

Natural England - 29 October 2020

"NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A."

22 September 2023

"The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us"

Cambridgeshire Fire and Rescue Service - 21 October 2020

“With regard to the above application, should the Planning Authority be minded to grant approval, the Fire Authority would ask that adequate provision be made for fire hydrants, which may be by way of Section 106 agreement or a planning condition.

The position of fire hydrants are generally agreed upon when the Water Authority submits plans”

3 March 2022

Repeats previous comments.

15 February 2023

Repeats previous comments.

5 June 2023

Repeats previous comments.

23 October 2023

Repeats previous comments.

Design Out Crime Officers - 26 October 2020

“This office has reviewed the above planning application in terms of community safety and reducing vulnerability crime - we have noted the paragraph in the Design Access Statement (6.7) under Crime Prevention and the comments regarding principles of secured by design.

The proposed layout provides a high level of natural surveillance with pedestrian and vehicle routes aligned together. Permeability is limited to essential areas/routes only, away from access to rear of properties which should provide high levels of territoriality amongst residents deterring searching/distraction behaviour that could target vulnerable or elderly occupants. Vehicle parking is in-curtilage to the front/sides of properties, allowing owners the ability to view their vehicles from inside their home from active windows.

I look forward to seeing a lighting plan when available. If this could be conditioned, I would be grateful in terms of community safety and reducing crime.

I am happy to support the proposed design and layout for this development. Should the developer be considering a Secured by Design application I welcome the opportunity to work with them to ensure they receive a Gold accreditation standard.

No further comments at present”

10 March 2022

“Thank you or the opportunity to comment on this planning application, I have reviewed the documents and design and access statement (DAS) in relation to crime, disorder and the fear of crime, I have searched the constabularies crime and incident systems for this location and surrounding streets over a 2-year period and consider this area to be a medium risk to the vulnerability to crime.

Please see below crime figures.

Crime Type	Ward 717 - Location including 7 surrounding streets	Total
Burglary Residential	3	
Attempted Burglary	1	
Burglary Business	1	
Theft From Motor Vehicle	4	
Theft Of Motor Vehicle	2	
Public Order	13	
Assault with injury	17	
Assault without injury	16	
Criminal Damage Vehicle	3	
Criminal Damage Residential	2	
Criminal Damage Other	4	
Theft of Cycle	3	
Drug related	5	
Arson	2	

Overall, this appears to be an acceptable layout in relation to crime prevention and the fear of crime providing reasonable levels of natural surveillance from neighbouring properties with many of the homes facing each other and or overlooking open space. Pedestrian and vehicle routes are aligned together, well overlooked, and pedestrian safety has been considered. This should encourage some level of territoriality amongst residents. Some of the vehicle parking is in-curtilage between and to the sides of properties. Most of the homes have back-to-back protected rear gardens which reduces the risk and vulnerability to crime and have been provided with the potential for some defensible space to their front.

I also note section's 3.3 and 6.7 of the DAS referring to - NPPF- (Safe places and health and well-being), and page 26 that crime prevention and secured by design principles have been considered, I do have the following comments and concerns.

- Rear access footpaths - I would like clarification that the shared footpaths providing access to the rear of some terraced properties ideally these should be fenced and gated as close as possible to the front building line, shared gates should be fitted with self-closers, private gates fitted with self-closers and lockable from both sides. There are numerous paths with this same design throughout the estate. By allowing access to the rear of those properties it will increase the vulnerability for burglary as most occur via the rear garden. I have concerns in relation to residents with these shared access bringing cycles and bins between parked vehicles where they can be damaged, in my experience this happens and leads to neighbour disputes.
- Sheds for cycle storage residential gardens - The design problems that we are trying to prevent are cycle hoops bolted into the ground; they need to be cemented 300mm into the floor or as a minimum ground anchors cemented into the floor, they should be fitted with a solid secure gold hasp and lock, No window to be present; Door hinges should be coach-bolted through the shed structure or secured with security or non-return screws.
- Landscaping - The off street parking for plots 7,8,10-17, 19-22, 25-27, 29, 31 and 32-33, these need to be clearly defined to prevent neighbour disputes also the landscaping surrounding these must be maximum height 1m, this must be part of a regular maintenance plan for safety and visibility of both pedestrians and vehicle using the shared parking and public footpaths.

- Parking - The street scene in some areas of this development is dominated by parking, if this is to be softened with planting landscaping this needs to be no higher than 1m and form part of the regular maintenance plan.
- Lighting - It would be good to see a copy of an External lighting plan (adoptable and private) including calculations and lux levels when available. For the safety of people and their property our recommendation is that all adopted and un-adopted roads, private and shared drives and parking areas should be lit by columns to BS5489:1 2020. Bollard lighting is only appropriate for wayfinding and should not be used as a primary lighting source for any roads, parking areas or footpaths where they are also prone to damage. Care should be taken in relation to the location of lighting columns with the entry method for the majority of dwelling burglary being via rear gardens. Lighting columns located next to rear/side garden walls and fences with little surveillance from other properties can be used as a climbing aid to gain entry to the rear gardens. Home security lights both front and rear should be dusk to dawn bulkhead LED lights.
- LAP and LEAP- What lighting will be installed within these areas?

I consider that this has the potential to be a development where there is a strong commitment to community safety and reducing vulnerability to crime, I would encourage the applicant consider submitting a "Secured by Design" 2019 Homes application - this office would be pleased to work with them to attain this award."

27 February 2023

"I have reviewed the documents and design and access statement (DAS) in relation to crime, disorder, and the fear of crime, I have searched the constabularies crime and incident systems for this location and surrounding streets over a 2-year period and consider this area to be a medium risk to the vulnerability to crime. I note my previous comments 10th March 2022, some of these still stand, due to the amendments to the plan and the time I have completed an up-to-date crime search as below...

Whilst overall this appears to be an acceptable layout in relation to crime prevention and the fear of crime providing reasonable levels of natural surveillance from neighbouring properties with many of the homes facing each other and overlooking open space. Pedestrian and vehicle routes are aligned together, well overlooked, and pedestrian safety has been considered. This should encourage some level of territoriality amongst residents. Some of the vehicle parking is in-curtilage between and to the sides of properties. Most of the homes have back-to-back protected rear gardens which reduces the risk and vulnerability to crime and have been provided with the potential for some defensible space to their front. I also note section's 3.3 and 6.7 of the DAS referring to - NPPF- (Safe places and health and well-being), and page 26 that crime prevention and secured by design principles have been considered and I can see that changes have been made to the DAS following my previous comments, I would like additional clarification on the below.

Rear access footpaths - I can see that some changes have been made to these footpaths, I would like clarification that the shared footpaths providing access to the rear of the plots 30,33 and 34, also 112-114 will be fitted with a gate for shared access level with the building line fitted with a self-closer. Shared gates should be fitted with self-closers, private gates fitted with self-closers and lockable from both

sides. Whilst these gates to the front will not be lockable, they are more likely to deter un-authorized persons using these gates and footpaths, this allows for residents to challenge any persons seen within these areas and will help to reduce the vulnerability to the rear gardens, it is recognised that most burglaries occur via the rear garden. I still have concerns in relation to residents with these shared access footpaths bringing cycles and bins between parked vehicles where they can potentially be damaged, in my experience this happens and leads to neighbour disputes.

Sheds for cycle storage residential gardens - I note that the DAS now reflects there will be cycle storage for the residential properties within the rear gardens. I would like to see a design for these once available.

The issues we are trying to prevent are cycle hoops bolted into the ground; they need to be cemented 300mm into the floor and should be within view of active windows (to make you aware there is now a Sheffield stand that has been SBD accredited)

Door hinges should be coach-bolted through the shed structure or secured with security/non-return screws.

Two hasp and staples that meet 'Sold Secure' Silver should be used. One positioned 200mm - 300mm down from the top of the door, and one positioned 200mm - 300mm up from the bottom of the door. Additionally, hasp and staples should be coach bolted through the shed structure or secured with either security or non-return screws.

Both padlocks should meet 'Sold Secure' Gold or LPS 1654 Issue 1.1:2014 Security Rating 1.

Shall be securely fixed to a suitable substrate foundation. See "Secured By Design" (SBD) website link. <https://www.securedbydesign.com>

Within secure garden sheds care must be taken to ensure that this will be robust and secure enough to protect what is being stored in it, particularly cycles or similar e.g. (gardening equipment).

There should be No Windows.

- Visitor cycle facilities:

The issues we are trying to prevent are cycle hoops bolted into the ground; they need to be cemented 300mm into the floor, they should be within view of active windows. Minimum requirements for such equipment are:

Galvanised steel bar construction (Sheffield stands).

Minimum foundation depth of 300mm with welded 'anchor bar'

The cycle stands must facilitate the locking of both wheels and the crossbar. (Cycle crime is a problem across the County particularly Cambridge).

As a minimum sold secure gold ground anchors cemented into the floor.
<https://www.securedbydesign.com>

- Lighting - I would like to see a copy of the lighting plan for this development once available including calculations and lux levels when available. For the safety of people and their property our recommendation is that All adopted and un-adopted roads, private and shared drives including parking courts and footpaths should be lit by columns to BS5489:1 2020. Bollard lighting is only appropriate for wayfinding and should not be used as a primary lighting source for any roads or parking areas, where they are also prone to damage. Care should be taken in relation to the location of lighting columns with the entry method for the majority of dwelling burglary being via rear gardens. Lighting columns located next to rear/side garden walls and fences with little surveillance from other properties can be used as a climbing aid to gain entry to the rear gardens. Home security lights both front and rear should be dusk to dawn bulkhead LED lights. (There are column lights that can be fitted with a back shield these are sympathetic to the environment and work alongside wildlife ecology and light pollution!).
- Parking - The street scene in the main has been softened with less parking, where possible soft landscaping should be considered between plots 103 - 114.

This office would be happy to meet with the applicant to discuss "Secured by Design" and measures to reduce crime and anti-social behaviour including building security, I believe this development could achieve "Secured By Design" homes 2023 accreditation with discussion.

I have no further comments at this time."

1 June 2023

"Thank you for the opportunity to comment on this planning application I have viewed the documents in relation to crime disorder and the fear of crime and have searched the Constabulary crime and incident systems covering this location for the last 2 years a two year period would usually provide sufficient information I would consider this to be an area of low medium risk to the vulnerability to crime at present I note my previous comments 27th February 2023 and 10th March 2022 some of these still stand due to the amendments to the plan I have completed an up to date crime search as below

Whilst overall this appears to be an acceptable layout in relation to crime prevention and the fear of crime providing reasonable levels of natural surveillance from neighbouring properties with many of the homes facing each other and or overlooking open space Pedestrian and vehicle routes are aligned together well overlooked and pedestrian safety has been considered This should encourage some level of territoriality amongst residents Some of the vehicle parking is in curtilage between and to the sides of properties Most of the homes have back to back protected rear gardens which reduces the risk and vulnerability to crime and have been provided with the potential for some defensible space to their front I also note sections 33 and 67 of the DAS referring to NPPF Safe places and health and well-being and page 26 that crime prevention and secured by design principles

have been considered and I can see that changes have been made to the DAS following my previous comments

I would like additional clarification on the below

Rear access footpaths I see that some changes have been made to these footpaths I would like clarification that the shared footpaths providing access to the rear of all terraced plots will be fitted with a gate level with the building line fitted and with a self-closer Shared gates should be fitted with self-closers private gates fitted with self-closers and lockable from both sides Whilst these gates to the front will not be lockable they are more likely to deter un authorised persons using these gates and footpaths this allows for residents to challenge any persons seen within these areas and will help to reduce the vulnerability to the rear gardens it is recognised that most burglaries occur via the rear garden I still have concerns in relation to residents with these shared access footpaths bringing cycles and bins between parked vehicles where they can potentially be damaged in my experience this happens and leads to neighbour disputes.

Sheds for cycle storage residential gardens I note that the DAS now reflects there will be cycle storage for the residential properties within the rear gardens I would like to see a design for these once available...

Parking The street scene in the main has been softened with less parking where possible soft landscaping should be considered between parking spaces these should be no more than 1m high to allow natural surveillance there should be a good maintenance plan in place

Lighting I would like to see a copy of the lighting plan for this development once available including calculations and lux levels For the safety of people and their property our recommendation is that All adopted and un adopted roads private and shared drives including parking courts and footpaths should be lit by columns to BS5489 1 2020. Bollard lighting is only appropriate for wayfinding and should not be used as a primary lighting source for any roads or parking areas where they are also prone to damage Care should be taken in relation to the location of lighting columns with the entry method for the majority of dwelling burglary being via rear gardens Lighting columns located next to rear side garden walls and fences with little surveillance from other properties can be used as a climbing aid to gain entry to the rear gardens Home security lights both front and rear should be dusk to dawn bulkhead LED lights There are column lights that can be fitted with a back shield these are sympathetic to the environment and work alongside wildlife ecology and light pollution

Cycle Footpath link to School Open Space Landscaping pedestrian links on this proposed development footpaths should be straight with clear visibility and a minimum 2m wide the landscaping along these paths should be maintained Trees the crowns should be raised to 2m including branch span Hedging and planting should be kept down to 1m to 12m Lighting of these areas also helps reduce the vulnerability risks to Women and Girls as part of the Violence Against Women and Girls VAWG strategy The footpath should be lit by columns to BS5489 1 2020 and care should be taken not to place columns within 5m of trees to reduce conflict and damage particularly

the cycle footpath leading to and from the school These should encourage residents to use the green space this should further improve natural surveillance which is always a proven deterrent to crime and antisocial behaviour as well as being a positive to health and wellbeing and a safe route

LAP and LEAP what lighting will be installed within these areas Whilst the public spaces footpaths LAP and LEAPs are mainly overlooked there are areas where there is limited natural or formal surveillance from residential properties While making comments to address the vulnerability to crime reduce the fear and incidence of crime and community safety we understand that there are competing issues the health and wellbeing agenda connectivity between developments safer routes to schools and local amenities including bus stops and the move to achieve more sustainable transport methods non car modes eg walking and cycling

Taking the above into consideration I am happy for the above to be conditioned and I have no further comments.

This office would be happy to meet with the applicant to discuss Secured by Design and measures to reduce crime and anti-social behaviour including building security I believe this development could achieve Secured by Design homes 2023 accreditation with discussion.”

29 September 2023

“Gates providing access to rear footpaths - rear access footpath between plot 33 & 34 providing access for plots 35 & 36 requires a gate level with the access gates for plots 33 & 34. This should be replicated for plots 109 & 112 access between plots 110 and 111, and plots 171 & 173 accessed between 172 & 173. These gates should be positioned as near to the building line as possible and fitted with self-closers, the gates providing access to the properties should be lockable and fitted with self-closers.

Footpaths – the plan shows a footpath the main road between phase 2 running along the front of plots 152-154, this footpath has a dog leg at the top which would reduce visibility. This footpath should be lit to with column lights to BS5489-1:2020 and should be straight, there is also a footpath leading through the youth play area, this should also be straight and lit by columns.

My previous comments dates above relating to cycle storage and lighting for the adopted, unadopted, parking areas and private driveways still stand. Taking the above into consideration, I am happy for the above to be conditioned and I have no further comments.”

20 October 2023

“My previous comments still stand 29th September 2023 and 1st June 2023. I have nothing further to add.”

Minerals And Waste Development Control Team - 28 October 2020

“Thank you for consulting Cambridgeshire County Council, as the Minerals and Waste Planning Authority (MWPA), on the above planning application. I have reviewed the available documentation and wish to make the following comments:

The reference to the RECAP SPD and commitment to producing a Waste Management Plan prior to construction in the Design and Access Statement is welcomed. In order to ensure that Policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) is satisfied, it is requested that the following condition be imposed, in the event that the Local Planning Authority is minded to grant planning permission:

Detailed Waste Management and Minimisation Plan

Prior to the commencement of development or any reserved matters approval, a Detailed Waste Management and Minimisation Plan (DWMMP) shall be submitted to and approved in writing by the local planning authority. The DWMMP shall include details of:

- i) Construction waste infrastructure including a construction material recycling facility to be in place during all phases of construction
- ii) anticipated nature and volumes of waste and measures to ensure the maximisation of the reuse of waste
- iii) Measures and protocols to ensure effective segregation of waste at source including waste sorting, storage, recovery, and recycling facilities to ensure the maximisation of waste materials both for use within and outside the site
- iv) Any other steps to ensure the minimisation of waste during construction
- v) the location and timing of provision of facilities pursuant to criteria i) to iv).
- vi) proposed monitoring and timing of submission of monitoring reports
- vii) the proposed timing of submission of a Waste Management Closure Report to demonstrate the effective implementation, management and monitoring of construction waste during the construction lifetime of the development
- viii) a RECAP Waste Management Guide toolkit shall be completed, with supporting reference material
- ix) proposals for the management of municipal waste generated during the occupation phase of the development, to include the design and provision of permanent facilities e.g. internal and external segregation and storage of recyclables, non-recyclables and compostable material; access to storage and collection points by users and waste collection vehicles

The Detailed Waste Management and Minimisation Plan shall be implemented in accordance with the agreed details.

Reason: In the interests of maximising waste re-use and recycling opportunities; and to comply with policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and the Recycling in Cambridgeshire and Peterborough (RECAP) Waste Design Guide 2012; and to comply with the National Planning Policy for Waste October 2014; and Guidance for Local Planning Authorities on Implementing Planning Requirements of the European Union Waste Framework Directive (2008/98/EC), Department for Communities and Local Government, December 2012.”

Waste Strategy (ECDC) - 6 November 2020

“- East Cambs District Council will not enter private property to collect waste or recycling, therefore all properties should be able to present bins and bags to the front of the property adjacent to the public highway, any private driveways must have collection points directly adjacent to the public highways, it would be the responsibility of the owners/residents to take any sacks/bins to the public highway boundary on the relevant collection day and this should be made clear to any prospective purchasers in advance, this is especially the case where bins would

need to be moved over long distances; the RECAP Waste Management Design Guide defines the maximum distance a resident should have to take a wheeled bin to the collection point as 30 metres (assuming a level smooth surface).

- Under Section 46 of The Environmental Protection Act 1990, East Cambridgeshire District Council as a Waste Collection Authority is permitted to make a charge for the provision of waste collection receptacles, this power being re-enforced in the Local Government Acts of 1972, 2000, and 2003, as well as the Localism Act of 2011.
- Each new property requires two bins; this contribution is currently set at £43 per property.
- Payment must be made in advance of bins being delivered; East Cambs District Council Account Number 43135897, Sort Code 52-41-19, reference should be the planning application number followed by (bins) i.e. 15/012345/FUL (bins) a separate e-mail should also be sent to waste@eastcambs.gov.uk detailing the payment amount and the planning reference number.”

12 April 2022

Repeats previous comments

12 July 2022

“For the 20/01238/FUM there is nothing additional to add from a waste perspective since out last set of comments.”

23 August 2022

“Nothing further to add to our comments recorded on the 12th April.”

21 March 2023

“Repeats previous comments”

15 September 2023

“Provides standard comments”

Environment Agency – 13 November 2020

“The Agency has no objection to the proposed development but wishes to make the following comments: -

National Planning Policy Framework Flood Risk Sequential Test

In accordance with the National Planning Policy Framework paragraph 101, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the local planning authority to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the National Planning Policy Framework. By consulting us on this planning application we assume that your Authority has applied and deemed the site to have passed the Sequential Test.

FLOOD RISK

We have no objection to the proposed development, providing that the mitigation measures proposed in the submitted Flood Risk Assessment (FRA) prepared by MLM Consulting Limited (document reference 6600240-MLM-ZZ-XX-RP-C-0001) dated October 2020 are adhered to.

In particular, the FRA recommends that:

- Finished floor levels will be set 300mm above the modelled breach flood level of 1.5 metres AOD.

It is also recommended that an area of open space be maintained to the south of the site, to maintain the surface water flow path from the east and ensure no impacts offsite.

WATER QUALITY

Information available to the Environment Agency suggests that there is sufficient permitted capacity at Littleport WRC to accommodate this proposed development. The Water Cycle Study highlights potential problems with capacity within the foul sewerage network, but we note that Anglian Water have confirmed that there is available capacity in the sewerage system to accommodate this development. Any necessary upgrades or adaptation to the sewerage infrastructure identified by Anglian Water should be completed ahead of occupation of the site in order to avoid flooding problems to existing properties and to prevent damage to the local water environment.”

7 March 2022

“We have no comments to add to those made previously”

Thank you for referring the above application, dated 20 October 2020.

The Agency has no objection to the proposed development but wishes to make the following comments: -

National Planning Policy Framework Flood Risk Sequential Test

In accordance with the National Planning Policy Framework paragraph 101, development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. It is for the local planning authority to determine if the Sequential Test has to be applied and whether or not there are other sites available at lower flood risk as required by the Sequential Test in the National Planning Policy Framework.

By consulting us on this planning application we assume that your Authority has applied and deemed the site to have passed the Sequential Test.

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It is also recommended that an area of open space be maintained to the south of the site, to maintain the surface water flow path from the east and ensure no impacts offsite.

WATER QUALITY

Information available to the Environment Agency suggests that there is sufficient permitted capacity at Littleport WRC to accommodate this proposed development. The Water Cycle Study highlights potential problems with capacity within the foul sewerage network, but we note that Anglian Water have confirmed that there is available capacity in the sewerage system to accommodate this development. Any necessary upgrades or adaptation to the sewerage infrastructure identified by Anglian Water should be completed ahead of occupation of the site in order to avoid flooding problems to existing properties and to prevent damage to the local water environment. General advice to the applicant

All surface water from roofs shall be piped direct to an approved surface water system using sealed downpipes. Open gullies should not be used.

Only clean, uncontaminated surface water should be discharged to any soakaway, watercourse, or surface water sewer.

If soakaways are proposed for the disposal of uncontaminated surface water percolation tests should be undertaken, and soakaways designed and constructed in accordance with BRE Digest 365 (or CIRIA Report 156), and to the satisfaction of the Building Control. The maximum acceptable depth for soakaways is 2 metres below existing ground level. If, after tests, it is found that soakaways do not work satisfactorily, alternative proposals must be submitted.

Surface water from roads and impermeable vehicle parking areas shall be discharged via trapped gullies.

Site operators should ensure that there is no possibility of contaminated water entering and polluting surface or underground waters.

13 June 2023

“We have reviewed the revised details and the Flood Risk Assessment Addendum and have no objection. The comments and guidance contained in our previous response, dated 13 November 2020 ref AC/2020/129757/01, remain pertinent.”

4 August 2023

“We have reviewed the updated documents, and we have no further comments. Please see our previous response dated 13 November 2020 and referenced AC/2020/129757/01 which is still relevant.”

2 October 2023

“Thank you for the consultation dated 13 September 2023. We have reviewed the amended plans and Flood Risk Assessment Addendum and have no further comments to add to our previous response. The Lead Local Flood Authority should be consulted with regard to the submitted surface water drainage proposals.”

Anglian Water Services Ltd - 28 October 2020

“ASSETS

Section 1 - Assets Affected

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore, the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Littleport Water Recycling Centre that will have available capacity for these flows

Section 3 - Used Water Network

This response has been based on the following submitted documents: Drainage_1158334.

The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network, they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection.

Section 4 - Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be reconsulted to ensure that an effective surface water drainage strategy is prepared and implemented.”

5 June 2023

“Section 1 - Assets Affected

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore, the site layout should take this into account and

accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.

Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Littleport Water Recycling Centre that will have available capacity for these flows

Section 3 - Used Water Network

This response has been based on the following submitted documents: Flood Risk Addendum for Barratt David Wilson which is dated April 2023-reference 19445-RLL-20-RP-C-002 The sewerage system at present has available capacity for these flows. However, we need to update our previous responses. Having received further information regarding the public foul sewer located in Wisbech Road, we can confirm that the point of connection suitable for the proposed development is to the manhole 5303 to the 225m sewer which is located in Wisbech Road. Anglian Water has assessed the proposed drainage strategy and can confirm that a pumped connection is acceptable to Anglian Water. Please note that the original point of connection was to manhole 5302. However, the appropriate point of connection for the proposed development, is to Manhole 5303 which is the header of the 225m sewer located in Wisbech Road (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991.

Section 4 - Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.”

The applicant has indicated on their application form that their method of surface water drainage is via SuDS. If the developer wishes Anglian Water to be the adopting body for all or part of the proposed SuDS scheme the Design and Construction Guidance must be followed. We would recommend the applicant contact us at the earliest opportunity to discuss their SuDS design via a Pre-Design Strategic Assessment (PDSA). The Lead Local Flood Authority (LLFA) are a statutory consultee for all major development and should be consulted as early as possible to ensure the proposed drainage system meets with minimum operational standards and is beneficial for all concerned organisations and individuals. We promote the use of SuDS as a sustainable and natural way of controlling surface water run-off. We please find below our SuDS website link for further information.

<https://www.anglianwater.co.uk/developers/drainage-services/sustainable-drainage-systems/>”

15 September 2023

“We have reviewed the submitted documents, and we can confirm we have no additional comments to add to our previous response PLN-0176496.”

19 October 2023

“No additional comments”

Lead Local Flood Authority - 9 November 2020

“At present we object to the grant of planning permission for the following reasons:

1. Oversized Pipes

The submitted General Arrangements drawings include the drainage pipe network across the development. The plan indicates that there will be some large diameter pipes included within the drainage scheme, with pipes proposed up to 900mm in diameter. With the correct use of SuDS features, providing source control and interception to slow the flow, oversized pipes should not be necessary. Therefore, further work is required to intercept and slow the flow to reduce the peak volume of water expected to drain through these pipes at the same time.

2. Flood Volumes and Exceedance

The submitted calculations indicate a large volume of flooding is expected during the 1% Annual Exceedance Probability (AEP) storm event. While there is no single point with high volumes of flooding, there are a lot of areas where smaller volume of water is expected to exceed the system, which could accumulate across the site. While it is indicated that this volume of water will be contained primarily in the road and public open space, more detailed exceedance modelling should be carried out to see how and where this exceedance of water accumulates on site.

3. Finished Floor Levels

The proposed finished floor levels across the site, in some places, are only marginally above the surrounding ground levels. For example, plots 11 and 12 are around the ground levels shown on the plan. In line with best practice, finished floor levels should be at least 300mm above the surrounding ground levels of the site. This is particularly important at sites where there is exceedance expected during the large storm events, to ensure they are safeguarded as much as possible against any surface water ingress to the dwellings.”

21 March 2022

“We have reviewed the following documents:

- Site Specific Flood Risk Assessment, MLM Consulting Limited, Ref: 6600240-MLM-ZZ-XX-RP_C-0001 Rev 03, Dated: 9 October 2020
- Flood Risk Addendum, RLL Civils, Ref: 19445-RLL-20-RP-C-002 Rev P03, Dated: 20 January 2022

Based on these, as Lead Local Flood Authority (LLFA) we have no objection in principle to the proposed development. The above documents demonstrate that surface water from the proposed development can be managed using permeable paving on the private shared access and parking areas. Surface water will be conveyed to online open attenuation features as swales and an attenuation basin, before discharge to the adjacent watercourse at a rate of 7.5 l/s, as agreed with the Littleport and Downham Internal Drainage Board (IDB).”

It requests conditions.

4 July 2022

“Having reviewed the revised documentation we can confirm that the LLFA has no further comments beyond those set down in our response of 21st March 2022 (ref: 201107356). Our position therefore remains supportive of the development, subject to the imposition of the suggested conditions.”

24 February 2023

“Having reviewed the revised documentation we can confirm that the LLFA has no further comments beyond those set down in our response of 21st March 2022 (ref: 201107356). Our position therefore remains supportive of the development.”

31 May 2023

“Thank you for your re-consultation which we received on 19th May 2023. Having reviewed the revised documentation we can confirm that the LLFA has no further comments beyond those set down in our response of 21 March 2022 (ref: 201107356). Our position therefore remains supportive of the development. The amended flood risk addendum information should be appended to any permission that may be given.”

10 August 2023

“Having reviewed the revised documentation we can confirm that the LLFA has no further comments beyond those set down in our response of 21 March 2022 (ref: 201107356). Our position therefore remains supportive of the development. The amended flood risk addendum information should be appended to any permission that may be given.”

26 September 2023

“We have reviewed the following documents: • Flood Risk Addendum, RLL Civils, Ref: 19445-RLL-20-RP-C-002 Rev P10, dated: 1 September 2023 Based on these, as Lead Local Flood Authority (LLFA) we have no objection in principle to the proposed development. The above documents demonstrate that surface water from the proposed development can be managed through the use of permeable paving on private shared access and parking areas and a swale for conveyance of water from part of the site. Attenuation will be provided within open basins before discharge into the receiving ditch network at 7.5 l/s, or 1.1 l/s/ha in line with the IDB requirements.” It then goes onto request conditions.

31 October 2023

“We have reviewed the following documents:
Flood Risk Addendum, Rogers Leask Ltd, Ref: 19445-RLL-20-RP-C-002 Rev P11, Dated: 13 October 2023
General Arrangement Sheet 1 of 2, Rogers Leask Ltd, Ref: 19445-RRL-20-XX-DR-C-202 Rev V, Dated: 13 October 2023
General Arrangement Sheet 2 of 2, Rogers Leask Ltd, Ref: 19445-RLL-20-XX-DR-C-203 Rev P, Dated: 13 October 2023
Flood Routing Plan, Rogers Leask Ltd, Ref: 19445-RLL-20-XX-DR-C-204 Rev N, Dated: 13 October 2023

Based on these, as Lead Local Flood Authority (LLFA) we **have no objection in principle** to the proposed development.

The above documents demonstrate that surface water from the proposed development can be managed through the use of permeable paving on private shared access and parking areas and a swale for conveyance of water from part of the site. Attenuation will be provided within open basins before discharge into the receiving ditch network at 7.5 l/s, or 1.1 l/s/ha in line with the IDB requirements.”

Updates recommended conditions.

The Ely Group of Internal Drainage Board - 30 October 2020

“This application for development is within the Littleport and Downham Internal Drainage District.

The consultant engineer has been in liaison with the Board in relation to the surface water discharge from the site. They have incorporated the Board's greenfield run-off rate into their design for the site. Therefore, the Board has no objections in principle to this development.

The applicant will need the Board’s consent to discharge into a watercourse within the District. The applicant will have to demonstrate that there is a flow path from the receiving watercourse to our Main Drain network.”

15 March 2022

The original application was commented on by the Board in a letter to the LPA dated 30/10/20, in which it was confirmed that the Board had no objections as the attenuated discharge was limited to 1. l/s/ha, although the letter did advise that besides planning consent discharge consent would be required from the Board, and that it would have to be demonstrated by the applicant that there is a "flow path from the receiving watercourse to the Main Drain network".

The planning application contained an FRA which has been updated for the revised layout but is essential the same, the discharge still being limited to 1. l/s/ha.

The site is proposed to discharge to a watercourse located to the south-east of the site, and which in turn flows via a culvert under the A 10. The watercourse not being a Board's maintained drain but is within the Littleport and Downham Internal Drainage District. The drain potentially connects to the Board's system and which in turn flows to the Board's Wood Fen Pumping Station.

On the basis that the discharge of 1.11/s/ha was satisfactory for up to the 1 in 100year event, plus allowance for climate change, and this has been maintained for the revised application. There is no reason for it still not to be so (the site does not consider the effect of successive storms as was required for the Grange Farm site). The updated FRA, however, does not consider the Board's requirement that it be demonstrated that the flow path exists between the receiving watercourse and the Board's Main Drain network. Presumably this can continue to be dealt with at the time discharge consent is applied for. However, if there are any issues with the connectivity whether the applicant has the ability to deal with them is uncertain as it is outside land under their control, and it is therefore suggested this should be considered as part of the planning process.

16 June 2023

“The current application includes an updated drainage strategy /Flood Risk Assessment (FRA). The impermeable area for the development being stated as

remaining as for the previous application despite the change in number of properties. The discharge rate being limited to the agreed rate of 1. l/s/ha.

Taking the above into account the comments as previously made against the previous version of the development as conveyed to the LPA still apply, these being as follows.

The site is proposed to discharge to a watercourse located to the southwest corner of the site, and which in-turn flows via a culvert under the A10. The watercourse not being an Internal Drainage Board (IDB) maintained drain but is within the Littleport and Downham IDB district. The drain potentially connects to the IDB system, and which in-turn discharges to the Catchwater Drain, the same drain as receives the flow from the Grange Farm site, which is located immediately to the southeast of the site under consideration, on the opposite side of Woodfen Road. On the basis that the discharge of 1. l/s/ha was satisfactory for up to the 1 in 100year event, + allowance for climate change in the previous versions of the application, and this has been maintained for the revised application, there is no reason for it still not to be so. The updated FRA, however, does not address the IDB's requirement that it be demonstrated that a flow path exists between the receiving watercourse, that flowing under the A10, and the IDB Main Drainage network. If there are any issues with the connectivity whether the applicant has the ability to deal with them is uncertain as it is presumably outside land under their control, and it is therefore suggested this should be considered as part of the planning process i.e. that an appropriate point of discharge exists for the development."

8 August 2023

"Firstly, considering the engineering matters, there remains a couple of issues that require resolution, these relate to the highway drainage but may require minor adjustment to the onsite drainage depending upon how they are dealt with. This issue being the slight increase in area of highway over that which currently exists, and which ultimately drains to the IDB system, along with how the runoff from the slopes to the noise bund is dealt with, and which is currently indicated as draining to the toe drain to the highway embankment, and thus increasing the discharge rate to the IDB system.

It is also understood from correspondence with the Engineers that the issue raised relating to the conflict between the invert levels of the highway drainage and culvert (invert level of the highway drainage, both toe drain and watercourse being above that of the connecting culvert) will be dealt with by appropriate regading works. It is suggested that this needs to be confirmed by appropriate notes / details shown on the construction drawings, and the requirement that this information is sent to the IDB for approval before works commence.

Referring to the issue of the connecting watercourse between the highway drain, watercourse, and the IDB maintained watercourse, there appears to have been conflicting information provided to the IDB in this regard. It is understood from the discussion held which included a representative from the developer, that the landowner through whose land the watercourse in question passes was party to the various land agreements, and therefore there would be no issue with the developer undertaking any works necessary to ensure there was no restriction on its capacity in terms of taking the flow from the development. Correspondence from the Engineers appears to suggest any works to the watercourse form part of the S 106

agreement, and the letter on the Planning Portal from Bidwells suggest that the watercourse is outside of the highway Authority and Developers control and Riparian ownership is relied upon to deal with any impact the watercourse may have to flow, and it is therefore not a planning issue.

As previously identified the discharge of surface water from the development to the IDB system is subject to the developer obtaining Byelaw consent from the IDB. This consent being separate, and unrelated to any planning consent/requirement. Therefore, regardless of the planning position relating to the watercourse, the IDB will require to be satisfied over its condition before consent is issued. Noting the above it is understood the IDB are prepared to take the watercourse in question as an IDB maintained drain given its significance in the drainage hierarchy for the area following the development taking place. To do so will remove the issue over ownership and any concerns under the planning process. A contribution would be required to be paid to the IDB to allow this to take place, along with the drawing up of the necessary final agreements.”

10 October 2023

IDB still working with developer in regards to drainage under the A10 and considers this is critical to be controlled, potentially by condition.

Environmental Health - 30 October 2020

“I include my previous comments concerning this site below and would request that they are also applied to this latest application.

I have read the Acoustic Design Statement dated the 5th October 2020.

Page 10 states -

"The final mitigations included within the design comprises a 2.3 metres high bund along the west side of [sic] the site, which begins at the north-west corner and follows the A10 toward the site entrance. The bund location can be observed in the proposals and its higher area is understood to be at 4.8metres ground height. Two acoustic barriers will be situated along both the northern and southern site boundary. They will be 2.3 metres in height and will comprise a close-boarded fence that is solid, continuous, sealed at all interfaces and have a surface density of at least 10 kg/m², or provide a minimum sound attenuation of 20 dB. The acoustic barrier (i.e. close-boarded fence) at the south-westerly corner at Site is understood to be located beyond the attenuation pond. The barrier will be 2.3metres high above ground floor level."

The location of the acoustic barriers can be found in Figure 4 on page 11 and have been incorporated into the modelling so if you do not find the bunding and barriers acceptable this will impact upon the rest of the report.

Page 14 states -

"The west-facing façades of some dwellings at the north-west corner and southwest corner, more exposed to the A10 will require closed windows and standard trickle vents for ventilation (i.e. mitigation TYPE 2), mainly for habitable rooms at first floor level. A section of the west façade of the dwelling at the north-west corner plot will

require closed windows, acoustic double glazing and acoustic trickle vents (i.e. mitigation TYPE 3), if there are habitable rooms at first floor level. The majority of the habitable rooms at ground floor levels (except for the west façade of one plot in the west) are suitable for natural ventilation with windows partially open."

I am aware that the requirement for closed windows is unlikely to be deemed acceptable by the LPA.

Figure D.5 outlines 14 proposed dwellings (located in Phase 2 of the site) which will not achieve the target internal sound levels with a partially open window, and which require other forms of mitigation. I have examined Figures D.3 and D.4 in the Appendix which are noise level maps for daytime and night-time levels, and they indicate that -

During the day -

Plot 32 has at least two façades with predicted levels of up to 39dB with a 5dB relaxation (the target being 35dB).

Plot 31 western façade with predicted levels of up to 39dB with a 5dB relaxation.

It would appear that around 3 plots in Phase 2 will also have facades with predicted levels of up to 39dB with a 5dB relaxation.

During the night -

Plot 32 appears to be the only plot which has a predicted façade level of up to 34dB with a 5dB relaxation (the target being 30dB).

My interpretation of these Figures is that only 5 plots will be unable to achieve target internal sound levels with a partially open window (and a relaxation of 5dB if you find the development necessary and desirable) which differs from Figure D.5 which outlines 14 proposed dwellings (located in Phase 2 of the site) which will not achieve the target internal sound levels with a partially open window.

Figure D.6 outlines 7 proposed dwellings (located in Phase 1 of the site) which will not achieve target internal sound levels with a partially open window, however, this seems to contradict Figures D.3 and D.4. Plots 1, 35, 34, 33, 32, 31 and 30 have been depicted as requiring further mitigation in Figure D.6 but Figures D.3 and D.4 show these plots with façade levels of up to 34 during the day and 29 during the night (and therefore meeting the target levels).

You may wish to request confirmation from the acoustician on these points to ensure I have interpreted the information correctly, but regardless, it is certain that a number of these plots will not be able to meet target internal sound levels with a partially open window.

Section 9.4.5 discusses whether a BS4142 assessment is required ultimately determining that due to the predominant noise source being the A10 it is not required. I have no issues to raise with this.

I have no concerns to raise concerning noise levels in external amenity areas.”

9 March 2022

“I have read the Acoustic Design Statement dated the 18th January 2022. The NIA advises that the separation distance between the closest dwellings and the A10 have now increased to 68m (an increase of 8m from the previous site layout).

The report advises that if you find the development necessary and desirable and relax the internal target by 5dB as afforded in the British Standard then -

"During the daytime, noise levels at ground floor habitable rooms will allow for open windows at all façades of all dwellings.

During the night-time periods, noise levels at first floor habitable rooms will allow for open windows at the vast majority of the façades.

Where this is not sufficient, at only one bedroom for one dwelling in the Northwest corner of the site facing the A10, appropriate façade mitigation measures have been provided in terms of suitable glazing systems and ventilation elements (i.e: trickle vents), to ensure that the Indoor Ambient Noise Levels Guidelines are achieved."

The report concludes by saying -

"Only a section of the first-floor façade facing the A10 in the dwelling in the north-west corner of the site will require suitable façade treatment in the form of trickle ventilator for habitable rooms. It must be noted that all other facades at this dwelling are suitable for natural ventilation with windows partially open. It is recommended that, where possible, the internal design layout of this dwelling is such that the first-floor bedroom located at the northwest corner presents a window to a façade not directly facing the A10. This will allow all habitable rooms to be ventilated through partially open windows."

I am struggling to find the plot numbers, but I have highlighted the plot in question below. It will be the western façade of the dwelling which could potentially see an exceedance of the relaxed internal sound levels of +4dB if a bedroom is to be located here. Dual aspect glazing or sensitive room placement should be employed at this plot.

With reference to a BS4142 assessment, the report finds that -

"Based on the above, the results of the survey show that the noise environment at the south-west and north boundary of the site is dominated by road traffic from the A10 and not by the commercial units nearby. The qualitative assessment suggests that a more specific BS4142 assessment is not necessary."

I accept this.

I can also see that there is a CEMP submitted dated 16th Feb 2022.

Page 7 mentions that "Piling, if required, will only be undertaken within the hours of 0800-1700". I welcome the initiative to restrict this activity, but I would recommend

that there is a slight amendment to this in order to bring it in line with what we currently recommend, that the start time will be 09:00. The report doesn't anticipate that piling will be necessary but in case this changes I would recommend the following condition (updated from my previous comments) -

If it is necessary to undertake ground piling, I would request that a method statement be produced and agreed in writing with the Local Planning Authority (LPA) before work takes place. This document should include the commitment to notifying nearby properties prior to the work commencing to advise how long the works will last. This notification should also provide a contact number so that if there are any concerns while the piling is taking place, they can contact the contractor. If the method of piling involves impact driving, I would request a commitment to the following restricted hours specifically for piling - 09:00 - 17:00 each day Monday - Friday and None on Saturdays, Sundays or Bank Holidays.

If there is no intention to utilise ground piling, then I would request this be confirmed in writing and a condition which prevents it be attached until such time as a ground piling method statement is agreed with the LPA.

With regard to vibration, the CEMP states that "The maximum level of vibration at construction sites will be set out to standard housing limits of no more than 10-12mm/s." It is not clear if this is referring to Vibration Dose Values or Peak Particle Velocity. VDV's are more appropriate when considering damage to property whereas for my remit it is the PPV's which are more important. I would advise that the CEMP is amended to reflect the guidance in BS 5228-2, table B.1 and sets a maximum vibration level of 1.0 mm-s⁻¹ which has the effect of - "It is likely that vibration of this level in residential environments will cause complaint but can be tolerated if prior warning and explanation has been given to residents."

I am satisfied with the section on lighting.

No other comments to make at this time but I'd be happy to discuss any of this if necessary."

(additional comments)

"Thank you for reconsulting us on the above application with regard to: Revised CEMP

I have read the CEMP dated 16th Feb 2022.

Page 7 mentions that "Piling, if required, will only be undertaken within the hours of 0800-1700". I welcome the initiative to restrict this activity, but I would recommend that there is a slight amendment to this in order to bring it in line with what we currently recommend, that the start time will be 09:00. The report doesn't anticipate that piling will be necessary but in case this changes I would recommend the following condition (updated from my previous comments) –

If it is necessary to undertake ground piling, I would request that a method statement be produced and agreed in writing with the Local Planning Authority

(LPA) before work takes place. This document should include the commitment to notifying nearby properties prior to the work commencing to advise how long the works will last. This notification should also provide a contact number so that if there are any concerns while the piling is taking place, they can contact the contractor. If the method of piling involves impact driving, I would request a commitment to the following restricted hours specifically for piling - 09:00 – 17:00 each day Monday – Friday and None on Saturdays, Sundays or Bank Holidays.

If there is no intention to utilise ground piling, then I would request this be confirmed in writing and a condition which prevents it be attached until such time as a ground piling method statement is agreed with the LPA.

With regard to vibration, the CEMP states that “The maximum level of vibration at construction sites will be set out to standard housing limits of no more than 10-12mm/s.” It is not clear if this is referring to Vibration Dose Values or Peak Particle Velocity. VDV’s are more appropriate when considering damage to property whereas for my remit it is the PPV’s which are more important. I would advise that the CEMP is amended to reflect the guidance in BS 5228-2, table B.1 and sets a maximum vibration level of 1.0 mm-s-1 which has the effect of – “It is likely that vibration of this level in residential environments will cause complaint, but can be tolerated if prior warning and explanation has been given to residents.”

I am satisfied with the section on lighting.”

23 June 2022

“I note that the amended CEMP concerns - "Amendments to delivery times and interaction with highways". I have no additional comments to make concerning this at this time.

I have read the revised D&AS which advises that -

"Following the original submission and comments by the Environmental Health Officer additional measures have been put in place to improve further the noise environment for future residents, not least to push the proposed dwellings further east away from the A10 and re-sculpt the landscape bund to perform a greater noise attenuation function."

I would welcome this but would request that once the final layout is agreed there is some supporting acoustic information to support the new/final layout.”

15 February 2023

“I have read the Acoustic Design Statement dated the 3rd Feb 2023 and identified the following changes since the last assessment -

- There has been a reduction from 405 to 389 dwellings (approximation).
- As a result of the modelling and re-design of the Masterplan, the separation distance between the closest dwellings and the A10 has increased to a minimum of 66 metres. (whereas previously it was 68m)

- The report advises that -

"During the daytime, noise levels at ground floor habitable rooms will allow for open windows at all façades of all dwellings. During the night-time periods, noise levels at first floor habitable rooms will allow for open windows at the vast majority of the façades. Where this is not sufficient, at only two bedrooms [previously this was one bedroom for one dwelling] for one dwelling in the Northwest corner of the site facing the A10, appropriate façade mitigation measures have been provided in terms of suitable glazing systems and ventilation elements (i.e: trickle vents), to ensure that the Indoor Ambient Noise Levels Guidelines are achieved."

- The report goes on to state -

"Only the first-floor façade facing the A10 in the dwelling in the north-west corner of the site will require suitable façade treatment in the form of trickle ventilator for two habitable rooms. It must be noted that all other façades in this dwelling are suitable for natural ventilation with windows partially open."

The findings are fundamentally the same as the previous report and so I have no additional comments to make at this time but would echo the advice in the NIA that -

"It is recommended that, where possible, the internal design layout of this dwelling is such that first-floor bedroom at the most exposed plot presents a window to a façade not facing directly to the A10. This will allow all habitable rooms to be ventilated through partially open windows."

I'd be happy to discuss any of this if necessary."

19 May 2023

"I have read the Acoustic Design Statement Update dated April 2023 which advises that -

"The new Masterplan includes very minor changes, and it can be confirmed that the results, conclusion and mitigation measures included in the previous assessment are still valid and that the revised layout does not impact the findings of the previous Assessment."

My previous comments therefore remain unchanged."

28 July 2023

"I have compared the latest site layout to previous iterations, and I do not foresee there being any meaningful acoustic changes as a result. My previous comments therefore remain unchanged."

13 September 2023

"I have examined the additional information submitted and this will not change my previous comments"

18 October 2023

"I have examined the latest and previous Illustrative Masterplans, and this new layout will not change my previous comments"

Environmental Health (Scientific Officer) - 1 December 2020

"I have read the Phase 1 Contamination Assessment Report dated 21/2/19, the Phase 2 Geoenvironmental Assessment Report dated 21/6/19, and the Air Quality Impact Assessment Report dated 8/10/20 prepared by MLM and accept the findings. With reference to the shallow TPH contamination referred to in 11.3 of the Phase 2 report it is understood that there was occasional unauthorised access to the site for motorbike scrambling which may be the source of the contamination. The report found elevated arsenic levels and proposes bio-accessibility analysis to determine the risk to human health followed by soil remediation if required. I recommend that standard contaminated land conditions 2, 3, (remediation) and 4 (unexpected contamination) are attached to any grant of permission."

22 February 2023

"I have read the Air Quality Technical Note dated 03/02/23 prepared by Sweco UK Ltd supplied with the application and accept the findings that the air quality impacts from the proposed development would be 'Not Significant'."

Housing Section - 2 November 2020

"The Strategic Housing Team would like to put in a holding response before being able to support Part 1 of this Hybrid application, to deliver 209 dwellings (including 42 affordable dwellings) as we would like further discussions with the developer regarding the affordable housing mix submitted as this does not meet the current housing needs for East Cambs.

I note that the Planning Statement has indicated that 20% affordable housing will be achieved on site in accordance with Policy HOU 3 of East Cambridgeshire Local Plan 2015 (as amended) and adheres to the tenure requirement of 77% rented and 23% shared ownership. However, the affordable housing mix proposed is significantly below the National Described Space Standards and I am aware that Registered Providers operating within the area will not take on the affordable dwellings if they are below this standard and not adequate to meet our current housing needs. Further details on the space standards that the affordable dwellings should meet is defined within the DCLG; National Describes Space Standards.

Please see link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf

As there should be a reasonable expectation of transfer to a Register Provider and if this cannot be achieved due to the sizes of the affordable dwellings then the Hybrid application should not be supported at this current time. These points were previously raised with the developer through pre-app discussions held in October 2019.

It is particularly important that the affordable dwellings are built to the recommended space standard as these homes are occupied to maximum occupation and therefore it is reasonable to expect that a two-bedroom dwellings should accommodate 4 persons, allowing for sufficient space to work, for storage, enabling the health and wellbeing of the household. It was also recommended that developer delivers a mix of 1 to 5 bedroom on site for the affordable dwellings.

The Planning Statement confirms that the developer intends to deliver the affordable dwellings as 4 x 1 bed apartments, 4 x 2 bed apartments, 16 x 2 bed houses and 8 x 3 bed house as the affordable rented and 7 x 2 bed house and 3 x 3bed house as intermediate housing. Although this isn't the affordable housing mix previously discussed, the council would be happy to support this affordable mix for Phase One only but would like to see a wider range of affordable dwellings sizes brought forward across the remaining phase, including the much needed 4- and 5-bedroom homes.

With regards to Part 2 of this Hybrid application, the Strategic Housing Team supports the above development in principle as it will meet our HOU3 policy to deliver 20% affordable housing on site. (Up to 241 dwellings will deliver up to 48 affordable dwellings)

Detailed discussions are recommended with the developer prior to submission of the reserved matters application in order to secure an affordable housing mix that meets the housing needs of the area. Early indications suggest that we will be requiring an affordable housing mix of 1-to-5-bedroom homes on site.”

28 February 2023

“We note the reduction of units from 430 to 389 units - with the reduction affecting Phase 1 of the development now set to deliver 173 dwellings. We confirm that the proposed housing mix still delivers the required 20%: 173 dwellings will secure 35 affordable dwellings.

The Planning Statement addendum confirms that the developer now intends to deliver the affordable dwellings as 4 x 1bed, 11 x2bed, 9 x3bed and 2 x4bed as affordable rental and 7 x2bed and 3 x3bed as intermediate housing. We note the addition of the requested 4 bed properties and confirm we continue to support this affordable mix for Phase One. As previously advised, we would like to see a mix of 1-5 bedrooms brought forward across the remaining phase. We are also pleased to see that the affordable units have been redesigned to meet NDDS standards with 88% designed to secure Part M4(2) compliance.”

26 September 2023

“We note that phase 1 will now deliver 180 dwellings. We confirm that the proposed housing mix still delivers the required 20%180 dwellings will secure 36 affordable dwellings.

We support the affordable mix for Phase One. As previously advised, we would like to see a mix of 1-5 bedrooms brought forward across the remaining phase.

It is not clear from the amended plans/additional information that has been received that the affordable units will still meet NDDS standards, and we would seek confirmation of this.”

Cambridgeshire County Council Education - 10 November 2020

Early Years:

“For the full planning permission element of the application, the contribution can be determined as: -

- 51 children = 19.5FTE x £17,441 OR £20,713 = £341,000 OR £403,904”

Table provided to how to work out costs for outline element.

Primary provision:

“For the full planning permission element of the application, the contribution can be determined as: -

- 52 children x £17,441 OR £20,713 = £906,932 OR £1,077,076.”

Table provided to how to work out costs for outline element.

Secondary provision:

“For the full planning permission element of the application, the contribution can be determined as: -

- 36 children x £24,013 = £864,468.”

Table provided to how to work out costs for outline element.

“Due to the significant development in Littleport, the Council is seeking developer contributions of £97 per increased head of population to enable new library provision at a shared community building (either existing or new build) as the existing library cannot be extended or modified. The cost per head is based on the Museums, Library and Archives guidance for new library space standards.”

31 October 2023

Provides up dated details on contributions following change in proposed housing mix.

Cambs Wildlife Trust - 13 November 2020

“I have reviewed the relevant documents relating to this application and I am pleased to see the completion of ecology surveys to a high standard.

Regarding the Landscape plans for the site, we would query the provision of accessible natural greenspace for the residents of the development. Aside from the small LEAP areas, there is very little greenspace that could be used by residents for recreational activities; the area in the north-west is to be a noise bund and therefore not suitable for dog walking, cycling etc and the areas of open water will be fenced off for safety (I have no argument with that as an approach but it means that part of the site is also of limited value, recreationally). The small area in the east of the site appears to be the only area delivering for recreation. Knowing that Littleport more widely is likely to be lacking in accessible greenspace, this raises questions regarding provision on the site. We feel that the delivery of greenspace within the site needs to be reconsidered. Additional greenspace needs to deliver to meet both recreational needs and biodiversity. These two uses can sometimes be delivered jointly, and in some cases, they need to be separate.

Regarding biodiversity, specifically Biodiversity Net Gain (BNG), the delivery of 3.42% is deemed insufficient. The ECDC SPD sets out a requirement for the post-development value of the site to significantly exceed that of pre-development. Whilst we are all aware that the Environment Bill has not yet been passed, it is

understood that a mandatory 10% is proposed. The ecological impact assessment of the proposed development highlighted a minor adverse impact arising from the loss of wintering bird habitat (specifically habitat for golden plover). This clearly would be very difficult to mitigate for within the redeveloped site and so remains an outstanding adverse impact. The development should be seeking to maximise other opportunities for biodiversity gain in light of this. Taking all these factors into account, we conclude that 3.42% gain is not sufficient.

I do have some comments on the specifics of the BNG calculations and I would like to receive a copy of the spreadsheet of calculations. This contains a section for reviewer comments which would allow us to engage in a dialogue with the applicants' ecologists regarding these aspects and reach a shared position."

21 March 2022

"The submitted ecological report covers all the relevant issues and makes appropriate avoidance, mitigation, and enhancement recommendations. If planning permission is granted, the recommendations in the report should be secured through the use of appropriately worded planning conditions.

However, in commenting on the submitted Biodiversity Net Gain BNG assessment it would be helpful for me to be sent a copy of the original spreadsheet version of the Defra Biodiversity Metric. From the information submitted, the development is likely to represent a negligible net gain in biodiversity units, even smaller than the 5% net gain claimed in the accompanying report. This is because the 2.89 Ha of gardens have been given a score of fairly poor. This should be reduced to poor, as there is nothing within the submitted documents to justify claims of a better condition and the developer and LPA will have no control over how future residents manage the gardens, irrespective of any wildlife features that may be incorporated into the designs. The requirement for off-site biodiversity units to offset this difference is therefore likely to be greater than the 1.60 Biodiversity Units (BU), and may be around 3 BU."

24 June 2022

"I can confirm that the BNG Addendum provided by BSG, dated 22nd April 2022 provides the evidence to support the previously submitted BNG assessment and address the concerns I raised in my previous response of 21st March 2022. I can therefore agree with the applicants that the predicted net loss in Biodiversity Units is 1.60 BU."

15 February 2023

"The submitted ecological report has been updated since previous report to keep the information current. It covers all the relevant issues and makes appropriate avoidance, mitigation, and enhancement recommendations. If planning permission is granted, the recommendations in the report should be secured through the use of appropriately worded planning conditions.

The submitted Biodiversity Net Gain (BNG) assessment provides an accurate representation of the baseline conditions of the application site and appropriate predictions for the post-development biodiversity value. The proposed biodiversity offsetting site to increase the net gain from this development from the predicted 5.47% to over 10% is located within a priority area identified in the East

Cambridgeshire Nature Recovery Network, and therefore represents an acceptable proposal, in line with adopted planning policies and the East Cambridgeshire Natural Environment SPD.”

Senior Ecologist (ECDC) – 18 October 2023

“Having read the updated Biodiversity Net Gain information provided, I cannot support this application until the metric itself has been submitted for review. It is impossible to tell if it has been completed appropriately, a screenshot of one part of the metric is unacceptable.

The BSG Biodiversity Net Gain report states that is a considerable increase in BNG for hedgerow habitat, but I cannot see how this is possible with the information provided to get +89.9% increase without significant increase in native hedgerow habitat being provided and existing hedgerows being maintained, and conditions significantly improved. The general habitat biodiversity units gain of +5.98% is not meeting the +10% minimum standard of “like for like or better” habitats being achieved.

The actual impact of this development maybe larger than suggested in the BNG report. From information in the revised ecological assessment features such as arable land with margins; existing trees & ditches doesn’t correlate with the BNG information provided. BNG metric 4.0 screen shot is not suitable to assessed and does not appear to fully support the statements in the ecological assessment report. I cannot see if all these features have been considered or not.

Any offsetting biodiversity credits needs to be incorporated in the BNG metric, but this should only be considered as a worst-case scenario IF BNG cannot be achieved onsite. Currently it is impossible for me to comment on whether it is justified or needed. On viewing planting plans, consideration for better habitat improvements onsite needs to be further explored. Native planting would also increase habitat availability over unnatural formal gardens with garden variety of trees, hedges and perennials. A mosaic native planting could provide a high visual impact as well as increase sustainable BNG ecological and local targets.

If offsetting is the only viable option and all onsite options do not make up enough Biodiversity Units and the Wildlife Trust site is going to be used to offset, then conservation covenant or proof of offsetting of some sort needs to be provided to ensure the protection of the biodiversity of this site before planning permission should be considered.

The reports also refer to Green Infrastructure Strategy and Wildlife Friendly Feature Plan and Landscape and ecology management however, I cannot find them in the submission. Best practice is to submit habitat management and monitoring of the site before applications are approved to ensure the survival of the habitats and species on this development site.”

Natural England – 29 October 2020

“NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.”

2 June 2023

“Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated 29th October 2020, NE reference number 331550.

The advice provided in our previous response applies equally to this amendment. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.”

30 October 2023

“Natural England has previously commented on this proposal and made comments to the authority in our response dated 29 October 2020, our reference number 331550.

The advice provided in our previous response applies equally to this amendment. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.”

ECDC Trees Team - 18 November 2020

“Overall, no objection in principle to the development as the site is agricultural with the only treed vegetation being on the boundaries which are being retained however given the scale of the development the tree planting is more than disappointing and needs to be reconsidered. There is a multitude of interesting species available which can be incorporated into the scheme to add colour and structure: -

Throughout the scheme there is a significant lack of 'trees' being included, ref plans:

8764-L-101 A - One Magnolia plot 5-6

8764-L-102 A - No trees

8764-L-103 A - Three River birch

8764-L-104 A - No trees

8764-L-105 A - Two Magnolia, One Amelanchier, One Birch

8764-L-106 A - One Magnolia

8764-L-01 rev 1 (Green Infrastructure) - the species for the avenue at the access needs to be revised due to the pest and diseases currently affecting Horse chestnut (this is not an appropriate choice). The planting of two alternate species is more

sustainable, for contrast, impact and for reasons of that a mono-culture is susceptible resulting in the potential loss of all trees. Species to consider e.g. Red Oak (*Quercus rubra*), Golden Alder (*Alnus glutinosa* 'Aurea'), Pride of India (*Koelreuteria paniculata*), Liquidamber, Tulip tree (*Liriodendron tuliperfera*) or Handkerchief tree (*Davidia involucrata*). Any combination of these will deliver colour, contrast and therefore interest. This is not to the exclusion of 'native' large specimens however current pests and disease need to be considered with any proposed landscape scheme.

Example of trees for the built environment, *Cercis canadensis* and *siliquastrum*, *Parrotia persica* 'Vanessa', Upright Golden Rain Tree (*Koelreuteria paniculata* *Fastigiata*), *Cornus* spp e.g. Chinese dogwood, Cornelian cherry dogwood, Turkish hazel, Lavealee hawthorn (*Crataegus x lavalleei*), there are also a multitude of Maples small and medium sizes multi-stem and specimen trees that should be explored.”

21 April 2022

“The submitted Arboricultural information is acceptable please condition compliance with its recommendations.

The revised soft landscaping scheme is acceptable with an interesting mix of species.”

5 July 2022

“The revisions do not affect my previous comments dated 21th April 2022”

27 March 2023

“The submitted arboricultural information and soft landscaping scheme are acceptable please condition compliance with both of them.”

1 June 2023

“The submitted arboricultural information is clear and concise in demonstrating that the site layout will not impact any of the existing trees on or adjacent the sit therefore please condition compliance with both the AIA and AMS sections of the report.

The street trees indicated on the soft landscaping scheme are a high-quality mix of site appropriate species that will create tree lined streets without impacting the free passage of vehicles, cyclists or pedestrians they also do not produce soft fruit that could cause issues of mess or slip hazards. The soft landscaping details for the public open spaces has not been provided with the same amount of detail as the other planting being provided more as site wide overview rather than detailed plans. There are also some plant ID codes that are not on the planting key such as Ps and Sc. *Crataegus monogyna* (Hawthorn) is indicated on the plan for use in the scrub planting and as an individual standard tree but its size when planted only relates to its scrub planting use, if used as a standard size tree it should be planted at a larger size.

From the plan provided which is difficult to scale the planting of *Malus sylvestris* (The European crab apple), *Prunus avium* (Wild cherry) and *Prunus padus* (Bird

cherry) where they will overhang footpaths or areas of hard standing should be reconsidered due to the issues caused by their falling fruit which will attract Wasps etc and pose a slip hazard.

The main drives planting is a high-quality mix of species suitable for their locations that will create a tree lined street without impacting the free passage of vehicles, cyclists or pedestrians. The entrance planting of *Liquidambar styraciflua* 'Worplesdon' and *Liriodendron tulipifera* (Tulip Tree) will provide an impressive entrance to the site without impacting on its use.

The attenuation pond planting could also include Willows trees that are native to the locality Crack Willow, White Willow, Goat Willow, Grey Willow and common Osier) this would soften the man made appearance of the pond. Guidance for the design of SUDS states that SUDS including attenuation ponds should look to create new habitats enhancing nature conservation and amenity space. The use of native Willow trees should be considered as part of the design as they have an important ecological role that relates to their affiliation with wetlands such as found in fenland areas. Willows have a high wildlife value, providing rich habitat and food for a diverse range of organisms. There is evidence of up to 450 species of insect associated with Willows. Willows aid fast stabilization of chemically degraded land surfaces, and the re-establishment of a biologically active soil can be achieved using Willow species, which possess the major requirements for plant survival in environmentally disrupted areas such as development sites.

Tolerance of soil chemical contamination is an important requirement for survival in many situations and Willow trees potential can be emphasized by the fact that, of the seven most important metal contaminants in soil, Willow has been reported to have tolerance to at least four (cadmium, copper, zinc, lead). Willows ability to sequester heavy metals and other contaminants in their root systems, halting their circulation within the environment, can be of great practical use when dealing with water runoff. Willows dense root system and high transpiration rates provide efficient control of soil water and high filtering capacity for pollutants, along with continuous growth of some species during the whole growing season, create an efficient dehydration plant that locks up the pollutants. The fast growth of willow can sequester more carbon than softwoods within a single growing season which could prove invaluable in the pursuit of being carbon neutral. The size of the tree can be easily managed by pollarding or coppicing. The cutting rotation cycle depends on species and growing conditions, and ranges from 3-5 years. Pollarding/Coppicing, minimizes wind damage, enhances branching appearance of willows, and supports a higher density of breeding birds.

The areas of new native woodland planting will require that a Woodland/tree Management and Creation Scheme is produced and submitted for approval. The Woodland Management and Creation Scheme (WMCS) will be required to contain details on the following which can be provided by condition:

- 1) The areas of woodland and hedgerows to be retained and/or enhanced.
- 2) Areas where new woodland planting including public open spaces planting and hedgerows will be established.
- 3) The methodology for the establishment of new areas of native woodland, public open spaces planting and hedgerows.

- 4) Management of existing and proposed woodland, public open spaces planting and hedgerows to enhance their amenity and ecological value.
- 5) Details of responsibility for the future management of the woodland areas, public open spaces, and hedgerows.
- 6) Details to cover a period of no less than 20 years.”

13 October 2023

“The revised soft landscaping scheme is acceptable”

Cambridgeshire Archaeology - 22 May 2023

“I am writing to you in regard to the above consultation for Hybrid planning application seeking full planning permission for 180 dwellings, access, landscaping, sustainable urban drainage, public open space and associated primary infrastructure; and outline planning permission for up to 217 dwellings with all matters reserved except access, for revised development description (reduction in number of dwellings) and revised scheme following consultation responses.

A programme of archaeological investigation was undertaken on site last year which followed an archaeological evaluation and geophysical survey. The Investigations revealed later prehistoric activity in the form of a linear and pits; Romano-British field systems and a small ring gully possibly part of a shelter or similar structure as well as post-medieval field boundaries and two 19th century windpumps.

We are not in receipt of a report of findings for the archaeological excavation, nor have the archiving elements of the archaeological programme been fulfilled, therefore recommend that the following condition be applied to secure the completion of the archaeological programme.

No demolition/development shall commence until the applicant, or their agents or successors in title, has implemented a programme of archaeological work, that has been secured in accordance with a Written Scheme of Investigation (WSI) that has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition/development shall take place other than under the provisions of the agreed WSI, which shall include:

- a) the statement of significance and research objectives.
- b) The programme and methodology of investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
- c) The timetable for the field investigation as part of the development programme.
- d) The programme and timetable for the analysis, publication & dissemination, and deposition of resulting material and digital archives.

REASON: To safeguard archaeological assets within the approved development boundary from impacts relating to any demolitions or groundworks associated with the development scheme and to ensure the proper and timely preservation and/or investigation, recording, reporting, archiving and presentation of archaeological assets affected by this development, in accordance with national policies contained in the National Planning Policy Framework (MHCLG 2021).

Informatives:

Partial discharge of the condition can be applied for once the fieldwork at Part c) has been completed to enable the commencement of development.
Part d) of the condition shall not be discharged until all elements have been fulfilled in accordance with the programme set out in the WSI.”

NHS PREMISES AND ESTATES – 30 May 2023

“Background

2. The proposal comprises a development of up to 180 residential dwellings, which is likely to have an impact of the NHS funding programme for the delivery of primary healthcare provision within this area and specifically within the health catchment of the development. CPICS would therefore expect these impacts to be fully assessed and mitigated by way of a developer contribution secured through the Community Infrastructure Levy (CIL).

Review of Planning Application

3. There is 1 x GP practice within a 2km radius of the proposed development. This practice does not have sufficient capacity for the additional growth resulting from this development and cumulative development growth in the area. Therefore, a developer contribution, via CIL processes, towards the capital funding to increase capacity within the GP Catchment Area would be sought to mitigate the impact.

Healthcare Needs Arising from the Proposed Development

Health & Wellbeing Statement

As an Integrated Care System, it is our ambition that every one of the one million people living in Cambridgeshire and Peterborough is able to live as healthy a life as possible and has access to the help and treatment that they need in the right place, with good outcomes and experience of the care they receive.

Cambridgeshire and Peterborough Integrated Care System, recognises and supports the role of planning to create healthy, inclusive communities and reduce health inequalities whilst supporting local strategies to improve health, social and cultural wellbeing for all aligned to the guidance in the NPPF section 91.

The way health and care is being delivered is evolving, partly due to advances in digital technology and workforce challenges. Infrastructure changes. Therefore, CIL funds received as a result of this development may incorporate not only extensions, refurbishments, reconfigurations or new buildings but will also look to address workforce issues, allow for future digital innovations and support initiatives that prevent poor health or improve health and wellbeing.

The NHS Long term plan requires a move to increase investment in the wider health and care system and support reducing health inequalities in the population. This includes investment in primary medical, community health services, the voluntary and community sector and services provided by local authorities so to boost out of hospital care and dissolve the historic divide between primary and community health services. As such, a move to health hubs incorporating health and wellbeing teams delivering a number of primary and secondary care services including mental health professionals, are being developed. The Acute hospitals will be focussing on providing specialist treatments and will need to expand these services to cope with additional growth. Any services which do not need to be delivered in an acute setting will look to be delivered in the community, closer to people’s homes.

The health impact assessment (HIA) submitted with the planning application will be used to assess the application. This HIA will be cross-referenced with local health evidence/needs assessments and commissioners/providers own strategies so to ensure that the proposal impacts positively on health and wellbeing whilst any unintended consequences arising are suitably mitigated against.

The primary healthcare services directly impacted by the proposed development and the current capacity position is shown in Table 1...

4. This development is not of a size and nature that would attract a specific Section 106 planning obligation. Therefore, a proportion of the required funding for the provision of increased capacity by way of extension, refurbishment, or reconfiguration at St Georges Medical Centre, servicing the residents of this development, would be sought from the CIL contributions collected by the District Council.

5. Although, due to the unknown quantities associated with CIL, it is difficult to identify an exact allocation of funding, it is anticipated that any funds received as a result of this development will be utilised to extend the above-mentioned surgery. Should the level of growth in this area prove this to be unviable, the relocation of services would be considered, and funds would contribute towards the cost of new premises, thereby increasing the capacity and service provisions for the local community.

Developer Contribution required to meet the Cost of Additional Capital Funding for Health Service Provision Arising

6. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact, a financial contribution is sought

7. Assuming the above is considered in conjunction with the current application process, Cambridgeshire and Peterborough would not wish to raise an objection to the proposed development.

Cambridgeshire and Peterborough look forward to working with the applicant and the Council to satisfactorily address the issues raised in this consultation response and would appreciate acknowledgement of the safe receipt of this letter."

Head Of Strategic Planning - No Comments Received

CCC Growth & Development - No Comments Received

Strategic Planning - No Comments Received

Parks And Open Space - No Comments Received

Infrastructure & Strategic Housing Manager - ECDC - No Comments Received

Ambulance Service - No Comments Received

Cadent Gas Ltd - No Comments Received

Wildfowl & Wetlands Trust - No Comments Received

Ward Councillors - No Comments Received

Economic Development - No Comments Received

Wildfowl & Wetlands Trust - No Comments Received

Building Control - East Cambridgeshire District Council - No Comments Received

Conservation Officer - No Comments Received

- 5.2 A site notice was displayed near the site on 27 October 2020 and a press advert was published in the Cambridge Evening News on 29 October 2020.
- 5.3 Neighbours – 70 neighbouring properties were notified, and the responses received are summarised below. A full copy of the responses is available on the Council's website.

Littleport Community Primary School

"I am writing in response to the recent correspondence regarding the above planning application. It is important to note from the outset that we acknowledge the need for new homes to be built in the growing locality and, therefore, are not opposed to the development itself. However, we have very serious concerns over certain aspects of the proposed plans. As a Governing Body, we have formulated this communication expressing our views on the proposed plans.

Our greatest concern for the safety of our school community has always been over the increased volume of traffic on Woodfen Road directly outside the school. We originally raised our concerns in January 2020 over not only the emergency vehicle-only access point on Woodfen Road but also the use of this junction for construction traffic. It would now appear that it is being proposed that this point will be used in the initial building phases as an access point for construction vehicles and site visitors rather than via the A10.

While we are actively working with our families to review the ways by which they travel to and from school each day, we have significant worries about the impact this decision will have on safety outside the school. A number of our families park outside the School along Woodfen Road during the school run and this already creates a strain on existing road network surrounding the school. It was brought to our attention that the traffic surveys carried out as part of the planning application were not conducted during school operational hours. Therefore, we would welcome you revisiting the site to complete an updated survey in order to give a more accurate reflection of traffic using the area during the school run if this was originally conducted during the school holidays. May we suggest 08.30– 09.00am or 15.00– 15.30pm during term time?

We acknowledge that there is a proposal in place to limit access to the site via Woodfen Road between 8.00-9.00am and 3.00-4.00pm, however, we know that parents and carers will often arrive early to reserve spots along the road, reducing parts of Woodfen Road to a single track from 2.30pm onwards.

We also operate a Pre-school from our site, which does not officially start until 9.00am compared to the school's start time of 8.45am, meaning that families with young children will still be moving around the vicinity as heavy machinery is accessing Woodfen Road.

Furthermore, we are worried about the congestion additional site traffic may add to the parking problems that already exist during the school run. We fear that, given the limited number of parking spaces on the development site assigned for construction workers, site personnel may park along Woodfen Road and cause our families to take greater risks when it comes to parking safely outside the school. This could also lead to parents/carers blocking driveways of local residents and causing undue stress to our neighbours.

Of additional concern is how the access to the site would be managed. Already, even before construction has begun, we have had multiple incidents of construction vehicles and plant machinery blocking access to the school and parts of Woodfen Road. Below are two examples of construction traffic causing disruption to the school and increasing the risk of accidents amongst the families using our setting. Both photographs were taken as families were arriving in the morning and would be within the proposed 'no access' windows.

We simply cannot allow the safety of our children to be jeopardised in this way and would much rather an access point from the A10 reinstated rather than via Woodfen Road. In the planning documents, it mentions the issue of traffic turning right across the A10, however, this is currently prohibited into the Saxon industrial estate and vehicles drive north around the roundabout and come back to gain access, only adding a short amount of time to their journey. If it was felt that drivers might not follow safety signs, perhaps a central barrier could be erected. We are aware of this solution working in other locations across the UK and it would cost a fraction of the cost of a new roundabout whilst ensuring the safety of children accessing the school site is not put at risk.

We would conclude that it is the safest and, therefore, best option for the school community that the Developer creates the access point from the A10 rather than Woodfen Road for the reasons stated above.

We would welcome the opportunity to discuss the access to the school from the new estate via the Developer's identified pedestrian pathway. It currently shows an access to the left, which then crosses Woodfen Road only to then cross another road, Parsons Lane. Looking to reduce the number of roads pedestrians would have to cross, we believe that there is a more logical and safer route to the school gate. We are confident that local residents would also welcome the opportunity to engage with the Developers regarding this as well as the access point for construction traffic.

We hope that the views of the Governing Body of the School will be taken into consideration during this process. We look forward to hearing from you regarding the points raised in this letter.”

119 Ely Road, Littleport – Raises concerns in regard to:

- Public consultation
- Can Littleport cope with additional houses
- Issues with Woodfen Road during school drop off/pick up times
- Construction work/access
- Highway safety issues

(additional comments) Raises previous concerns.

(additional comments) Raises detailed concerns in regard to Woodfen Road.

19A Woodfen Road, Littleport – Objects to the proposal on the grounds of:

- The submitted proposal does not comply with National Planning Policy Framework 2021 (Sections 92, 104, 112).
- The submitted proposal also does not comply with the East Cambridgeshire Transport Strategy 2016 Policies (TSEC) 1 (Supporting growth), TSEC 5 (Planning Obligations), TSEC 7 (Supporting Sustainable Growth) and TSEC 12 (Encouraging cycling and walking).
- The submitted proposal does not comply with the East Cambridgeshire Local Plan 2015 Policy COM 7 (Transport impact), Policy LIT 1 (Housing/employment allocation, west of Woodfen Road).
- The plans for a junction with the A10 does not provide a facility for pedestrians and cyclists to cross the A10.
- The Local Plan also includes a strategic objective of facilitating improved access to Littleport railway station through additional car parking and enhanced walking and cycling routes.

22 Woodfen Road, Littleport – Objects on the following grounds:

- Proposal too close to existing housing
- How will the emergency vehicle access point be monitored?
- Will sufficient parking be provided?

24 Woodfen Road, Littleport – Raises concerns in regard to:

- Houses are still under construction and additional housing will place burden on facilities and infrastructure.
- Highway safety along Woodfen Road.
- Loss of privacy.
- Sufficient drainage and open space should be provided.

(additional comments submitted) – Previous comments highlighted.

(additional comments submitted) – “In addition, to comments submitted in 2015, 2019 and 2020 they raise the following:

- Impact on transport movements on Woodfen Road.
- Impact on the day-to-day operation of the school.

- Concerns that the CEMP will not work in practice.

26 Woodfen Road, Littleport – Writes in with concerns in so far as:

- Impact on the daily operation of the school and how construction traffic will impact upon it.
- Drainage of the site.
- Residential amenity.
- Traffic survey done during a school holiday.

30 and 32 Woodfen Road, Littleport – Raises concerns in regard to:

- Proximity of houses to the north boundary of the site. Seeks amendments to secure either a green corridor or plots to be moved.
- Proposal will change the A10 from a bypass to a town road, as well as increasing pollution.
- Concern that Saxon Way Business Park uses Woodfen Road in breach of its conditions.
- Construction access via Woodfen Road should only be used to allow roundabout construction.
- Traffic survey was undertaken during school holiday period.

32 Woodfen Road, Littleport – Raises the following points:

- Construction traffic through Woodfen Road should not be used.
- Traffic surveys were undertaken during June/July 2021 where many people were still working from home.
- Additional roundabout along A10 will change the nature of this road.
- Only two parking spaces per dwelling is not adequate.
- Wants the Council to set up a public meeting.
- Proposal should meet high sustainable requirements.

(additional comments) raise some concerns:

1. Residential amenity.
2. Access and pollution via the A10 remain unaddressed by this revision.
3. Site access from new A10 roundabout or via Woodfen Road?
4. increased traffic now down Woodfen Road to Saxon Business Park.

(additional comments) Raises concerns of:

1. Transport Survey: The proposal to reduce the speed limit to 30mph on the A10 should be rejected, on the basis that the A10 is a bypass and not a local road.
2. Transport Survey: This makes no mention of the already dangerous, overused and abused access to Saxon Business Park via the A10.
3. The proximity of the proposed new houses on the existing north side of the site as a problem.

(additional comments):

“As we have written before that we are not against the application per-se, but it does still raise some continued concerns:

1. We note that none of the Woodfen Road residents' concerns about using Woodfen Road for construction traffic have been addressed.
2. The proximity of Saxon Business Park still does not seem to appear in any of the traffic surveys.

3. Traffic from Saxon Business Park is already using Woodfen Road as an exit, including vans and lorries. The road past the school car park is single track and as far as we are aware the planning agreed for Saxon Business Park development was for emergency vehicles only. 4. We also note the lack of visitor parking on the new housing site - with only 18 unallocated visitor parking spaces available. Given the proximity of Woodfen Road and the good pedestrian access it seems highly likely that both visitors and residents will use Woodfen road for parking. As you will be aware Woodfen Road already has serious parking issues both at normal School times and when the school is used for events.”

34 Woodfen Road, Littleport – Following amendments specifically in regards to CEMP, construction access being via Woodfen Road states:

- They have professional expertise in dealing with construction trade.
- Why the change to allow construction now via Woodfen now, when previously not allowed.
- Impact on school pick up and drop off.
- “Authorities are preferring to turn a blind eye to the impact and dangers of using, for an 18-month period, Woodfen Road as access to the development, yet it was clearly not permitted in prior applications.”
- “The Traffic Survey carried out last year confirmed the survey was carried out during school holidays, it goes without saying this was not a complete survey and could only result in misinformation being passed onto the Authorities.”
- There will not be sufficient parking in the site compound, which will lead to further parking on Woodfen Road.

(additional comments) Raises concerns in regard to:

- Residential amenity
- Temporary access arrangements
- Green corridor to separate existing Woodfen Roads with new.

(additional comments)

- Raises detailed concerns in regard to CEMP and construction access via Woodfen Road.

35 Woodfen Road, Littleport – Raises highway safety concerns.

(additional comments) Highways concerns again raised in regard to Wisbech Road, Woodfen Road and Parsons Lane.

(additional comments) again raised in regard to Wisbech Road and Woodfen Road

175 Wisbech Road, Littleport – Makes comments in regard to:

- Application should consider impacts on road network and school.
- Can the application provide them with mains sewage and gas connections.

51 Upton Place, Littleport – Objects to the development on the following grounds:

- Harm to residential amenity.
- Loss of view.
- Homes are not necessary, still building out other developments.

- How will the emergency only access point on Woodfen Road be monitored?
- The traffic management trials were conveniently carried out during the holidays
- Highway safety concerns/school drop off and pick up times
- Lack of parking

1 Oak Lane, Littleport – Concerns raised over:

- Drainage
- Climate change

14 Old School Close, Littleport – Objects on the grounds of:

- That the flood mitigation measures are not adequate.

11 Millpit Furlong, Littleport –

“Littleport does not need another peripheral, disconnected housing estate built in the middle of a field, with no vehicle access to the wider town. New housing needs to be fully integrated with the existing community. Our community is being swamped with commuter developments as it is. This kind of disconnected planning only creates problems for the future.”

6.0 THE PLANNING POLICY CONTEXT

6.1 East Cambridgeshire Local Plan 2015

GROWTH 2	Locational strategy
GROWTH 3	Infrastructure requirements
GROWTH 4	Delivery of growth
GROWTH 5	Presumption in favour of sustainable development
HOU 1	Housing mix
HOU 2	Housing density
HOU 3	Affordable housing provision
ENV 1	Landscape and settlement character
ENV 2	Design
ENV 4	Energy and water efficiency and renewable energy in construction
ENV 8	Flood risk
ENV 9	Pollution
ENV 14	Sites of archaeological interest
COM 7	Transport impact
COM 8	Parking provision
LIT 1	Housing/employment allocation, west of Woodfen Road

6.2 Supplementary Planning Documents

Contaminated Land
 Developer Contributions
 Design Guide
 Cambridgeshire Flood and Water
 Custom and Self Build
 Natural Environment

Climate Change

6.3 National Planning Policy Framework 2021

Chapter 2	Achieving sustainable development
Chapter 4	Decision Making
Chapter 5	Delivering a sufficient supply of homes
Chapter 6	Building a strong, competitive economy
Chapter 8	Promoting healthy and safe communities
Chapter 9	Promoting sustainable transport
Chapter 10	Supporting high quality communications
Chapter 11	Making effective use of land
Chapter 12	Achieving well-designed places
Chapter 14	Meeting the challenge of climate change, flooding and coastal change
Chapter 15	Conserving and enhancing the natural environment
Chapter 16	Conserving and enhancing the historic environment

7.0 **PLANNING COMMENTS**

7.1 Principle of Development

7.2 The proposed site is within the policy area of LIT1, which seeks a mixed-use development incorporating up to 7 hectares of employment land and approximately 250 dwellings and on this basis development in this location is supported within the Local Plan. The principle of development, therefore, also accords with GROWTH 1 and 2.

7.3 This proposal is not providing any employment land on the site and is seeking up to 397 dwellings; the development is departure on this basis. However, it should be noted that the policy makes it clear that it is up to 7 hectares of employment land and does not set a minimum and on this basis only low weight should be given to this breach. It is also noted that the developer is seeking to provide the potential for a four-arm roundabout onto the A10 to allow for potential future employment land on the west side of the A10. Given the loss of employment land on site it is logical for the number of dwellings to be increased within the site to ensure best use of land (Chapter 11 NPPF). On this basis the proposal is considered to be acceptable in principle in regard to the quantum of dwellings and employment coming forward.

7.4 The policy also requires that a Masterplan for whole area is submitted with the first planning application. Given that this site is primarily a full application that demonstrates where the majority of the open space and SuDS, as well as the dwellings, will be located it is considered that the proposal has met this requirement.

7.5 Policy LIT1 also includes:

- Provide an element of affordable housing as required by HOU3.
- Mix of house types to reflect current need and 5% self builds.
- A minimum of 1.6 hectares of public open space and provide green links into the countryside while connecting to Littleport.

- Built form to minimise amenity impact and screen the site from the A10 and surrounding countryside.
- Provide safe vehicular access(es).
- Undertake a Habitats Regulation Assessment and ensure that there is adverse effect on European sites.
- Provide a safe pedestrian and cycle link from the A10 roundabout to join Woodfen Road in the south-east corner of the site.
- Provide pedestrian and cycle links between the housing and employment element of the site.
- Provide pedestrian and cycle links between site and Saxon Way Business Park.
- Provide necessary highway improvements and traffic calming measures.
- Demonstrate how flood risk will be mitigated.
- Demonstrate how noise from A10 will be mitigated.
- Demonstrate there is adequate sewage treatment capacity.

7.6 The elements will be covered in the relevant sections below and the full wording of these additional requirements can be found on pages 221-222 of the Local Plan.

7.7 Highways and parking

7.8 The proposal is seeking its primary vehicular access off a new proposed roundabout on to the A10 with four ancillary vehicular access points of Woodfen Road to serve the proposed self-build plots. The proposal is also seeking pedestrian access points onto Woodfen Road one in the southwest corner of the site (near the Saxon Way Business Park and potential pedestrian/cycle access into the LIT2 site) and the other in the north west corner (opposite Parsons Lane).

7.9 The proposal is seeking to provide a range of highway/transport improvements in order to accommodate the increase in traffic that have been considered and deemed required by the County Council Transport Team. These improvements cover:

- The proposed roundabout to provide site access onto the A10.
- Highway improvements to Woodfen Road.
- Bus stop improvements to the existing bus stops on Gilbert Road and Wisbech Road; including a S106 contribution of £10,000 towards the maintenance of Wisbech Road bus stop and £21,000 towards the RTP1 Gilbert Road/Wisbech Road stops.
- Roundabout improvements to the A10/Downham Road.
- Residential Travel Plan to promote sustainable means of transport.
- £190,570 towards the Littleport bus service.
- £123,565.85 towards the A10/Witchford Road roundabout improvement scheme.

7.10 Within the site the proposal is seeking to provide a cycle/footpath link that runs along its site boundary adjacent to Woodfen Road, as well as one that runs from the edge of Woodfen Road along the southern and western boundaries and finally an additional one that runs through the middle of the site from the A10 to Woodfen Road. It is considered that the developer has maximised the amount of cycle links

it can provide within the site. There is some concern on how safe and practical it will be for pedestrians/cycles to cross the A10 in the long term.

- 7.11 It is considered that subject to suitable conditions and S106 contributions the scheme will not have a detrimental impact on the wider road network, as the scheme can mitigate against its increase in traffic. On this basis it is considered that the proposal complies with Policy COM7 of the Local Plan.
- 7.12 While the developer has submitted a Construction Environmental Management Plan (CEMP), which demonstrated that Woodfen Road could be used for construction traffic to the satisfaction of the Local Highways Authority there has been significant objection from local people in regard to this. The developer is therefore seeking to find alternative solutions in order to accommodate construction traffic in the early phases of the development. On this basis a standard CEMP condition is therefore recommended in order to allow alternative solutions to be explored.
- 7.13 Parking
- 7.14 The proposal is seeking 360 off-road parking spaces on the full application element, which is on average 2 parking spaces per dwelling. It is noted that some dwellings also benefit from a garage, but it is not expected that these will be needed for parking provision.
- 7.15 There is one visitor parking space per ten dwellings, while this is a low level of visitor parking spaces it has to be noted that the Local Plan only requires up to 1 visitor car parking space per 4 units and that visitor parking spaces often make it hard to get roads adopted.
- 7.16 A condition will be needed to ensure suitable cycle parking spaces are provided, as not all dwellings have access to secure cycle storage in a garage.
- 7.17 The outline application parking will be covered by future reserved matters if application is approved.
- 7.18 The proposal is considered to comply with the requirements of Policy COM8.
- 7.19 Housing Mix
- 7.20 Policy HOU 1 requires that housing developments provide an appropriate mix of dwelling types and sizes that contribute to current and future housing needs as identified in the most recent available evidence. The latest Strategic Housing Market Assessment (SHMA) published in 2021 sets out a suggested mix of market housing in order to meet likely future housing needs in the Cambridgeshire and West Suffolk region.
- 7.21 The SHMA indicates that in respect for market homes, there will likely be a highest need for 3-bedroom dwellings (40-50%), followed by need for 2-bedroom and 4+ bedroom dwellings (both 20-30%).
- 7.22 In September 2023 the developer changed the housing mixture to make the scheme more SHMA compliant. The market housing mixture is now proposed as:

	PHASE 1		PHASE 2		TOTAL		SHMA
	No.	%	No.	%	No.	%	
1 bed	0	0%	0	0%	0	0%	0-10%
2 bed	20	14%	40	26%	60	20%	20-30%
3 bed	70	49%	60	39%	130	44%	40-50%
4+ bed	54	38%	54	35%	108	36%	20-30%
Total	144	100%	154	100%	298	100%	

- 7.23 It should be noted that part of how the developer has achieved this housing mix is rearranging internal layouts of dwellings. For instance, the Ingleton house type now has a large master bedroom with walk in wardrobe space. It is also noted that the Cannington house type has always been either a small four-bedroom house or a large 3-bedroom house depending on internal layout.
- 7.24 The market mix as proposed now much better reflects the SHMA when compared to the previous revision. It is noted and accepted that the 1–3-bedroom dwellings are in compliance with the SHMA, though a condition will be required to ensure a level of compliance on the outline element of the scheme. The proposed market four-bedroom dwellings are 6% over the SHMA max percentage and this weighs against the application. Given that there are no 1-bedroom market dwellings and minimum level of 2 bedroom dwellings, it is considered that this weighs low to moderate against the application.
- 7.25 In the full application element, the proposal is providing 144 market dwellings and 36 affordable dwellings. This equates to 20% affordable housing provision. Policy HOU3 requires 30% affordable housing in Littleport unless it can be demonstrated by the applicant via a financial viability assessment that this would not be viable. While the developer has not done this, the Council has on a strategic basis and concluded that it would be unlikely that a scheme would be viable while providing more than 20% affordable housing in Littleport. While the Council’s strategic viability report is now less relevant as it based on 2019 data, this scheme by the developer would have been negotiated on the basis of only reasonably providing 20% affordable housing. On this basis the level of affordable housing does not weigh against the application. The affordable housing mix provides 26 rented units and 9 shared ownerships, which is close to a 77/23 % split between rented/shared ownership as usually required. However, no concerns have been raised by the Housing Officer and on this basis this split is acceptable.
- 7.26 The vast majority of affordable dwellings are designed for easy conversion/adaptability to meet the requirements of the elderly or people with disabilities. It should be noted that the developer is not seeking any of the market dwellings to meet the requirements to allow easy conversion/adaptability. It is considered possible that this element of HOU1 is complied with given there is no specific percentage the developer needs to meet.
- 7.27 19 dwellings have been allocated for self-build plots, which is one plot short in order to meet the requirements of 5% of total dwellings in order to meet the requirements

of Policy HOU1. While there is space for an additional self-build plot currently this weighs slightly against the application.

7.28 Residential Amenity

7.29 The main source of noise for the development is from the A10. In order to reduce the need for mechanical ventilation a bund has been placed adjacent to the A10, which has reduced the need for mechanical ventilation to nearly all the proposed dwellings within the scheme. It is predicted that a few dwellings in the outline phase might require mechanical ventilation and on this basis a condition should be added to ensure that this would be a last resort. In addition, a condition is recommended to ensure that the bund is created prior to first occupation of any dwelling.

7.30 It is considered that all of the proposed dwellings will have suitable residential amenity space and the dwellings.

7.31 It is also noted on the indicative element of the outline that the proposed dwellings will be located at least 10m away from the boundaries of existing dwellings and on this basis is considered to comply with the minimum requirements set out in the Design Guide.

7.32 Given the potential disturbance construction can have on both existing and future residents it is considered required that the methods and timings of construction work will need to be conditioned.

7.33 It is considered that the proposal will comply with ENV2 of the Local Plan in regard to residential amenity.

7.34 Visual Amenity

7.35 Paragraph 126 of the NPPF states:
“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”

7.36 Policy ENV 1 requires new development to provide a complementary relationship with existing development and conserve, preserve and where possible enhance the distinctive and traditional landscapes and key views in and out of settlement. Policy ENV 2 requires that new development should ensure its location, layout, form, scale and massing and materials are sympathetic to the surrounding areas.

7.37 The proposal on submission was a poorly designed scheme with very little architectural merit. Since the application was submitted it has had several amendments and discussions in regard to design with both the case officer and an independent Urban Designer.

- 7.38 The Urban Designer was commissioned in order to help improve the design and to confirm it meets the definition of 'beautiful' as required by the NPPF.
- 7.39 The Urban Designer in their professional opinion stated that the master planning of the site was now a substantial benefit and on this basis the scheme would meet the requirements of the NPPF. However, concern was raised in regard to house type designs.
- 7.40 It is accepted that while the layout of the site has been greatly improved and weighs in favour of the application, the design of the dwellings is mediocre to at best good. On this basis while the house types would be unlikely to be considered as beautiful by any independent viewer, overall the scheme does meet the beautiful standard set by the NPPF.
- 7.41 Landscape
- 7.42 The NPPF paragraph 131 requires:
"Planning policies and decisions should ensure that new streets are tree-lined... Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate."
- 7.43 The landscape has been worked up in order to provide street trees along the main road, as well as suitable landscaping on secondary/tertiary roads within the scheme. The placement of street trees took several amendments in order to ensure that suitable trees could be provided, without affecting vehicular visibility splays. Given the constraints of ensuring roads are safe and designed to adoptable standards it is considered the right balance of trees has been provided along the proposed roads. Other locations suitable for tree planting have been secured.
- 7.44 The development has also sought to provide a mix of quality of spaces ranging from grass areas and equipped areas for play, to walkways around the site and to spaces designed for flooding (SuDS) as well as areas designed for biodiversity (including a village pond).
- 7.45 It is considered that the proposed landscape would comply with the requirements of ENV1 and ENV2 of the Local Plan.
- 7.46 Ecology
- 7.47 The developer has submitted a Habitats Regulations Assessment and no objections have been received.
- 7.48 It should be first noted that while it is sought that developments should provide at least 10% biodiversity net gain; there is nothing either in policy or legislation that requires developers to do this.
- 7.49 The developer has worked with the Council and the Wildlife Trust in order to demonstrate it is aiming to provide a 10% net gain in biodiversity. It is achieving this by providing an offsite contribution that is included within the draft S106 agreement. However, it is noted that the Council's Senior Ecologist (new post created in 2023) has raised concern in regard to the quality of the ecological

information supplied by the developer. Given the conflicting professional advice, it has been considered that it would be unreasonable at this stage to go against the advice that the developer has been provided with for over 2 years and so the application is recommended for approval. However, it must be noted that the biodiversity benefit might be a lot lower than the 10% net gain reported. Therefore, it is concluded that any biodiversity improvements should be given neutral weight in the determination of this application.

- 7.50 The proposal is considered not to be contrary to the requirements of ENV7 of the Local Plan and the Natural Environment SPD.
- 7.51 Public Open Space
- 7.52 The developer has amended their scheme in order to increase the amount of equipped play areas they are seeking to provide, at the same time reducing the number of four-bedroom properties in order to reduce the demand for play spaces. The proposal in total is 3.3 hectares, with the vast majority of this being informal open space that the developer has overprovided on. The formal play spaces are approximately the right level in order to mitigate the needs of new residents.
- 7.53 It is now considered that the developer is providing a suitable amount and mix of public open spaces to accommodate the likely needs of the residents of the development.
- 7.54 Historic Environment
- 7.55 The comments from Historic Environment Team at County Council are noted and accepted. On this basis a condition is recommended to be added to ensure that suitable archaeological investigations and reporting is completed at the appropriate times. On this basis the proposal is considered to comply with Policy ENV14 of the Local Plan.
- 7.56 Flood Risk and Drainage
- 7.57 The site is primarily in Flood Zone 1, though the southwestern corner of the site is within Floodzone 2 and 3. It is the southwest corner of the site where the developer has placed the main sustainable drainage features. All of the proposed dwellings are within Floodzone 1.
- 7.58 Policy ENV 8 states that all developments should contribute to an overall flood risk reduction, demonstrate that appropriate surface water drainage arrangements for dealing with surface water run-off can be accommodated within the site, and that issues of ownership and maintenance are addressed. The use of Sustainable Drainage Systems will be required for new developments. This supported by the Cambridgeshire Flood and Water SPD.
- 7.59 It is noted that Anglian Water have confirmed that there is capacity in the sewer system and at Littleport Water Recycling Centre to deal with foul water. Given this it is expected that Anglian Water will suitably deal with the foul water and will not need to illegally 'dry spill'.

- 7.60 It is considered that subject to the conditions recommended by the Lead Local Flood Authority that the proposal should provide long term mitigation against increase in risk of flooding due to the site being built on, as well as short term mitigation from the impacts construction periods have on surface water run off rates. On this basis and subject to conditions, the proposal is acceptable in regard to flood risk/drainage.
- 7.61 Contributions/S106
- 7.62 The S106 is seeking to control/provide contributions:
- Affordable Housing
 - Open Space
 - Sustainable Drainage Systems
 - Wheeled bins
 - Self-build dwellings
 - Offsite biodiversity contributions
 - Library contributions
 - Bus stop/service contributions
 - Highway contributions
- 7.63 Littleport schools are included on the CIL list, and it would not be reasonable to seek additional money from a developer when they are already required to pay CIL contributions. It would then be the County's responsibility to put forward suitable expansion plans for Littleport schools and request money raised via CIL.
- 7.64 It is noted that the NHS accepts that any infrastructure improvements can be secured via CIL funding.
- 7.65 Other Material Matters
- 7.66 It is considered that the request from the Fire and Rescue Service for Fire Hydrants could be secured via a condition.
- 7.67 It is not for this development to correct any breaches of planning permission etc on the adjacent Saxon Business Park.
- 7.68 It is noted that the development will need to meet current building regulations and on this basis, it will meet the requirements of policy ENV4 and the Climate Change SPD. In addition, it will need to provide electric charging points. However, the developer is not sure how it will meet these building control requirements in regards to climate change and on this basis conditions will be added to control solar panels and air source heat pumps.
- 7.69 Planning Balance
- 7.70 The proposal will provide a significant level of additional housing within the district, though should be noted the scheme is not providing any employment land. It is considered that this is only a minor breach of LIT1. However, given that this scheme is providing housing as allocated in the Local Plan overall it is considered to be of a benefit.

- 7.71 It is considered that the proposed highway improvements are significant, though this is required to mitigate against the harm of the development. On this basis this has a neutral weighting in the determination of this application.
- 7.72 The proposed market housing mix is close to being SHMA compliant. With the provision of 4-bedroom dwellings above the SHMA level, as detailed above, low to moderate weight is given against the proposal.
- 7.73 It is considered that in regard to residential amenity there is a neutral weighting in the determination of this application.
- 7.74 The policies that refer to visual impact require a scheme to meet a high level of quality. It is considered that the overall scheme has met this requirement and, on this basis, while this should be granted neutral weighting; though noting the high level of design the developer has achieved.
- 7.75 The developer is also considered to have met the high level of landscape quality required. Given that this is again an expectation of a scheme of this size, it is considered to have neutral weighting.
- 7.76 In regard to ecology the developer could be providing a 10% net gain in biodiversity, which in current policy/legislation terms is a significant benefit. However, given the concerns that the figures might not be correct only neutral weight should be granted to this.
- 7.77 On the whole the developer has provided over the required amount of open space, though this via informal open space (which is not all of great practical use). However, given the developer has over provided on public open space this is considered to be of a moderate benefit of the scheme.
- 7.78 The impact on the historic environment is considered to be neutral, subject to an archaeological condition.
- 7.79 The long-term drainage of the site is considered to be of a neutral benefit when determining the scheme.
- 7.80 It is considered on balance that the proposal will bring forward a significant amount of dwellings and it is considered that the benefits of the scheme will outweigh the negatives. On this basis the application is recommended approve subject to the recommended conditions and the completion of the S106 Agreement. If the developer fails to agree a suitable S106 Agreement, then many of the impacts of the development (e.g Highways) will not be mitigated against and the proposal will have a detrimental impact on the infrastructure in both the short and long term.

8.0 COSTS

- 8.1 An appeal can be lodged against a refusal of planning permission, or a condition imposed upon a planning permission. If a local planning authority is found to have acted unreasonably and this has incurred costs for the applicant (referred to as

appellant through the appeal process) then a cost award can be made against the Council.

- 8.2 Unreasonable behaviour can be either procedural ie relating to the way a matter has been dealt with or substantive ie relating to the issues at appeal and whether a local planning authority has been able to provide evidence to justify a refusal reason or a condition.
- 8.3 Members do not have to follow an officer recommendation indeed they can legitimately decide to give a different weight to a material consideration than officers. However, it is often these cases where an appellant submits a claim for costs. The Committee therefore needs to consider and document its reasons for going against an officer recommendation very carefully.
- 8.4 In this case members' attention is particularly drawn to the following points:
- Current legislation and policy does not require 10% biodiversity net gain.
 - That the site-specific policy does not require a minimum amount of employment to be provided on site.
 - CIL payments cover both infrastructure health care provision in the district and school infrastructure improvements within Littleport.

9.0 APPENDICES

Appendix 1- Draft Conditions

Background Documents

20/01238/FUM

National Planning Policy Framework -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

East Cambridgeshire Local Plan 2015 -

<http://www.eastcamb.gov.uk/sites/default/files/Local%20Plan%20April%202015%20-%20front%20cover%20and%20inside%20front%20cover.pdf>

APPENDIX 1 - 20/01238/FUM Conditions

- 1 Development shall be carried out in accordance with the drawings and documents listed below

Plan Reference	Version No	Date Received
CA-05-02	F	13th October 2023
CA-05-15	M	13th October 2023
CA-05-20	P	13th October 2023
CA-05-01	W	13th October 2023
CA-05-06	M	13th October 2023
CA-05-10	L	13th October 2023
19445-RLL-20-XX-DR-C-202	V	13th October 2023
19445-RLL-20-XX-DR-C-203	P	13th October 2023
8764-L-01	X	13th October 2023
8764-L-100	K	13th October 2023
8764-L-101	K	13th October 2023
8764-L-102	K	13th October 2023
8764-L-103	K	13th October 2023
8764-L-104	K	13th October 2023
8764-L-105	K	13th October 2023
8764-L-106	K	13th October 2023
8764-L-107	K	13th October 2023
8764-L-108	K	13th October 2023
CA-05-07	L	13th October 2023
LP-STN-00-WR-DR-C-0110-P06	Woodfen Road GA	8th September 2023
CA-05-12	Q	8th September 2023
Ecological Assessment		8th September 2023
Biodiversity Net Gain Assessment	Addendum	8th September 2023
43030_5501_2801 P01		3rd May 2023
LP-STN-GN-A10-DR-CD-0101.1	P04	3rd May 2023
LP-STN-GN-A10-DR-CD-0102.1	P04	3rd May 2023
LP-STN-GN-A10-DR-CD-0103.1	P04	3rd May 2023
LP-STN-GN-A10-DR-CD-0111.1	P04	3rd May 2023
LP-STN-GN-A10-DR-CD-0112	P04	3rd May 2023
LP-STN-GN-A10-DR-CD-0113.1	P04	3rd May 2023

- 1 Reason: To define the scope and extent of this permission.

Full application (phase 1)

- 2 The development hereby permitted shall be commenced within 3 years of the date of this permission.
- 2 Reason: To comply with Section 91 of the Town and Country Planning Act 1990, as amended.
- 3 Prior to first occupation of any dwelling, the developer shall deliver the A10/Site Access roundabout as detailed in drawing nos. LP-STN-GN-A10-DR-CD-0101.1 Rev P04, LP-STN-GN-A10-DR-CD-0102.1 Rev P04, and LP-STN-GN-A10-DR-CD-0103.1 Rev P04.
- 3 Reason: In the interests of highway safety, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015. This is a Grampian condition.

- 4 Prior to first occupation of any dwelling, the developer shall deliver the off-site highway improvement works on Woodfen Road as shown on drawing no. LP-STN-00-WR-DR-C-0110 Rev P06.
- 4 Reason: In the interests of highway safety, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015. This is a Grampian condition.
- 5 Prior to first occupation of any dwelling, a scheme for the upgrade to the existing bus stop on Gilbert Road to include a bus flag and pole, and Real Time Passenger Information (RTPI) unit shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out prior to first occupation of any dwelling.
- 5 Reason: In the interests of sustainable transport, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015. This is a Grampian condition.
- 6 Prior to first occupation of any dwelling, a scheme for the upgrade to the existing bus stop on Wisbech Road to include a bus flag and pole, and RTPI unit shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out prior to first occupation of any dwelling.
- 6 Reason: In the interests of sustainable transport, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015. This is a Grampian condition.
- 7 Prior to first occupation of any dwelling, the developer shall deliver the junction capacity improvement works at the A10/Downham Road roundabout as detailed on drawing no.43030_5501_2801 Rev P01.
- 7 Reason: In the interests of highway safety and capacity, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015. This is a Grampian condition.
- 8 Prior to first occupation of any dwelling, a Residential Travel Plan shall be submitted to and agreed in writing with the Local Planning Authority. The Residential Travel Plan shall include suitable measures and incentives inclusive of bus taster and/or cycle discount vouchers to promote sustainable travel. The Residential Travel Plan shall be implemented upon first occupation of the first dwelling and shall be monitored annually until the occupation of the 300th dwelling on the site. The annual monitoring shall be submitted to the Local Planning Authority for its written approval and review all measures contained within the approved Travel Plan to ensure targets are met.
- 8 Reason: In the interests of sustainable transport, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015.
- 9 Prior to the first occupation of any dwelling the road(s), footway(s) and cycleway(s) required to access that dwelling shall be constructed to at least binder course surfacing level from the dwelling to the adjoining adopted road in accordance with the details approved on 19445-RLL-20-XX-DR-C-202 Rev V and 19445-RLL-20- XX-DR-C-203 Rev P.

- 9 Reason: In the interests of highway safety, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015.
- 10 Notwithstanding the provision of Class A of Schedule 2, Part 2 of the Town and Country Planning (General Permitted Development) Order 2015, (or any order revoking, amending or re-enacting that order) no gates, fences or walls shall be erected across any vehicle access serving more than one dwelling, as shown on 19445-RLL-20-XX-DR-C-202 Rev V and 19445-RLL-20-XX-DR-C-203 Rev P.
- 10 Reason: In the interests of highway safety, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015.
- 11 Prior to first occupation or commencement of use of the development sufficient space shall be provided within the site to enable vehicles to enter, turn and leave the site in forward gear and to park clear of the public highway. The area shall be levelled, surfaced and drained and thereafter retained for that specific use.
- 11 Reason: In the interests of highway safety, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015.
- 12 Prior to the occupation of each dwelling the visibility splays associated with its vehicular access (single or shared) shall be provided in full accordance with the details approved on 19445-RLL-20-XX-DR-C-202 Rev V and 19445-RLL-20-XX-DR-C-203 Rev P. The splays shall thereafter be maintained free from any obstruction exceeding 0.6m above the level of the adjacent highway carriageway (inter-vehicular visibility splays) or the adjacent highway footway / shared use path (pedestrian visibility splays and cycle visibility splays).
- 12 Reason: In the interests of highway safety, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015.
- 13 No above ground construction shall take place until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the Local Planning Authority. (The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an Agreement has been entered into unto Section 38 of the Highways Act 1980 or a Private Management and Maintenance Company has been established).
- 13 Reason: To ensure satisfactory development of the site and to ensure estate roads are managed and maintained thereafter to a suitable and safe standard, in accordance with policy COM7 of the East Cambridgeshire Local Plan 2015.
- 14 No above ground construction shall take place on site until details of the external materials to be used in the construction of the dwellings hereby permitted have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.
- 14 Reason: To safeguard the character and appearance of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.

- 15 No above ground construction shall commence until details of the boundary treatments have been submitted to and agreed in writing with the Local Planning Authority. The boundary treatments shall be in situ in accordance with the approved details prior to the first occupation of the dwelling it relates to or adjacent to.
- 15 Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
- 16 All hard external surface landscaping works shall be carried out in accordance with the approved details (drawing number CA-05-06M). The works shall be carried out prior to the occupation of any part of the development or in accordance with a programme agreed in writing with the Local Planning Authority.
- 16 Reason: To ensure the longevity of the landscaping scheme, in accordance with policy ENV1 and ENV2 of the East Cambridgeshire Local Plan 2015.
- 17 All soft landscaping works shall be carried out in accordance with the approved details (8764-L-100 to 108 Rev K and 8764-L-01 REV X). The works shall be carried out prior to the occupation of any part of the development or in accordance with a programme agreed in writing with the Local Planning Authority. If within a period of five years from the date of the planting, or replacement planting, any tree or plant is removed, uprooted or destroyed or dies, another tree or plant of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.
- 17 Reason: To ensure the longevity of the landscaping scheme, in accordance with policy ENV1 and ENV2 of the East Cambridgeshire Local Plan 2015.
- 18 Prior to first occupation of any dwelling hereby permitted, a landscape and ecological management plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The LEMP shall include:
- a) Description and evaluation of features to be managed.
 - b) Aims and objectives of management.
 - c) Appropriate management options for achieving aims and objectives.
 - d) Prescriptions for management actions.
 - e) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
 - f) Details of the body or organization responsible for implementation of the plan.
 - g) Ongoing monitoring and remedial measures.
- The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details and maintained for a period of at least 30 years.
- 18 Reason: To protect and enhance species and to ensure long term strategic landscaping in accordance with policies ENV1, ENV2 and ENV7 of the East Cambridgeshire Local Plan 2015.

- 19 No development shall commence until a detailed design of the surface water drainage of the site has been submitted to and approved in writing by the Local Planning Authority.

The scheme shall be based upon the principles within the agreed:

Flood Risk Addendum, Rogers Leask Ltd, Ref: 19445-RLL-20-RP-C-002 Rev P11, Dated: 13 October 2023

General Arrangement Sheet 1 of 2, Rogers Leask Ltd, Ref: 19445-RRL-20-XX-DR-C-202 Rev V, Dated: 13 October 2023

General Arrangement Sheet 2 of 2, Rogers Leask Ltd, Ref: 19445-RLL-20-XX-DR-C-203 Rev P, Dated: 13 October 2023

Flood Routing Plan, Rogers Leask Ltd, Ref: 19445-RLL-20-XX-DR-C-204 Rev N, Dated: 13 October 2023

and shall also include:

- a) Full results of the proposed drainage system modelling in the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance;
- b) Detailed drawings of the entire proposed surface water drainage system, attenuation and flow control measures, including levels, gradients, dimensions and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it);
- c) Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections).
- d) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants.
- e) Demonstration that the surface water drainage of the site is in accordance with DEFRA non-statutory technical standards for sustainable drainage systems.
- f) Full details of the maintenance/adoption of the surface water drainage system.
- g) Measures taken to prevent pollution of the receiving groundwater and/or surface water

Those elements of the surface water drainage system not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved management and maintenance plan.

- 19 Reason: To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development and to ensure that the principles of sustainable drainage can be incorporated into the development, noting that initial preparatory and/or construction works may compromise the ability to mitigate harmful impacts. In accordance with policies ENV2 and ENV8 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.

- 20 No development, including preparatory works, shall commence until details of measures indicating how additional surface water run-off from the site will be avoided during the construction works have been submitted to and approved in writing by the Local Planning Authority. The applicant may be required to provide collection, balancing and/or settlement systems for these flows. The approved measures and systems shall be brought into operation before any construction works begin.
- 20 Reason: To ensure surface water is managed appropriately during the construction phase of the development, so as not to increase the flood risk to adjacent land/properties or occupied properties within the development itself; recognising that initial works to prepare the site could bring about unacceptable impacts. In accordance with policies ENV2 and ENV8 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted and the details need to be agreed before construction begins.
- 21 Upon completion of the surface water drainage system, including any attenuation ponds and swales, and prior to their adoption by a statutory undertaker or management company; a survey and report from an appropriately qualified independent Surveyor or Engineer shall be submitted to and approved in writing by the Local Planning Authority. The survey and report shall demonstrate that the surface water drainage system has been constructed in accordance with the details approved under the planning permission and condition 19 above.

Where necessary and compliance cannot be demonstrated, details of corrective works to be carried out along with a timetable for their completion, shall be included for approval in writing by the Local Planning Authority. Any corrective works required shall be carried out in accordance with the approved timetable and subsequently re-surveyed by an independent surveyor, with their findings submitted to and approved in writing by the Local Planning Authority.

- 21 Reason: To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies ENV2 and ENV8 of the East Cambridgeshire Local Plan 2015.
- 22 Prior to first occupation of any dwelling a scheme of biodiversity improvements and timetable for implementation shall be submitted to and agreed in writing with the Local Planning Authority. The proposed improvements shall demonstrate how they comply with the approved Biodiversity Net Gain Assessment August 2023 and Ecological Assessment August 2023. The biodiversity improvements shall be installed in accordance with the agreed timeframe and thereafter maintained in perpetuity.
- 22 Reason: To protect and enhance species in accordance with policies ENV1, ENV2 and ENV7 of the East Cambridgeshire Local Plan 2015.
- 23 No above ground construction shall take place until a scheme for the timetable, provision, and location of fire hydrants to serve the development to a standard recommended by the Cambridgeshire Fire and Rescue Service or alternative scheme has been submitted to and approved in writing by the Local Planning Authority. The hydrants or alternative scheme shall be installed and completed in accordance with the

approved details prior to the occupation of any part of the development or in accordance with an agreed timeframe.

- 23 Reason: To ensure proper infrastructure for the site in the interests of public safety in that adequate water supply is available for emergency use. This is supported by paragraph 97 of the NPPF.
- 24 In the event of the foundations from the proposed development requiring piling, prior to the commencement of piling the applicant shall submit a report/method statement to the Local Planning Authority, for approval in writing, detailing the type of piling and mitigation measures to be taken to protect local residents from noise and/or vibration. Noise and vibration control on the development shall be carried out in accordance with the approved details.
- 24 Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
- 25 Construction times and deliveries, with the exception of fit-out, shall be limited to the following hours: 0730 to 1800 each day Monday - Friday, 0730 to 1300 Saturdays and none on Sundays, Bank Holidays and Public Holidays.
- 25 Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
- 26 Prior to any work commencing on the site a Construction Environmental Management Plan (CEMP) shall be submitted to and agreed in writing with the Local Planning Authority regarding mitigation measures for noise, dust, and lighting during the construction phase. These shall include, but not be limited to, other aspects such as access points for deliveries and site vehicles, and proposed phasing/timescales of development etc. The CEMP shall be adhered to at all times during construction.
- 26 Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
- 27 The bund (adjacent to the A10) and acoustic fence as detailed on drawing number 8764-L-01 X shall be completed prior to the first occupation of any dwelling and thereafter maintained in perpetuity.
- 27 Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
- 28 No development shall take place until a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment has been submitted to and approved in writing by the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

- 28 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy ENV9 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
- 29 Prior to the commencement of any development, the remediation scheme approved in Condition 28 above shall be implemented in accordance with the agreed timetable of works and to the agreed specification. The Local Planning Authority must be given two weeks written notification of commencement of any remediation scheme works. Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be submitted to and approved in writing by the Local Planning Authority.
- 29 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy ENV9 of the East Cambridgeshire Local Plan 2015.
- 30 In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported to the Local Planning Authority within 48 hours. No further works shall take place until an investigation and risk assessment has been undertaken and submitted to and approved in writing by the Local Planning Authority. Where remediation is necessary, a remediation scheme must be submitted to and approved in writing by the Local Planning Authority. The necessary remediation works shall be undertaken, and following completion of measures identified in the approved remediation scheme a verification report must be prepared and approved in writing by the Local Planning Authority.
- 30 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property, and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy ENV9 of the East Cambridgeshire Local Plan 2015.
- 31 Prior to first occupation a scheme detailing the NEAP, LEAP and LAP as detailed on drawing number 8764-L-01 X including timetable for completion shall be submitted to and approved in writing by the Local Planning Authority. Development shall commence in accordance with the approved details.
- 31 Reason: To ensure appropriate levels of play equipment as required by Policy GROWTH 3 of the Local Plan and the Developer Contributions SPD.
- 32 No demolition/development shall commence until the applicant, or their agents or successors in title, has implemented a programme of archaeological work, that has been secured in accordance with a Written Scheme of Investigation (WSI) that has

been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition/development shall take place other than under the provisions of the agreed WSI, which shall include:

- a) the statement of significance and research objectives.
- b) The programme and methodology of investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
- c) The timetable for the field investigation as part of the development programme.
- d) The programme and timetable for the analysis, publication & dissemination, and deposition of resulting material and digital archives.

32 Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any demolitions or groundworks associated with the development scheme and to ensure the proper and timely preservation and/or investigation, recording, reporting, archiving and presentation of archaeological assets affected by this development, in accordance with national policies contained in the National Planning Policy Framework (MHCLG 2021) and policy ENV14 of the Local Plan.

33 Prior to the commencement of development a Detailed Waste Management and Minimisation Plan (DWMMP) shall be submitted to and approved in writing by the local planning authority. The DWMMP shall include details of:

- i) Construction waste infrastructure including a construction material recycling facility to be in place during all phases of construction
 - ii) anticipated nature and volumes of waste and measures to ensure the maximisation of the reuse of waste
 - iii) Measures and protocols to ensure effective segregation of waste at source including waste sorting, storage, recovery, and recycling facilities to ensure the maximisation of waste materials both for use within and outside the site
 - iv) Any other steps to ensure the minimisation of waste during construction
 - v) the location and timing of provision of facilities pursuant to criteria i) to iv).
 - vi) proposed monitoring and timing of submission of monitoring reports
 - vii) the proposed timing of submission of a Waste Management Closure Report to demonstrate the effective implementation, management, and monitoring of construction waste during the construction lifetime of the development
 - viii) a RECAP Waste Management Guide toolkit shall be completed, with supporting reference material
 - ix) proposals for the management of municipal waste generated during the occupation phase of the development, to include the design and provision of permanent facilities e.g. internal and external segregation and storage of recyclables, non-recyclables and compostable material; access to storage and collection points by users and waste collection vehicles
- The Detailed Waste Management and Minimisation Plan shall be implemented in accordance with the agreed details.

33 Reason: In the interests of maximising waste re-use and recycling opportunities; and to comply with policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste

Core Strategy (2011) and the Recycling in Cambridgeshire and Peterborough (RECAP) Waste Design Guide 2012; and to comply with the National Planning Policy for Waste October 2014; and Guidance for Local Planning Authorities on Implementing Planning Requirements of the European Union Waste Framework Directive (2008/98/EC), Department for Communities and Local Government, December 2012. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.

- 34 Prior to occupation of the relevant dwelling; a scheme for the secure storage of cycles shall be submitted to and approved in writing by the Local Planning Authority. The agreed cycle storage shall be provided prior to the occupation of the dwelling that it relates to.
- 34 Reason: To ensure suitable secure cycle storage in accordance with Policy COM8 of the East Cambridgeshire Local Plan 2015.
- 35 In the event that solar photovoltaic (PV) panels are required to serve any dwellings hereby permitted, prior to first occupation of the dwelling(s) to which they relate, details of the design and position of the PV panels shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the PV panels shall be installed in accordance with the approved details prior to first occupation to which they relate.
- 35 Reason: To ensure that the proposal meets with the requirements of sustainability as stated in policy ENV4 of the East Cambridgeshire Local Plan 2015 and on the request by the developer.
- 36 In the event that air source heat pumps (ASHPs) are required to serve any dwellings hereby permitted, prior to first occupation of the dwelling(s) to which they relate, details of the ASHPs shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall specify the make, model and sound power levels of the proposed unit(s), the siting of the unit(s) and the distances from the proposed unit(s) to the boundaries with neighbouring dwellings. Where necessary, the scheme shall also provide full details of anti-vibration mounts, and all noise attenuation measures. The scheme shall be implemented as approved prior to occupation of the dwelling to which it relates and thereafter maintained as such.
- 36 Reason: To ensure that the proposal meets with the requirements of sustainability as stated in policy ENV4 of the East Cambridgeshire Local Plan 2015 and on the request by the developer.
- 37 No development above ground slab level shall take place until a scheme of lighting for all unadopted shared private drives has been submitted to and approved in writing by the Local Planning Authority. The approved lighting shall be installed prior to first occupation of any dwelling(s) to which it relates.
- 37 Reason: To safeguard the character and appearance of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015 and to protect and enhance species in accordance with policies ENV1, ENV2 and ENV7 of the East Cambridgeshire Local Plan 2015.

OUTLINE

- 38 Approval of the details of the layout, scale, appearance, landscaping (hereinafter called "the reserved matters") shall be obtained from the Local Planning Authority in writing before any development is commenced and shall be carried out as approved. Application for approval of the reserved matters shall be made within 3 years of the date of this permission, with the exception to any self-build plot where reserved matters shall be made within 5 years of the date of this permission.
- 38 Reason: The application is for outline permission only and gives insufficient details of the proposed development, and to comply with Section 92 of the Town and Country Planning Act 1990.
- 39 The development hereby permitted shall be commenced within 2 years of the date of the approval of the last of the reserved matters.
- 39 Reason: To comply with Section 92 of the Town and Country Planning Act 1990, as amended.
- 40 Each reserved matters (excluding landscaping) shall demonstrate that the proposed market housing mix is as follows:
- 26% 2 Bedroom dwellings (+/-1%):
 - 39% 3 Bedroom dwellings (+/-1%):
 - 35% 4+ Bedroom dwellings (max)
- 40 Reason: In order to ensure that the proposed development has a suitable housing mix in accordance with Policy HOU1 of the Local Plan.
- 41 In the event of the foundations from the proposed development requiring piling, prior to the commencement of development the applicant shall submit a report/method statement to the Local Planning Authority, for approval in writing, detailing the type of piling and mitigation measures to be taken to protect local residents from noise and/or vibration. Noise and vibration control on the development shall be carried out in accordance with the approved details.
- 41 Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
- 42 Construction times and deliveries, with the exception of fit-out, shall be limited to the following hours: 0730 to 1800 each day Monday - Friday, 0730 to 1300 Saturdays and none on Sundays, Bank Holidays and Public Holidays.
- 42 Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
- 43 Prior to any work commencing on the site a Construction Environmental Management Plan (CEMP) shall be submitted to and agreed in writing with the Local Planning Authority regarding mitigation measures for noise, dust, and lighting during the construction phase. These shall include, but not be limited to, other aspects such as

access points for deliveries and site vehicles, and proposed phasing/timescales of development etc. The CEMP shall be adhered to at all times during all phases.

- 43 Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
- 44 No above ground construction shall commence until details of the proposed arrangements for future management and maintenance of the proposed streets within the development have been submitted to and approved in writing by the Local Planning Authority. (The streets shall thereafter be maintained in accordance with the approved management and maintenance details until such time as an Agreement has been entered into under Section 38 of the Highways Act 1980 or a Private Management and Maintenance Company has been established).
- 44 Reason: To ensure satisfactory development of the site and to ensure estate roads are managed and maintained thereafter to a suitable and safe standard, in accordance with policy COM7 of the East Cambridgeshire Local Plan 2015.
- 45 No development shall commence until a detailed design of the surface water drainage of the site has been submitted to and approved in writing by the Local Planning Authority.

The scheme shall be based upon the principles within the agreed:

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General Arrangement Sheet 2 of 2, Rogers Leask Ltd, Ref: 19445-RLL-20-XX-DR-C-203 Rev P, Dated: 13 October 2023

Flood Routing Plan, Rogers Leask Ltd, Ref: 19445-RLL-20-XX-DR-C-204 Rev N, Dated: 13 October 2023

and shall also include:

- a) Full results of the proposed drainage system modelling in the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance.
- b) Detailed drawings of the entire proposed surface water drainage system, attenuation and flow control measures, including levels, gradients, dimensions and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it).
- c) Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections).
- d) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants.
- e) Demonstration that the surface water drainage of the site is in accordance with DEFRA non-statutory technical standards for sustainable drainage systems.

- f) Full details of the maintenance/adoption of the surface water drainage system.
- g) Measures taken to prevent pollution of the receiving groundwater and/or surface water

Those elements of the surface water drainage system not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved management and maintenance plan.

- 45 Reason: To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development and to ensure that the principles of sustainable drainage can be incorporated into the development, noting that initial preparatory and/or construction works may compromise the ability to mitigate harmful impacts. In accordance with policies ENV2 and ENV8 of the East Cambridgeshire Local Plan 2015.
- 46 No development, including preparatory works, shall commence until details of measures indicating how additional surface water run-off from the site will be avoided during the construction works have been submitted to and approved in writing by the Local Planning Authority. The applicant may be required to provide collection, balancing and/or settlement systems for these flows. The approved measures and systems shall be brought into operation before any construction works begin.
- 46 Reason: To ensure surface water is managed appropriately during the construction phase of the development, so as not to increase the flood risk to adjacent land/properties or occupied properties within the development itself; recognising that initial works to prepare the site could bring about unacceptable impacts. In accordance with policies ENV2 and ENV8 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted and the details need to be agreed before construction begins.
- 47 Prior to occupation of any dwelling with each phase (defined by reserved matters area) a scheme of biodiversity improvements for that phase shall be submitted to and agreed in writing with the Local Planning Authority. The proposed improvements shall demonstrate how they comply with Biodiversity Net Gain Assessment August 2023 and Ecological Assessment August 2023. The biodiversity improvements shall be installed prior to the first occupation of the hereby approved development and thereafter maintained in perpetuity.
- 47 Reason: To protect and enhance species in accordance with policies ENV1, ENV2 and ENV7 of the East Cambridgeshire Local Plan 2015.
- 48 No above ground construction shall take place in each reserved matters area until a scheme for the timetable, provision and location of fire hydrants to serve that reserved matters area to a standard recommended by the Cambridgeshire Fire and Rescue Service or alternative scheme has been submitted to and approved in writing by the Local Planning Authority. The hydrants or alternative scheme shall be installed and completed in accordance with the approved details prior to the occupation of any part of the development or within the agreed timeframe.

- 48 Reason: To ensure proper infrastructure for the site in the interests of public safety in that adequate water supply is available for emergency use. This is supported by paragraph 97 of the NPPF.
- 49 No development shall take place until a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment has been submitted to and approved in writing by the Local Planning Authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
- 49 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy ENV9 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
- 50 Prior to the commencement of any development, the remediation scheme approved in Condition 49 above shall be implemented in accordance with the agreed timetable of works and to the agreed specification. The Local Planning Authority must be given two weeks written notification of commencement of any remediation scheme works. Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be submitted to and approved in writing by the Local Planning Authority.
- 50 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy ENV9 of the East Cambridgeshire Local Plan 2015.
- 51 In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported to the Local Planning Authority within 48 hours. No further works shall take place until an investigation and risk assessment has been undertaken and submitted to and approved in writing by the Local Planning Authority. Where remediation is necessary, a remediation scheme must be submitted to and approved in writing by the Local Planning Authority. The necessary remediation works shall be undertaken, and following completion of measures identified in the approved remediation scheme a verification report must be prepared and approved in writing by the Local Planning Authority.
- 51 Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property, and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy ENV9 of the East Cambridgeshire Local Plan 2015.

52 The first reserved matters shall include a noise report, detailing how the need for mechanical ventilation has sought to be avoided. It shall detail but not limited to how the layout of plots and internal arrangement have been considered.

52 Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.

53 No demolition/development shall commence until the applicant, or their agents or successors in title, has implemented a programme of archaeological work, that has been secured in accordance with a Written Scheme of Investigation (WSI) that has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition/development shall take place other than under the provisions of the agreed WSI, which shall include:

- a) the statement of significance and research objectives.
- b) The programme and methodology of investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
- c) The timetable for the field investigation as part of the development programme.
- d) The programme and timetable for the analysis, publication & dissemination, and deposition of resulting material and digital archives.

53 Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any demolitions or groundworks associated with the development scheme and to ensure the proper and timely preservation and/or investigation, recording, reporting, archiving and presentation of archaeological assets affected by this development, in accordance with national policies contained in the National Planning Policy Framework (MHCLG 2021) and policy ENV14 of the Local Plan.

54 Prior to the commencement of any reserved matters approval, a Detailed Waste Management and Minimisation Plan (DWMMP) shall be submitted to and approved in writing by the local planning authority. The DWMMP shall include details of:

- i) Construction waste infrastructure including a construction material recycling facility to be in place during all phases of construction
- ii) anticipated nature and volumes of waste and measures to ensure the maximisation of the reuse of waste
- iii) Measures and protocols to ensure effective segregation of waste at source including waste sorting, storage, recovery, and recycling facilities to ensure the maximisation of waste materials both for use within and outside the site
- iv) Any other steps to ensure the minimisation of waste during construction
- v) the location and timing of provision of facilities pursuant to criteria i) to iv).
- vi) proposed monitoring and timing of submission of monitoring reports

vii) the proposed timing of submission of a Waste Management Closure Report to demonstrate the effective implementation, management, and monitoring of construction waste during the construction lifetime of the development

viii) a RECAP Waste Management Guide toolkit shall be completed, with supporting reference material

ix) proposals for the management of municipal waste generated during the occupation phase of the development, to include the design and provision of permanent facilities e.g. internal and external segregation and storage of recyclables, non-recyclables and compostable material; access to storage and collection points by users and waste collection vehicles

The Detailed Waste Management and Minimisation Plan shall be implemented in accordance with the agreed details.

- 54 Reason: In the interests of maximising waste re-use and recycling opportunities; and to comply with policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and the Recycling in Cambridgeshire and Peterborough (RECAP) Waste Design Guide 2012; and to comply with the National Planning Policy for Waste October 2014; and Guidance for Local Planning Authorities on Implementing Planning Requirements of the European Union Waste Framework Directive (2008/98/EC), Department for Communities and Local Government, December 2012. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
- 55 Prior to or as part of the first reserved matters application, an energy and sustainability strategy for the development, including details of any on site renewable energy technology and energy efficiency measures, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved strategy.
- 55 Reason: To ensure that the proposal meets with the requirements of sustainability as stated in policy ENV4 of the East Cambridgeshire Local Plan 2015.
- 56 Prior to first occupation of any dwelling within any reserved matters area, a Residential Travel Plan for the outline planning permission area shall be submitted to and agreed in writing with the Local Planning Authority. The Residential Travel Plan shall include suitable measures and incentives inclusive of bus taster and/or cycle discount vouchers to promote sustainable travel. The Residential Travel Plan shall be implemented upon first occupation of the first dwelling and shall be monitored annually until occupation of the 300th dwelling on the site. The annual monitoring shall be submitted to the Local Planning Authority for its written approval and review all measures contained within the approved Travel Plan to ensure targets are met.
- 56 Reason: In the interests of sustainable transport, in accordance with policies COM7 and COM8 of the East Cambridgeshire Local Plan 2015.

22/01291/ESF

Six Oaks Renewable Energy Park
Newmarket Road
Bottisham
Cambridgeshire

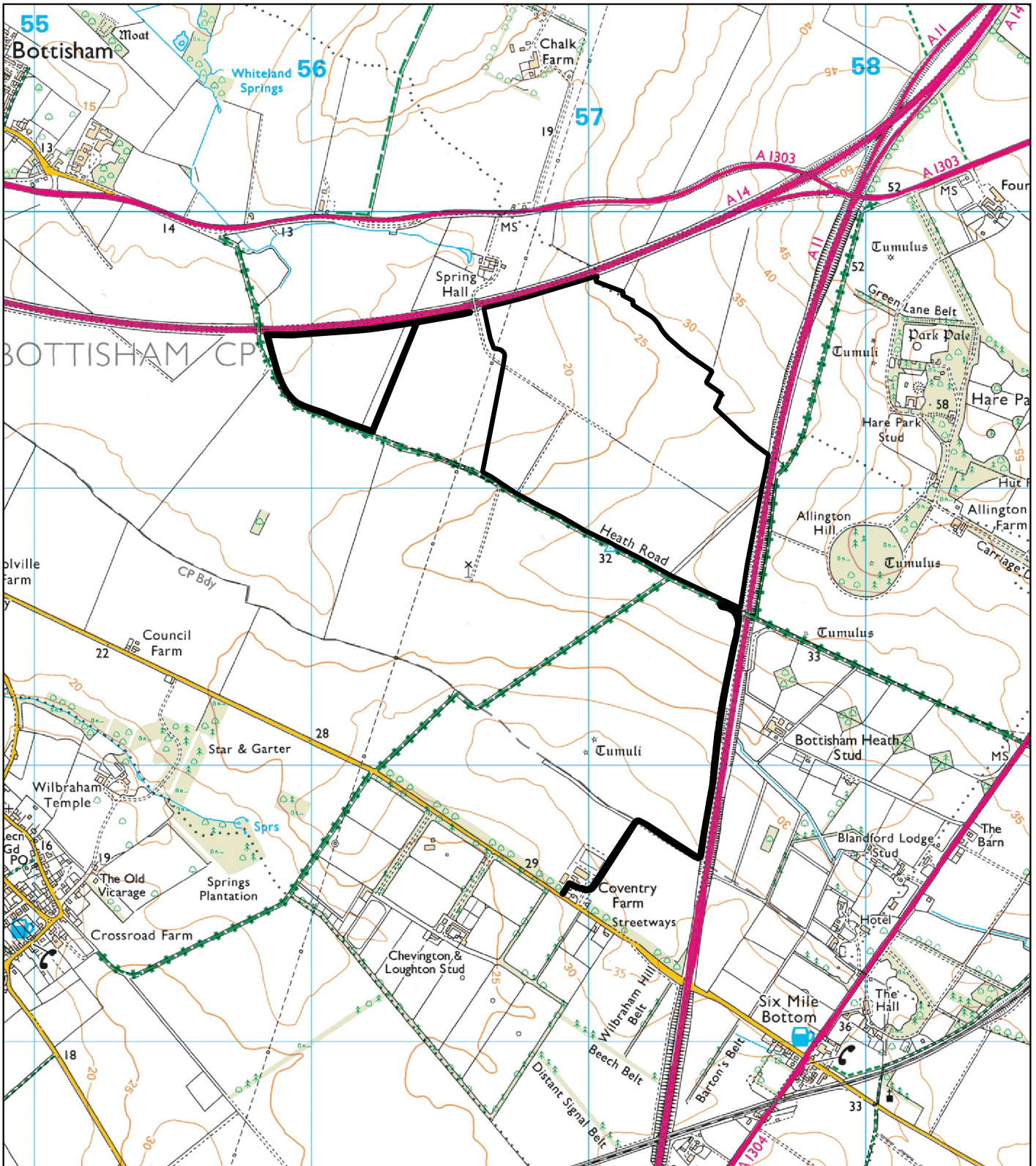
Installation of a Renewable Energy Park comprising ground mounted solar panels; access tracks; inverters, transformers; substation and battery energy storage system; customer cabin; underground cables and conduits; perimeter fence; CCTV equipment; temporary construction compound; and associated infrastructure and planting scheme

To view all of the public access documents relating to this application please use the following web address or scan the QR code:

<http://pa.eastcambs.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=RKQ8HXGGN0R00>



AGENDA ITEM 5



22/01291/ESF

Six Oaks Renewable Energy
Park
Newmarket Road
Bottisham



East Cambridgeshire
District Council

Date: 13/10/2023
Scale: 1:20,000



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TITLE: 22/01291/ESF

Committee: Planning Committee

Date: 15 November 2023

Author: Planning Team Leader

Report No: Y93

Contact Officer: Toni Hylton, Planning Team Leader
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Room No 011 The Grange Ely

Site Address: Six Oaks Renewable Energy Park Newmarket Road Bottisham Cambridgeshire

Proposal: Installation of a Renewable Energy Park comprising ground mounted solar panels; access tracks; inverters, transformers; substation and battery energy storage system; customer cabin; underground cables and conduits; perimeter fence; CCTV equipment; temporary construction compound; and associated infrastructure and planting scheme

Applicant: Six Oaks Renewable Energy Park Ltd

Parish: Bottisham

Ward: Bottisham

Ward Councillor/s: Charlotte Cane
John Trapp

Date Received: 18 November 2022

Expiry Date: 10 March 2023 agreed extension of time until 17.11.23

1.0 RECOMMENDATION

- 1.1 The proposal represents inappropriate development in the Green Belt. Section 13 of the NPPF states that substantial weight should be given to the Green Belt and inappropriate development should not be permitted except in 'very special circumstances'. It is considered there would also be some visual impacts and biodiversity, however these can be mitigated through the use of conditions, as detailed in Appendix 1.
- 1.2 Notwithstanding this, the proposal would generate enough electricity for 10, 730 homes with an annual carbon offset of 9430 tonnes. On this basis there are substantial benefits of the scheme which contribute to the local and national targets

for reducing carbon emissions. The Local Authority has also declared a Climate Emergency in 2019, followed by the adoption of the Climate Change SPD in 2020.

- 1.3 It is considered that there are substantial benefits environmental benefits of the scheme which clearly outweigh the harm to the Green Belt and all other identified harm. As such the proposal is considered to accord with Chapter 14 of the NPPF; National Policy Statements for Energy EN1 and EN3 and the East Cambridgeshire Climate Change SPD.
- 1.4 Members are advised that if they resolve to approve this application, the Council are required to give the Secretary of State (under the terms of the Town and Country Planning (Consultation England) Direction 2021 as applied to Major development in the Green Belt) the opportunity to call in the application as it is a major application for inappropriate development in the Green Belt.
- 1.5 Members are recommended to APPROVE the application subject to the recommended conditions summarised below: The conditions can be read in full on the attached appendix 1.

- 1 Approved Plans
- 2 Development within 3 years
- 3 Construction Traffic Management Plan
- 4 Sufficient space for vehicles to turn
- 5 Biodiversity management plan
- 6 No laying of services
- 7 Foul and surface water
- 8 Soft landscaping scheme
- 9 Foul and surface water
- 10 Temporary fencing
- 11 Noise levels
- 12 Limit construction times
- 13 Construction Environmental Management Plan
- 14 Details of piling
- 15 Lighting scheme
- 16 Maintenance soft landscaping
- 17 Archaeological Works
- 18 Decommissioning works
- 19 Restrict amount of electricity
- 20 Details of the BESS
- 21 Emergency Response Plan
- 22 Water Quality
- 23 Earthing and harmonics report
- 24 Adhere to Skylark Management Plan

2.0 SUMMARY OF APPLICATION

- 2.1 The application is for the comprehensive development of a solar farm operational for 40 years, comprising of the following.

- **Ground mounted solar panels**
These will cover 32 hectares (79 acres) of the site as a whole and each panel will be 3 metres (approximately 10 feet) in height. The panels are set at between 20 and 25 degrees and arranged in rows of 2 lots of 26 panels.
- **Access tracks**
There are existing tracks within the existing farm complex which will be upgraded where necessary. The upgrade will be using crushed stone that overtime grass will grow over. These tracks are permeable and there is no need for additional drainage.
- **Inverters/transformers**
Solar panels create 'direct electricity', which to work with the 'alternating current' electricity has to be converted which is through Inverters and Transformers.
An inverter is 100 cm (3ft) by 70 cm (2 ft) by 37cm (1 ft) and there are 232 across the site.
A transformer is 6.1 metres (20 ft) in length, 2.4 metres wide (8 ft) and 2.9 metres in height, (9.5ft) with 9 units across the site.
- **Substation**
This is required by UK Power Networks and would be a brick construction, with the final finish to be agreed by way of condition. The substation would be 6.9 metres (20 ft) in height; 17 metres (55.7 ft) in length and 10 metres (33 ft) in width.
The substation will form part of a compound that will be enclosed by 2.4 metre (7.8 ft) high palisade fencing.
- **Battery energy storage system (BESS)**
A BESS contains a switchgear container, battery rack housing and PCS Converter unit. The finish would be agreed by way of condition.
A switchgear container is 12.2 metres (40ft) in length; 2.4 metres (7.8) wide and 2.5 metres (8.2ft) in height.
Battery rack housing is 6 metres in length (20 ft); 2.4 metres in width (7.8ft) and 2.5 metres in height (8.2ft).
PCS converter housing is 3.7 metres (12 ft) in length; 2.4 metres (7.8ft) in width and 2.5 (8.2ft) metres in height.
Each unit is set of the ground by 0.62 metres (2ft) to give an overall height of the containers 3.4 metres. (11ft)
- **Customer cabin**
The customer cabin is for security and for the controls of the solar farm. The cabin will be 6.1 metres (20 ft) in length; 2.4 metres (7.8ft) wide and 2.9 (9.5 ft) metres in height. The finish of the cabins is to be agreed via condition.
- **Underground cables/conduits**
These connect the solar panels together and onto the transformer/converters.
- **Perimeter fence**
Stock style fencing would be sited around the perimeter of the solar farm, and a gap would be provided to enable wildlife to traverse across the site.
- **Planting scheme**
 - Species rich hedgerow
 - Species rich grassland
 - Hedgerow restoration
 - Tree planting

- **CCTV**

No lighting is proposed, however infrared CCTV cameras would be provided on poles 2 metres (6.5ft) high and would face into the site. In the event of lighting being required this can be secured by way of condition.

The solar array would export up to 49.995MWe of renewable electricity to the National Grid.

2.2 The full planning application, plans and documents submitted by the Applicant can be viewed online via East Cambridgeshire District Council's Public Access online service, via the following link <http://pa.eastcambs.gov.uk/online-applications/>.

3.0 PLANNING HISTORY

3.1 22/00072/SCREEN

SCREENING OPINION - Installation of ground mounted solar array and Battery Energy Storage System

Issued 5 May 2022

4.0 THE SITE AND ITS ENVIRONMENT

4.1 The site is approximately 78.65 hectares (194 acres) of arable land set within the Cambridge Green Belt. The site is sat between the A14 and A1103 to the north and the A11 to the south and is accessed from Wilbraham Road. The site is predominantly within East Cambridgeshire, with the access being located within the adjoining Local Authority, South Cambridgeshire.

4.2 The site is not adjoining any village, within either Local Authority boundaries and forms part of other land in arable farming, although unknown if its within the same ownership.

4.3 The site is bound by established hedgerow to the west where it adjoins the Public Right of Way, (Byway 25/7) with a bank of trees to the east. The ground rises from Wilbraham Road to the site where it then starts to gently slope away.

5.0 RESPONSES FROM CONSULTEES

5.1 Responses were received from the following consultees, and these are summarised below. The full responses are available on the Council's web site.

Bottisham Parish Council- 13 January 2023

In addition to the comments already made to ECDC, Bottisham Parish Council at the January 5th meeting, voted unanimously to support his application.

Bottisham Parish Council - 12 December 2022

The Parish Council would request that construction vehicles should access the site via the A1303/Little Wilbraham Road junction (the junction opposite that The Missing Sock public house), not the A1303/Wilbraham Road junction.

Great Wilbraham Parish Council - 23 December 2022

We would like to register the following concerns with respect to the development:

- 1 HGVs passing through Great Wilbraham. During construction and maintenance of the site we would request that no HGVs should be allowed to pass through Great Wilbraham as they access the site. Access should be from A11 or A1303 via the Six Mile Bottom Road.
- 2 Cable connection of the site to the National Grid. In the past we have experienced substantial disruption as cabling from a solar park in the south of Great Wilbraham parish was laid through Great Wilbraham and on to connection with the National Grid beyond Fulbourn. We understand that the cabling route for the Six Oaks development is still under discussion and will be the subject of a second planning application to SCDC. We would request that cabling should not be allowed to follow routes through Great Wilbraham - specifically routes that may affect our biodiverse public footpaths (such as Streetway) or our public highways through Great Wilbraham.

Little Wilbraham and Six Mile Bottom Parish - 13 January 2023

Whilst the parish council is generally supportive of the application for a solar farm on this site, it has a number of points to raise in relation to this application:

1. Traffic Management Plan. The TMP must take account of the significant increase in traffic that will happen during the construction phase. The Wilbraham Road is a fast, busy through-route and any additional heavy traffic on this road must be subject to careful control.
2. Ridge should work with the local communities and County Highways to ensure that noise, disruption, traffic back-up is kept to a minimum by careful timetabling and by having traffic management liaison staff employed. Following construction, the flow of traffic should be discussed with the local communities.
3. The access point for the site should be patrolled at all times during construction. Notice should also be given of the delivery of any abnormal loads or any other aspects of construction that might lead to traffic back-up.
4. The application is for a solar farm but there are no details given of how the energy produced on site will be connected to the grid at Cherry Hinton. There needs to be a detailed plan produced relating to proposals for the cabling route and this needs to be agreed with County Highways, relevant landowners and with local communities.
5. To date the community involvement arrangements have been directed principally at Bottisham. Although the site is located in Bottisham parish, much of the direct impact of the site will be on our parish of Little Wilbraham and Six Mile Bottom. The parish council believes that the applicant should engage more formally in community involvement that includes the Wilbrahams and Six Mile Bottom.

Ward Councillors - No Comments Received

Local Highways Authority - 28 June 2023

In response to the re-consultations 20th June and 23rd June, I have reviewed the additional information submitted. None of this information seems related to

highways (substation lighting, greenbelt assessment, habitat) so I have no further comments to add.

Local Highways Authority - 30 March 2023

The revised Traffic and Access Statement has addressed most of my previous comments.

The vehicle tracking provided demonstrates that the existing access is sufficient to accommodate one-way HGV traffic. It cannot accommodate two such vehicles passing simultaneously. The risk of two HGVs meeting at the site access can be managed with advanced booking / timing of deliveries (to be confirmed in any future Construction Traffic Management Plans). However, based upon the traffic flow information provided, the access should be sized to allow for an HGV to access the site while a smaller vehicle (van or mini bus) is leaving. Alternatively, due to the tidal nature of forecast traffic, deliveries could be restricted through the CTMP so that they do not coincide with peak arrival / departure timings for construction workers. I note that the applicant has proposed that construction compound and haul road layouts will be detailed within a future CTMP. This approach is agreed in principle, but the applicant should note that the internal construction route needs to be laid out in such a way to ensure the risk of vehicles reversing onto the highway is suitably mitigated. This will need to detail appropriate haul road widths to allow for vehicle passing and / or suitable passing places and space for HGV turning.

I also acknowledge that the applicant is stating that the construction traffic route will only be via the A14 to the north. Site operatives and visitors will need to be informed as appropriate that construction routing is not to take place from the south via Six Mile Bottom and the A11. This can be confirmed in a CTMP.

Provided the applicant addresses the above comment regarding the design / use of the Wilbraham Road junction and a Construction Traffic Management Plan is conditioned, I do not object. In the event that the LPA are mindful to approve the application, please append the following Conditions to any consent granted:
Conditions

HW1A: No development shall take place until full details have been submitted to and approved in writing by the Local Planning Authority to illustrate the following: A Construction Traffic Management Plan which shall include construction traffic routing, timings / management of deliveries, site compound layouts, haul road details and other items as required to demonstrate highway safety will be safeguarded throughout the construction and decommissioning phases.

HW14A: Prior to first occupation or commencement of use of the development sufficient space shall be provided within the site to enable vehicles to enter, turn and leave the site in forward gear and to park clear of the public highway. The area shall be levelled, surfaced, and drained and thereafter retained for that specific use.

Local Highways Authority - 17 May 2023

I have reviewed the additional information submitted in support of the application and my previous comments dated 30th March remain applicable. I am awaiting further information regarding the site access but otherwise the proposals are acceptable.

Local Highways Authority – 11 May 2023

I have reviewed the additional information submitted in support of the application and my previous comments dated 30th March remain applicable. I am awaiting further information regarding the site access but otherwise the proposals are acceptable.

Environmental Health - 23 June 2023

I have read the Substation Lighting Plan documents and am happy with the i

Design Out Crime Officers - 27 June 2023

Thank you for the opportunity to comment on this application. I note the amended plan in relation to the external lighting for the substation.

Experience would suggest that installing large amounts of any expensive and desirable equipment (E.G. Solar Panels and associated cable and infrastructure) in isolated rural locations will attract criminals. This appears to be borne out by the increase in reported offences Nationally, some including violence. With this in mind, the location for such installations is important along with appropriate and proportionate security measures, which will need to be considered on a site-specific basis. Basic crime prevention is about putting layers of security in place to delay and deter criminals. As well as physical security measures such as fencing, there must be either sufficient natural surveillance, monitored electronic security measures, or both prompting an appropriate response.

As per my previous comments regarding perimeter fencing and CCTV, lighting is also an important safety and security measure. Our recommendation for the external lighting is as follows.

- Lighting - A fully qualified lighting engineer should be able to design a lighting plan to provide security and safety of people and the property on site as well as reducing the effects on ecology and local wildlife habitat. Consideration could be given to utilising a PIR system which operates when motion is detected and incorporates a slow rise in the lighting level, minimising glare, and light pollution.

If I can be of further assistance, please do not hesitate to contact me.

Design Out Crime Officers - 13 December 2022

We have seen some cable thefts with violence from similar locations nationally. Cambridgeshire have seen a rise in this type of offence, this includes theft of cables and solar panels. It is also an area known for hare coursing and nighttime poaching.

With the above in mind, please see following recommendations:

- Security Fencing - I note the proposed fencing and landscaping. Our recommendation is that 2m high weld mesh fencing and security gates should be used which would reduce the possibility of climbing or cutting and offers good surveillance.
- CCTV - While CCTV is not a universal solution to security problems, it can help deter vandalism or burglary and assist with the identification of culprits

once a crime has been committed. The provision and effective use of CCTV fits well within the overall framework of security management and is most effective when it forms part of an overall security plan. CCTV should meet BS EN 50132-7: 2012+A1:2013 CCTV surveillance systems for use in security applications. CCTV Signs should conform to the Information Commissioners Office regulations and placed in relevant areas around the site. Our Rural Crime Team (RCAT) request that all CCTV companies are to be made aware of the site layout should there be a camera activation as this assist in a timely deployment of officers.

- Lighting - I would see what lighting is being considered for the site as this will complement the CCTV mentioned above.

National Highways - 7 July 2023

Referring to the consultation on a planning application dated 22 June 2023 referenced above, in the vicinity of the A11 and A14 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- c) recommend that planning permission not be granted for a specified period (see reasons at Annex A).
- d) recommend that the application be refused.

National Highways - 28 July 2023

Referring to the consultation on a planning application dated 22 June 2023 referenced above, in the vicinity of the A11 and A14 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we: recommend that conditions should be attached to any planning permission that may be granted (see Annex A - National Highways recommended Planning Conditions & reasons); Highways Act 1980 Section 175B is/is not relevant to this application.¹This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete. National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

The application site is situated to the south of the A14 and the west of the A11. The proposed development seeks permission for the installation of a Renewable Energy Park, including Ground Mounted solar panels, substation and battery energy storage system and associated infrastructure. Due to the sensitive location between

two SRN Trunk Roads, A11 and A14, we reviewed the accompanying Glint and Glare Assessment. Following a review of the document, we confirm we are content that with the information provided and the proposed mitigation. Accordingly, National Highways are now content that this application can be approved, based on the following planning condition:

Condition 1

The development hereby permitted shall be carried out in accordance with the submitted 'Biodiversity Management Plan: Hedgerows' prepared by Ridge Clean Energy.

Reason - To ensure the safe operation of the A11 and A14 trunk roads.

Standing advice to the local planning authority

The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of PAS2080 promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Environment Agency - 3 May 2023

Thank you for consulting us on the above application. We have reviewed the new documents as submitted and we have no further comments. Please refer to our previous letter referenced AC/2022/131378 for information regarding our no objection and proposed conditions.

Lead Local Flood Authority - 16 May 2023

we can remove our objection to the proposed development.

The above documents demonstrate that surface water from the proposed development can be managed through the use of suitable planting to mitigate the surface water runoff from the solar panels. Swales are also proposed throughout the scheme to intercept any overland flows and assist in the discharge of water back into the ground. The gravel area in the southeast of the site will drain into a basin, which subject to infiltration testing will discharge water back into the ground.

We request the following conditions are imposed:

Condition

No laying of services, creation of hard surfaces or erection of a building shall commence until a detailed design of the surface water drainage of the site has been submitted to and approved in writing by the Local Planning Authority. Those elements of the surface water drainage system not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved management and maintenance plan.

The scheme shall be based upon the principles within the agreed Flood Risk Technical Note prepared by RAB Consultants (ref: RAB3018 Version 1.0) dated 25 April 2023 and shall also include:

- a. Full results of the proposed drainage system modelling in the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance.
- b. Detailed drawings of the entire proposed surface water drainage system, attenuation, and flow control measures, including levels, gradients, dimensions, and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it).
- c. Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections).
- d. Site Investigation and test results to confirm infiltration rates.
- e. Demonstration that the surface water drainage of the site is in accordance with DEFRA non-statutory technical standards for sustainable drainage systems.
- f. Full details of the maintenance/adoption of the surface water drainage system.
- g. Permissions to connect to a receiving watercourse or sewer.

Reason

To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development and to ensure that the principles of sustainable drainage can be incorporated into the development, noting that initial preparatory and/or construction works may compromise the ability to mitigate harmful impacts.

Condition

No development, including preparatory works, shall commence until details of measures indicating how additional surface water run-off from the site will be avoided during the construction works have been submitted to and approved in writing by the Local Planning Authority. The applicant may be required to provide collection, balancing and/or settlement systems for these flows. The approved measures and systems shall be brought into operation before any works to create buildings or hard surfaces commence.

Reason

To ensure surface water is managed appropriately during the construction phase of the development, so as not to increase the flood risk to adjacent land/properties or occupied properties within the development itself; recognising that initial works to prepare the site could bring about unacceptable impacts.

Informatives

Infiltration

Infiltration rates should be worked out in accordance with BRE 365. If infiltration methods are likely to be ineffective then discharge into a watercourse/surface water

sewer may be appropriate; however, soakage testing will be required at a later stage to clarify this.

OW Consent

Constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under the Land Drainage Act 1991. Ordinary watercourses include every river, drain, stream, ditch, dyke, sewer (other than public sewer) and passage through which water flows that do not form part of Main Rivers (Main Rivers are regulated by the Environment Agency). The applicant should refer to Cambridgeshire County Council's Culvert Policy for further guidance:

<https://www.cambridgeshire.gov.uk/business/planning-and-development/water-minerals-and-waste/watercourse-management/>

Please note the council does not regulate ordinary watercourses in Internal Drainage Board areas.

Pollution Control

Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

County Highways Transport Team - 6 December 2022

Based on the information submitted, I am unable to make an informed decision on the application.

Traffic Volumes

The submitted Traffic and Access Statement includes details of HGVs only and omits other vehicle trips associated with contractors / site operatives / visitors. This is not accepted. Any assessment must be based upon total anticipated vehicle flows. As construction traffic is expected to fluctuate throughout the nine-month programme, the applicant will need to highlight the anticipated variation in traffic over this length of time.

To quantify whether highway impacts of construction traffic may be considered severe, the applicant has benchmarked the development impacts against traffic flows obtained from a Department for Transport traffic count (ID 800343). This data contains out of date (2018) Annual Average Daily Flows only which cannot be disaggregated by time. Instead, the application should be based upon observed traffic flows which can be easily obtained by placing an Automatic Traffic Counter along Wilbraham Road. The survey date should be no older than three years from date of application determination. Traffic flows have only been provided for the construction phase. While this may be the most intense phase of the development lifecycle, data must also be provided for the operational and decommissioning phases as there could be residual impacts in need of consideration.

One abnormal load is anticipated throughout the construction phase. I would like to ask the applicant to clarify if this will be abnormal in weight or width / length. If the load is of abnormal dimensions, supportive vehicle tracking may be required. Construction traffic routing is shown via the A14 and the A1303. I would like to ask the applicant to clarify if this is the only permitted routing as, access via the A11 is

more direct if arriving from the south. That being said the A1304 / Wilbraham Road / Brinkley Road crossroads is not necessarily suited for large construction vehicles and is particularly ill suited any abnormally sized loads.

Site Access - Construction

Access is proposed for the construction phase from an existing agricultural access, although based upon the submitted information, it is difficult to identify the specific location.

An existing access is not necessarily suitable for intensification of use without mitigating works. The applicant will therefore need to submit details of the existing access arrangements, and potentially an enhanced design. For avoidance of doubt, the Local Highway Authority's minimum requirements are set out below:

- The access must be capable of achieving inter-vehicle visibility splays commensurate with the signed speed limit (4.5m x 215m in this case). However, I will accept reduction in the y-distance based upon the observed 85th percentile vehicle speed. The necessary visibility splays must be fully contained within the application boundary and / or the highway boundary.
- The access must be sized to allow passing of the largest vehicles expected to need regular access to the site, presumably a 16.5m articulated truck and 12m rigid truck.
- The access must have a metalled surface for the length of the largest anticipated construction vehicle or 10m from the carriageway edge, whichever is longer.
- Any gates across the construction access must be set back sufficiently to allow the largest anticipated vehicle space to wait fully off the highway, or else the gates must stay open throughout the working day.

Site Access - Operation / Decommissioning

The submission states that some regular access will be required during the 40-year operational phase prior to the final decommissioning stage where there will again be an intense period of activity. It is unclear what access arrangements will be maintained for operation / decommissioning and what vehicles the access needs to be designed for. I would like to seek this clarification from the applicant.

Site Layout

The applicant states that the internal construction access route will have a typical width of 4m. This is insufficient to allow two vehicles to pass and thus could result in vehicles reversing onto the public highway. This arrangement may be acceptable with the inclusion of regular passing places, but in absence of a plan showing the access road, I am unable to advise further.

A site-specific layout, rather than a typical layout, should be provided for the construction compound. However, should the applicant prefer, this can be omitted for a future Construction Traffic Management Plan (to be conditioned).

Summary

In summary, I require the following information:

- All vehicle trip generation for construction, operational and decommissioning phases. Trip generation for the construction phase needs to be profiles across the nine-month build out.
- Clarification regarding construction traffic routing.

- A (dimensioned) design for the site access capable of safely accommodating intensified traffic flows. If no mitigation is deemed necessary, details of the existing access must still be included.
- Supportive vehicle tracking for the site access.
- Visibility splays commensurate with the stopping sight distance for the signed speed limit or 85th percentile observed vehicle speed.
- Internal access route layout, inclusive of passing places.
- Observed and up-to-date traffic flows along Wilburton Road.

If the applicant is unwilling or unable to amend the application or provide additional information as outlined above, please advise me so I may consider making further recommendations, possibly of refusal. This response should be read in parallel to that of the County's Transport Assessment team and Definitive Map Officer.

ECDC Trees Team - 1 August 2023

No comments further to those made 16th May 2023 requiring the provision of a soft landscaping scheme including a planting and maintenance specification by condition. The soft landscaping details must include:

- 1) A scaled plan showing the locations of new and existing vegetation
- 2) A tree pit design specification (See below)
- 3) A schedule detailing sizes and numbers/densities of all proposed trees/plants (Hedging ideally needs to be planted at 0.60m centres in a double staggered row, usually a 20% mix of five species for a native species hedge)
- 4) Specifications for operations associated with plant establishment (planting specification, weed control, mulching, watering pruning etc.) to include a program for the timings of the landscape works and maintenance, to ensure successful establishment and survival of new planting and having regard to the timing of the commencement of the development hereby permitted.

Tree pits to be excavated to a minimum size of 600mm larger than the container, root ball or bareroot stock and shall be square so as to avoid root girdling issues.

The base of the tree pit shall be slightly domed and only 'broken' up in the event of inadequate drainage.

Backfill tree pit with subsoil up to ~400mm depth from ground surface and with topsoil above ~400mm depth from ground surface or to match the existing soil profiles.

Watering 'dishes' to be created around the base of each tree, to hold water directly over root ball during watering.

1m diameter mulched dish for Standard trees/3.0m in height or smaller

Bare root, root ball or container multi-stem trees shall be single staked as a minimum double staked as required, fixed with suitable tree ties (biodegradable if available and suitable)

Trees to be mulched with minimum 50mm settled depth, medium grade ornamental wood mulch.

Trenches for hedge planting will be dug to a minimum depth of 400mm and width of 600mm, with the plants put into the ground at the same depth at which they had been previously grown in the nursery.

All plants need to be well heeled in after planting and watered in during dry weather.

All hedging to be mulched with minimum 50mm settled depth, medium grade wood mulch.

As most hedging plants are supplied as bare root specimens measures are to be taken ensure that the roots do not dry out prior to planting such as healing in or covering root with damp straw.

Planting to be undertaken in the first planting season (October to February) after completion of development activities.

ECDC Trees Team - 16 May 2023

The revised habitat enhancement drawings provide information on the location of new and restorative hedge planting and a percentage mix for these areas which is acceptable subject to supplying a planting and maintenance specification. The seven new trees indicated for planting adjacent to the battery storage area have not been specified as to what species they will be, nor do they have a planting and maintenance specification but all the details relating to the soft landscaping scheme can be provided by condition if required.

The previously mentioned concerns regarding the trees adjacent the underpass shading out solar panels has been removed with the area most likely to be shaded now identified as becoming new native grassland for nesting birds.

Therefore, there are now no tree related objections to this application subject to the provision of a soft landscaping scheme including a planting and maintenance specification by condition. The soft landscaping details must include:

- 1) A scaled plan showing the locations of new and existing vegetation.
- 2) A tree pit design specification (See below)
- 3) A schedule detailing sizes and numbers/densities of all proposed trees/plants (Hedging ideally needs to be planted at 0.60m centres in a double staggered row, usually a 20% mix of five species for a native species hedge)
- 4) Specifications for operations associated with plant establishment (planting specification, weed control, mulching, watering pruning etc.) to include a program for the timings of the landscape works and maintenance, to ensure successful establishment and survival of new planting and having regard to the timing of the commencement of the development hereby permitted.

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Backfill tree pit with subsoil up to ~400mm depth from ground surface and with topsoil above ~400mm depth from ground surface or to match the existing soil profiles.

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Trenches for hedge planting will be dug to a minimum depth of 400mm and width of 600mm, with the plants put into the ground at the same depth at which they had been previously grown in the nursery.

All plants need to be well heeled in after planting and watered in during dry weather.

All hedging to be mulched with minimum 50mm settled depth, medium grade wood mulch.

As most hedging plants are supplied as bare root specimens measures are to be taken ensure that the roots do not dry out prior to planting such as healing in or covering root with damp straw.

Planting to be undertaken in the first planting season (October to February) after completion of development activities.

ECDC Trees Team - 2 February 2023

The design and access statement mentions a scheme for soft landscaping, yet this has not been provided. Tree planting stated to comprises of 7 Rowans which don't tend to do well locally as such are scarce in this locality, these trees are also a small-scale species unlikely to offer significant screening. Block plan does not include and landscaping either existing or proposed but indicates the removal of all the existing hedges within the site which includes species rich defunct hedge in the centre of site. The trees adjacent the underpass are likely to shade adjacent panels but the application does not include an arboricultural assessment or a hedgerow assessment to allow assessment of this, the shading information should also take account of the future growth potential of these trees for the life of the scheme. All the hedgerows should be assessed in accordance with the 1997 hedgerow regulations.

County Council Ecologist - 29 December 2022

We are concerned that the proposal scheme has the potential to result in adverse impact to a County Wildlife Site, as discussed below. We are also concerned about the likelihood of the proposed Biodiversity and Landscape Management Plan being delivered.

We recommend that East Cambridgeshire's ecological advisor (Wildlife Trust) be consulted on these matters, as well as the assessment for protected species, such as adverse impacts to ground-nesting birds.

Proposals

Proposal comprises an array of ground-mounted solar photovoltaic panels (max. 3m in height) is set out within a fenced area of approximately 72.4 hectares and Battery Energy Storage System (BESS). As well as necessary electrical and supporting infrastructure to export and generate electricity to the grid and charge the battery.

Access to the site is required during construction, through operation, and finally during the decommissioning of the site at the end of the project's operational life. Proposed development will be accessed from Wilbraham Road, using existing farm entrances and farm tracks, crossing the Heath Road Byway Open to all Traffic. Where sections of new, upgraded or widened access track are required, these will have the appearance of typical vernacular farm tracks with a crushed stone running surface. The running surface (4.5m wide) is laid over a stone sub-surface which itself is typically constructed upon a geotextile membrane A perimeter fence would be installed to protect the panels from theft. The fence will be stock style fencing with wooden posts and open wire mesh up to 1.8m tall.

Chapter 8 of the written statement does not set out any landscape scheme or biodiversity enhancement as part of the proposal.

Heath Road/Street Way Green Lanes County Wildlife Site

We are concerned that the ecological assessment of the Heath Road/Street Way Green Lanes County Wildlife Site is inaccurate. Paragraph 9.867 of the Written Statement (Volume 2B) states that: "One County Wildlife Site, the Heath Road/Street Way Green Lanes lies adjacent to the proposed development. It will be crossed by the site access track". However, a section of Heath Road/Street Way Green County

Wildlife Site (CWS) falls within the red-line boundary (see figure 9.1).

The proposal includes a maintenance track to be constructed within this County Wildlife Site (figure 1.2). The proposed tracks for the development will have the "appearance of typical vernacular farm tracks with a crushed stone running surface built up over geotextile placed on top of prepared (scraped and levelled) topsoil at, or just below, existing ground level" (paragraph 8.11, Written Statement, Volume 2A). The Typical Access Track Detail (figure 7.3) drawing also shows excavations of the shoulder of the track to contain cables, with the turf or topsoil being reinstated and re-seeded.

This CWS is designated for its grassland and nationally scarce flora. The section of CWS within the Site has been recorded as neutral grassland and bordered by hedgerows on the Phase 1 Habitats Map (figure 9.2). The proposed removal of topsoil and compaction of the soils / surfacing works, as part of the creation of a maintenance track, will result in the permanent loss of the grassland habitat and potentially nationally scarce plant populations for which the County Wildlife Site has been designated. Any works within the shoulder of the track, including excavations and reseeded, has the potential to further degrade the quality of the CWS grassland habitat. It is likely that the scheme will result in adverse impact to this local wildlife site. The assessment hasn't determined the level of impact on this wildlife site, nor incorporated any avoidance, mitigation, or compensation measures.

Therefore, we object to the current proposal.

The ecological assessment must be updated to assess the level of impact of the scheme on the County Wildlife Site. This should include detailed botanical surveys to assess the baseline condition of the County Wildlife Site, as well as identifying the location of any notable plant species, for which it is designated. The mitigation hierarchy must be followed, and all works must be excluded from the County Wildlife

Site. Where this is not possible, mitigation measures should be adopted, with any residual impact addressed through compensation measures. Opportunities to enhance the County Wildlife Site should be incorporated into the scheme.

The ecological assessment should also consider the cumulative impact of the "underground 33kV cable will run from the substation compound across fields to Wilbraham Road and on to Fulbourn Substation following the highway and field/track margins".

This MV cable (shown on Figure 1.2) will result in the excavation of a substantial proportion of the grassland within the section of County Wildlife Site located to the south of the proposed red-line boundary. Although these works are subject to separate consenting procedures, it is understood they are integral to the solar farm scheme. The combined on-site habitat loss and off-site degradation to this County Wildlife Site, directly as a result of this solar farm, has the potential to result in

the loss of nationally scarce plants and a significant amount of the grassland for which the CWS has been designated. This must be considered as part of the current application.

Biodiversity And Landscape Management Plan (Appendix 9-3, Volume 2B)

The proposed development set out at Chapter 8 of the Written Statement (Volume 2B) does not commit to any landscape or biodiversity enhancement as part of the scheme. The application is not supported by an outline landscape scheme / parameters plan. We are therefore concerned that the applicant is not committed to deliver the biodiversity mitigation, compensation and enhancements set out in the Biodiversity and Landscape Management Plan.

Furthermore, we consider that some of the proposals within the BMLP are unrealistic or not adequately incorporated into the scheme design:

The BLMP proposes to restore lowland species-rich grassland across the entire site, stating that it "will be managed after construction of the Project either by sustainable grazing or cutting". Other solar farms have demonstrated that the majority of the grassland will develop into poor quality grassland, supporting only a small number of plants that can tolerate the extreme conditions, with species-rich grassland restricted to the small areas of tracks between the arrays that are unaffected by shading that can be managed effectively.

We note the aspiration to graze the site to maximise its biodiversity value but in reality, very few solar farms are grazed, this is a particular concern given the lack of commitment by the Applicant to graze the site. As a result, it is recommended that the site be identified as modified grassland rather than neutral grassland (UK Habitats criteria).

The BLMP states that the fence will be designed / managed to "avoid barriers to mammal movement". However, this is not demonstrated within the submission documentation, with neither the Typical Fence Design drawing (figure 7.3) or Outline Landscape and Biodiversity Mitigation and Enhancement Plan (figure 9.3) showing any access points / permeability of the fence for wildlife. It is considered that the proposed line of Rowan trees (see Figure 9.3) is not characteristic of the local landscape. We suggest ECDC's landscape / tree officer be consulted on this issue. We seek that native tree species resilient to predicted climate change are selected. No tree planting should be undertaken within the County Wildlife Site.

The BLMP provides no compensation measures for the loss of habitat for breeding farmland birds associated with open ground, such as lapwing, skylark, yellow wagtail, and corn bunting. These adverse impact further compound by loss of suitable arable farmland as a result of other solar farms and other development in Cambridgeshire. Adequate compensation must be provided. Finally, it is noted that the Outline Landscape and Biodiversity Mitigation and Enhancement Plan (figure 9.3) doesn't accurately reflect the proposed development, such as the omission of maintenance tracks shown on the PV layout drawing REC1002-100 Rev A (figure 1.2).

Cambridge Airport - 3 February 2023

We refer to your consultation email dated 31st January 2023. The airport safeguarding team has assessed the proposal in accordance with the CAA ADR -

Aerodromes Regulation 139-2014 and it does not conflict with the safeguarding criteria for the airport. Accordingly, we have no aerodrome safeguarding objection to the proposal based on the information provided.

Defence Infrastructure Organisation Safeguarding (Wind Turb) - 6 February 2023

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System. The applicant has submitted an Environmental Statement Full application seeking Environmental Impact Assessment approval for a proposed Installation of ground mounted solar array and Battery Energy Storage System

The application site occupies the statutory safeguarding zones surrounding Cambridge Airport. In particular, the height, and bird strike safeguarding zones surrounding Cambridge Airfield and is approximately 7.3km from the centre of the Airfield.

After reviewing the application documents, I can confirm the MOD has no safeguarding objections to this proposal.

The MOD must emphasise that the advice provided within this letter is in response to the data and information detailed within the developer's document, submitted in support of application 22/01291/ESF, as referred to in the consultation letter dated 23rd November 2022, received from East Cambridgeshire District Council.

Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Environment Agency - 25 August 2023

Thank you for the consultation dated 04 August 2023. We have reviewed the documents as submitted and our position of no objection remains the same from our previous response (referenced AC/2022/131378/01 and dated 13 December 2022). Our recommended condition from this response still stands. See the section below for further information.

Information regarding Battery Energy Storage Systems, also previously referred to in AC/2022/131378/01, still remains relevant.

Required Information

We have reviewed document 'RAB 3018 TECHNICAL NOTE' dated 27 April 2023. The additional information referred to in document only deals with surface water. The condition we recommended also includes foul drainage and how firewater will be dealt with. Neither of these issues appear to have been addressed yet.

Environment Agency - 13 December 2022

We have no objection to the proposed development provided the below planning condition is included on any planning permission.

The proposed location overlies a major aquifer which is used extensively for public drinking water supply abstractions. The south-east corner of the site where the substation and battery storage compound are located is within a Source Protection Zone (SPZ) 2. Any pollutants entering the ground in this area will reach the abstraction point within 400 days. The rest of the site is within a SPZ3. Any pollutant entering the ground in this area will eventually end up at the abstraction point.

There appears to be a culverted watercourse running through the south-west corner of the site. The applicant should ascertain the exact location of this culvert prior to starting any works at site.

There is very little information on any proposed drainage arrangements on site. There is no mention of foul drainage arrangements during the construction phase. Consideration should be given to how any firewater will be contained and disposed of in the event of a fire at the site.

Environment Agency position

The proposed development will be acceptable if the following measures are implemented and secured by way of a planning condition on any planning permission.

Condition

The development hereby permitted shall not be commenced until such time as a scheme to:

- dispose of foul and surface water
 - contain and dispose of any contaminated water resulting from firefighting has been submitted to, and approved in writing by, the local planning authority.
- The scheme shall be implemented as approved.

Reason(s) - To protect ground and surface water.

General comments on Battery Energy Storage Systems

Energy storage will play a significant role in the future of the UK energy sector. Effective storage solutions will benefit renewables generation, helping to ensure a more stable supply and give operators access to the Grid ancillary services market. The National Grid's Enhanced Frequency Response programme will provide a welcome catalyst for a significant level of battery storage deployment in the UK. Currently, DEFRA does not consider the need to regulate the operation of battery energy storage systems (BESS) facilities under the Environmental Permitting Regulations regime. Although these are a source of energy to the National Grid they do not result in the direct impact to the environment during normal operations. We do not generally object to battery storage proposals, however, the potential to pollute in abnormal and emergency situations should not be overlooked. Applicants should consider the impact to groundwater from the escape of firewater/foam and any metal leachate that it may contain. Where possible the applicant should ensure that there are multiple 'layers of protection' to prevent the source-pathway-receptor pollution route occurring. In particular, proposals should avoid being situated near to rivers and sensitive drinking water sources.

However, an important factor that can be overlooked by parties involved in new battery storage projects or investing in existing projects is that battery storage falls within the scope of the UK's producer responsibility regime for batteries and other waste legislation. This creates additional lifecycle liabilities which must be understood and factored into project costs, but on the positive side, the regime also creates opportunities for battery recyclers and related businesses. Operators of battery storage facilities should be aware of the Producer Responsibility Regulations. Under the Regulations, industrial battery producers are obliged to:

- take back waste industrial batteries from end users or waste disposal authorities free of charge and provide certain information for end users.
- ensure all batteries taken back are delivered and accepted by an approved treatment and recycling operator.
- keep a record of the amount of tonnes of batteries placed on the market and taken back.
- register as a producer with the Secretary of State.
- report to the Secretary of State on the weight of batteries placed on the market and collected in each compliance period (each 12 months starting from 1 January). Putting aside the take back obligations under the producer responsibility regime, batteries have the potential to cause harm to the environment if the chemical contents escape from the casing. When a battery within a battery storage unit ceases to operate, it will need to be removed from site and dealt with in compliance with waste legislation.

The party discarding the battery will have a waste duty of care under the Environmental Protection Act 1990 to ensure that this takes place. The Waste Batteries and Accumulators Regulations 2009 also introduced a prohibition on the disposal of batteries to landfill and incineration. Batteries must be recycled or recovered by approved battery treatment operators or exported for treatment by approved battery exporters only. Many types of batteries are classed as hazardous waste which creates additional requirements for storage and transport.

Other advice to applicant

Construction phase activities need to be carefully managed to prevent pollution. An overview of pollution prevention advice can be found here:

<https://www.gov.uk/guidance/pollution-prevention-for-businesses>

We would advise early discussion with the Environment Agency regarding any proposed discharges to watercourse/land as part of this development, e.g. dewatering.

Fuel, oil and chemical storage needs to comply with the Control of Pollution (Oil Storage) (England) Regulations 2001 where relevant. For further information see here: <https://www.gov.uk/guidance/storing-oil-at-a-home-or-business>

Spill kits should be located in delivery and storage areas in the event of a spillage or leak.

Only clean uncontaminated surface water should be discharged to any watercourse, soak away (including SUDS) or surface water sewer.

Vehicle washing effluent must be collected and disposed of to an appropriately authorised site. Sewage should be discharged to the foul sewer where possible. If

this is not possible then please refer to this page of our website for other options and requirements: <https://www.gov.uk/permits-you-need-for-septic-tanks>.

Operational phase

During the operational phase there is a potential risk to groundwater from small leakages of chemicals from the solar panels. Regular inspection and maintenance of these structures is key to reducing the likelihood of this occurring.

Permanent structures containing oil, e.g. transformers, fuel/oil storage tanks, should be provided with the appropriate level of secondary containment (see above link to guidance on oil storage) which is regularly inspected, and any spillages or leaks dealt with as soon as possible. Spill kits should be provided in these areas and staff should be trained on what to do in the event of a spillage/leak.

Historic England - 21 December 2022

Historic England provides advice when our engagement can add most value. In this case we do not wish to offer advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Cambs Wildlife Trust - 4 July 2023

I have reviewed the additional Skylark Management Plan and Habitat Enhancement Figures 1 & 2. I can confirm that the measures proposed including numbers of plots and broad locations are acceptable, as is the proposed monitoring regime. I am therefore happy to sign off these documents as suitable mitigation for the proposed development, along with the other measures set out in other ecological reports.

Cambs Wildlife Trust - 26 May 2023

This professional ecological advice has been provided in accordance with the Service Level Agreement held with East Cambridgeshire District Council.

The additional drawings supplied show a 15-metre grassland buffer to the Heath Road County Wildlife Site which would be acceptable if it comprises native species-rich grassland. The plans show the locations of new hedgerows and their proposed species mixes, though these do not include the additional species I suggested. The plans also show locations for proposed grassland strips for breeding birds such as skylark. However, these are likely to be too narrow to be effective as it has been shown that skylarks prefer large open areas away from hedgerows or structures such as solar panels. This aspect of the proposals remains unacceptable, and it is likely that an off-site mitigation on an adjacent farmland may be a more realistic mitigation & compensation solution for this species.

Many of the detailed comment I made in my previous response of 16/12/2022 will need to be integrated into the proposed Biodiversity Management Plan, should the application be approved.

I hope these comments are of help to you. If you have any queries regarding this advice, please don't hesitate to contact me.

Cambs Wildlife Trust - 16 December 2022

This professional ecological advice has been provided in accordance with the Service Level Agreement held with East Cambridgeshire District Council.

Ecological Impact Assessment

The submitted ecological chapter of the Environmental Statement covers all the relevant issues and has included a comprehensive range of surveys, including some of the most extensive surveys for birds of any solar park proposal locally. The full range of ecological impacts has been described and a range of appropriate avoidance, mitigation and enhancement recommendations included. However, there are a number of changes as well as a number of additional measures which should be incorporated into the scheme, which are set out below in my comments on the biodiversity management plan.

There are also a number of points of clarification that are required from the ecological information submitted.

The ecological chapter and Biodiversity Management Plan (BMP) both refer to the enhancement of 2.5 Km of hedgerow and the creation of 1.1 Km, however, I have not been able to find a plan showing where these improvements are located. In addition, the hedgerow biodiversity net gain assessment only describes a 2% gain, which is significantly below what would be expected with this amount of hedgerow creation and enhancement. From looking at the BNG assessment spreadsheet, it appears that the hedgerow enhancement tab has not been completed which may account for the discrepancy. The applicants should clarify this apparent contradiction and provide a plan showing where hedgerows will be retained, enhanced, and created.

The application site is adjacent to the Heath Road / Street Way County Wildlife Site (CWS), selected for its species-rich grassland, which in the past was more calcareous in nature, though now tends towards neutral grassland due to years of sub-optimal or limited management. A 5-metre buffer is proposed along all hedgerows, and therefore I presume also along the CWS. However, the extent of the buffer along the CWS could usefully be widened to help facilitate better management of the CWS and to facilitate natural colonisation of the CWS wild plants into any newly created grasslands. The quality of any wildflower grassland under and between the solar panels is likely to be limited by practical constraints to management, for example hay cutting not being practical between solar panels, and the difficulties of securing grazing management in this mainly arable farmed part of the country. Therefore, the creation of a wider buffer, for example 20 metres of species-rich grassland that could be managed in a more ideal way in conjunction with the CWS would be a significant improvement to the scheme. We also strongly suggest that management of the CWS forms part of the proposals and is included within the BMP.

The ecology chapter and BMP both refer to provision being made for ground nesting birds adversely impacted by the proposed development. However, there isn't a plan showing where this will be located, and the extent of proposed solar panels would not appear to allow for this within the boundary of the application site? Skylarks are unlikely to nest among the panels in significant numbers, so the location should be shown now, particularly if it requires removal of some of the solar panels or an off-site solution.

Biodiversity Management Plan

The Biodiversity Management Plan (BMP) includes a number of acceptable proposals, so I have not commented on those and only make observations below where I have comments or concerns.

I welcome the broad approach to wildflower grassland creation, including pre-design soil testing (essential) and use of seeding supplemented with green hay from the adjacent CWS (if possible). This latter approach has the potential to help deliver better management to the CWS which it desperately needs. While the possibility of grazing the new grasslands is described, this may be a challenge to achieve and without it, the quality of the new grassland habitats is likely to be limited. This however is accounted for in the BNG assessment (see below).

The Breeding Bird Protection Plan is also welcome. The proposed hedgerow management to allow hedges to grow to 3 metres high and 2 metres wide and be allowed to flower and fruit is also welcome. I would just like to clarify that this is possible, and that this objective won't be compromised by the location of the hedgerows in relation to the solar panels.

I have a number of comments and proposed changes to the Biodiversity Management Plan, which are set out below:

- Management of the Heath Road / Street Way Green Lanes CWS should form part of the proposals and be included within the BMP.
- A wider buffer (suggested minimum 20 metres) of species-rich grassland should be created adjacent to the CWS.
- A bespoke wildflower species mix should be used for the grassland creation, including a number of locally appropriate chalk species. Although Heath Road CWS has been described as neutral grassland it is at the calcareous end of the neutral spectrum and would with better management tend toward calcareous grassland (as it was in the past).
- The suggestion of grazing management is welcomed but may be challenging to achieve. The proposed alternative cutting approach (one cut in August / September) will not sustain good quality grassland habitat on former nutrient enriched arable soils. Firstly, the cuttings will need to be removed, and secondly, a second cut is likely to be required in early spring, or alternatively much of the grassland mown short during the autumn and early spring growing season.
- The species mix for the proposed hedgerows could be further enhanced with the addition of species typical of the local chalk landscape, planted at a low frequency, including Buckthorn, Dogwood, Wayfaring Tree, and Privet.
- The location of the proposed area for ground nesting birds should be shown now in the outline BMP.

- Why has Rowan been selected for planting in the south-east corner? This is not a typical species of the chalk landscape, so would a more locally appropriate species be better?
- Where are the locations for the proposed bird & bat boxes and are these required if the proposed tall and thick hedgerows are planted? If they are to be included, there should be a plan showing their locations.
- The proposal is for a 20 cm gap at the base of all security fencing. However, will that be compatible with sheep grazing? Would the alternative of mammal gates also suggested be better?
- The monitoring proposals for habitat creation and birds are welcomed. I do however recommend that the monitoring of the habitats is continued throughout the whole life of the development to demonstrate delivery of BNG and wider biodiversity objectives for the full 40 years of the solar park. Additional monitoring should take place at year 20, 30 and 40.

As the submitted BMP is only an outline, significant more detail in a full plan will be required prior to commencement of development.

Biodiversity Net Gain Assessment

The submitted Biodiversity Net Gain (BNG) assessment provides an accurate representation of the baseline conditions of the application site and appropriate predictions for the post-development biodiversity value. The habitat baseline has been assessed as 152 Biodiversity Units (BU), and the post development situation predicted to achieve 252.52 BU, a net gain of 100.52 BU (or 66%). This is based on the change from arable cropland to low value grassland habitats.

The hedgerow baseline has been assessed as 123.4 Hedgerow Biodiversity Units (HBU) and post development situation as 125.4 HBU, a net gain of 2%. This figure does not seem accurate as the enhancement of 2.5 Km and creation of 1.1 Km of new hedgerow would be expected to achieve a significant increase. Addition of the hedgerow enhancement tab into the metric may resolve this apparent anomaly.

Conclusions

The ecological report and Biodiversity Management Plan should both be updated to incorporate these changes. If planning permission is granted, the recommendations in the ecological report (updated with our additional proposals) should be secured through the use of appropriately worded planning conditions. With these changes there are no biodiversity policy reasons to refuse this application.

However, there is a wider sustainability question of whether arable land capable of growing food should be converted to solar parks, rather than solar being developed associated with existing and new buildings? The loss of the cropland potentially has an indirect negative impact on biodiversity elsewhere if habitats are lost to grow food crops elsewhere in the UK or world. Likewise, the loss of cropland to solar parks, reduces the potential for cropland elsewhere to be devoted to nature recovery with the creation of higher quality habitats in the right locations and better than anything that will be achieved under a solar park.

I hope these comments are of help to you. If you have any queries regarding this advice, please don't hesitate to contact me.

Asset Information Definitive Map Team - 22 December 2022

I write in response to the application of the Installation of a Renewable Energy Park comprising ground mounted solar panels; access tracks; inverters, transformers; substation and battery energy storage system; customer cabin; underground cables and conduits; perimeter fence; CCTV equipment; temporary construction compound; and associated infrastructure and planting scheme, at Six Oaks Renewable Energy Park Newmarket Road Bottisham Cambridgeshire.

The site is bordered to the east by Public Byway 7, Bottisham, with one point being used for access. To view the location of the Byway please view our interactive map online which can be found at <http://my.cambridgeshire.gov.uk/myCambridgeshire.aspx>. Below are our comments on the application:

According to your design and access statement: DA.54 The solar farm will have a perimeter fence, which will be stock style fencing with wooden posts. This type of fencing is chosen to be less intrusive and more rural in character than other types of fencing.

- Temporary fencing with shielding netting should be erected alongside all PROW and permissive paths before construction commences and maintained until hedges are high enough to shield users from the visual impact of the development.
- The British Horse Society advice on Solar Farms noise explains that noise from inverters can be intrusive, and could potentially be disturbing to equestrian users of the Bridleway 204/5. It should be noted that a horse's range of hearing is wider than a humans and sounds are audible at lower decibels.
- With regard to the proposed fencing and landscaping and the public rights of way, this will need to be set back from the PRoW in accordance with the County Council's boundary policy which is available to view in the guidance for planners and developers document available here [Public Rights of Way - Guidance for Planners and Developers v4 \(cambridgeshire.gov.uk\)](http://cambridgeshire.gov.uk).

Whilst the Definitive Map Team has no objection to this proposal, the Byway must remain open and unobstructed at all times.

Informatives

Should you be minded to grant planning permission we would be grateful that the following informatives are included:

- Public Byway 7, Bottisham must remain open and unobstructed at all times. Building materials must not be stored on Public Rights of Way and contractors' vehicles must not be parked on it (it is an offence under s 137 of the Highways Act 1980 to obstruct a public Highway).
- The Public Byway must not be used to access the development site unless the applicant is sure they have lawful authority to do so (it is an offence under S34 of the Road Traffic Act 1988 to drive on a Public Byway without lawful authority).

- No alteration to the Byway's surface is permitted without our consent (it is an offence to damage the surface of a public footpath under s 1 of the Criminal Damage Act 1971).
- Landowners are reminded that it is their responsibility to maintain boundaries, including trees, hedges, and fences adjacent to Public Rights of way, and that any transfer of land should account for any such boundaries (s154 Highways Act 1980).
- The granting of planning permission does not entitle a developer to obstruct a Public Right of Way (Circular 1/09 para 7.1).
- Members of the public on foot, horseback and pedal cycle have the dominant right of passage along the public byway; private vehicular users must 'give way' to them.
- The Highways Authority has a duty to maintain Public Rights of Way in such a state as to be suitable for its intended use. (S41 Highways Act 1980 and S66 Wildlife & Countryside Act 1981). If the surface of the Byway is damaged as a result of increased motorised vehicle usage, the Highways Authority is only liable to maintain it to a Byway standard. Those with private vehicular rights will therefore be liable for making good the surface of the Public Right of Way.

Furthermore, the applicant may be required to temporarily close public rights of way whilst construction work is ongoing. Temporary Traffic Regulation Orders (TTROs) are processed by the County Council's Street Works Team and further information regarding this can be found on the County Council's website at <https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/roads-and-pathways/highway-licences-and-permits/>

Cambridge Ramblers Association - 29 November 2022

I am responding on behalf of the Cambridge Group of the Ramblers, a statutory consultee, to Planning Application 22/01291/ESF in Bottisham by Six Oaks Renewable Energy Park.

We have no substantive comments on the proposal to construct a renewable energy park, involving a large number of solar panels on land between the A14 and A11 in Bottisham parish. However, we are concerned about the proposals insofar as they impact on the restricted byway Heath Road, running from grid refs 558596 to 576586, as well as the byway known as Street Way, running from grid refs 562580 to 573587.

We are very pleased to read that the applicants propose to avoid using Heath Road as an access for construction traffic - and, presumably, ongoing maintenance. We request that a condition of any planning permission granted should explicitly state that no construction or maintenance traffic should access the site via Heath Road; the only exception is the crossing point from the farm tracks identified in the planning documents.

We note the Environmental Statement's promises to enhance the hedgerows alongside the north/east side of Heath Road - namely maintenance which will enable the hedgerow to grow by a further 1 metre high over 4 years, with infilling of sections of the route where the hedgerow is currently missing or sparse. We request that ongoing maintenance and improvement to this hedgerow is also included as a planning condition. This should cover the entire 40-year life of the development. We also request that the proposed tree planting alongside Heath Road by the new battery storage area traffic access road is well-maintained

throughout the 40-year life of the development. There is some conflicting information regarding the height of the perimeter fence on the north side of the hedge. We request that this is no higher than 2m and it is at least 3m away from the hedge line. Any new hedging or tree planting which fails should be replaced.

We request that Heath Road is kept open throughout construction, with only temporary closures managed by a banksman when traffic needs to cross the route.

One area of concern, not fully addressed by the applicants, concerns the underground cable connection link between the site and Fulbourn sub-station. The Environmental Statement indicates that the desired route is either along, or close to, the byway Street Way. We are very worried that Street Way will be dug up; experience elsewhere suggests that this historic grassy surface could be trashed and turned into a mud bath. We request that the cable route runs alongside, not along, the byway, preferably in adjoining farmland; the byway surface should not be disturbed. This is a County Wildlife site, and it should be conserved. Please ensure that the Ramblers are consulted on the proposed 'consenting process' for this power connection.

Environmental Health - 8 December 2022

I have read the NIA dated the 10th October 2022 (but issued on the 11th).

The report indicates that operational noise will be below existing ambient noise levels. I would recommend the following condition to ensure this is enforceable -

"The specific rated noise level emitted from the site shall not exceed the existing background noise level. The free field sound level shall be measured and/or calculated at the boundary of the nearest noise sensitive property. The noise level shall be measured and/or calculated in accordance with BS 4142:2014+A1:2019.

Section 5 mentions that -

"During construction deliveries will be restricted, wherever possible, to off peak weekdays to reduce impacts on local road users. Off-peak is considered to be between 09:00 and 15:00 Monday to Friday and 09:00 12:00 Saturday mornings.' No Deliveries will take place on Sundays or Bank Holidays."

This is more restrictive than what we would usually request but if you are in agreement I would have no objections to this.

Section 7 states that -

"It is understood that there will be approximately 2520 deliveries expected across a 9-month period working Monday-Friday and Saturday 07:30 - 13:00 whilst the site is being constructed. There will be up to 364 deliveries per month. With there being 21 working days in a month this averages out as 17 deliveries per day."

Some clarification would be appreciated as this seems to suggest that deliveries could take place between the hours above but with an effort to restrict those to those off-peak hours previously mentioned.

I would advise that construction times (and deliveries if the previously mentioned hours cannot be agreed) during the construction phase are restricted to the following:

07:30 - 18:00 each day Monday - Friday
07:30 - 13:00 on Saturdays and
None on Sundays or Bank Holidays

I would also advise that prior to any work commencing on site a Construction Environmental Management Plan (CEMP) shall be submitted and agreed in writing with the Local Planning Authority (LPA) regarding mitigation measures for the control of pollution (including, but not limited to noise, dust and lighting etc) during the construction phase. The CEMP shall be adhered to at all times during the construction phase, unless otherwise agreed in writing with the Local Planning Authority (LPA).

The NIA advises that if piling is required then a PMS and CEMP specifically for the activity will be produced. I would ask that this is conditioned.

I have read the Glint and Glare Assessment dated the 10th November 2022 which finds that -

"Glare is theoretically possible at 10 of the 15 residential receptors assessed within the 1km study area. The initial bald-earth scenario identified potential impacts as High at 10 receptors and None at the remaining five receptors. Upon reviewing the actual visibility of the receptor, glint and glare impacts reduce Low at two receptors and to None at all remaining receptors."

I have no concerns to raise concerning this element.

I would recommend a condition which prevents any external lighting from being installed without approval from the LPA in order to protect the amenity of neighbouring properties.

No other comments to make at this time but please send out the environmental notes.

Cambridgeshire Archaeology - 25 November 2022

Our records indicate that the site lies in an area of high archaeological potential, in the vicinity of Hare Park Barrow Cemetery (Cambridgeshire Historic Environment Record reference. 06757). Hare Park and Allington Hill where a series of Bronze Age tumuli or barrows, both designated as Scheduled Monuments and non-designated, occur to both sides of the current A11. These include scheduled bowl barrows to the north-east of the development (CHER ref. 1016819), a further group of five bowl barrows to the northeast (CHER ref. 1016818) and four scheduled bowl barrows to the south-east (CHER ref. 06751). Further barrows have been located from cropmarks across the Hare Park Barrow Cemetery area to the south (CHER ref. 06744 and 06745) east (CHER ref. 06755 and 06302) and north-east (CHER ref. 06737). The activity in this area appears to be clustered around the north-east to southwest course of 'The Street Way' (CHER ref. MCB31325) a communication route of prehistoric origin discussed by Cyril Fox in his 1923 publication The Archaeology of the Cambridge Region. Further scheduled remains include the Roman settlement of Allington Hill (CHER ref. 1006901), which lies to the east of the development.

Geophysical survey and the creation of a Historic Environment Desk Based Assessment (HEDBA) has been undertaken, which revealed linear anomalies a possible trackway and a sub-rectangular enclosure, the latter of which now falls outside the proposed development area.

Due to the archaeological potential of the site a further programme of investigation and recording is required in order to provide more information regarding the presence or absence, and condition, of surviving archaeological remains within the development area, and to establish the need for archaeological mitigation of the development as necessary. Usage of the following condition is recommended:

Archaeology Condition

No demolition/development shall commence until the applicant, or their agents or successors in title, has implemented a programme of archaeological work, commencing with the evaluation of the application area, that has been secured in accordance with a Written Scheme of Investigation (WSI) that has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition/development shall take place other than under the provisions of the agreed WSI, which shall include:

- a) The statement of significance and research objectives.
- b) The programme and methodology of investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works.
- c) The timetable for the field investigation as part of the development programme.
- d) The programme and timetable for the analysis, publication & dissemination, and deposition of resulting material and digital archives.

REASON: To safeguard archaeological assets within the approved development boundary from impacts relating to any demolitions or groundworks associated with the development scheme and to ensure the proper and timely preservation and/or investigation, recording, reporting, archiving and presentation of archaeological assets affected by this development, in accordance with national policies contained in the National Planning Policy Framework (MHCLG 2021).

Informatives:

Partial discharge of the condition can be applied for once the fieldwork at Part c) has been completed to enable the commencement of development.

Part d) of the condition shall not be discharged until all elements have been fulfilled in accordance with the programme set out in the WSI.

Lead Local Flood Authority - 3 July 2023

Having reviewed the revised documentation we can confirm that the LLFA has no further comments beyond those set down in our response of 16 May 2023 (ref: 201109128). Our position therefore remains supportive of the development, subject to imposition of the previously suggested condition.

Informatives

Infiltration

Infiltration rates should be worked out in accordance with BRE 365. If infiltration methods are likely to be ineffective then discharge into a watercourse/surface water

sewer may be appropriate; however, soakage testing will be required at a later stage to clarify this.

OW Consent

Constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under the Land Drainage Act 1991. Ordinary watercourses include every river, drain, stream, ditch, dyke, sewer (other than public sewer) and passage through which water flows that do not form part of Main Rivers (Main Rivers are regulated by the Environment Agency). The applicant should refer to Cambridgeshire County Council's Culvert Policy for further guidance:

<https://www.cambridgeshire.gov.uk/business/planning-and-development/water-minerals-and-waste/watercourse-management/>

Please note the council does not regulate ordinary watercourses in Internal Drainage Board areas.

Pollution Control

Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

Lead Local Flood Authority - 22 December 2022

At present we object to the grant of planning permission for the following reasons:

1. Insufficient surface water strategy

Whilst it is broadly accepted that solar farms do not respond in the same way as impermeable surfaces, they can lead to localised channelling of rainfall, particularly on sloping sites. This has the potential to increase flood risk downstream and therefore an adequate assessment of surface water runoff as a result of the development needs to be carried out.

Options such as the inclusion of a French drain at the base of each row to intercept flows, inclusion of a swale(s) at the lowest parts of the site and designing panels with horizontal slots across the surface area should be considered as measures to manage surface water.

In addition to the above, for a full application the following should be included within the surface water strategy:

- I. Existing impermeable area
- II. Proposed impermeable area / developable area
- III. A description of site topography
- IV. Identification of watercourses within the vicinity of the site and their outfalls and associated flood risk
- V. A description of ground conditions (using site investigation where possible)
- VI. Identification of any surface water flood risk
- VII. Existing site drainage arrangements
- VIII. Proposed method of surface water disposal
- IX. Existing and proposed runoff rates (if discharging off-site)
- X. Existing and proposed runoff volumes (if discharging off-site)
- XI. Required volume of attenuation (m³ per m² of impermeable area)
- XII. Preliminary SuDS proposals

- XIII. Infiltration test results in accordance with BRE365 (or second viable option for surface water disposal if testing hasn't yet been undertaken)
- XIV. Drainage layout drawing and supporting hydraulic calculations

2. Gravel surfacing

Any proposed gravel surfacing should be modelled as impermeable surfacing. Replacing the existing topsoil with gravel will not entirely replicate the greenfield situation. Gravel behaves differently to grassland and can be subject to compaction over time, reducing the ability for water to drain through its voids. The gravel area should therefore be included as part of the total impermeable area.

Informatives

Infiltration

Infiltration rates should be worked out in accordance with BRE 365/CIRIA 156. If infiltration methods are likely to be ineffective then discharge into a watercourse/surface water sewer may be appropriate; however, soakage testing will be required at a later stage to clarify this.

Ordinary Watercourse Consent

Constructions or alterations within an ordinary watercourse (temporary or permanent) require consent from the Lead Local Flood Authority under the Land Drainage Act 1991. Ordinary watercourses include every river, drain, stream, ditch, dyke, sewer (other than public sewer) and passage through which water flows that do not form part of Main Rivers (Main Rivers are regulated by the Environment Agency). The applicant should refer to Cambridgeshire County Council's Culvert Policy for further guidance:

<https://www.cambridgeshire.gov.uk/business/planning-and-development/water-minerals-and-waste/watercourse-management/>

Please note the council does not regulate ordinary watercourses in Internal Drainage Board areas.

Pollution Control

Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

Assistance For Developers o Cambridgeshire County Council has a surface water guidance document which is available to view here. This document provides checklists and templates to help ensure you include sufficient information within your drainage strategies. Following this guidance will help reduce the risk of an objection which can hold up a planning application. o We also offer a pre-application service which enables you to discuss your drainage proposals with the LLFA Officers prior to submission of a formal application.

Natural England - 13 December 2022

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. Natural England's generic advice on other natural environment issues is set out at Annex A

Planning Casework Unit - 10 January 2023

I confirm that we have no comments to make on the environmental statement.

Cadent Gas Ltd - 4 August 2023

We have no objection in principle to your proposal from a planning perspective.

We have a 219 MM ST HP pipeline in the vicinity of the works area which will need to be protected at all times this has an easement in place with BPD distances which must not be encroached upon crossed over or anything built or placed/stored on or over the pipeline in or on top of the main or easement.

No mechanical excavation within 3m of the pipeline without plant protection present.

Cadent Gas will need to be further contacted before works start to ensure safety practices and protection methods in relation to our high -pressure assets are in place before works start and throughout the life of the project if required.

Any damage or any action that puts the pipeline at risk will be reportable to the HSE. Please refer to MAHP and the BPD noted below.

What you need to do

Please review our attached plans, which detail the Cadent gas asset/s in the area. If your application affects one of our high- pressure pipelines, it is a statutory requirement that you input the details into the HSE's Planning Advice Web App. For further details, visit www.hse.gov.uk/landuseplanning/planning-advice-web-app.htm. The HSE may wish to apply more stringent criteria for building proximity after assessment. Please ensure that you formally consult with them before you proceed.

In order to help prevent damage to our asset/s, please add the following Informative Note into the Decision Notice:

Cadent Gas Ltd own and operate the gas infrastructure within the area of your development. Prior to carrying out works, please register on www.linesearchbeforeudig.co.uk to submit details of the planned works for review, ensuring requirements are adhered to.

The original holding objection was triggered due to the presence of a High Pressure Major Accident Hazard Pipeline (MAHP) and/or an Intermediate Pressure Pipeline and/or an Above Ground Installation.

The minimum building proximity distance (BPD) for the pipelines and associated installations is as follows:

- Specific MAHP BPD (15 METERS MIN)
- Specific IP BPD (3 METERS MIN)
- Specific AGI BPD (based upon the hazardous area zoning)10 METERS MIN

The building proximity distance taken from The Institution of Gas Engineers and Managers publication IGEM/TD/1 Edition 5 which is the standard applicable to steel pipelines and associated installations for high pressure gas transmission and IGEM/TD/3 Edition 5 Steel and PE pipelines for gas distribution.

Cadent Gas Ltd - 3 August 2023

Your planning application - Holding objection

We have received a notification from the LinesearchbeforeUdig (LSBUD) platform regarding a planning application which is in the vicinity of our gas asset/s. We are placing a holding objection on the proposal whilst our engineering team reviews the available information. We will be in touch once we have reviewed the proposals in

more detail. In the meantime, we may contact you for more information to help us make the decision.

What you need to do

Please review our attached plans, which detail the Cadent gas asset/s in the area. If your application affects one of our high-pressure pipelines, it is a statutory requirement that you input the details into the HSE's Planning Advice Web App. For further details visit www.hse.gov.uk/landuseplanning/planning-advice-web-app.htm

Your responsibilities and obligations

Cadent may have a Deed of Easement on the pipeline, which provides us with a right of access for a number of functions and prevents change to existing ground levels and storage of materials. It also prevents the erection of permanent/temporary buildings, or structures. If necessary Cadent will take action to legally enforce the terms of the easement.

This letter does not constitute any formal agreement or consent for any proposed development work either generally or related to Cadent's easements or other rights, or any planning or building regulations applications.

Cadent Gas Ltd - 24 November 2022

see EDRMS

HSE (Nationally Significant Infrastructure Projects) - 4 August 2023

HSE is a statutory consultee for certain developments within the consultation distance (CD) of major hazard sites and major accident hazard pipelines, and has provided planning authorities with access to HSE's Planning Advice WebApp <https://pa.hsl.gov.uk>

- I should therefore be grateful if you would arrange for HSE's Planning Advice WebApp to be used to consult HSE for advice on this application, which lies within the CD of Pipeline 1710.

Should you or your colleagues need any additional help in using the new WebApp to obtain HSE's advice on a proposed development, a central support service is available at lupenquiries@hse.gov.uk or by telephoning on 0203 028 3708.

NB On 1 August 2021 HSE became a statutory consultee with regard to building safety (in particular to fire safety aspects) for planning applications that involve a relevant building.

A relevant building is defined in the planning guidance at gov.uk as:

- containing two or more dwellings or educational accommodation and
- meeting the height condition of 18m or more in height, or 7 or more storeys

National Grid - Electricity - 4 August 2023

After receiving the details of your planning application, we have completed our assessment. We have no objection in principle to your proposal from a planning perspective.

We have a 219 MM ST HP pipeline in the vicinity of the works area which will need to be protected at all times this has an easement in place with BPD distances which must not be encroached upon crossed over or anything built or placed/stored on or over the pipeline in or on top of the main or easement.

No mechanical excavation within 3m of the pipeline without plant protection present.

Cadent Gas will need to be further contacted before works start to ensure safety practices and protection methods in relation to our high -pressure assets are in place before works start and throughout the life of the project if required.

Any damage or any action that puts the pipeline at risk will be reportable to the HSE.

Please refer to MAHP and the BPD noted below.

What you need to do

Please review our attached plans, which detail the Cadent gas asset/s in the area. If your application affects one of our high- pressure pipelines, it is a statutory requirement that you input the details into the HSE's Planning Advice Web App. For further details, visit www.hse.gov.uk/landuseplanning/planning-advice-web-app.htm. The HSE may wish to apply more stringent criteria for building proximity after assessment. Please ensure that you formally consult with them before you proceed. In order to help prevent damage to our asset/s, please add the following Informative Note into the Decision Notice:

Cadent Gas Ltd own and operate the gas infrastructure within the area of your development. Prior to carrying out works, please register on www.linesearchbeforeudig.co.uk to submit details of the planned works for review, ensuring requirements are adhered to.

The original holding objection was triggered due to the presence of a High Pressure Major Accident Hazard Pipeline (MAHP) and/or an Intermediate Pressure Pipeline and/or an Above Ground Installation.

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The building proximity distance taken from The Institution of Gas Engineers and Managers publication IGEM/TD/1 Edition 5 which is the standard applicable to steel pipelines and associated installations for high pressure gas transmission and IGEM/TD/3 Edition 5 Steel and PE pipelines for gas distribution.

Your responsibilities and obligations

This letter does not constitute any formal agreement or consent for any proposed development work either generally or related to Cadent easements or other rights, or any planning or building regulations applications.

Cadent Gas Ltd or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability were prohibited by the law nor does it supersede the express terms of any related agreements.

If you need any further information or have any questions about the outcome, please contact us at [\[box.eaplantprotectionops@cadentgas.com](mailto:[box.eaplantprotectionops@cadentgas.com) / quoting your reference at the top of this letter.

Fire and Rescue Service – 29th September 2023

1. Water Supplies and Firefighting – Dependent on the system design and size there should be consideration for adequate water provision to the site with sufficient water run off containment to protect the environment. The requirements of these will be dependent on the system design. Previous fires in BESS sites globally have utilised extensive quantities of water and this should be a consideration. Although there are dry extinguishing agents present on the market our preference is for a deluge water system.

2. Access to and around the site for emergency vehicles – Access should be provided in accordance to Approved Document B5 Vehicle Access. Each service has a difference in fleet provision so early communication about the site layout is paramount to allow us to determine access that is suitable for fire engines in the area.

3. Operational emergency preparedness – There should be suitable and sufficient plans that identify actions to be taken if an emergency event takes place. This should incorporate both on-site and off-site emergency actions. This information should also be available to emergency responders. Our risk team can support with our requirements for information.

4. Environmental impact following an emergency event – We request that early communication with Environment Agency is carried out to understand ground water risk. This should take into account the application of significant water in the event of an incident. The exact calculations should be supported by understanding the design of the BESS system. Provision should be in place to allow firefighting actions to take place without posing any risk to the environment.

5. Design, testing, construction and decommission of the site – We request that the details of the BESS system are provided with evidence of detailed testing of safety systems implemented. Any emergency plans and information should include the construction, operation, and decommissioning of the site.

Consultations sent but no comments received

County Highways Transport Team

South Cambs District Council

The Ely Group of Internal Drainage Board

Economic Development

Minerals And Waste Development Control Team

5.2 A site notice was displayed near the site on 16 December 2022 and a press advert was published in the Cambridge Evening News on 1st December 2022.

5.3 Neighbours – 19 neighbouring properties were notified, and the 8 responses received are summarised below. A full copy of the responses is available on the Council's website.

- 2 responses fully support the application
- 2 responses fully support as there are community projects going to benefit from the proposal
- 5 responses raise the following concerns:
 - The road is used by cyclists and many other large vehicles

- Will the road be repaired as the surface is poor?
- How will cyclists be protected at the site entrance?
- No access from the A11 or A1103
- No cabling should be allowed through Great Wilbraham
- Traffic should be restricted in residential areas
- Loss of hedgerows
- How is the grazing/CWS mitigation going to be secured?
- Characteristics of the Green Belt will be harmed
- 40 years is not a temporary permission
- Increase in traffic
- Increase in crime
- Lack of details for the temporary facilities

6.0 THE PLANNING POLICY CONTEXT

East Cambridgeshire Local Plan 2015 (as amended 2023)

GROWTH 2	Locational strategy
GROWTH 5	Presumption in favour of sustainable development
ENV 1	Landscape and settlement character
ENV 2	Design
ENV 4	Energy and water efficiency and renewable energy in construction
ENV 6	Renewable energy development
ENV 7	Biodiversity and geology
ENV 9	Pollution
ENV 10	Green Belt
ENV 12	Listed Buildings
COM 7	Transport impact
COM 8	Parking provision

6.1 Supplementary Planning Documents

Developer Contributions and Planning Obligations
 Design Guide
 Contaminated Land - Guidance on submitted Planning Application on land that may be contaminated
 Flood and Water
 Natural Environment SPD
 Climate Change SPD

6.2 National Planning Policy Framework 2021

- 2 Achieving sustainable development
- 11 Making effective use of land
- 12 Achieving well-designed places
- 13 Protecting Green Belt land
- 14 Meeting the challenge of climate change, flooding and coastal change
- 16 Conserving & enhancing the historic environment

6.3 Planning Practice Guidance

6.4 Greater Cambridge Green Belt 2021

7.0 PLANNING COMMENTS

7.1 Environmental Statement

- 7.1.1 The site would use arable farmland, 15% would be grade 3a land with the remaining 85% grade 3b. The grading of agricultural land is 1 -5, with 1 being the most excellent. Grade 3 is divided into 'a' and 'b'. 'A' being good quality with 'b' being moderate quality land. The proposal would not lead to the most excellent and fertile of farmland being lost.
- 7.1.2 The site would enhance the existing planting on the site, with improving existing hedgerows and planting new sections of hedgerow. With regard to ecology, a skylark management plan has been considered acceptable with further ecological enhancements including a ground nesting bird grassland area; buffer zone of approximately 15 metres (49ft) of species rich grassland and bird and bat boxes. This will equate to a 66% increase in habitat units and 2% growth in hedgerow units.
- 7.1.3 The site is within flood zone 1, which is considered to have the lowest probability of flooding, however due to its size is supported by a Flood Risk Assessment (FRA). There are no heritage assets within close proximity to the site, although the application is supported by a Heritage Assessment. The site is not in close proximity to a SSSI, AONB, Ramsar sites, Conservation Areas, Special Protection Area (SPA) or Nature Reserves.
- 7.1.4 The Environmental Statement concludes that the overall development would not have any significant or cumulative effects.

7.2 Principle of Development

- 7.2.1 The site is wholly contained within the Cambridge Green Belt. Chapter 13 of the NPPF identifies the aims of the Green Belt as a whole and this is supported by the Greater Cambridgeshire Green Belt 2021.
- 7.2.2 Paragraphs 147 – 151 of the NPPF discuss what proposals are considered appropriate development in the Green Belt, and paragraph 151 states “When located in the Green Belt, elements of many renewable energy projects will comprise of inappropriate *development*. *In such cases developers will need to demonstrate very special circumstances if projects are to proceed. **Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.***” On this basis, the provision of a renewable energy project is considered to be inappropriate development. However, if it can be demonstrated there are very special circumstances, and environmental benefits the project can be considered acceptable and amount to very special circumstances to outweigh the presumption against inappropriate development in the Green Belt.
- 7.2.3 Paragraph 158 of the NPPF, Chapter 14 ‘Managing the challenge of climate change, flooding and coastal change’ states that renewable energy should be approved if its

impacts can be made acceptable. There are caveats which relate to wind turbines, however on the whole projects should be approved where they can. In paragraph 154, it states *‘when new development is brought forward in areas which are vulnerable, care should be taken to ensure risks can be managed’*.

7.2.4 As an overview, renewable energy projects such as solar farms are inappropriate development unless there are very special circumstances, using chapter 13 of the NPPF. In Chapter 14 of the NPPF, it seeks approval of renewable energy projects subject to the impacts being considered acceptable. On this basis it is necessary to assess the impacts of the development on the Green Belt, which will be discussed below.

7.2.5 There are 5 purposes of the Green Belt (para 138 of the NPPF)

- To check unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging together
- To assist in the safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration, by encouraging the recycling of derelict and urban land.

7.2.6 The ‘Greater Cambridge Green Belt 2021’ outlines 3 aims of the Cambridge Green Belt.

- Preserve the unique character of Cambridge as a compact and dynamic city with a thriving historic centre
- Maintain and enhance the quality of its setting
- Prevent communities in the environs of Cambridge merging into another and with the city

To check unrestricted sprawl of large built-up areas & to prevent neighbouring towns merging together

7.2.7 The site is located between the A1303, A1304, A14 and A11. The nearest settlements from the proposal are identified below. Using that the site is at an intersection of 4 ‘A’ roads and in an isolated location, it cannot be considered to be allowing ‘unrestricted urban sprawl’. The proposal will not link any of the nearest settlements, and therefore on this basis would not compromise these aims of the Green Belt.

Settlement	Distance from site kilometres	Distance from site in Miles
Bottisham	2.5	1.5
Six Mile Bottom	2.7	1.6
Great Wilbraham	3	1.8
Swaffham Bulbeck	3	1.8
Fulbourn	6	3.7
Newmarket	7	4.3
Cambridge	8	5

To assist in the safeguarding the countryside from encroachment

7.2.8 The site is currently used as part of an arable farm operation. It is surrounded by open fields, with limited development. However, its character is limited by its location at an intersection of the A11 and A14, which has an urbanising feel. Whilst this will be located in the countryside, it sits on land which is predominantly hidden by the banks of the A11 and A14. The site sits discreetly as the land slopes away, so visually there would be limited visual encroachment into the countryside.

To preserve the setting and special character of historic towns

7.2.9 The site is approximately 8km (5 miles) from the proposal. When standing at the edge of the site there are limited views into the historic core of Cambridge, these views are mainly obscured by the airport and Industrial development to the edge of Cambridge. It is considered that the distance between the proposal and the historic centre is such it would have limited or no impact upon this heritage asset. In the Cambridge Green Belt 2021, whilst it does not assess the Green Belt within East Cambridgeshire, in figure 4.1 (p113) states that the land immediately adjacent to the proposed site, has limited contribution to the overall purposes of the Green Belt in relation to purpose 1. (Preserve the unique character of Cambridge as a compact and dynamic city with a thriving historic centre) With regard to the quality of setting, (Maintain and enhance the quality of its setting) the land adjacent to the proposed site was considered to have a moderate impact, followed by a moderate impact on the environs. (Prevent communities in the environs of Cambridge merging into another and with the city) It is considered on balance that the impact on the setting of the historic city of Cambridge would be limited.

To assist in urban regeneration, by encouraging the recycling of derelict and urban land.

7.2.10 Solar farms are by their nature need to be locations where there is significant solar gain and are often this is found in large open expanses of open land. Urban areas very rarely have large expanses of open land available for development. There are many factors which contribute to why urban areas are not suitable for solar farms; price of land; contamination issues and lack of availability. On this basis they are often located in rural locations in order to maximise the capture of the sun's rays. This proposal would not prevent the recycling of urban or derelict land for other land uses.

Recent Decisions

7.2.11 Evidence has been provided by the applicant and through the case officer, to establish whether 'solar farms' are being considered contrary to Green Belt policy and what has been happening nationally. This section looks at recent decisions regarding solar farms around the country that are located within the Green Belt. A copy of these decisions is available on the Council's website. Due to the number of decisions and the length of decision, it was seen as unsustainable to attach as appendices.

7.2.12 In Appeal APP/W1525/W/22/3300222, in Chelmsford, the Inspector concluded that the use of the land for solar panels for 40 years is a long time, however it is temporary, it will be reinstated so it would lead to moderate harm to the Green Belt. The Inspector also agreed that solar panels on previously developed land (PDL) is not the most secure or efficient use of land. Whilst there was harm to the Green Belt, the benefits were considered to outweigh this harm by meeting climate change; delivery of

renewable energy projects; facilitate the country's transition to a low carbon future and on this basis meet very special circumstances.

- 7.2.13 At North Warwickshire Borough Council gave planning permission on two sites in the Green Belt for a solar farm and battery storage. (applications PAP/2021/0605 and PAP/2021/0651) In their report that the impact of the solar farm would have moderate harm and that the life of the solar farm is limited to 40 years.
- 7.2.14 Telford and Wrekin are seeking to challenge an appeal decision, whereby the Minister allowed the development of a solar farm in the Green Belt and AONB. The Council had commented that *"This would result in significant harm to the character of the area and thus impact on the enjoyment of the area by receptors using the local public rights of way,"*. The Minister concluded that the solar farm would not harm the setting of the landscape, and overturned the original Inspectors decision and that of the Local Planning Authority.
- 7.2.15 At South Gloucestershire Council, the conclusion of the planning officer was that very special circumstances applied as there was a need to secure renewable energy; the council had declared a climate emergency; biodiversity net gain; improvements to local green infrastructure and would allow for farm diversification. (application P20/13909/F)
- 7.2.16 At Central Bedfordshire, planning permission was granted for a solar farm on the basis the benefits outweighed the harm to the Green Belt. The proposal would provide power for 9,000 homes; meet Government guidance on climate change; not lead to a loss of most fertile agricultural land and increase renewable energy production. (application CB/20/03856/FULL)
- 7.2.17 At Kirklees Council planning permission was granted on the basis that the benefits of the proposal outweighed the harm to the Green Belt. (application 2021/93644)
- 7.2.18 In close proximity to the site is a solar and wind farm albeit outside of the boundary for East Cambridgeshire, and within the adjacent Local Planning Authority, South Cambridgeshire District Council. The distance between the proposed solar farm and the existing wind and solar farms is approximately 2.7 km (1.7 miles). The wind farm site is within the Green Belt and part of the Cambridge Green Belt. In the determination of the application. it was stated that *"For the reasons given at IR12.57, the Secretary of State agrees with the Inspector that there is no substance to objections relating to the location of the appeal proposals just beyond the edge of the Cambridge Green Belt."*
- 7.2.19 With regard to the solar farm the Local Planning Authority considered that *"The installation of a solar farm is considered to represent appropriate development within the countryside providing given that there are no suitable brownfield sites available in the area of the scale required and the proposal would allow the land to continue to be used for agricultural purposes through grazing."*

Summary of the impact on the Green Belt

- 7.2.20 The harm identified is that solar farms are considered to be inappropriate development in the Green Belt, however there are locational factors which suggest the harm would be minimal, it being located between 2 'A' roads; the land sloping away and being on

the very edge of the Green Belt. However, are there very special circumstances which could support the siting of the solar farm in this location.

- 7.2.21 In 2019 East Cambridgeshire District Council declared a Climate Emergency and published the Climate Change SPD and A Strategy and Action Plan to Boost the Environment and Help Mitigate Climate Change. This declaration is a 'very special circumstance' as the Council acknowledges more needs to be done to secure energy for the future through the use of renewable energy. There is an identifiable need for renewable energy projects across the country, and they need to be in locations which are in areas whereby they are not overshadowed by buildings which would limit the effectiveness of the panels. This is why, solar farms are located in rural areas as they have uninterrupted sun. On this basis the Council, has identified that they need to deliver more projects which reduce carbon emissions, and this proposal would lead to a reduction in carbon of 9430 tonnes per annum. This is a very special circumstance which weighs heavily in favour of the project and meets the requirements of paragraph 151 of the NPPF, whereby if very special circumstances apply, planning permission maybe granted planning permission.
- 7.2.22 It is noted that South Gloucestershire; Central Bedfordshire; Kirklees and South Cambridgeshire Councils concluded that the need for the solar farm in order to meet climate change outweighed the minimal harm to the Green Belt. This is also supported in chapter 14 of the NPPF, whereby even in vulnerable areas the risks can be weighed in favour of the proposal. (paragraph 154 of the NPPF))
- 7.2.23 The site itself has a relationship with energy production, with the pylons and power lines which wind through the site, with a connection to the Fulbourn Substation having been already secured. The nature of the site, which is already enclosed by natural features and set lower than surrounding land assists in not conflicting with the aims of the Green Belt. On this basis the vulnerable location, can be considered acceptable as the risks can be weighed in favour of the proposal, (paragraph 154 of the NPPF)
- 7.2.24 The proposal would provide energy for 10,730 homes in Cambridgeshire, a county that has a growing in population and would offset 9430 tonnes of carbon dioxide (annually). The site would also see a 66% increase in habitats, adding to the biodiversity of the area. This is a significant improvement to the local environs and as such would meet the tests of paragraph 158 of the NPPF, as its impacts can be made acceptable. The proposal would also seek to reduce greenhouse gases in accordance with paragraph 154 of the NPPF. Further to this paragraph 174 of the NPPF seeks developments to provide a net gain in biodiversity, of which this scheme will deliver a 66% net gain in biodiversity.
- 7.2.25 The land used for the solar panels is not the most fertile or versatile agricultural land and the process is reversible, albeit over 40 years and possibly not in some of our lifetime, it is essentially temporary. This view was supported in the Inspectors decision for the Appeal APP/W1525/W/22/3300222 and shared in Central Bedfordshire. Whereby it was temporary and did not lead to the loss of most fertile land. This is a consideration in paragraph 183 of the NPPF.
- 7.2.26 On this basis, whilst the proposal is inappropriate development in the Green Belt, there are very special circumstances which apply to the proposal and as such consider that

whilst there will be some harm to the Green Belt this is outweighed by the very special circumstances discussed and outlined below:

- 66% net gain in biodiversity
- Reduction of in excess of 9 tonnes of carbon annually
- Provide secure power for 10,730 homes for the next 40 years
- Does not lead to a loss of most fertile agricultural land
- It is a reversible project, in 40 years
- The Council has declared a climate emergency

7.2.27 Members are advised that if they resolve to approve this application, the Council are required to give the Secretary of State the opportunity to call in the application as it is a major application for inappropriate development in the Green Belt.

7.3 Residential Amenity

7.3.1 The site is in an area isolated from residential dwellings, although there are 3 dwellings in close proximity. Bottisham Heath Stud Cottages are approximately 0.5km (0.3 miles) from the edge of the solar farm with the A11 between the 2 sites. Breckland Cottage is adjacent to the road access the solar farm, however the solar panels are 1.1 km (0.6 miles). Spring Hall is approximately 0.1km (0.1miles) from the site, however separated by the A14.

7.3.2 Whilst the dwellings are relatively close to the development, in regard to Spring Hall and Bottisham Stud Cottages they are separated by the A11 and A14. It is considered that these are unlikely to be affected by the proposal due to the separation by the 'A' Roads.

7.3.3 Breckland Cottage is furthest from the solar panels and on this basis, it is considered the impact of the physical structures would not cause harm to the neighbours' amenities. However, the access road to the solar farm adjoins their residential boundary and therefore consideration is given to the noise and disturbance from the use of the access road. In consultation with the Local Highway Authority, they are mindful of this, and it is suggested that a condition is appended to any planning consent requiring the submission of a Construction Traffic management Plan, to ensure that during construction the impacts can be managed to ensure amenities and highway safety is maintained.

7.3.4 It is considered that the amenities of the nearby neighbours can be managed by way of condition. The proposals will not be overbearing, lead to a loss of light or privacy in accordance with policy ENV2 of the East Cambridgeshire District Council Local Plan 2015.

7.4 Visual Amenity

7.4.1 The site is situated between the A11 and A14, on land which gently slopes away and not on elevated land. It is not to say, that the solar farm will not be visible from aspects of the A11 and A14, however these will be the only long and intermittent views. The site is bounded by a Public Right of Way, however there is significant hedging to this boundary which will be enhanced through the delivery of the scheme. The contour of

the land, as it slopes away will limit views from the Public Right of Way of the solar panels. In consultation with the County's Public Right of Way team, did not raise any objections to the proposal. The team welcomed the use of stock fencing and the infilling and planting of new hedgerow, although do require that whilst the hedge is being established, netting is erected to reduce the views of solar panels, which would seem reasonable.

- 7.4.2 With regard to views from adjoining settlements, there will be limited views from the nearby settlements of Bottisham; Six Mile Bottom; Little and Great Wilbraham. The views from the village of Bottisham, are going to be limited as the land is undulating and is interrupted by the A14 which acts a buffer between the settlement and the proposal.
- 7.4.3 Six Mile Bottom sits southeast of the proposal, there will be no or very limited views from the village itself. However, it is accepted there will be views as you approach from the A1304, whereby the road is elevated and then falls away as you enter the village. From the elevated part of the A1304, there will be some limited views although this is predominantly screened by Hare Park and existing established planting.
- 7.4.4 Great Wilbraham sits directly south of the site which from the centre of the village will have no views of the site. There will be limited views from Wilbraham Road, although due to the undulating nature of the land, these views will be minimised.
- 7.4.5 Little Wilbraham sits south west of the site and there will be no views of the proposal from the village centre. Again, limited views from Wilbraham Road of the proposal.
- 7.4.6 In summary, due to the undulating nature of the site it is considered that the views of the proposal are going to be limited. It is accepted there will be some views, however these are going to be intermittent and in the distance. It is considered that the proposal can be landscaped to mitigate views, and these will last over the lifetime of the project and once it has been decommissioned.
- 7.4.7 In 40 years, it is expected that the solar panels and associated equipment will be removed. A condition can be applied and has been applied to other renewable energy applications for details of how this will take place and how the land will be reinstated. Whilst this information will not be available to determine the application, the land will be required to be reinstated, including additional biodiversity features. On this basis the proposal is considered to comply with policy ENV2 of the East Cambridgeshire District Council Local Plan 2015.

7.5 Historic Environment

- 7.5.1 Spring Hall is a Grade II Listed building; however, this is dissected from the site by the A14. It is considered there is a neutral impact on the setting of this heritage asset in accordance with Policy ENV12 and the NPPF.
- 7.5.2 In consultation with the Historic Environment Team, it was acknowledged that there were some archaeological potential of the site. It was noted the potential for bronze age burial grounds; prehistoric communication route and remains of the Roman settlement of Allington Hill. On this basis a pre commencement condition for archaeological programme of investigation is required in the event of planning permission being granted.

7.5.3 It is considered that the overall impact on the heritage assets would be neutral and as such does not need to be weighed against the public benefit of the scheme. On this basis the proposal is considered to comply with policies ENV12, ENV14 of the East Cambridgeshire District Council Local Plan 2015 and the NPPF.

7.6 Highways

7.6.1 The application has been assessed by the Local Highway Authority and National Highways, and both have raised no objections to the scheme, although conditions have been suggested. The Local Highway Authority have considered that the proposal will not have a significant impact on the locally based roads. Some works are required to the access however this can be achieved through condition. A condition is also required for a Construction Traffic Management Plan (CTMP) this would include the agreed traffic route; timings for deliveries; compound layout and haul road details.

7.6.2 Concerns have been raised from local residents over the use of residential roads, and this can be dealt with through the CTMP to be agreed with the Local Planning Authority and Local Highway Authority by way of condition. Whilst initially there will be some disturbance during construction, this will be for a temporary period over 9 months, it is anticipated that there will be an increase of vehicles by 15%, which is not considered to be significant to warrant a refusal of development proposed.

7.6.3 National Highways have assessed the application and in particular the Glint and Glare Assessment which they found subject to the mitigation measures proposed would be acceptable. The mitigation requires the provision of additional native hedgerows or the infilling of existing hedgerows to a height of 2.5 metres (8 feet) along the northeast and northwest boundaries.

7.6.4 Once the solar farm is operational, there will be a monthly visit undertaken by the energy company for maintenance purposes. On this basis, once the solar farm is up and running there will be limited vehicles visiting the site, so will have minimal or no noise or disruption to local residents or on the highway network.

7.6.5 The solar panels to be used in this development have a lifespan of 40 years, and after this date would be redundant. On this basis, a scheme for decommissioning the site and reinstatement of the land, will lead to increased vehicle activity during this stage. A condition can be appended to manage this and the return of the land to agricultural use.

7.6.6 It is considered that the proposal can meet the requirements of policies COM7 and COM8 through the use of conditions, which is acceptable to the Local Planning Authority.

7.7 Ecology

7.7.1 The application was supported by Biodiversity and Landscape Management Plan, which was updated during the life of the application, with expert assessments from the Cambridge Wildlife Trust (CWT). As a conclusion with the submission of the additional information the proposal was considered to be acceptable, leading to a 66% increase in biodiversity and 2% increase in hedging. The measures proposed are listed below.

- Planting of a native species grassland
- Planting and infilling of native hedgerows
- Management of Skylarks, including creating fallow plots approximately 2 per hectare (this roughly equates to 1 per acre)
- Grazing sheep
- Barn owl box
- 20 x songbird nest boxes
- 10x bat boxes
- Wood piles for invertebrates
- Gaps under fences to ensure mammals can negotiate the site.

7.7.2 In consultation with the CWT, the scheme was considered acceptable and would need to be conditioned to ensure all of the mitigation measures proposed are included in any planning permission granted. This would also need to be monitored and after 3 years, if it was noted that there had not been a significant increase in the baseline of biodiversity, additional measures would be put in place and then surveyed again in 5, 10 and 15 years respectively.

7.7.3 It is considered that the proposal would comply with policy ENV7 of the East Cambridgeshire District Council Local Plan 2015 and Natural Environment SPD. It would increase the ecological value of the site by 66%, which is significant and weighs heavily in favour of the proposal.

7.8 Flood Risk and Drainage

7.8.1 Consultation was undertaken with the Environment Agency who raised no objection to the proposal subject to the appendage of a condition. The site is in excess of 1 ha and was therefore supported by a Flood Risk Assessment (FRA). The site is within flood zone 1, the least likely to flood location, albeit in extreme occasions. The proposal being for energy, does not require to determine if a Sequential Test or Exception Test is required as this is essential infrastructure to support the population. The information provided within the FRA mitigates flood risk by locating the substation and cabin away from any watercourses; decompact the soil to enable filtration through the soil and using the Construction regulations 2015. It is considered that subject to a condition for details of a surface and foul water disposal scheme the proposal meets the requirements of ENV8 of the East Cambridgeshire District Council Local Plan 2015.

7.9 Fire Safety

7.9.1 The proposal includes the provision of Battery Energy Storage (BESS), which have become national news due to the risk of fire. In March 2023 the MP for Basingstoke motioned a bill (Standing Order No.23) to make the local fire services a statutory consultee for battery storage planning applications. The MP considered that the batteries are hazardous and therefore the Environment Agency (EA); HSE and the Fire Safety Service should be consulted on such applications. The reason behind this, is due to in the event of a fire the only way to distinguish is through cooling the apparatus down with water and wait for it to extinguish. In the event of the fire, it can allow for toxic chemicals to seep into watercourse and cause environmental harm. The MP recognised there is a need for these facilities, particularly in light of climate change and not being

able to rely on other countries for our energy however the safety of the batteries needs to be considered.

7.9.2 East Cambridgeshire District Council have already undertaken these consultations in advance of the Members Bill, however it is important to acknowledge there may be a change in circumstances in the future should this Bill be implemented. Whilst, the consultations have been undertaken, there was a delay in getting some of the responses. With regard to the EA have raised no objection, although do require conditions relating to how foul water and fire water will be dealt with.

7.9.3 In consultation with the HSE, no objections have been raised to the proposal. With regard to the Fire Service, they have made suggestions with regard to how fire safety can be managed within the site. Having reviewed their comments and other planning permissions granted, it has been considered that can be dealt with by way of condition. East Cambridgeshire District Council have previously issued planning decisions on this basis, and it would seem unreasonable to take a different approach with this application. On this basis, it is considered that subject to a pre commencement condition the scheme can address the risk of fire in accordance with policy GROWTH 3.

7.10 Planning Balance

7.10.1 With the need to create energy from sustainable methods, allowing continued economic growth, the transition to electric cars and the reduction in using natural gas to heat properties places a significant requirement on the planning system to allow renewable energy schemes. The scheme is also highly likely to improve biodiversity and drainage on the site, as well as long term benefits to agricultural land quality. The merits of the scheme far outweigh any short-term harm identified.

7.10.2 It is considered that the cumulative impacts are not great enough to harm the Green Belt and warrant the refusal of this application, based upon the very special circumstances that apply. However, it is likely there will be a limited detrimental impact to the overall enjoyment of the countryside in the short term given the number of solar panels and the time for the planting to be established.

7.10.3 It has been assessed that the proposal will have less than substantial harm to heritage. However, this level of harm is clearly outweighed by the public benefit of renewable energy and the requirement of an archaeology condition.

7.10.4 The proposal is considered to comply with the adopted Local Plan, Renewable Energy Development SPD, Natural Environment SPD and National Policy (NPPF). On this basis it is recommended that the application is approved, subject to the recommended conditions.

8 COSTS

8.10 An appeal can be lodged against a refusal of planning permission, or a condition imposed upon a planning permission. If a local planning authority is found to have acted unreasonably and this has incurred costs for the applicant (referred to as appellant through the appeal process) then a cost award can be made against the Council.

- 8.11 Unreasonable behaviour can be either procedural ie relating to the way a matter has been dealt with or substantive ie relating to the issues at appeal and whether a local planning authority has been able to provide evidence to justify a refusal reason or a condition.
- 8.12 Members do not have to follow an officer recommendation indeed they can legitimately decide to give a different weight to a material consideration than officers. However, it is often these cases where an appellant submits a claim for costs. The Committee therefore needs to consider and document its reasons for going against an officer recommendation very carefully.
- 8.13 In this case members' attention is particularly drawn to the following points:
- The Council has declared a climate emergency
 - Fundamental need for renewable energy projects
 - No objections from statutory bodies
 - Previous appeals and decisions across the country

9 APPENDICES

Appendix One – Recommended Conditions

Appendix Two - Environmental Statement Summary by East Cambridgeshire District Council

Appendix One

Recommended conditions

1. The development hereby permitted shall be commenced within 3 years of the date of this permission.
1. Reason: To comply with Section 91 of the Town and Country Planning Act 1990, as amended.
2. No development shall take place until full details have been submitted to and approved in writing by the Local Planning Authority to illustrate the following: A Construction Traffic Management Plan which shall include construction traffic routing, timings / management of deliveries, site compound layouts, haul road details and other items as required to demonstrate highway safety will be safeguarded throughout the construction and decommissioning phases.
2. Reason: In the interests of highway safety, in accordance with COM7 and COM8 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
3. Prior to first occupation or commencement of use of the development sufficient space shall be provided within the site to enable vehicles to enter, turn and leave the site in forward gear and to park clear of the public highway. The area shall be levelled, surfaced, and drained and thereafter retained for that specific use.
3. Reason: In the interests of highway safety, in accordance with COM7 and COM8 of the East Cambridgeshire Local Plan 2015.
4. The development hereby permitted shall be carried out in accordance with the submitted 'Biodiversity Management Plan: Hedgerows' prepared by Ridge Clean Energy.
4. In the interests of highway safety, and to ensure the safe operation of the A11 and A14 trunk roads in accordance with COM7 and COM8 of the East Cambridgeshire Local Plan 2015.
5. No laying of services, creation of hard surfaces or erection of a building shall commence until a detailed design of the surface water drainage of the site has been submitted to and approved in writing by the Local Planning Authority. Those elements of the surface water drainage system not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved management and maintenance plan. The scheme shall be based upon the principles within the agreed Flood Risk Technical Note prepared by RAB Consultants (ref: RAB3018 Version 1.0) dated 25 April 2023 and shall also include:
 - a) Full results of the proposed drainage system modelling in the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance.

- b) Detailed drawings of the entire proposed surface water drainage system, attenuation and flow control measures, including levels, gradients, dimensions and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it).
 - c) Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections).
 - d) Site Investigation and test results to confirm infiltration rates.
 - e) Demonstration that the surface water drainage of the site is in accordance with DEFRA non-statutory technical standards for sustainable drainage systems.
 - f) Full details of the maintenance/adoption of the surface water drainage system.
 - g) Permissions to connect to a receiving watercourse or sewer.
5. Reason: To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development and to ensure that the principles of sustainable drainage can be incorporated into the development, noting that initial preparatory and/or construction works may compromise the ability to mitigate harmful impacts. In accordance with policy ENV8 of the East Cambridgeshire District Council Local Plan 2015.
 6. No development, including preparatory works, shall commence until details of measures indicating how additional surface water run-off from the site will be avoided during the construction works have been submitted to and approved in writing by the Local Planning Authority. The applicant may be required to provide collection, balancing and/or settlement systems for these flows. The approved measures and systems shall be brought into operation before any works to create buildings or hard surfaces commence
 6. Reason: To ensure surface water is managed appropriately during the construction phase of the development, so as not to increase the flood risk to adjacent land/properties or occupied properties within the development itself; recognising that initial works to prepare the site could bring about unacceptable impacts. In accordance with policy ENV8 of the East Cambridgeshire District Council Local Plan 2015.
 7. No above ground works shall take place until a soft landscaping scheme has been submitted to and agreed in writing by the Local Planning Authority. The scheme shall be maintained as approved, and the scheme shall include:
 - 1) A scaled plan showing the locations of new and existing vegetation
 - 2) A tree pit design specification (See below)
 - 3) A schedule detailing sizes and numbers/densities of all proposed trees/plants (Hedging ideally needs to be planted at 0.60m centres in a double staggered row, usually a 20% mix of five species for a native species hedge)
 - 4) Specifications for operations associated with plant establishment (planting specification, weed control, mulching, watering pruning etc.) to include a program for the timings of the landscape works and maintenance, to ensure successful establishment and survival of new planting and having regard to the timing of the commencement of the development hereby permitted.

Tree pits to be excavated to a minimum size of 600mm larger than the container, root ball or bareroot stock and shall be square so as to avoid root girdling issues.

The base of the tree pit shall be slightly domed and only 'broken' up in the event of inadequate drainage

Backfill tree pit with subsoil up to ~400mm depth from ground surface and with topsoil above ~400mm depth from ground surface or to match the existing soil profiles.

Watering 'dishes' to be created around the base of each tree, to hold water directly over root ball during watering

1m diameter mulched dish for Standard trees/3.0m in height or smaller

Bare root, root ball or container multi-stem trees shall be single staked as a minimum double staked as required, fixed with suitable tree ties (biodegradable if available and suitable)

Trees to be mulched with minimum 50mm settled depth, medium grade ornamental wood mulch

Trenches for hedge planting will be dug to a minimum depth of 400mm and width of 600mm, with the plants put into the ground at the same depth at which they had been previously grown in the nursery.

All plants need to be well heeled in after planting and watered in during dry weather.

All hedging to be mulched with minimum 50mm settled depth, medium grade wood mulch.

As most hedging plants are supplied as bare root specimens' measures are to be taken ensure that the roots do not dry out prior to planting such as healing in or covering root with damp straw.

Planting to be undertaken in the first planting season (October to February) after completion of development activities. If within a period of the use of the site as a solar farm from the date of planting, or replacement planting, any tree or plant of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives it consent to any variation.

7. Reason: To safeguard the character and appearance of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
8. No development shall take place until a scheme to dispose of foul and surface water has been submitted to and approved in writing by the Local Planning Authority. The scheme(s) shall be implemented prior to first use of the solar farm hereby approved.
8. Reason: To prevent the increased risk of flooding and to improve and protect water quality, in accordance with policies ENV2 and ENV8 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted and the details need to be agreed before construction begins
9. Prior to the commencement of development details of the temporary fencing with shielding netting shall be submitted to and approved in writing by the Local

- Planning Authority. The fencing shall be erected alongside the Public Right of Way and permissive paths and maintained until the planting has been established.
9. Reason: To safeguard the character and appearance of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
 10. The specific rated noise level emitted from the site shall not exceed the existing background noise level. The free field sound level shall be measured and/or calculated at the boundary of the nearest noise sensitive property. The noise level shall be measured and/or calculated in accordance with BS 4142:2014+A1:2019.
 10. Reason: To safeguard the residential amenity of neighbouring occupiers and rural character of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
 11. Construction times and deliveries, with the exception of fit-out, shall be limited to the following hours: 07:30 - 18:00 each day Monday – Friday, 07:30 - 13:00 on Saturdays and
None on Sundays or Bank/public Holidays.
 11. Reason: To safeguard the residential amenity of neighbouring occupiers and rural character of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
 12. In the event of the foundations from the proposed development requiring piling, prior to the commencement of development the applicant shall submit a report/method statement to the Local Planning Authority, for approval in writing, detailing the type of piling and mitigation measures to be taken to protect local residents from noise and/or vibration. Noise and vibration control on the development shall be carried out in accordance with the approved details.
 12. Reason: To safeguard the residential amenity of neighbouring occupiers and rural character of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
 13. Prior to any work commencing on the site a Construction Environmental Management Plan (CEMP) shall be submitted to and agreed in writing with the Local Planning Authority regarding mitigation measures for noise, dust, and lighting during the construction phase. These shall include, but not be limited to, other aspects such as access points for deliveries and site vehicles, and proposed phasing/timescales of development etc. The CEMP shall be adhered to at all times during all phases.
 13. To safeguard the residential amenity of neighbouring occupiers and rural character of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
 14. The Lighting scheme shall be implemented as approved in accordance with the Six Oakes Lighting Plan, Part 1, Part 2 and Part 3. The scheme shall be maintained in perpetuity, unless otherwise agreed in writing. The scheme does not allow for any additional lighting without express consent from the Local Planning Authority.

14. To safeguard the residential amenity of neighbouring occupiers and rural character of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015.
15. Prior to any occupation of the development, a scheme for the maintenance of the soft landscaping; for the lifespan of the proposal from last occupation, shall be submitted to and agreed in writing by the Local Planning Authority. All works shall be maintained in accordance with the agreed scheme. The scheme shall include the following:
 - A) methods for the proposed maintenance regime.
 - B) detailed schedule.
 - C) details of who will be responsible for the continuing implementation
 - D) details of any phasing arrangements
15. To ensure the longevity of the landscaping scheme, in accordance with policy ENV1 and ENV2 of the East Cambridgeshire Local Plan 2015.
16. No development shall take place within the area indicated until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved in writing by the local planning authority.
16. To ensure that any archaeological remains are suitably recorded in accordance with policy ENV14 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.
17. The Local Planning Authority shall be notified in writing, within 5 working days of the date of the first export of power from the site. This permission expires 40 years from the date of the first export of power or 6 months after the solar panels on site are no longer being used for the production of energy. After this date, the site shall be reinstated to arable agricultural land in accordance with a Decommissioning Scheme that shall have first been submitted to and approved in writing by the Local Planning Authority prior to the expiration of this permission.
The scheme shall address, though not be limited to, the following areas:
 - Soil management
 - Hours of works
 - Lighting
 - Noise
 - Traffic and highway impacts
 - Public Rights of Way
 - Wildlife
 - Soft landscaping including protection measures
17. Reason: The application has been assessed and determined on this basis.
18. The, hereby approved, solar farm shall only export up to 49.995MWe of renewable electricity to the National Grid during peak operation.
18. Reason: The application has been assessed and determined on this basis.

19. Prior to commencement of development details of the Battery Energy Storage System (BESS) shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the following as a minimum:

- Details of component procurements and construction techniques, including reference to all relevant guidance and legislation.
- Details of the automatic fire detection and suppression systems to be incorporated in the development design.
- Measures to incorporate redundancy in the design to provide multiple layers of protection.
- Measures to contain and restrict the spread of fire through the use of fire-resistant materials, including adequate separation between elements of the BESS; and
- Measures to ensure that sufficient water is available for manual firefighting, including the location of fire hydrants.

19. Reason The development shall be carried out in accordance with the approved details.

20. Prior to the commencement of development, an Emergency Response Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include:

- Details of the hazards associated with lithium-ion batteries.
- Isolation of electrical sources to enable firefighting activities.
- Measures to extinguish or cool batteries involved in fire.
- Management of toxic or flammable gases.
- Measures to minimise the environmental impact of an incident, including containment of fire water run-off, prevention of ground contamination and water course pollution and the release of toxic gases.
- Handling and responsibility for disposal of damaged batteries.
- Establishment of regular onsite training exercises.

The development shall be carried out in accordance with the approved details and the Emergency Response Plan shall be maintained and reviewed on a regular basis (at least once every 2 years) in conjunction with the Local Planning Authority, with any material changes notified to the Cambridgeshire Fire and Rescue Services.

21. Reason: To ensure proper infrastructure for the site in the interests of public safety in that adequate water supply is available for emergency use. This is supported by paragraph 95 of the NPPF. The condition is pre-commencement

as it would be unreasonable to require applicants to undertake this work prior to consent being granted.

22 The development hereby permitted shall not be commenced until such time as a water quality risk assessment report has been submitted to, and approved in writing by, the local planning authority. The report shall include:

- the specification of any electrical transformers, batteries, and any other equipment on site (as applicable) with regard to the volumes and composition of any potentially polluting substances.
- assessment of the risks (including from leakage, fire, explosion, malicious interference) to water quality presented by any electrical transformers, batteries,
- ancillary or other equipment or materials within the development, and details of
- the measures to be implemented to control those risks.
- The risk control measures proposed by the report shall be implemented as approved

22 Reason: Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property, and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy ENV9 of the East Cambridgeshire Local Plan 2015. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted.

23 No development shall commence until an Earthing and Harmonics Report has been submitted to and approved in writing by the Local Planning Authority. Development shall commence in accordance with the agreed details.

23 Reason: To ensure proper infrastructure for the site in the interests of public safety. This is supported by paragraph 95 of the NPPF. The condition is pre-commencement as it would be unreasonable to require applicants to undertake this work prior to consent being granted and the details need to be agreed before construction begins.

24 Prior to the commencement of development the Skylark Management Plan, by Ecology Consulting dated June 2023 shall be implemented as agreed and maintained throughout the life of the solar farm hereby approved.

24. Reason: To protect and enhance species in accordance with policies ENV1, ENV2 and ENV7 of the East Cambridgeshire Local Plan 2015.

25. Development shall be carried out in accordance with the drawings and documents listed below		
Plan Reference	Version No	Date Received
Supplementary Green Belt Assessment		15th June 2023
Six Oakes Skylark Management Plan		15th June 2023

Six Oakes Habitat Enhancement Fig 1		15th June 2023
Six Oakes Habitat Enhancement Fig 2		15th June 2023
Transport and Access Statement		16th March 2023
SIX OAKS SUBSTATION LIGHTING		22nd June 2023
RCE1002-100	A	2nd November 2022
RAB 3018 Technical Note	V1	27th April 2023
Location Plan		2nd November 2022
Planning Statement 2		18th November 2022
Design & Access Statement		18th November 2022
Flood Risk Assessment 2.0		18th November 2022
Noise Impact Assessment A1938 R01b		18th November 2022
Geophysical Survey		18th November 2022
Glint & Glare		18th November 2022
Historic Environment Desk Based Assessment PN3424		18th November 2022
Socio Economic Statement		18th November 2022
Statement of Community Involvement		18th November 2022
Vol 1 - Non-Technical Summary		18th November 2022
Vol 2A - Written Statement		18th November 2022
Vol 2B-App 4_1		18th November 2022
Vol 2B-App 5_1		18th November 2022
Vol 2B-App 9_1		18th November 2022
Vol 2B-App 9_2		18th November 2022
Vol 2B-App 9_3		18th November 2022
Vol 2B-App 9_6		18th November 2022
Vol 2B-App 9_7		18th November 2022
Vol 2B-App 10_1		18th November 2022
Vol 2B-App 10_2		18th November 2022
Vol 2B-App 10_3		18th November 2022
Vol 3-Figures		18th November 2022
Vol 4-Visualisations		18th November 2022

25. Reason: To define the scope and extent of this permission

Appendix Two

Environmental Statement Summary by East Cambridgeshire District Council

Decision and conditions

Planning Committee is being asked to grant approval for this application on the 15th November 2023

Reasoned conclusion on the significant effects of the development on the Environment

It was considered that an Environmental Statement was needed to cover the significant amount of energy farm developments having taken and potentially taking place in the locality there will be a cumulative significant impact upon the visual character of the area and the amount of high-quality farmland being used.

This was detailed under reference 22/00072/SCREEN

The developer submitted an Environmental Statement, which also addressed the Landscape Visual Impact Assessment within it and included biodiversity.

The developer also submitted with the application were:

- Geophysical Report.
- Historic Environment report;
- Noise Impact Report and
- Transport Assessment.

Further reports were also received.

- Green Belt Report dated 15/06/23.
- Skylark Management Plan dated 15/06/23 and
- Lighting Plan dated 22/06/23.

Main reasons and considerations on which the decision is based

The decision was based on the information provided by the developer that formed the Environmental Statement. In addition to this it was based on consultation responses and neighbour representations.

The application was considered and determined with regard to East Cambridgeshire Local Plan 2015 as amended 2023, Council's adopted Supplementary Planning Documents, National Planning Policy Framework 2023 and Cambridge Green Belt 2021.

With the submitted documentation it was not considered necessary to seek independent specialist advice on agricultural land or landscape. In regards to heritage comments were received and considered from Historic England, the Council's Conservation Officer and the Historic Environment Team (Archaeology).

Summary of results of the consultations undertaken and how these results have been incorporated or otherwise addressed

A range of consultees and local residents mentioned landscape issues, cumulative development, loss of agricultural land and heritage.

The relevant parts in the committee report:

7.1 Environmental Statement

7.2 The application was screened under planning reference 21/00062/SCREEN where it was concluded that:

“It was considered that an Environmental Statement was needed to cover the significant amount of energy farm developments having taken and potentially taking place in the locality there will be a cumulative significant impact upon the visual character of the area and the amount of high-quality farmland being used.”

7.3 It is generally considered that by 2050 the world will have a homo sapiens (humans) population of around 9 to 10 billion (currently around 7.5 billion). There is substantial scientific argument that we can currently feed 10 billion people, though not necessarily sustainably. Starvation is, therefore, currently down to greed and bad management of food production/storage/distribution and not down to lack of agricultural land.

7.4 The site would use arable farmland, 15% would be grade 3a land with the remaining 85% grade 3b. The grading of agricultural land is 1 -5, with 1 being the most excellent. Grade 3 is divided into 'a' and 'b'. 'A' being good quality with 'b' being moderate quality land. The proposal would not lead to the most excellent and fertile of farmland being lost.

7.5 The site would enhance the existing planting on the site, with improving existing hedgerows and planting new sections of hedgerow. With regard to ecology, a skylark management plan has been considered acceptable with further ecological enhancements including a ground nesting bird grassland area; buffer zone of approximately 15 metres (49ft) of species rich grassland and bird and bat boxes. This will equate to a 66% increase in habitat units and 2% growth in hedgerow units.

7.6 The site is within flood zone 1, which is considered to have the lowest probability of flooding, however due to its size is supported by a Flood Risk Assessment (FRA). There are no heritage assets within close proximity to the site, although the application is supported by a Heritage Assessment. The site is not in close proximity to a SSSI, AONB, Ramsar sites, Conservation Areas, Special Protection Area (SPA) or Nature Reserves.

7.7 The Environmental Statement concludes that the overall development would not have any significant or cumulative impacts.

7.8 Historic England and the Council's own Conservation Officer have raised no objections.

7.9 It is noted that Cambridgeshire Historic Environment Team have requested a condition which can be duly attached.

7.10 The proposal complies with policies ENV6, ENV11, ENV12 and ENV14 of the Adopted Local Plan.

Description of measures to avoid, prevent, reduce or offset

In regards to landscape impact, it was considered that a condition was required in order to ensure suitable landscape measures were incorporated, as well as associated maintenance. (Conditions 5, 7 and 15 as provided in Appendix 1)

In addition, a landscape management plan is required to ensure the long term maintenance of the landscaping as well as biodiversity improvements. (Conditions 7, 15 & 24 as provided in Appendix 1)

A condition is also required to ensure heritage (archaeology) is duly preserved and recorded. (Condition 16 as provided in Appendix 1)

Finally, a condition is required to ensure that the site is suitably restored once the solar farm is no longer required. (condition 17 as provided in Appendix 1)

Monitoring measures

Will be covered by conditions.

The recommended conditions can be enforced (Breach of Condition Notice) if a developer fails to comply with them.

Public participation process

The Planning Committee process allows for the Parish Council and members of the general public to speak.

10 neighbouring properties were notified, and the responses received are summarised below. Site notices were put up on the 16th December 2022 and again 28th September 2023 and the last notice put in the press on the 28th October 2023. A full copy of the responses is available on the Council's website.

Background Documents

22/01291/ESF

Please note that these decisions are available on the Councils website and are documents attached to application 22/01291/ESF

22/00072/SCREEN

2021/93644 – Kirklees Council

P20/13909/F – South Gloucestershire Council

PAP/2021/0605 – North Warwickshire Borough Council

PAP/2021/0651 - North Warwickshire Borough Council

CB/20/03856/FULL – Central Bedfordshire Council

APP/W1525/W/22/3300222 - Planning appeal decision Chelmsford City Council

National Planning Policy Framework -

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

East Cambridgeshire Local Plan 2015 -

<http://www.eastcamb.gov.uk/sites/default/files/Local%20Plan%20April%202015%20-%20front%20cover%20and%20inside%20front%20cover.pdf>

