Appendix 2

Cambridgeshire County Council Comments on land West of Cambourne Planning Application (S/2903/14/OL).

The planning application seeks approval for 2,350 dwellings; retail, use classes A1-A5; offices/light industry, use class B1; community and leisure facilities, use class D1 and D2; Two primary schools and one secondary school, use D1; three vehicular access points and associated infrastructure.

1.0 EDUCATION

- 1.1 Full comments on education provision are set out in appendix A of this note, however, subject to the below matters of detail being addressed or clarified there is no objection to the planning application on education grounds.
- 1.2 Matters of detail that will need to be addressed as part of the outline planning application process of by way of planning condition or Section106 agreement:
 - The contours at the school site in the western part of the development to be at a noticeable gradient. It will be a requirement of the Section106 agreement for this site to be flat and confirmation should be sought from the applicants that this can be achieved prior to the determination of the application.
 - The maximum heights of the school buildings are set as 12 metres. To give the flexibility required at detailed design stage, it is considered that this should be increased to 15 metres.
 - The renewable energy statement contains a series of potential recommendations for the schools. Unless the applicants are willing to fund the provision of increased renewable energy within the school sites as part of the Section106 agreement, it is unreasonable for the school buildings to provide a higher level of renewable energy than that required by policy.
 - Early Years and Childcare Facilities will be required at the primary school sites

2.0 LIBRARIES AND LIFELONG LEARNING

- 2.1 An expansion of the existing library at Cambourne is not proposed in the planning application although an expansion to the co-located health provision is.
- 2.2 The library in Cambourne was opened in 2004 and at present serves a population of over 6,500 people. There are currently Section106 monies available to modify the library to serve another 2,442 residents (arising from the Cambourne 950 development). A potential influx of another 6,345 residents as a result of this development proposal on library provision will require further enhancements to the existing facility to ensure it can deliver a good service to the additional population.

2.3 The existing library is approximately 1 mile away from this proposed development so officers confirm that there is no requirement to provide a presence within the development site boundary. The existing library is ideally situated near the centre of the Cambourne villages and main retail area.

Section 106 Contribution

- 2.4 Provision for enhanced static library provision (resources and fitout) with no physical changes to existing building.
- 2.5 Financial contribution **£42.12 per head of population increase**. This figure is based on the fit out costs in the MLA document: *Public Libraries, Archives and New Development: AStandard Charge Approach, May 2010.*

3.0 PLANNING, MINERALS AND WASTE& WASTE STRATEGIC PROJECTS(as WASTE PLANNING AUTHORITY (WPA) AND WASTE DISPOSAL PLANNING AUTHORITY (WDPA)).

Planning Statement and Design & Access (D&A) Statement

- 3.1 The policy review in the Planning Statement, and the overview within the D&A statement, omit any mention of the adopted Cambridgeshire and Peterborough Minerals and Waste Core Strategy (July 2011) and the linked RECAP Waste Management Design Guide SPD (February 2012) that form part of the adopted development plan. Both have policies and guidance which are directly relevant to waste planning and which need to be reflected in the development's Construction Environmental Management Plan (CEMP) and the Waste Strategy (including Site Waste Management Plan) going forward. This is particularly important for both the construction and operational phases of the development, as at present the planning statement and D&A statement focus on the occupational phases. Whilst we appreciate that consideration of the construction phases of the development and the adopted waste planning policy documents have been touched upon within the Environmental Statement, waste issues and planning policies need to be fully reflected to ensure that the overall impact of the development is considered from the outset in its entirety.
- 3.2 Paragraph 5.51 of the Planning Statement discusses compliance with South Cambs Policy T1/8 and confirms that contributions will be secured via planning obligations and / or Community Infrastructure Levy (CIL). As this is a strategic site that will have an impact on the household recycling centres, and therefore the strategic waste 'service' provided for the new residents, we would expect this development to make a contribution to strategic waste infrastructure in line with adopted Minerals and Waste Core Strategy Policies CS16 and CS28 and the linked RECAP Waste Management Design Guide Supplementary Planning Document (SPD), as discussed further below.

- 3.3 The D&A includes 'Community Infrastructure' under the sustainable development section of the document on page 100. This notes that 'Waste and recycling facilities' **may** be included. However, reference to strategic waste and the guidance set out in the RECAP Waste Management Design Guide SPD is not included within this document or within the draft Heads of Terms document. The requirements set out within the RECAP Waste Management Design Guide SPD need to be addressed.
- 3.4 Although there is no specific reference to the RECAP Waste Management Design Guide SPD within the D&A, we welcome the section on 'Waste & Recycling' on Page 102 which refers to the house design and layout allowing for the storage of waste and recycling bins to be submitted at the reserved matters stage. We also note that the wheelie bin locations will not be further than 20 metres away from the adopted highway and the layout of individual plots must ensure that wheelie bins can be easily moved from their day to day location to their collection point. Although we appreciate where wheelie bins are required to move through their garages adequate space in the width of garages needs to be designed, as stated within this section, we would suggest that this is not ideal for new developments. Appropriate space needs to be designed in at an early stage to avoid such a solution. These requirements can be secured by planning condition.
- 3.5 We note that the phasing strategy shown on Page 104 of the D&A considers the routes for construction traffic and ensures that these routes are kept separate from visitor and residential routes at all times. This acknowledgement is welcomed and further detail and movement numbers will need to be assessed at the reserved matters stage. This information can be secured by planning condition (see below).

Environmental Statement (ES)

3.6 Chapter 15 of the ES considers the 'Waste Effects' that are likely to result from the Cambourne West application. This takes account of predicted waste arisings during the construction phase, and the occupation phase of the completed Development. We welcome the inclusion of predicted quantities of individual waste arisings and their proposed waste management options within the Site Waste Management Plan (SWMP) shown in Appendix 15.1. We also welcome reference to the Cambridgeshire and Peterborough Minerals and Waste Core Strategy Development Plan Document (2011) and the requirements within it that need to be met. Particularly that Mineral and Waste Core Strategy Policy CS16 requires new development to contribute to the provision of Household Recycling Centres (HRCs) with an identified link to the RECAP Waste Management Design Guide SPD, and the requirement for the development to provide temporary waste management facilities, which will be in place throughout the construction of the development.

- 3.7 Chapter 15 of the ES considers the development in line with the Waste Hierarchy, where disposal should be considered as the last resort. This approach is welcomed, as is reference to as much of the materials being reused on site where possible. Whilst it is slightly unclear why the soils (excavated soil and topsoil, including material to be reinstated) are counted as 'Non-Hazardous' as opposed to 'Inert' in the consideration of the waste stream, we do welcome the statement in Paragraph 15.83 that states that the soils should be appropriate for reuse on site either as direct reinstatement, or for use in landscaping and bunds, or as low-grade fill material. However, whilst we welcome this approach, we are concerned that as approximately 90% of the Non-Hazardous waste stream assessed is soils (511.042 tonnes over the 12 year construction period), and the risk of contamination is raised, there does not appear to be an analysis of the impacts any contamination would make to the disposal rates off-site, and the impact that would have in terms of traffic movements and available waste facilities. More information in relation to the risks associated with the proposed earthworks needs to come forward for further consideration, along with anticipated construction traffic anticipated for both minerals and waste traffic, to allow a cumulative assessment to be made within the transport assessment for the development. This information can be secured by planning condition (see below).
- 3.8 Storage design in line with the RECAP Waste Management Design SPD has also been addressed in Paragraphs 15.141 to 15.152 of the ES. On the basis that this information will be used to inform the master planning of Cambourne West and that more detail will be provided at the reserved matters stage, we are content that the policy requirements can be met.
- 3.9 Chapter 9 of the ES acknowledges that the design of the roads serving the site has been completed to ensure that access can be completed by large vehicles. Furthermore, that provision will be made within the completed proposed development to ensure that the suitable street widths serving development are provided in order to accommodate refuse collection vehicles. More detail should come forward at the reserved matters application which should include swept path analysis in line with adopted waste planning policy and the related guidance set out in the RECAP Waste Management Design Guide SPD.

Suggested Conditions

1. Site Waste Management Plan and Waste Audit

3.10 Prior to the commencement of development a full Site Waste Management Plan and Waste Audit must be submitted in writing and approved by the Local Planning Authority. This shall include details of: a) Construction waste infrastructure including a construction material recycling facility to be in place during all phases of construction; and details of how inert waste arisings will be managed / recycled during the construction stage;

b) Anticipated nature and volumes of waste and measures to ensure the maximisation of the reuse of waste;

c) 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;

d) Any other steps to ensure the minimisation of waste during construction;

e) The location and timing of provision of facilities pursuant to criteria a/b/c/d;

f) Proposed monitoring and timing of submission of monitoring reports;

g) 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;

h) A RECAP Waste Management Guide toolkit, including a contributions assessment, shall be completed with supporting reference material;

i) 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 is required.

3.11 The agreed Site Waste Management Plan shall be implemented.

Reason: To ensure that waste arising from the development is minimised and that which is produced is handled in such a way that maximises opportunities for re-use or recycling in accordance with Policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) and Policy DP/6 of the South Cambridgeshire District Council Development Control Policies DPD (2007).

2. Construction Environmental Management Plan

- 3.12 A Construction Environmental Management Plan (CEMP) shall be submitted and approved for the development hereby permitted. The CEMP shall accord with and give effect to the waste management principles set out in the adopted Cambridgeshire & Peterborough Minerals and Waste Core Strategy (2011) and Waste Hierarchy.
- 3.13 The CEMP shall address the following aspects of construction:
 - a) A construction programme;

b) Contractors' access arrangements for vehicles, plant and personnel including the location of construction traffic routes to, from and within the site, details of their signing, monitoring and enforcement measures, along with location of parking for contractors and construction workers;

c) Construction hours;

d) Delivery times for construction purposes;

e) Soil Management Strategy including a method statement for the stripping of top soil for re-use; the raising of land levels (if required); and arrangements (including height and location of stockpiles) for temporary topsoil and subsoil storage to BS3883:2007;

f) Noise monitoring method including location, duration, frequency and reporting of results to the LPA in accordance with the provisions of BS 5228 (1997);

g) Maximum noise mitigation levels for construction equipment, plant and vehicles;

h) Vibration monitoring method including location, duration, frequency and reporting of results to the LPA in accordance with the provisions of BS 5228 (1997);

i) Setting maximum vibration levels at sensitive receptors;

j) Dust management and wheel washing measures to prevent the deposition of debris on the highway;

k) Site lighting;

I) Drainage control measures including the use of settling tanks, oil interceptors and bunds;

m) Screening and hoarding details;

n) Access and protection arrangements around the site for pedestrians, cyclists and other road users;

o) Procedures for interference with public highways, (including public rights of way), permanent and temporary realignment, diversions and road closures;

p) External safety and information signing and notices;

q) Liaison, consultation and publicity arrangements including dedicated points of contact;

r) Consideration of sensitive receptors;

s) Prior notice and agreement procedures for works outside agreed limits;

t) Complaints procedures, including complaints response procedures

Membership of the Considerate Contractors Scheme;

u) Location of Contractors compound and method of moving materials, plant and equipment around the site.

- 3.14 The Construction Environmental Management Plan shall be implemented in accordance with the agreed details, unless otherwise agreed in writing by the Local Planning Authority.
- 3.15 **Reason:** To ensure the environmental impact of the construction of the development is adequately mitigated and in the interests of the amenity of nearby residents/occupiers (District Council to insert policy references); and to comply with 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.

Section 106 Contribution

3.16 **Infrastructure type:** Strategic Waste – Household Recycling Service;

- 3.17 **Requested obligation** Capital contribution from Cambourne West towards the cost of providing a household recycling service to serve the Cambourne West residents in line with adopted waste planning policy. Calculated on a per dwelling basis to support the household recycling service for the new residents of Cambourne West.
- 3.18 **Project name** Household recycling service waste contribution;
- 3.19 **Detail** For Cambourne West (based on 2,350 dwellings) a capital contribution of **£425,350** is required in line with adopted waste planning policy, which is consistent with all growth sites around Cambridge. Costs are based on a per household basis on the catchment area for St Neots. The strategic waste contribution sought is for a financial contribution to the capacity already created and improvements to the service for the new residents. The requirement is based on a capital cost only which equates to £181 per dwelling, i.e. 2,350 dwellings X £181.00 per dwelling = **£425,350**.

4.0 ARCHAEOLOGY

- 4.1 Regarding the archaeological implications of the above development officers**object** to the planning application and recommend that permission is refused on the grounds that the impact of the development on heritage assets of archaeological significance has not been adequately assessed and that the requirements for mitigation of the impact cannot presently be defined.
- 4.2 Archaeological investigations undertaken during the development of Cambourne to the east demonstrated that this landscape was extensively and intensively settled and managed from the Middle Iron Age to the early Saxon period (Wessex Archaeology Report Number 23). Investigations in advance of improvements to the A428 adjacent to Cambourne also contributed to this understanding of the late prehistoric and Roman landscape (Albion Archaeology, EAA 123).
- 4.3 Surveys undertaken in support of the application (aerial photographic assessment and geophysical survey) indicate areas of settlement and related activity. Some of these appear to be very extensive in nature and likely continuous (AP5 and AP6). Others, such as the area of settlement identified as AP6 and the enclosures at AP4 give the impression of being contained. However, the fieldwork undertaken in advance of construction of the new school site demonstrated that features relating to these areas of settlement extend beyond the areas of visible cropmarks (HER ECB3735). The proximity to the major Roman road Ermine Street (HER 15034) increases the importance of the area and the potential for highly significant archaeology.
- 4.4 Swansley Wood Farm is a moated manor of medieval origin. Although excluded from the application area, this site is unlikely to have existed in

isolation and additional evidence for medieval settlement and land use can be anticipated in the surrounding area.

- 4.5 The site of RAF Caxton Gibbet is located within the northern part of the site and evidence for this is recorded in the aerial photographic assessment. The site has heritage value in terms of Cambridgeshire's role in the Second World war and should also be considered as a heritage asset.
- 4.6 There is therefore high potential for significant archaeology of Iron Age, Roman, Early Saxon, Medieval and modern date to survive in the proposed development area. Surface artefacts also suggest a Bronze Age presence in the landscape (HER 11874). The National Planning Policy Framework paragraph 128 state: In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets to be affected. In also states that Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk based assessment and, where necessary, a field evaluation. The Cambridgeshire Historic Environment Record and the applicant's own assessment conclusively demonstrate the presence of assets with archaeological interest. Our understanding of the landscape strongly indicates that these will be more extensive than can be defined from aerial photographic and gesophysical surveys. Furthermore, there is potential for additional assets to be present which have not been responsive to the surveys undertaken to date. It is not possible to adequately assess the extent and significance of these heritage assets on the basis of information currently available.
- 4.7 The Environmental Statement suggests that it has not been possible to undertake fieldwalking or trial trenching surveys due to the agricultural crop cycle (13.112). However, we have been advising this approach for over a year, and issued a design brief for this work in March 2014. I find it difficult to believe that there has not been adequate opportunity to arrange fieldwork around the agricultural cycle within this time frame.
- 4.8 The Environmental Statement proposes trial trench evaluation as a mitigation strategy but goes on to suggest that mitigation will be developed subsequent to this (13.113). The ES goes on to suggest generic principles of preservation in situ or by record. We would not consider evaluation to be an appropriate mitigation response. Evaluation is intended to define the character, extent and significance of heritage assets likely to be effected by development and provide information to determine appropriate mitigation strategies. We would suggest that this is contrary to 2011 Environmental Impact Assessment Regulations. Schedule 4 lists for inclusion: *A description of the likely significant effects of the development on the environmental, which should*

cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development (Part 4). In the absence of field testing, it is not possible to determine the significance of the heritage assets known to be present, or of the location, extent and significance of assets which have not been responsive to the limited surveys undertaken to date.

- 4.9 In order to successfully implement preservation in situ, it must be targeted on defined archaeological assets. It would not be appropriate to pick areas of convenience for preservation in situ or to attempt preservation of parts of heritage assets while destroying the remainder. To do so would result in the fragmentation of assets with a resultant loss of understanding and significance. It should be noted that the work undertaken to date indicates that some archaeological assets cover a considerable area (e.g. AP5 and AP6). In the context of the development proposal it is difficult to see how the preservation of these assets in situ could be achieved. Similarly, where preservation by record is to be preferred, we would expect programmes of excavation to address identifiable archaeological assets across phases of development would also result in their fragmentation and consequent loss of significance and understanding.
- 4.10 Officers therefore advise that:
 - the application does not adequately define the character, extent and significance of archaeological assets likely to be effected by development;
 - the application does not make appropriate provision for the management and mitigation of the archaeological resources within the site;
 - in bringing forward development proposals without an adequate understanding of the archaeological context of the landscape, the applicant is does not consider the potential positive contribution that the historic environment can make to place making and the character of the new settlement.

5.0 NEW COMMUNITIES

- 5.1 Up to 0.25ha of land has been provided for indoor community facilities which is welcomed. The exact form and function of the proposed facility will be determined at Reserved Matters stage. It is anticipated and supported that the building will provide a base for a variety of different groups and activities, helping to build an inclusive and vibrant community
- 5.2 It is important that this community facility is suitable for activities for children and young people and their families, especially as Cambourne already has a much higher average of children and young people than the rest of South Cambridgeshire. These community facilities will also need to be suitable for

older people and for those with a disability (whether physical, sensory or learning). As noted in the DAS, most community facilities are within a 2km journey which is considered a reasonable walking distance. However, for young children, mums and dads with prams, older people, those in need of support and the disabled this is can be a more difficult distance to walk so it is very important that the community facilities available in Cambourne West are suitable for their needs. This should include provision such as smaller meeting room(s), sports facilities suitable for disabled use (spring floor), disabled toilets, hearing loops etc. To assist with this, the Council, in conjunction with South Cambridgeshire District Council, would like to be involved in the design of the community facilities to ensure the needs of the community as a whole and especially those who may be more vulnerable to social isolation, will be met.

5.3 The community facilities are not planned to be developed in the first phase of the development, which is disappointing, as such facilities can be important in helping to create a community. The Council would therefore seek a commitment from the developer that some form of temporary indoor community facility, outside of a school building, will be available from the outset of the development so that there is space for information sharing and signposting to existing services and a space for the community to meet together. This is especially important for young families, who will need information about the local children's centre (for example) and for older people and the disabled who may be more vulnerable to social isolation.

Healthcare facilities

5.4 **Ref – DAS (pg32).** Confirmation is sought that the expansion of the existing GP facilities in Cambourne, as suggested in the DAS, will not have a negative effect on the size of the children's centre provision that is currently located within the same building (Sackville House).

Environment that promotes positive mental health

5.5 Ref – DAS (pg 58, 62). Officers support the commitment to community greens and good pedestrian and cycle routes (for active transport) as these promote positive mental health benefits. It would be beneficial too if there is also a commitment to providing adequate room sizes.

Physical environment that is accessible and easy to navigate

5.6 **Ref – DAS (pg 66 - 68, 82).**It is important that the physical environment is accessible and easy to navigate for all members of the community, especially any residents, as with all communities, that may suffer with dementia and for older people who may be more likely to get lost if there is nothing distinctive about the environment. The description of 'street and blocks' as a "logical, legible grid to the development" may make different parts of the development look similar, leading to disorientation.

- 5.7 It is supported that "Landmark buildingsshould be used at key locations to aid navigability and orientation" (Frontages and Local Areas for Play) and "Completed schemes should create identifiablespaces with local character and distinctiveness" (Place Making). Officers would encourage that other landmarks are used too, possibly using landscaping and public art, to creative distinctive features throughout the development.
- 5.8 It is also encouraged that sensory and mobility needs are considered in the design, such as textured pavements, sensible placing of street furniture so it does not create a barrier, and level pavements wide enough for ease of and wheelchair and or buggy usage.

Affordable Homes

5.9 **Ref - DAS(pg 71).**Officers are encouraged by the commitment to a range of affordable housing to meet the needs of the community and expect that the development will be policy compliant with 40% affordable housing.

Social integration

- 5.10 **Ref DAS (Pg100, 108).**Officers areencouraged that the developer has recognized the importance of informal social integration and community infrastructure to enhance youth and community initiatives for example and officers would welcome further details on what the plan is for more formal social integration and what support will be made available to the new residents.
- 5.11 Officers would welcome the opportunity to work with the applicant to seek a commitment for more formal support and community development, especially for those who may be more vulnerable, to ensure all people are fully integrated and welcomed in the new community. This may be achieved through initiatives such as a commitment to provide community development workers and specialist workers for those who are more susceptible to social isolation (those who are at risk of developing mental health problems andolder people for example) and for children and young people. This is important to avoid the higher needs that were witnessed in the earlier development of Cambourne.

Building for Life 12

Ref – DAS (pg 112 -113)

"Facilities and services.

Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?"

5.12 To meet this criteria an additional commitment to early provision of indoor community space for signposting/information sharing and groups/activities to take place should be met.

"Creating well defined streets and spaces. Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?"

"Easy to find your way around. Is the scheme designed to make it easy to find your way around?"

"Streets for all.

Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?"

5.13 As set out above, to meet these criteria it is important that the development is designed with distinctive features so people do not get easily confused or lost and provision is made for those with mobility issues to ensure they can easily navigate around the development. The experience of new developments being that there is a need for community building by the new community itself, and making sure a strong and sustainable community is formed that people want to live in.Officers would be keen to work with the developer and SCDC to ensure a combined approach is taken to community building in this new development.

Section 106 Contributions

Type: Health & Wellbeing of Community

Request obligation: Financial contribution to staff costs (short term 2 years)

Details: Community development workers (specialist mental health) x 2. \pounds 75,000 per year (total = \pounds 150,000)

Type: health and wellbeing

Request obligation: for financial contribution to the kick start funding for groups and activities for people with disabilities and their carers = \pounds 9,292 (OP = \pounds 2,761 and LDPD = \pounds 6531)

Type: Health and Wellbeing of Community

Request obligation: for financial contribution towards 0.7 of an Independent Domestic Abuse Advisor for two years. Revenue funding = \pounds 30,420 per years (total = \pounds 60,840.78)

Type: Health & Wellbeing of Community

Request obligation: Financial contribution to staff costs (short term for two years)

Details: Locality workers x 2, Children's Centre worker x0.7

Flexibility should be given allow the role out of positions as need dictates, staff to be hired on two year contracts

Finance:

2 x Locality workers FTE revenue funding = £69,000 per year. (Total = £139,000)

0.7 x children's centre worker = \pounds 15,467.90 per year (Total = \pounds 30,935.80)

Contribution calculated using the known salary banding for similar roles, plus on costs. All salaries based on 1 April 2014 pay scale.

Type: Health and wellbeing

Request obligation of financial Contribution towards an additional social care for a period of two years = $\pounds 113,333$

6.0 HIGHWAYS (See Section 8 for combined response)

7.0 EMPLOYMENT AND ECONOMIC IMPACT ASSESSMENT

- 7.1 The allocation of employment land within Cambourne West is supported, but only if the currently allocated land for office use (or other potentially appropriate employment use such as technology units) on Cambourne Business Park is retained, and not re-allocated for residential. However, the Council is aware that there are potentially proposals for some residential development on the vacant Business Park land, in accordance with policy SS/8 of the draft local plan. Based on the fact that policy SS/8 would require the provision of 8.1ha of employment land within the smaller site for the Cambourne West proposals (1,200 homes) to be policy compliant this figure would appear to be a starting point for negotiations on this larger proposal.
- 7.2 The location of the proposed 4.4ha of employment use in the north west corner is noted, however, it is suggested that some of the employment provision would be better situated elsewhere within the development, in order to create a more integrated and balanced community and reducing the need for those Cambourne West residents potentially employed locally to travel to work. The proximity of business uses to the proposed local centre and any development of small business units on the Business Park (which could include solicitors, accountants etc.) should also be considered as part of the masterplanning of the site. Whilst the proposed access from the A1198 and segregation from residential housing may be appropriate for some uses, other units should be more integrated within the development, which would provide a better balance of uses across the site and generate activity throughout the day across the site. The focus on providing accommodation for medium and small occupiers who require a mix of office, storage and production spaces is welcomeand helps address a gap in the current range of facilities available in the area. It is disappointing to note however that this area will not be

developed until the later phases. Given the slow take-up of land on the Cambourne Business Park it would be helpful if this could be developed earlier to provide some early employment options for residents on the site. Units for rent by companies should certainly be amongst the mix.

7.3 Assuming the job creation estimates for the proposed employment development in West Cambourne are correct, and when added to the existing employment in Camborne and that proposed for the Cambourne Business Park, it suggests that there will be a broad match between the number of jobs (6300) and the number of houses (6600) in Cambourne when the development is fully completed. However, opportunities to further close any gap should be explored and supported.

8.0 TRANSPORT

- 8.1 The application has been accompanied by a Transport Assessment (TA). A review of the Transport Assessment submitted in support of the application is provided below. Officers are minded to recommend a holding objection until the development is demonstrated as adequately mitigating its impacts.
- 8.2 The comments set out in this response represent interim comments on the TA and accompanying information. Further comments may be forthcoming following more detailed analysis and consideration of the additional information required. In addition there will of course be a need for significant further discussion with the applicant's transport consultants throughout the determination period. This will include how this development interacts with, and contributes towards, the emerging proposals for the A428 corridor such as the A428-M11 segregated bus route and Madingley Road bus priority schemeand potentially a proposed new park and ride site in the corridor.
- 8.3 This response is broken down into the Key Transport Assessment headings.

West Cambourne Transport Assessment

8.4 Paragraph 1.4.1 refers to Guidance for Transport Assessment (March 2007), although it should be noted that this document is now archived.

Planning Policy context

- 8.5 Paragraph 2.6(g) refers vehicular access being provided through an enhanced route through the Business Park, one or more access points from the Caxton Bypass and via Sheepfold Lane. The development access is not being taken through the Business Park and therefore further justification/ clarification should be provided to explain why this is the case.
- 8.6 Paragraph 2.9.1 refers to the Guidance on Transport Assessment (Department for Transport, 2007b). This document is now archived and replaced by the National Planning Policy Framework. (NPPF)

- 8.7 Given that West Cambourne has a proposed allocation of approximately 1,200 homes in the SCDC Local Plan currently at examination, there are already clearly defined transport strategy objectives for a site in this area.
- 8.8 The location of the proposed development is also in close proximity to the proposed site at Bourn Airfield, both of which lie on the A428 corridor. The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) has a list of comprehensive proposals for improvements for the A428 corridor. It is therefore important that any site coming forward on this corridor, even if it is separate or additional to the Local Plan allocation, pays heed to these strategic transport proposals for this corridor and doesn't come forward in silo.
- 8.9 Major strategic priorities include:
 - Linking the development to the proposals for a segregated HQPT scheme on the corridor
 - Proposals for an additional P&R site on the A428 corridor
 - Improvements to the A428
 - Improvements to the Caxton Gibbet and Black Cat roundabouts
- 8.10 It is also important for any site in this area to include strong sustainable links, including:
 - Sustainable links into and within the site
 - Sustainable links to the rest of Cambourne and surrounding settlements
- 8.11 It is also important to state that any County Council comments on an assessment, including a safety assessment, coming from the planning application are specific to that assessment and should not be interpreted as overall agreement that the site fits with the strategic objectives of the corridor.

Existing Transport Conditions

Pedestrian/ Cycle facilities

8.12 Paragraph 3.1.3 includes a list of facilities that are within reasonable walking and cycling distance of the development, however the plans demonstrating this are not clear and should be revisited by the applicant. The county require that walking and cycling isochrones are measured on network rather than as the crow-fly. The facilities should be marked on the appropriate walking and cycling plans, and an audit of provision on these routes to understand any shortcomings that might limit use of these modes by future occupants of the site. Importantly, the propensity for cycling in Cambridgeshire is significantly greater than typically assumed national averages. The 5km threshold distance set out in paragraph 3.1.2 is not therefore accepted by the County Council in a Cambridgeshire context.

Public Transport Facilities

- 8.13 Figure 3.2 the public transport route plan is not very clear and should be revisited.
- 8.14 Paragraph 3.2.3 should consider whether the X5 Oxford to Cambridge service plays a role in this corridor.
- 8.15 Paragraph 3.2.4 should set out what facilities are provided at the identified bus stops including provision of shelters, information, RTPI and so on.
- 8.16 Paragraph 3.2.6 refers to the closest rail stations to the site and that they are reachable by bus, however it should be made clear which service carries out this journey and what level of service is provided. This will give a better understanding of whether these modes provide an attractive journey choice.
- 8.17 It is recommended that the applicant refers to the Census 2011 to identify current travel patterns of residents and proportion travelling by the above modes currently.

Highway Network

- 8.18 Further comments on the highway network and its treatment in this assessment are provided in later sections of the document.
- 8.19 The Broad Street/ High Street Junction is to be redesigned and therefore all assessments should include this.
- 8.20 Paragraph 3.3.2 refers to all routes identified as operating within capacity, although this should be demonstrated with evidence rather than stated.

Road Safety

- 8.21 The accident data should be for the most recent five year period with the manoeuvre data analysed to identify repeat issues that could be exacerbated by the development. The full accident data obtained should be included as an Appendix.
- 8.22 The B1040/ A428 is also an accident cluster which should be considered as part of the assessment.
- 8.23 Paragraph 3.4.7 identifies that most accidents occurring at the accident cluster sites are slow moving shunt type accidents and that no common features were identified although without the full accident output it is not possible to confirm this is the case.

Baseline Traffic Volumes

8.24 The Baseline Traffic Survey data has not been provided as part of the application and therefore this information is required to support the baseline survey information presented.

Proposed Development

8.25 Figure 4.2 is not clear and therefore a printed version of the plan should be provided at a suitable scale to ensure it is readable. The current masterplan should be overlaid with the Figure 4.2 drawing to ensure the proposed facilities are clearly set out in the context of the proposed development.

Access

- 8.26 The Highway Authority are unable to comment on the application in full until the applicant has addressed all the matters raised in the Stage One Safety Audit carried out by Cambridgeshire County Council's Road Safety Audit Team dated 29th October 2014 have been addressed to the satisfaction of the Highway Authority.
- 8.27 The Access drawings numbered Figure 9.6 and 85-78i do not correlate to each other. The applicant show only one 'cycle' path (this presumably excludes pedestrians) to Lower Cambourne and the proposed pedestrian connections are to un-made leisure public rights of way. The proposed 'cycle' path along Sheepfold Lane is intermittent and does not connect to a wider network. Overall the connectivity of the proposed extension to the village of Cambourne is poor and access to the development is car dominated which is contrary to the guidance for new developments contained within Manual for Streets.
- 8.28 Recently County and District Councillors have raised concerns about the size and nature of new accesses to proposed developments. Whereas it is technically practical to make the proposed designs as presented by the applicant acceptable in engineering terms, the Highway Authority requests that the applicant provide a detailed rationale of why other potential access arrangements were discarded as part of the design process. This will give comfort to all concerned that the most appropriate access for a development of this size and nature has been achieved.
- 8.29 On drawing number Fig. 9.4 P1 the applicant appears to infer that Sheepfold Lane is a highway. The Highway Authority requests that it is made clear to the applicant that Sheepfold Lane is a private road that until the opening of the Cambourne Village College, it was a no through route that served only commercial units. If the applicant wishes to bring this road forward for adoption by the Highway Authority, the Highway Authority reserves the right to

require that it is fully reconstructed to the present requirements of the Highway Authority.

8.30 Dwg No. 855-7K (Phasing Plan), the Highway Authority will not adopt any roads that are being used as haul roads. Whereas the phasing plans seem to be a reasonable way forward for dealing with this issue, the Highway Authority requests that it is drawn to the applicant's attention that many roads within the development are likely to remain their responsibility for considerable periods of time.

Parking

8.31 The County Council accept the use of the Proposed Submission Local Plan provided this is acceptable to the Local Planning Authority.

Pedestrian, Cycle and Equestrian Proposals

- 8.32 Paragraphs 4.3.1 and 4.3.2 set out proposed access points and potential routes. This will require detailed further review but currently no information is given on the proposed provision to accompany the development and further work is required to address this.
- 8.33 Proposals set out in 4.3.5 will require significant further consideration, including interaction with emerging City Deal proposals and handling potential contributions to wider network enhancements.
- 8.34 Paragraph 4.3.7 proposes settlements to which enhanced provision could be made. The applicant should indicate what improvements would be required. Further discussion will also be needed with the County Council's PROW team as, whatever improvements are ultimately identified, either delivered by the applicant or through contribution to be agreed with CCC in due course.

Rights Of Way

- 8.35 The County Council also welcome the intention to create emphasis on the historical features of the existing landscape to engender a sense of embedded identity. This approach works particularly well for green infrastructure and was successfully achieved with the earlier development, for example with the retention of the well-used ancient Crowdene Bridleway through Lower Cambourne.
- 8.36 The County Council would emphasise the importance of ensuring that good soft-user infrastructure is in place before residents and community facilities. Experience from Upper Cambourne where the school was created before infrastructure was in place showed that people quickly fell into poor habits driving children to school rather than walking or cycling.

A. Proposed new rights of way

- 1) A footpath link from Lower Cambourne to the spine road and main site access which crosses Cambourne Bridleway 1
- 2) A Bridleway from the A1198 around the perimeter of the site to link up with Bridleway 2 Cambourne
- 3) A footpath link from this new bridleway on the north west of the development to the same bridleway on the north east passing the proposed athletics track.
- 4) A network of cycleways within the development
- For all these routes The County Council require clarification as to the details, including width, classification, surface and any path furniture. All new routes should be built to the same standard as the previous Cambourne development using the Cambourne Highway Design guide specification for Footways, Cycleways and Bridleways. They should be clearly identified on the MasterPlan.
- The County Council also require clarification as to whether these routes are to be dedicated as Public Rights of Way maintained by the Highways Authority? If they are we would expect the developer to work with us to ensure that they are suitable and meet CCC standards.
- 8.37 With regard to the new routes described above:

Route 2 - appears to terminate onto the A1198 to the west of the roundabout. Can the developer clarify the detail of what is intended in this location? The County Council would like to see a new 800 metre bridleway created which would continue south alongside Ermine Street to connect BR2 Caxton as shown on the accompanying plan.

Route 3 – Is there sufficient access to this route where it runs in between the sports pavilion and the athletics track? Depending on the exact location of the pavilion the applicant might consider routing the footpath behind the pavilion to reduce risk of future conflict between user of the path and the athletics track.

B. Footpath 17 Caxton

8.38 The southern end of this route is compromised by two new proposed water bodies and will require a Public Path Order to divert it onto the alignment of route 3 above. Please contact Cathy Collins (Asset Information) cathy.collins@cambridgeshire.gov.uk for further guidance.

General principles

- 8.39 With regard to rights of way which cross the development site we wish to draw your attention to the following principles:
 - Public rights of way are highways that must remain open and unobstructed at all times, including during site construction. Building materials must not be stored on the public rights of way and contractors' vehicles must not be parked on them (it is an offence under s 137 of the Highways Act 1980 to obstruct a public right of way). A Code of Construction methodology must be agreed with the County Council's Rights of Way team for any rights of way affected. A methodology was successfully implemented for the development of Greater and Upper Cambourne. Please see the attached document summarising the methodology and the Cambourne Design Guide for reference.
 - No alteration to the surface of rights of way is permitted without our consent (it is an offence to damage the surface of a highway under s1 of the Criminal Damage Act 1971).
 - Landowners are reminded that it is their responsibility to maintain 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).
 - Legal orders to realign or create public rights of way take time and therefore need to be carefully programmed in to ensure that development can take place as planned. We would request that the developer sets up regular communication with Asset Information to ensure the optimum outcome for this element of the development.
 - The local communities should be kept informed as to proposed changes to the network, including temporary closure, as objections can significantly delay progress.

C. Request for improvements to the Rights of Way network

8.40 The improvements listed below would allow the communities of Caxton and Cambourne to have better direct links which would especially benefit young people going to school and enable access to the wider countryside via the local rights of way network. These improvements when connected to the developers proposed on site would create an opportunity for a greater circular route out and back to Cambourne for those wishing to take a longer recreational route beyond Caxton, particularly when new sports facilities are being provided on the new development. These improvements would significantly add to the health and wellbeing of both communities and users from further afield in accordance with the policies noted above.

- A new 800 metre bridleway created from the junction of the proposed bridleway and the roundabout on the A1198 (Route 2) which would continue south alongside Ermine Street to connect BR2 Caxton. This bridleway would enable recreational users from Cambourne to access to the wider countryside via the public rights of way network to the west of Caxton and beyond. Cost = £135,000 for construction works. Administrative fee for the legal order approximately £4,000
- An improvement to the surface of Bridleway 5 Caxton/Bridleway 4 Cambourne which is the main route between Caxton and Cambourne. This route is used by many young people to go to schools in Cambourne. Total distance approx. 1580 metres. Cost = £250,000.
- An improvement to the surface of 170 metres of Footpath 7 Caxton. This route is a popular route for parents and young people to use for catching the school bus. Cost = £15,000.
- 8.41 These costs are all estimates based on previous improvement schemes.
- 8.42 Further discussion on feasibility of delivering these will be needed with the applicant.

Public Transport Proposals

- 8.43 Further details on the proposed services will be required with CCC's passenger transport team on the acceptability or otherwise of the proposals set out in paragraph 4.4.3.
- 8.44 In due course more detailed proposals for how the bus services, if agreed, can be phased in and assessments made by the applicant of patronage levels. This will allow levels of potential pump-priming subsidy to be identified which CCC would secure through s106.
- 8.45 Paragraph 4.4.8 –The proposed provision of a bus lane will require significant further consideration by the County Council, particularly in the light of Council's emerging thinking on wider transport provision in this corridor to accommodate growth from developments including at land west of Cambournefor which CCC will look to secure a proportionate contribution. This includes the proposed A428-M11 segregated bus route and Madingley Road bus priority schemes.Notwithstanding this, the applicant has not provided adequate evidence to demonstrate the claimed betterment in para 4.4.9, and further reassurance is required that the proposal set out would actually be deliverable in either public highway, in land under the control of the applicant, and without any special permissions being required.
- 8.46 Paragraph 4.4.11 It should be demonstrated that all dwellings will be within 400m walk of a bus stop. All stops will require bus shelters and installation of

RTPI and it is not acceptable to limit provision to just four stops should more be required

Travel Plan

8.47 Travel Plan comments are provided below. In any event the travel plan would need to be agreed via planning condition or obligation with the County Council expecting stretching targets to minimise single occupancy car use being achieved.

Construction Traffic

- 8.48 Issues concerning haul roads are included in the access section of this response.
- 8.49 A construction management plan will need to be agreed prior to commencement on site.

Accessibility Assessment

- 8.50 Figure 5.1 walk isochrones should be on network rather than as the crow-fly. The walking speed assumed should be provided. The facilities identified in Table 5.1 should be included on Figure 5.1. Cycle isochrones are also required.
- 8.51 The most recent National Travel Survey journey time to each facility should be included in Table 5.1 as a comparison, currently 2009 survey is referred to whilst it is understood that 2012 data is available for journey times to each facility. The Indicator column should be separated by mode e.g. walk, cycle and public transport journey times rather than combined. The walking and cycling speed should be clearly defined and where possible actual distances provided. The journey times should be measured on carriageway rather as the crow-fly.
- 8.52 The accessibility to facilities by each mode is dependent on the suitability of the infrastructure available to reach these destinations, therefore journey times to facilities should only be identified where it is possible to undertaken a journey by each mode.
- 8.53 Figure 5.2 does not appear to have been submitted as part of the current Transport Assessment.

Forecast Traffic Demand

Derivation of Base Traffic Flows

8.54 The growth factors identified in Table 6.1 should be compared to TEMPRO to demonstrate the appropriateness of the factors applied.

- 8.55 Paragraph 6.2.4 identifies that the CSRM includes 1,200 residential units that it assumes will be provided at the Proposed Development site at West Cambourne. It is not acceptable for part of the West Cambourne development to be included in the 2031 base as an allocated development. This will result in part of the development impact being accounted for as part of the background growth and committed development, rather than demonstrate the full development impact.
- 8.56 Paragraph 6.2.7 refers to the use of the 4,250 traffic flows to identify internal Cambourne junction growth factors, although it is not clear where the traffic flows have been sourced from and therefore further information is required. Similarly the 2013 traffic surveys have not been provided and therefore it is not clear where the flow figure in Table 6.2 has been sourced.
- 8.57 It is not made clear whether growth has been applied to internal network to account for the remaining non-residential development coming forward in Cambourne and therefore further explanation and reassurances are required.
- 8.58 Paragraph 6.2.8 refers to the junction growth factors associated with the remaining junctions being broadly in line with traffic growth figures derived for the area previously and are considered a fair basis for the assessment, although this should be demonstrated.

Development Trip Overview

8.59 The County Council require trip generation by mode for both peaks and daily trips to be provided. This should also quantify the relative distribution and those travelling within/ beyond Cambourne.

Residential Trip Generation

- 8.60 The Person Trip rates identified in Table 6.2 match with those presented in Table 7.1 of the Cambourne 950 Transport Assessment, which were calculated using surveys of Cambourne dwellings. The Cambourne surveys were undertaken in 2007 although details such as proportion of residential dwellings occupied at the time have not been provided.
- 8.61 The mode choice has been informed by the Cambourne Household Survey (2007), however this should be compared to the 2011 Census data.
- 8.62 The Residential trip rates presented in Table 6.3 are lower than those presented in Table 7.2 of the Cambourne 950 Transport Assessment. Furthermore, CCC have been unable to verify the derivation of the traffic generation figures shown in Table 6.3 and how these relate to data shown in Table 6.2.

8.63 Paragraph 6.4.2 referred to a calibration of the Cambourne Household Survey data against TRICs data, although it is not clear where this analysis has been carried out and whether the TRICs data has been provided, and therefore further information is required.

Commercial Trip Generation

- 8.64 The TRICs database outputs should be provided in order that the County Council can check the site selections.
- 8.65 It is not made clear whether a light industrial trip rate is the most appropriate to represent the non-residential land uses included in the application, and therefore further consideration should be given to this. The proposed commercial premises could potentially be occupied at a much greater density than implied through use of light industry assumptions. This could give rise to greater levels of trip generation. Further assessment work will be required to provide reassurance that any conclusions ultimately drawn on transport impact are robust to this potential outcome.

Development Traffic Distribution

- 8.66 The County require that the applicant compare the distribution applied to that contained in the Census 2011 for both residential and employment trip ends.
- 8.67 Paragraph 6.6.5 refers to route choice being determined by the shortest journey time. The routing applied for each destination should be identified and evidenced as part of the Transport Assessment.
- 8.68 The Commercial trip distribution and route choice has been identified using observed turning movements, although these should be calibrated using Census 2011 data and route choice assessment.

Peak hour Forecast Scenarios

8.69 The assessment scenarios are not acceptable to the County Council. The 2031 base year should contain none of the current proposals (allocated or unallocated). The 2031 base plus development should include all 2,350 dwellings. Without this it is not possible to understand the incremental impact of the development.

Traffic Impact Assessment

8.70 The County Council are unable to comment on this section of the Transport Assessment at this stage as we do not accept assessment scenarios. This section will need to be rerun once the above comments have been revised and agreed. We provide the following comments in the interim.

- 8.71 Paragraph 7.1.1 needs to explain how these time periods match with those proposed in the trip generation section which are different.
- 8.72 The County require that junction geometry measurements be provided to check those presented in each of the junction modelling scenarios. In addition, all junction models should be run with existing traffic flows to demonstrate that the models are able to replicate observed queuing and delays. Without these two pieces of information the County Council is unable to confirm whether the junction models in their current format are acceptable. When this has been provided it is recommended that the junction modelling is resubmitted showing three scenarios:
- (i) observed
- (ii) future baseline with <u>no</u> development at Cambourne West
- (iii) future baseline plus development at Cambourne West
- 8.73 Paragraph 7.2.15 implies that a degree of saturation of less than 0.90 indicates that a junction is operating within capacity. This is accepted for signalised junctions but not for uncontrolled junctions where a value of 0.85 must be used.
- 8.74 Paragraph 7.2.17 refers to the use of ODTAB to input flows into Arcady, the County are unable to agree this approach without the 2013 traffic surveys being provided to demonstrate the assumed profile is appropriate.
- 8.75 The School Lane/ Broad Street junction modelling should take account of the latest junction design. It is not discussed why this junction is not appropriate for PICADY modelling and therefore further justification is required to clarify why LinSig was used to model a priority junction.
- 8.76 The Cambourne Interchange Southern Roundabout (p58) will also need to be modelled in its existing configuration with the 'no Cambourne West' flows so that baseline conditions in the absence of the development can be understood.
- 8.77 For the proposed junction arrangements a link diagram should be provided. Notwithstanding the wider issues identified above it is noted that some arms are operating in excess of capacity.

Travel Plan

8.78 The wider Cambourne settlement is identified as already benefitting from an existing Travel Plan for the existing 950 Cambourne development. The proposed development Travel Plan is to supersede the existing strategy to provide an enhanced overall Travel Plan Strategy. The objectives of the overall Travel Plan Strategy presented in this document need to be clearer

and how the proposed development Travel Plan relates to the 950 Cambourne Travel Plan and the remaining (3,300 dwelling) Cambourne settlement.

- 8.79 Further details should be provided to identify the success of the Cambourne 950 Travel Plan so far which can be used to inform the proposed development Travel Plan.
- 8.80 This travel plan sets overall outcomes, targets and indicators for the development site.
- 8.81 Paragraph 1.3.1 incorrectly quotes the permitted number of dwellings in the Cambourne settlement.
- 8.82 Paragraph 1.4.3 appears to be incomplete.
- 8.83 Paragraph 1.4.5 does not make it clear how the Travel Plan will integrate with existing business users or monitor the existing 4,250 dwellings and schools within the settlement and therefore further information is required.
- 8.84 The draft document does not set the parameters for the requirement for individual sites (or uses / elements) within the overall development to prepare and implement their own subsidiary travel plans. The timeframe for completion of individual travel plans should be detailed.
- 8.85 The Travel Plan needs to include how potential and existing occupiers will be advised of the travel plan requirements (there is little or no evidence of this to date).
- 8.86 Paragraph 4.2.1 appears to be incomplete.
- 8.87 The Travel Plan should be updated in light of the comments provided on the relevant sections of the Transport Assessment detailed earlier in this response.
- 8.88 The proposed measures were implemented as part of the Cambourne 950 development although details are not provided as to the successes and failures, and therefore further information should be provided.
- 8.89 The Travel Plan Coordinator should be employed for a minimum of 5 years post full occupation to align with the required monitoring period. It is unclear who the role of Travel Plan Coordinator will be passed to after this period, and therefore further consideration should be given to this.
- 8.90 There is a lack of management overview and responsibility in the Travel Plan. The Travel Plan should make reference to the Developer responsibilities which should include: chairing the Travel Plan Steering Group, managing the travel plan co-ordinator and being responsible for monitoring and review. It

should be noted that the 950 travel plan by RPS states "6.4 A representative of the developer (initially the Project Director) will act as Travel Plan Coordinator (TPC). The TPC will be supported by consultants, as and when required, and will work closely with Cambourne Parish Council (CPC) and relevant resident bodies."

- 8.91 Welcome Packs should include one month taster tickets for local bus services and discounts at local bikes shops to purchase cycle goods and accessories.
- 8.92 Cambourne 950 travel survey information can be used to identify interim targets, although the baseline survey should be carried out on the new development in order to understand current travel patterns on which to measure future progress. It is not clear whether monitoring of the development will coordinate with the rest of the Cambourne settlement.
- 8.93 The timing of the baseline and subsequent surveys will need to be agreed with the County Council. Monitoring should continue for 5 year post full occupation.
- 8.94 The Targets presented in Table 7.1 are stretching but realistic when compared to the 2011 travel from Cambourne census and the TfC travel to work surveys for Cambourne between 2009 and 2014. The travel plan does not explain why the interim targets are higher and more challenging than the longer term combined modal split and therefore further information is required. The Travel Plan targets should be compared to the achievements of the Cambourne 950 Travel Plan to date to assess their appropriateness.

Conclusions

8.95 We welcome the Transport Assessment and Residential Travel Plan provided as part of this application. However, as outlined above, significant additional information and clarification is required before the County Council can give a view on the full impact of the development including a reassessment based on the actual development proposals in the planning application. Without this the incremental impact of the development cannot be understood and any required mitigation measures identified. Further consideration will also be required on the relationship this development proposal has with wider County Council proposals to accommodate developments, including that land west of Cambourne. These include the A428 – M11segrated bus route and Madingley Road bus priority schemesand potentially a proposed new park and ride site in the corridor for which proportionate contributions will be sought from this development. Therefore we would recommend a holding objection on this development until this additional information has been provided and fully reviewed by the County Council. As noted above, these comments cannot be exhaustive at this stage as the additional information will invariably identify further issues that will require resolution

23 March 2015

Appendix A: EDUCATION

1.0	Introduction	
1.1	The application is an outline application with all matters reserved other than access and therefore the layout masterplan and the planning, design and access statement are only indicative at this stage. The application does however clearly set out the proposed locations and design parameters for the proposed secondary school and the two proposed primary schools. It is therefore important to assess key parameter issues at this stage. A response to the key areas in the application from a design, location and planning perspective is set out in this response.	
1.2	Provision has been made for 2 primary schools (both 2FE) and one secondary school (4FE). A schools campus has been proposed following the development of the secondary school and one of the primary schools in close proximity of the existing Cambourne Secondary School College.	
1.3	The second primary school is proposed to be centrally located within the new development.	
2.0	Design and Access Statement	
2.1	Size and location of Schools	
2.1.1	 The proposed school site sizes are as follows: Primary school 1: 2.2 ha in size Primary school 2: 2.7 ha in size Secondary school: 6.4 ha in size No objection is raised in principle to the size of the proposed schools, although it has not been made clear within the submission whether the school sites will incorporate Early Year and Childcare facilities. 	
2.1.2	The clustering of schools within the school campus, (new and existing secondary schools, Hardwick's Cambourne Campus and Primary School 1), represents good urban design. However, significant care will need to be taken in designing the access and connectivity to and from this area. In total, these four education establishments will ultimately provide places for at least 2,700 pupils. Significant consideration will need to be given to movement and access arrangements to ensure that the impact of this number of pupils, and additional staff travel, do not have a significant impact on the surrounding transport infrastructure. This is especially true in relation to the impact at peak school travel times. It is critical that this is considered from the outset of planning, and that the outline planning application does not create a transport network and infrastructure which prevents successful delivery of education infrastructure.	
2.1.3	It is recommended that at design code / detailed design stage that the Cluster of Schools are designed with separate staff and visitor access points. In	

	particular the drop off area for pupils should be on the public highway and located away from the staff entrances to minimise congestion.		
2.1.4	CCC Education would like to be consulted on the arrangements for the highway network adjacent to the cluster of schools from early stages, to ensure that the arrangements will work from an educational perspective.		
2.2	Primary Schools		
2.2.1	The County Council's adopted policy is for all new primary schools to be developed with accommodation and facilities to facilitate the delivery of early years provision. This approach was established in policy by the Council's Cabinet in September 2007, and is required to ensure that the Council is able to fulfil its statutory duties as set out in the Childcare Act 2005. The requirement for site area is for two form entry schools to be located on 2.3 hectare sites, which should meet specifications established by Cabinet in January 2014.		
2.2.2	To meet this requirement, the County Council would require the site of primary school 1 to be increased from 2.2 ha to 2.3 ha.		
2.2.3	It is recognised that the proposed site area for primary school 2 is 0.4ha larger than the Council's minimum requirement. However, should the developer, wish to make this size site available at no additional cost this would be welcomed by the Council. This would provide greater flexibility and address concerns which may exist locally given the history of Cambourne, and the pressures arising from the documents high birthrate.		
2.2.4	Both primary schools are situated relatively centrally within the development. These central locations to ensure that the primary schools are within a 10 minute walk of all parts of . This is a considerable benefit when encouraging the use of sustainable methods of transport.		
2.3	Secondary School		
2.3.1	The site area proposed for the secondary school site is in line with the requirements set out in the Department for Education's (DfE) Building Bulletin guidance. In this regard, the Council is content with the scale of the site proposed in the outline masterplan.		
2.3.2	The principle of the school being located adjacent to the existing Cambourne Village College to form an education hub at the centre of the development is supported. This will enable the new provision to become an expansion of Cambourne Village College, with good relationship to the existing settlement of Cambourne to the east and the proposed expansion to the west, supporting community cohesion and the integration of the new and existing communities, and is supported.		
2.3.3	In addition, the location of the secondary schools will ensure that all properties		

	would be within a 15 minute walk of secondary education provision. This is considered suitable and favourable for the encouragement of sustainable transport use.	
2.3.4	The Council is aware that the site currently proposed for the secondary school does raise a number of other challenges in relation to the wider connectivity and relationships between existing and proposed communities. As is outlined above, the current arrangement is in principle, supported by the Council from an education perspective. The Council would request that officers from the 0-19 Place Planning and Organisation service are involved in any subsequent masterplanning discussions relating to the relocation or retention of the currently proposed education provision.	
2.3.5	The co-joining of sites will also enable the sharing of facilities and services however it must be ensured that all facilities that are provided have a suitable capacity for both of the schools. This approach also promotes a number of potential opportunities through which the Council, working alongside the Comberton Educational Trust, can secure a sustainable approach for delivering secondary education in Cambourne. Whilst it is understood that the application shows a new secondary school on the southern edge of the additional site, the Council is aware that this may not be the most appropriate location for the additional accommodation to be sited. The Council considers that the secondary school site should be considered as a single site, rather than as a second school. This would ensure that there is sufficient flexibility for the delivery of secondary school provision to be planned and delivered effectively. This should also include the potential for removing / relocating existing planting across the larger site so that this does not become a constraint preventing the delivery of suitable education provision.	
2.4	Connectivity of the Schools	
2.4.1	The proposed secondary school is located adjacent to a cycleway on its west and south boundaries. Confirmation should be sought from the applicants that this will be a joint cycleway and pedestrian route. This approach is supported and will encourage sustainable modes of transport to the school both by foot and cycle from both the existing settlement of Cambourne and the proposed new settlement. This represents good urban design.	
2.4.2	The main route to the Secondary school is served by a loop road, which appears to be designed for the drop off of school children. This approach is supported in principle; however careful design will be required at detailed application stage to ensure adequate space is available to avoid congestion. In addition a separate access will need to be provided to the secondary school away from the drop off area. It is considered that this is a matter that can be fully considered at detailed design stage.	
2.4.3	It is worth highlighting that, in designing the access and parking at Cambourne Village College, the County Council responded to the request / desire of the landowner and their representatives to develop a design which would allow main access to come into the middle of the site through the housing block	

	shown adjacent to the school site in the planning application. The fact that the emerging masterplan has been developed in a totally different manner is rather disappointing, as this may undermine the long-term vision and approach adopted during the design of the current secondary and primary school entrance and parking.	
2.4.4	The proposed primary school in the western part of the development is adjacent to a 'loop road' on its south- west and north- west boundaries, albeit separated by a cycle route and attenuation area. The entrance to the school is proposed to be located in the eastern part of the site, adjacent to the existing public right of way and in close proximity to the spine road. The preference of CCC would be to have a spill out area in front of the school away from the spine road, and although the current relationship is not ideal in this regard, there does appear space for a spill out area. It is considered that this is matter than can be considered further at detailed design stage, especially given that it is stipulated elsewhere in the D&A that the schools will be free from traffic at their entrances.	
2.4.5	It has been proposed that the main outdoor sport area and a large neighbourhood play area close to the northern primary school and western primary school respectively. This proposed location, and the type of facilities which are proposed, specifically the full sized athletics track are welcomed by the Council. These facilities will provide unique access to this type of facility within South Cambridgeshire. The proximity of these additional facilities will potentially enable the school to offer a greater breadth of curriculum.	
2.4.6	This main outdoor sports area offers the potential for a range of uses that will not be subject to noise and over-looking issues as residential properties may be. This is positive in ensuring that there can be a full range of activities hosted at these facilities.	
2.4.7	It is important to highlight that SCDC policy prevents the use of school sports pitches being counted towards the community sports provision (Stuart, can you insert the appropriate policy reference). Whilst the proximity of the community sports provision therefore offers a range of benefits, which will help to ensure that the schools are integrated with other community services and facilities, this does not provide an opportunity to reduce the quantum of land available for either type of provision.	
2.4.8	All schools appear to be well accessed in terms of cycle and walking routes. This approach is supported.	
2.5	LEAPs and NEAPs	
2.5.1	It is noted and supported that LEAPs and NEAPs are situated on the green spaces allocated close by to the schools. This is a logical arrangement to ensure the play areas are accessible and well-used by the younger population and is good urban design.	

	Due Deutee		
2.6	Bus Routes		
2.6.1	The spine road will enable bus routes to run directly to the schools, which is important especially for the Secondary Schools and is an approach that is supported.		
2.6.2	It is supported that the frontage of the schools will be designated for buses and non-motorised traffic only. This will help ensure the safety of pupils and staff when arriving and leaving the school by minimising traffic in the immediate vicinity of the school, and discourage the use of unsustainable private vehicles for school journeys.		
2.6.3	However, as noted in paragraph 2.1.2 above. A significant amount of school related traffic, of all modes of travel, including walking, is likely to be concentrated around the proposed school campus area. This could present a number of challenges, for all users and residents. This could have a negative impact on the flow of traffic in the area around the school. The roads in this area, especially the spine road, will need to be designed carefully to ensure that they are able to cope with the volume of traffic, and do not create challenges to the safety of users, especially younger school-aged children.		
2.7	Heights of School Buildings		
2.7.1	It has been proposed that school building heights will not exceed 12.0m. It is considered that this is overly restrictive, especially having regard to the proposed height of the Secondary School, which is likely to be higher than 12 metres in height. It is recommended that the Design and Access Statement is amended to give a height parameter of up to 15 metres for all school buildings. It is supported that there is no minimum building height, to give flexibility at detailed design stage.		
2.7.2	Having maximum heights of 15m for secondary school has become the Council's standard approach in planning for the delivery of major housing developments across the county. Having this greater flexibility around the height of school buildings allows for greater flexibility in developing the adjacencies of different facilities within the school. The experience of providers who have recently designed Trumpington Community College and North Cambridge Academy has illustrated that having this additional flexibility can generate benefits in-terms of school design.		
2.8	Levels		
2.0			
2.8.1	A contour map featured in the Design and Access Statement shows the site for the western most primary school to be of a noticeable gradient. The school playing fields will require a minimum gradient of approximately 1:70, which will be a requirement of the Section106 agreement. Confirmation from the		

	applicants should be sought at planning application stage to ensure that the			
	school sites can be delivered as flat sites, without significant impact in other			
	areas of the masterplan.			
-				
3.	Planning Statement			
3.1	It is supported that the location of the development in relation to the existing Cambourne College allows for the central hub around this school and the proposed future schools to develop quickly and provide facilities for the initial phases of Cambourne West. The eastern-most parts of the development are to be built out first, ensuring reasonable access to existing school provision until the critical level of demand is reached for the new schools to be developed. The phasing and delivery of the schools will be considered further as part of the Section106 agreement.			
4.	Sustainability Assessment			
4.1	A 10% renewable energy level has been set for the development as a whole. It has been estimated that up to 37% of the estimated total regulated energy consumption from educational buildings can be met by photovoltaic. It has also been considered that solar hot water and air source heat pumps could provide a low/medium contribution to the overall 10% renewables requirement. The uses of such energy resources will be considered in the more detailed design stages however this will be subject to an assessment of viability for the development of the three new schools.			
4.2	Whilst some flexibility has been included in the sustainability statement, it is not appropriate to require 37% of energy requirements from photovoltaic cells, along with air source and solar hot water. This level of provision would add significantly to the capital cost of the school and is not appropriate accounting for adopted planning policy and that the development requirement across the site is only 10%. If the applicants were proposing this level of renewable energy for the schools, a considerable increase in contribution to the Section106 would be required.			
5.	Environmental Statement			
5.1	Space for 2.54ha of community allotments has been proposed for space adjacent to the proposed secondary school. This is a land use considered to have a low impact on the school however security at the boundary between the two sites will need to be considered at detailed application stage.			
5.2	Transport			
5.2.1	It is supported that there would be no access for the construction traffic to the site via School Lane. This is to ensure that the sensitive schools and colleges will be avoided and will not be impacted by the potential noise, safety and air quality impacts that construction vehicles may have.			

5.2.2	Table 9.20 sets out that provision of a school crossing assistance should be provided to mitigate the impact of the development on School Lane. Whilst this is recognised as being a positive approach. As such, it is supported that school crossing assistance during school starting and ending times will be provided and that an on-going commitment for a school crossing patrol warden to operate during the busiest pedestrian times will be enforced. However, it is unclear how this will be funded, and what expectations exist around how this mitigation will be secured. There will need to be consideration to if this can be secured, especially in the short-term, through a S106 contribution from the development.	
5.3	Noise	
5.3.1	Noise to the schools has not been assessed in detail as part of the noise chapter. However, the schools appear to have been located in appropriate locations away from the A428, which is the main noise generating source near the site. The eastern of the two primary schools is located in close proximity to the main spine road, which does have the potential to generate some noise to the school. However, this is only in the north- west corner of the site, with separation provided from the playing fields to the west of the school. It is therefore considered that this is a matter than is likely to be able to be addressed at detailed design stage and no objection is raised to the application in terms of noise.	
5.4	Lighting	
5.4.1	A pedestrian right of way along the boundary of the proposed development and adjacent to the proposed secondary school has been recognised as being likely to be used for commuting bats. Although this imposes light restrictions, it should be ensured that the footpath is adequately lit to provide a safe route for pedestrian accessing the school. The need for lighting of this route should be a condition on any grant of planning permission.	
6.	Conclusion	
6.1	The application is generally supported when considering the location and constraints of the school sites within the development. The location of the schools has clearly been subject to detailed urban design considerations. The schools appear to be well related to the proposed development parcels. The provision for good cycle links and pedestrian connectivity to the schools and the provision for NEAP's are supported. The Design and Access Statement also stipulates that the front of schools will be pedestrian areas, free from vehicular traffic, which is welcomed and will require further consideration at detailed design stage.	
6.2	There are some matters of detail that will need to be addressed as part of the outline planning application process of by way of planning condition/Section106 agreement:	

	 The contours at the school site in the western part of the development to be at a noticeable gradient. It will be a requirement of the Section106 agreement for this site to be flat and confirmation should be sought from the applicants that this can be achieved prior to the determination of the application. The maximum heights of the school buildings are set as 12 metres. To give the flexibility required at detailed design stage, it is considered that this should be increased to 15 metres. The renewable energy statement contains a series of potential recommendations for the schools. Unless the applicants are willing to fund the provision of increased renewable energy within the school sites as part of the Section106 agreement, it is unreasonable for the school buildings to provide a higher level of renewable energy than that required by policy. Early Years and Childcare Facilities will be required at the primary school sites 	
6.3	Subject to the above matters of detail being addressed/clarified there is no objection to the planning application.	

Appendix B Indicative Section 106 Costs

Summary table of emerging issues and contributions (amounts specified are indicative in some cases and therefore are subject to further discussion and agreement)			
Service	Issues	S106 Contributions	
Education	Flat and free serviced school sites; School site sizes; Maximum school heights too low; renewables funding/requirement; EY and Childcare Facilities provision.	2 x 2FE Primary Schools (£8.5M (4Q2014) each) and 1 x 4FE Secondary School (Cost TBC).	
Life Long Learning		£42.12 per head = 6345 x 42.12 = £267,250	
Waste Disposal Planning Authority& Waste Planning Authority	Holding objection until s106 contributions secured until RECAP requirements and HRC contribution agreed. Planning conditions required for CEMP and Waste Audit	£425,350	
Transport	Holding objection until additional information provided and reviewed by County Council		
New communities	Temporary provision of community facilities; impact on Sackville House Children's centre; affordable housing levels	Community development workers x 2 - £150k; kickstart funding £10k; 2 x Locality workers £140k; Children's Centre worker £15.5k; and social care £113k.	
Archaeology	Holding objection until trenching concerns addressed		
S106 monitoring		£60k (County Policy - Monitoring fees charged at 1% on the initial £2m and 0.5% thereafter, subject to a cap of £60K).	