

**ALCONBURY WEALD, ERMINE STREET, LITTLE STUKELEY – OUTLINE PLANNING APPLICATION CONSULTATION RESPONSE**

**To: Economy and Environment Committee**

**Meeting Date: 17<sup>th</sup> October 2019**

**From: Steve Cox: Executive Director, Place and Economy**

**Electoral division(s): Warboys and the Stukeleys, Alconbury and Kimbolton, Sawtry and Stilton, Huntingdon West, Huntingdon North and Hartford, Brampton and Buckden**

**Forward Plan ref: N/a Key decision: No**

**Purpose: To consider and endorse the officers' response to the outline planning application for a mixed-use development of up to 1,500 dwellings, local centre including retail and community facilities, primary school, open space, play areas, recreation facilities, landscaping, associated demolition, ground works and infrastructure.**

**Recommendation: Committee is asked to:**

- a) Endorse the response as set out in Appendix 1; and**
- b) Delegate to the Executive Director (Place and Economy) in consultation with the Chairman and Vice Chairman of the Committee the authority to make minor changes to the response.**

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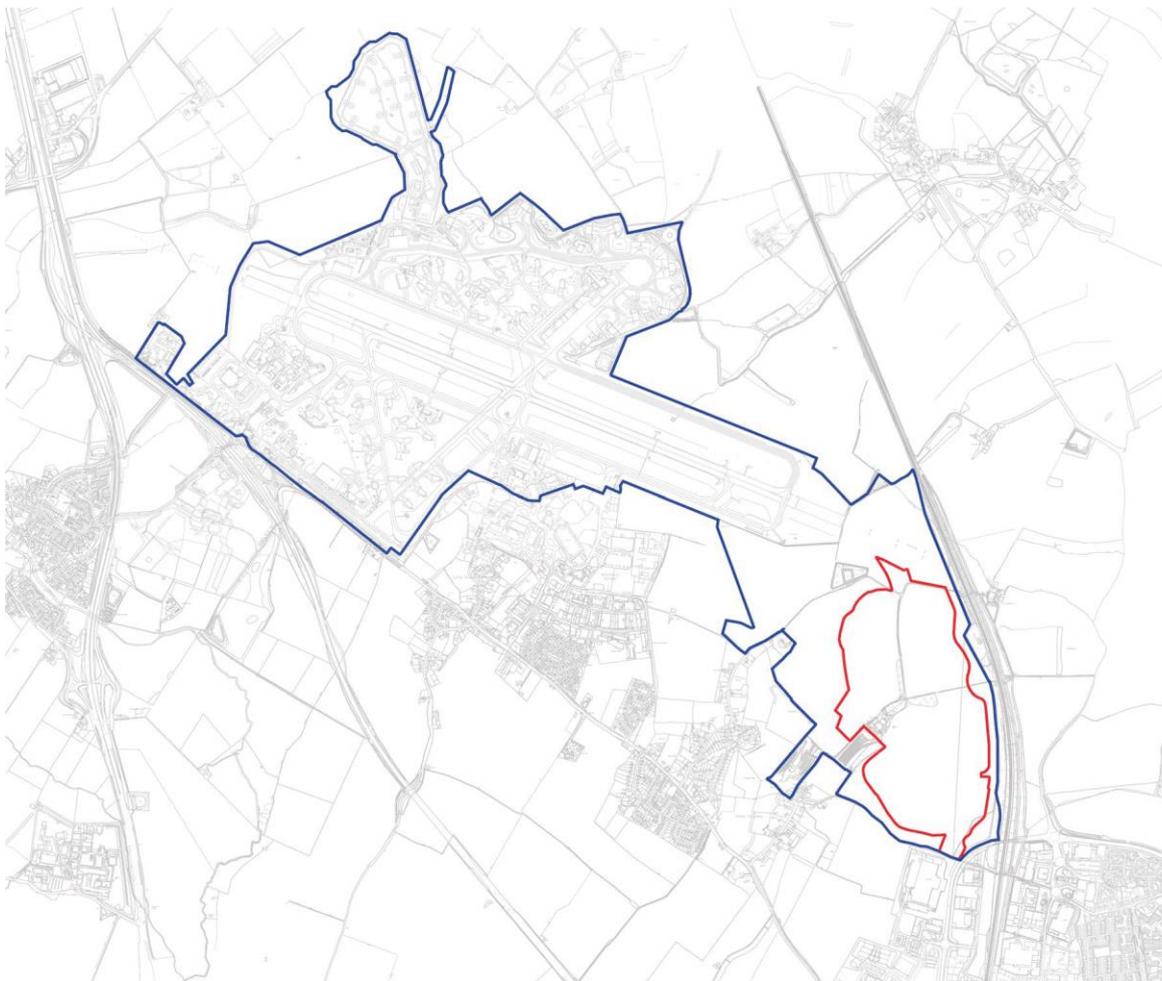
## 1.0 BACKGROUND

- 1.1 Development company Urban and Civic have submitted an outline planning application (OPA) to Huntingdonshire District Council (HDC), as the local planning authority, for up to 1,500 new homes. This report seeks Member endorsement of the officer response to the planning application consultation which was submitted to HDC on the 2<sup>nd</sup> September 2019 in order to meet the consultation deadline.

### The Site

- 1.2 The site is located to the north of Huntingdon. It comprises 80.3 ha of agricultural land. This extends to the A141 to the south, the East Coast Mainline railway line to the east, the two Stukeley settlements to the west, and the wider Alconbury Weald to the north. It constitutes part of the southern section of the wider former Alconbury Airfield and Grange Farm site and is located within the existing Alconbury Weald planning permission boundary. The location of the site is outlined in red in diagram 1.

### Diagram 1: Location Plan



Source: Alconbury Weald (Grange Farm) Outline Planning Application

1.3 The OPA proposes :-

- Up to 1,500 residential dwellings;
- Primary School, including early years;
- Local centre including retail and community facilities (A1-A5 and D1),
- Open Space and Play Areas;
- Landscaping;
- Recreation facilities;
- Associated demolition, ground works and infrastructure.

1.4 The site is allocated under Policy SEL1.1 Former Alconbury Airfield and Grange Farm of the Huntingdonshire's Local Plan to 2036: Adopted 2019 for approximately 5,000 homes with potential for more homes to be supported subject to capacity. However, this new outline planning application will increase the capacity of the wider Alconbury Weald site by 1,500 dwellings.

1.5 Any planning consent granted will be subject to securing a S106 Agreement to mitigate any adverse impacts of the development on existing infrastructure, such as highways or schools.

1.6 The planning application reference number is 19/01341/OUT.

## **2.0 MAIN ISSUES**

2.1 Appendix A of this report contains the full officer response submitted to HDC. Where necessary, valid objections (either 'objection' or 'holding objection') have been made which will constitute a material consideration when the local planning authority determine the planning application at planning committee. The degree of weight attached to these material considerations will be set out in the HDC planning officer report.

2.2 The cumulative impact of the entire Alconbury Weald allocation will need to be considered to provide the adequate infrastructure and facilities that will serve the whole development.

### Developer contributions / s106 agreement

2.3 Officers have and will continue to work with the applicant and HDC to secure an acceptable s106 agreement to mitigate any negative impacts arising from the development. Such provisions must be in accordance with the Town and Country Planning Act 1990 and in particular, contributions must meet the following tests:-

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonable related in scale in kind to the development.

2.4 The County Council will work with the district council and applicant to ensure that the s106 agreement makes provision for adequately mitigating the impacts of the development.

## Education

- 2.5 The location of the proposed primary school is welcomed, however, the school will need to be accessible and serviced in order that it can be delivered in line with first site occupations if required.
- 2.6 The planning application does not specify the size of the school but 1,500 dwellings will generate a need for 3FE primary school with 3ha of land.
- 2.7 It will be necessary to provide land for a further 3FE of secondary school provision, in addition to the 8FE currently agreed for Alconbury Weald and the land for the special school. This will be secured through the corresponding application to amend the Alconbury Weald planning application and s106 agreement. This will take the secondary school to 11FE. The County Council's preferred size for a secondary school provision is 12FE. Therefore the possibility for further expansion on the secondary school site is limited and should further housing be proposed it may be necessary to consider alternative options for secondary education provision.
- 2.8 S106 contributions will be required for primary, secondary (in addition to land) and special school places.

## Lead Local Flood Authority

- 2.9 A holding objection is raised until further technical evidence is submitted.

## Transport Assessment

- 2.10 A holding objection is raised until further information is provided to carry out a detailed review of the Transport Assessment and Transport Assessment Addendum.
- 2.11 The Transport Assessment does not consider the actual proposed quantum of development (having assessed a lesser amount) and has concluded that the difference between the assessed and actual is immaterial. This is not acceptable as the cumulative impact of this and other such assertions within Key phase 1 and subsequent applications will be significant.
- 2.12 Copies of the modelling spreadsheets will be required to review the assumptions in respect of trips, distribution and mode share.
- 2.13 Any mitigation proposals will be agreed once all the relevant information is submitted.

## Public Health

- 2.14 A holding objection is raised until a full health impact assessment is carried out as part of this planning application. The application does not comply with the Huntingdonshire District Council Local Plan as it fails to meet policy requirement LP 29 Health Impact Assessment, therefore the application has not demonstrated that the design of the scheme has been informed by the conclusion of a full health impact assessment.

## Other services

- 2.15 Archaeology, County Planning and Strategic Waste and Library Services have raised issues of concern which can either be addressed by way of planning condition or by working with the application to agree appropriate mitigation measures.

### **3. ALIGNMENT WITH CORPORATE PRIORITIES**

#### **3.1 A good quality of life for everyone**

The application provides a range of measures to promote healthy lives, including sport, play and leisure uses.

#### **3.2 Thriving places for people to live**

The development will provide employment opportunities to benefit the local economy for all.

#### **3.3 The best start for Cambridgeshire's children**

The development should provide appropriate mitigation to ensure that the needs of children are met in terms of providing early years, primary and secondary education.

### **4. SIGNIFICANT IMPLICATIONS**

#### **4.1 Resource Implications**

There are no additional resource implications at this stage

#### **4.2 Procurement/Contractual/Council Contract Procedure Rules Implications**

There are no implications at this stage.

#### **4.3 Statutory, Legal and Risk Implications**

There are no implications at this stage.

#### **4.4 Equality and Diversity Implications**

There are no implications at this stage.

#### **4.5 Engagement and Communications Implications**

There are no implications at this stage.

#### **4.6 Localism and Local Member Involvement**

There are no implications at this stage.

#### 4.7 Public Health Implications

There are no implications at this stage.

Implications	Officer Clearance
Have the resource implications been cleared by Finance?	Yes Sarah Heywood
Have the procurement/contractual/ Council Contract Procedure Rules implications been cleared by the LGSS Head of Procurement?	Not applicable
Has the impact on statutory, legal and risk implications been cleared by LGSS Law?	Yes Fiona McMillan
Have the equality and diversity implications been cleared by your Service Contact?	Yes Cat Rutangye
Have any engagement and communication implications been cleared by Communications?	Yes Sarah Silk and Joanne Dickson
Have any localism and Local Member involvement issues been cleared by your Service Contact?	Yes Andy Preston
Have any Public Health implications been cleared by Public Health	Yes Iain Green

Source Documents	Location
Alconbury Weald (Grange Farm) – Planning Application 19/01341/OUT	Available at <a href="https://publicaccess.huntingdons-hire.gov.uk/online-applications/">https://publicaccess.huntingdons-hire.gov.uk/online-applications/</a>

## APPENDIX A: OFFICER RESPONSE TO OUTLINE PLANNING APPLICATION FOR

### County Council Officer Comments

*Outline planning permission (all matters reserved) for a mixed-use phased development to include - residential development of up to 1,500 dwellings (C2 and C3), local centre including retail and community facilities (A1-A5 and D1), primary school, open space, play areas, recreation facilities, landscaping, associated demolition, ground works and infrastructure.*

19/01341/OUT

The following County Council Services have been consulted ( ✓ denotes response received):-

- Archaeology – comments to be provided separately
- Digital Infrastructure & Connecting Cambridgeshire – no comments received
- Education ✓
- Energy Investment – no comments received
- Floods and Water– comments to be provided separately
- Libraries and Lifelong Learning ✓
- Minerals and Waste ✓
- New Communities ✓
- Public Health ✓
- Transport Assessment ✓

## **1.0 EDUCATION INFRASTRUCTURE SERVICE**

### **Location of Schools**

- 1.1 The central location of the school is welcomed as it will be within reasonable walking distance for all areas of Grange Farm. It is also located away from main roads and the train line. The indicative location of the school suggests it may border the country park, this may improve air quality and could offer opportunities for the school to make use of the park to support its curriculum.
- 1.2 The statutory walking distance for primary pupils is 2 miles. However, the distance from the southern edge of the Grange Farm development to Ermine Street Primary Academy is likely to exceed the statutory walking distance. The proposed site for the primary school on Grange Farm is located in key phase (KP) 2 of the development which suggests it would not be available for first occupations. Should the situation arise that there are primary aged children living on Grange Farm before the school is available and the closest available alternative primary school exceeds the statutory walking distance then the expectation is that the developer will meet any resulting additional cost incurred, including the cost of any transport required. It is likely that additional transport will impact on the transport assessment and does not meet the policy requirement to minimise the need to travel.
- 1.3 It is also possible that the Ermine Street Primary Academy will be full prior to the availability of the primary school site on Grange Farm. This is due to the proposal that KP1 on Alconbury Weald is extended to 1900 dwellings. The higher dwellings in Alconbury Weald KP 1 may result in a child yield of 3.6FE, higher than the 3FE that can be accommodated by the current primary school, Ermine Street Primary Academy. Should this be the case the primary school on Grange Farm may be required before the primary school site (in Grange Farm KP 2) is available unless the location is changed.
- 1.4 For the reasons set out above the primary school site on Grange Farm will need to be accessible and serviced in order that it can be delivered in line with first occupations if required.

### **Post 16**

- 1.5 It is noted that there is a loss of a site originally proposed by the developer for post 16 education on Grange Farm and agreed in the Alconbury Weald S106. We would therefore seek to offer post 16 education on the secondary school site on Alconbury Weald. This approach has been agreed by the Department for Education for the proposed new Alconbury Weald Secondary free school. Therefore this approach can be included as part of the S106 and considered within the S73 application for Alconbury Weald.

### **School Size**

- 1.6 The application does not state a proposed size for the primary school site. It is likely that a 3 form of entry (FE) school incorporating pre-school provision on the site, will be required for Grange Farm. A 3FE primary school will require a 3 ha site which meets the requirements of the Council's school site specifications.

## **Early Years Provision**

- 1.7 Cambridgeshire County Council have a statutory duty to provide early years and childcare places for parents to work and train and to meet the free entitlement, (15 hours free childcare for 3 & 4 year olds) and extended entitlement (30 of free childcare for many working parents). It is County policy to site early years provision on school sites and we therefore welcome the recognition that the provision of early years facilities will be provided on the primary school site.
- 1.8 The application proposes that additional D1 space is provided in the Local Centre in order to provide nursery places. The proposal to offer additional early years places is welcomed. However, the space that is set aside will need to be of sufficient in size, with an outdoor area and should be available for sole use by the early years provider for full time use.

## **Secondary and Special School**

- 1.9 1500 dwellings will result in the need for an additional 375 secondary places, this is equivalent to 2.5FE. For school organisational purposes we do not develop half forms of entry, therefore 3FE will be required to accommodate the increased secondary demand.
- 1.10 The application suggests that additional land will be provided on the secondary school site identified on Alconbury Weald to mitigate the additional need for secondary places resulting from Grange Farm. The land required should be sufficient to provide a further 3FE of secondary school provision, in addition to the 8FE currently agreed for Alconbury Weald and the land for the special school. This will take the secondary school to 11FE.
- 1.11 It should be noted that the Council's preferred size for a secondary school provision is 12FE. Therefore the possibility for further expansion on the secondary school site is limited and should further housing be proposed it may be necessary to consider alternative options for secondary education provision.
- 1.12 Special education provision for children with SEN is delivered through area special schools one of which will be located on Alconbury Weald. There will be a requirement for a contribution towards the cost of providing 15 special school places to mitigate the impact of the development of Grange Farm, this will be secured as part of the Section 106 agreement.

## **Levels and site requirements**

- 1.13 The school site will be required to meet the School Site Specification (Appendix 1), including the requirement for a level and flat site. This will need to be secured as part of the Section106 agreement.

## **Other**

- 1.14 CCC's general multiplier for early years and school places has been agreed by the Council's Children and Young Peoples Committee 5th December 2017. For sites such as Alconbury Weald a multiplier of 40 children per 100 dwellings is used for primary aged child yield calculations and 25 children per 100 dwellings for secondary aged child yield calculations.

## **Recommendations**

- 1.15 We recommend that the location of the primary school site is such that it allows for delivery of the school in line with first occupations if required. Should the school be located in a position where timely delivery is not possible, the developer will be required to meet any additional cost resulting from this.
- 1.16 S106 contributions will be required for primary, secondary and special school places.

## **2.0 LIBRARIES AND LIFELONG LEARNING**

- 2.1 Cambridgeshire County Council has a mandatory statutory duty under the Public Libraries and Museums Act to provide a comprehensive and efficient library service to everyone living, working or studying in Cambridgeshire.
- 2.2 The importance of libraries to the quality of life, well-being, social, economic and cultural development of communities is recognised both nationally and locally. Therefore, it is important to include access to a range of library facilities to meet the needs of the residents of this new development for information, learning and reading resources in connection with work, personal development, personal interests and leisure.
- 2.3 These services and facilities include:
- Adult and children's books
  - Information books and leaflets
  - Local studies and tourist information
- 2.4 These services in libraries, including mobile libraries, are supplemented by online access to books and high quality information resources available to library members from their home, workplace or school/college.
- 2.5 The facilities and services provided by libraries play a vital role in the following areas:

- Developing children's reading skills and enjoyment of reading and providing the resources for improving them throughout their pre-school and school years;
- Encouraging and supporting the development of adult and children's literacy through the delivery of the Reading Agency's Universal Reading Offer;
- Supporting the economic development of the local area by providing books, information resources and courses for people in work to develop their skills and knowledge, or for people to improve their literacy, numeracy, IT or other basic skills to help them enter or return to the job market;
- Supporting local tourism, sense of place and population movement by providing information and leaflets about local places and services, and local history and heritage.

2.6 In assessing the contribution to be sought from developers towards library provision, a consistent methodology is applied in Cambridgeshire, based on the following two principles.

2.7 Firstly, the **requirement** for a contribution is determined according to:

1) The County Council's Service Levels Policy for the provision of a range of levels of library service to ensure that communities of similar sizes across the County receive equivalent access. Since this policy is used on an ongoing basis to determine the level of stock and resources available in line with the existing population it follows, therefore, that a significant increase in population will require a corresponding increase in the level of resources made available.

2) An assessment of how the additional demand can be addressed, taking into account:

- The size and position of the planned development;
- The distance to / catchment area of any existing static library provision or the location of any existing mobile library stop(s);
- The physical capacity of the existing library provision in the area to deliver a service to additional users.

2.8 Secondly, where appropriate the **level** of developer contributions for new library service provision will be based on national guidance which sets out the costs per head of population increase to cover building, fitting out, stocking and equipping libraries. The guidance is contained in the document: *Public Libraries, Archives and New Development: A Standard Charge Approach, May 2010*, developed by the Museums, Libraries and Archives Council on behalf of the Department of Culture, Media and Sport, the central government department with overall statutory responsibility for public libraries. This standard charge approach has formed the basis of the agreements already in place for the major new developments in Cambridgeshire. The standard charges are based on the Royal Institution of Chartered Surveyors (RICS) Building Cost Index and the National Statistical Office Retail Price Index for books and periodicals and will be adjusted in line with those indices over time.

2.9 Based on these principles, the actual level of the contribution sought for each development will depend on its size and location in relation to the size / physical capacity of existing library accommodation. However, in all cases it will include a one-off contribution to book and library stock and the shelving, equipment and infrastructure to accommodate and support those additional resources.

- 2.10 In order to assess whether the contribution is ***necessary to make the development acceptable in planning terms*** the County Council calculates the number of new residents arising from the new development and assesses this against the current capacity in the area.
- 2.11 The Huntingdonshire Developer Contribution SPD sets out the average household size multiplier of 2.25 people per dwelling. This equates to 3,375 new residents arising from the development.
- 2.12 The contribution will be sought on the basis of £97 per head of population increase which is the cost specified in the Museums, Libraries and Archives Council for the creation of additional floorspace including resourcing and fit out of library facility at the main Alconbury Weald development.

### **3.0 TRANSPORT**

- 3.1 Further information is required in order for Cambridgeshire County Council's Transport Assessment Team to carry out a detailed review of the Transport Assessment and Transport Assessment Addendum. Therefore, the County Council holds an **objection** until this information is submitted following the comments below.
- 3.2 A 'churn' affect has been added to the traffic flows using proportions taken from Alconbury Weald Key Phase 1 to simulate the addition of traffic to a constrained (congested) network. Given that this is a first principles assessment which effectively sits outside the Alconbury weald outline planning application, this required further investigation.
- 3.3 The Transport Assessment does not consider the actual proposed quantum of development (having assessed a lesser amount) and has concluded that the difference between the assessed and actual is immaterial. This is not acceptable as the cumulative impact of this and other such assertions within Key phase 1 and subsequent applications will be significant.
- 3.4 The Transport Assessment make reference to Scenario 6 of the CSRM2 modelling which apparently shows that 6,500 dwellings may be accommodated as well as committed development. If this is the case then any 'Churn' affect should be inherent within this model and thus this should be used to identify any impacts of a constrained network.
- 3.5 Modelling Input files/Outputs have not been included within the assessment therefore the modelling and subsequent conclusions cannot be verified/agreed at this time.
- 3.6 Copies of the modelling spreadsheets will be required to review the assumptions in respect of trips, distribution and mode share.
- 3.7 It is noted that the internalisation of trips for Grange Farm is higher than that for key phase 1 extension, this requires further investigation/consideration once the modelling spreadsheets have been received.
- 3.8 Proposed Junction mitigation measures cannot be agreed at present.

3.9 Any junction mitigation proposals that are agreed with CCC will require submission for Stage 1 Road safety Audit.

#### 4.0 PUBLIC HEALTH

4.1 The application has been compared to the New Housing Developments and the Built Environment Joint Strategic Needs Assessment (JSNA) for Cambridgeshire<sup>1</sup>.

4.2 The JSNA contains an evidence review of the built environment's impact on health and has distilled the evidence into the following themes:

- Generic evidence supporting the built environment's impact on health.
- Green space.
- Developing sustainable communities.
- Community design (to prevent injuries, crime, and to accommodate people with disabilities).
- Connectivity and land use mix.
- Communities that support healthy ageing.
- House design and space.
- Access to unhealthy/"Fast Food".
- Health inequality and the built environment.

4.3 The application, in particular the Socio- Economic section of Environmental Statement (ES), has therefore been reviewed against these themes to ensure the application and assessments submitted in support of the application has identified relevant impacts on health and contains specific mitigation measures to address the impact the development can have on human health.

4.4 The application does not comply with the Huntingdonshire District Council Local Plan as it fails to meet policy requirement LP 29 Health Impact Assessment which requires "A proposal for large scale major development, defined in the 'Glossary', will be supported where it can be demonstrated that the design of the scheme has been informed by the conclusions of a full Health Impact Assessment."

4.5 There is no mention of a full health impact assessment being carried out in any of the application documents, and therefore the application has not demonstrated that the design of the scheme has been informed by the conclusion of a full health impact assessment. It is also therefore not possible to fully assess the application.

4.6 At this stage a **holding objection** is made on the grounds that the application has failed to adequately assess the potential beneficial and adverse impacts on human health as required by the Huntingdonshire local plan, in addition the socio-economic chapter of the Environmental Statement has failed to adequately assess the potential impacts on human health as required.

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<sup>1</sup> <http://cambridgeshireinsight.org.uk/joint-strategic-needs-assessment/current-jsna-reports/new-housing-developments-and-built-environment>

*Specific comments on the Environmental Statement are as follows.*

### **Construction Environmental Management Plan (CEMP)**

- 4.4 The commitment to control air bourn pollutants and control measure in section 7 are supported as are the control measure in section 8 - Noise, however their link to adverse effects of noise on human health has not been considered, e.g. mental health.

### **Design and Access Statement**

- 4.5 The concept of Country Park Living, in particular the objectives to; create a new neighbourhood set within an extensive network of green space, and promote health and wellbeing by providing open space areas for active and recreational use are supported.
- 4.6 The overarching vision for Grange Farm is underpinned by the positive impact that the outdoors and nature can have on our mental health and emotional well-being, through the notion of:- 'Creating Healthy Infrastructure' delivering 'A Park for Life' is supported.
- 4.7 The four themes which underpin the landscape vision - Community Landscapes, Diverse Landscapes, Active Landscapes, and Productive Landscapes are also supported.

### **Design Code**

- 4.8 The concept of "play for all ages" (Section 8.8) is supported in particular the "Grange farm standard" (section 8.11) particularly room sizes is supported, however the application has failed to make the link between room sizes and positive/adverse health outcomes.
- 4.9 The design code has failed to address the needs of an ageing population e.g. "age proofing", however masterplanning 14 does include wayfinding which is supported.
- 4.10 The application would benefit from including a wider acknowledgement that the "Grange Farm Standard" also contributes to positive Health and wellbeing outcomes – this should have been addressed through a full Health Impact Assessment.
- 4.11 The "Grange Farm Design Code Compliance Checklist" in Appendix 1 should also include "age proofing/dementia friendly", and a requirement to address any adverse health impacts – The Design code should also show how it is addressing the "Ten principles of the NHS Healthy Town programme", and subsequent guidance.

### **Green Infrastructure Strategy**

- 4.12 The opportunity to contribute and promote 'The Huntingdonshire Health Walks' scheme by providing a range of circular walks within the Application Site that range in distance to suit different abilities, ages and user groups is supported.

### *Gardens and Private Spaces*

- 4.13 The concept of "most properties will benefit from external spaces which will be their responsibility to maintain. Opportunities should be provided for greenhouses, raised beds and any other form of food production to be installed where possible. Responsibility for the management of these areas will be solely with the individual property owners, but a

community and healthy living ethos should be encouraged to help support this initiative” is supported.

#### *Overall net gain*

- 4.14 The proposal for the delivery of formal and informal play provision to address current deficit within the local area and meet the Huntingdon open space and sports standards is supported.
- 4.15 Promoting local food production with provision for community allotments and orchards is supported.
- 4.16 Delivery of a ‘healthy infrastructure’ focussed on getting people outdoors, active and engaging with productive landscapes and the positive environmental, social and health benefits Green Infrastructure can have on health and wellbeing is supported.

### **Environmental Statement**

#### *Map of local facilities*

- 4.15 The reference to NELNHSFT is not correct - the buildings referenced are likely to be occupied by the Cambridgeshire and Peterborough Foundation Trust and are likely to be offices only – there are not a hospital service building as indicated on the key to the map.
- 4.16 The aims and objectives of the Grange Farm Travel Plan, as below are supported:
- to reduce the reliance on the private car in the long-term by seeking to secure a reduction in the number of vehicle trips (especially single occupancy vehicle trips) generated by the Grange Farm development, by shifting trips towards sustainable modes of travel;
  - to minimise travel demand by providing on-site facilities at the onset of the Grange Farm development;
  - to manage travel demand through the implementation of proactive behavioural change measures, encouraging the default mode of travel to be the most sustainable mode of travel;
  - to reduce carbon emissions associated with the Grange Farm development;
  - to embed travel behavioural change within the Grange Farm development, the wider Alconbury Weald community and the surrounding areas of Alconbury, the Stukeleys, Abbots Ripton and Huntingdon;
  - to reduce costly road congestion by managing travel demand from the Site, consistent with Government policy;
  - to build upon good urban design principles that maximise the permeability of the development to promote walking, cycling and public transport use to the local area and also the wider Alconbury Weald development;
  - to promote healthy workforces and lifestyles; and
  - to deliver a transport strategy for Grange Farm parallel with the transport strategy for the whole of Alconbury Weald which will evolve over time to reflect technological, policy and behavioural change.

### **Section 106 Heads of Terms**

- 4.17 The Planning Statement includes a commitment in the Community Facilities section for the “provision of offsite extensions to health and dental facilities (within wider Alconbury Weald).”
- 4.18 Clarification should be sought from the applicant and the Cambridgeshire and Peterborough Clinical Commissioning Group on how this is to be delivered. Currently the Alconbury Weald Section 106 consists of the transfer of serviced land (0.23ha) to a health provider for a nominal sum of £1. The land will be returned if the health facility is not build within 10 years. There is no capital sum towards the construction of the facility.
- 4.19 There is also a requirement to provide a temporary facility in an existing building together with a contribution of £180,000.
- 4.20 As the commitment to provide a health facility on Alconbury Weald is not confirmed by the Clinical Commissioning Group it is not possible for the applicant to commit to building an additional two consulting rooms as no existing facility exists.

## **5.0 Minerals and Waste**

- 5.1 The Waste Strategy supplied with this application has been reviewed and its content is welcomed. The commitment to prepare a Site Waste Management Plan is also noted. Subject to the applicant submitting the Site Waste Management Plan and its Closure Report to the LPA, when available, it is considered that the requirement of Policy CS28 of the Cambridgeshire and Peterborough Minerals and Waste Core Strategy (2011) will be adequately addressed.

**Appendix 1; S106 Site Specification – Primary School (1 Form of Entry (FE) 2FE or 3 FE).**

<b>Requirement</b>	<b>Description</b>	<b>Trigger</b>
<b>Site</b>	Unencumbered freehold title to site. Site is to be provided for NIL consideration with services available for connection. All non-servient easements, wayleaves and public rights of way are to be diverted around site.	Transfer to facilitate any necessary remediation works in order to commence construction 12 months prior to target opening date.
<b>General site issues</b>	Site shall be clear of refuse at time of transfer. Clean topsoil shall be included and shall not be removed from site prior to transfer. Site shall be free from constraints such as contamination, ancient hedgerows or drainage ditches.	Transfer
<b>Site area, delineation and temporary access</b>	Site area to be a minimum of 2.3 hectares (1.5 ha for 1FE, 2.3 ha for 2FE, and 3 HA for 3FE delineated by concrete marker posts (min 900mm above ground level) located at each change of direction. An adequate haul road with no use restrictions shall be provided to enable plant, vehicles and machinery to access the site from the existing adopted highway.	Master planning
<b>Site configuration and levels</b>	Preferred shape is rectangular (with long side no longer than twice the short side). There is to be a minimum of 130m road frontage. The site shall be level and the maximum gradient across any direction shall not exceed 0.25m across whole site.	Master planning
<b>Site position within development</b>	The site shall have straight road frontage and shall not to be situated on a corner near road junctions. The location shall be agreed as part of the planning application process	Master planning

	with the school being located reasonably central to the proposed catchment area.	
<b>Site Plans</b>	<p>To provide:</p> <ul style="list-style-type: none"> <li>• Draft transfer plan to maximum scale of 1:500.</li> <li>• Layout plan of entire development showing existing highway network.</li> </ul>	Commencement of S106 negotiations
<b>Surveys &amp; Investigations</b>	<p>To provide the following documents insured by collateral warranties to provide the Council with redress from the provider in the event of error or inaccuracy:</p> <ul style="list-style-type: none"> <li>• Planning statement of the site to confirm existence of any listed buildings or scheduled monuments, and confirm whether the site is within or near a Conservation Area or SSSI.</li> <li>• Full site topographical survey (electronic format compatible with AutoCAD 2007 (copyright to be passed to CCC)) to include boundaries, site features, all existing underground and above ground services, identifying type, level and route across the site, levels expressed relative to Ordnance Datum at 5m grid centres, drainage levels, adjacent development proposals for highways and infrastructure.</li> <li>• Full archaeological survey as required by planning authority.</li> <li>• Detail and location plans of known previous site disturbances, eg, depth and location of previous archaeological</li> </ul>	

	<p>excavations carried out by the developer could impact on foundation design and construction.</p> <ul style="list-style-type: none"> <li>• Results of site investigation carried out to the relevant current British and European Standards, including BS 5930, BS EN 1997-1, BS EN 1997-2 and all related standards referred to therein. This shall determine load bearing capacity of soils, soil types (and depths), type and location of any contamination and ground water level.</li> </ul> <p>The Council shall be granted a licence with no fee payable to enter the site to carry out any independent pre-construction surveys.</p>	
<b>Communications masts/above ground high tension cables</b>	<p>All site boundaries to be a minimum distance of 2000m from the nearest communications mast and 440,000v power cables. Site boundaries shall be a minimum distance of 100m from 11,000v overhead cables.</p>	Master planning
<b>Sound</b>	<p>The acoustic requirements for the school site stated in BB93 should be applicable to the school site at all stages of any surrounding development and on completion of the development. For example, before, during and after construction of adjoining or nearby development that forms part of the same overall development and under the control of the same developer.</p>	Master planning
<b>Indemnity</b>	<p>To fully indemnify Cambridgeshire County Council for costs of relocating, re-routing, remediating,</p>	Commencement of S106 negotiations

	removing or disposing of any live service, underground obstruction or contamination	
<b>Boundaries</b> This is an advisory item.	<p>When contemplating design and uses for adjoining development developers should be aware of typical school boundary specification. An example follows:</p> <p>All site boundaries (other than front boundary) fenced with 1800 mm high weld mesh on steel posts in accordance with BS 1722. The front boundary to be 1800 mm high galvanised steel railings. One pedestrian entrance to be provided on front boundary, a second on an alternative boundary in agreed position, each with steel gates, and three vehicular entrances (on differing boundaries) with steel gates complete with crossovers of pavements to adopted highways. Any and all boundary treatments, hedges, etc required by planning conditions are to be provided in-situ. Each entrance to have level access to roads that are or shall be adopted.</p>	After site transfer
<b>Highway</b>	<p>Adjacent roads, pavements and cycleways to be constructed up to base course level, final wearing courses to be laid within 12 months of site transfer or at a time to be agreed with the Council.</p> <p>Highway infrastructure adjoining site to be adopted by Highway Authority.</p>	<p>Base course level on site transfer.</p> <p>As S106.</p>
<b>Services generally</b>	All easements, wayleaves and associated installations to serve the site shall have been completed to the site boundary.	Site transfer

	In the event that incomplete agreements or installations threaten to delay delivery of the school the transferor shall undertake to provide temporary services to the site.	
<b>Water</b>	Supply to terminate no less than 3 metres within site boundary at a position to be agreed with the Council. Size of main and water pressure to meet the requirements a 3FE school with appropriate stop valves/terminations/meters in the appropriate boxes/pits/inspection chambers.	Site transfer
<b>Fire hydrant</b>	To be located approximately 5 metres within the front boundary at a position to be agreed with the Council with appropriate stop valves/terminations/meters in the appropriate boxes/pits/inspection chambers.	Site transfer
<b>Gas</b>	Supply to terminate no less than 3 metres within site boundary at a position to be agreed with the Council. Natural gas main to size and pressure to meet the minimum requirement of an operational 3FE school with appropriate stop valves/terminations/meters in the appropriate boxes/pits/inspection chambers.	Site transfer
<b>Electricity</b>	Supply to terminate no less than 3 metres within site boundary at a position to be agreed with the Council. Size of supply to meet the minimum requirement of an operational 3FE primary school with appropriate stop valves/terminations/meters in the appropriate	Site transfer

	boxes/pits/inspection chambers.	
<b>Telecoms</b>	Broadband connection to terminate no less than 3 metres within site boundary at a position to be agreed with the Council. Sufficient number of telephone lines (20 as a guide) for a 3FE school with appropriate terminations in the appropriate boxes/pits/inspection chambers.	Site transfer
<b>Foul &amp; surface water drainage</b>	<p>To provide details of the Sustainable Urban Drainage Scheme that has been prepared as a development-wide strategy. Such a scheme may include attenuation, swales, balancing ponds, soakaways and discharging into watercourses etc, and may have to be built to an adoptable standard. The onus for design, construction and approvals scheme to the site boundary is to remain with the developer even though the school site may make use of and discharge into the system.</p> <p>If there is a requirement for pumping then this is not part of the school design, all associated infrastructure shall be off site and adopted by the drainage authority.</p> <p>If there are any restrictions on outfall from the site then these need to be stated by the developer, this usually applies to surface water and may dictate whether attenuation is required on the site.</p> <p>No open water shall be located adjacent to the school site.</p> <p>Connections to the foul</p>	Master planning

	sewerage system (to be adopted) shall be made available to accommodate the minimum requirement of a 3 FE school no less than 3 metres within the site boundary, at a position to be agreed with the Council.	
<b>Sub-stations</b>	Any substation or pumping house is to be located beyond the site and not within 10m of school site boundary.	Master planning
<b>BREEAM</b>	Site characteristics and development infrastructure shall not hamper or impede the aim of achieving <b>VERY GOOD BREEAM</b> rating. Master planning	Master planning

## Appendix 2 – Flood and Water Response

We have reviewed the following documents:

- Flood Risk Assessment and Water Management Strategy, prepared by Peter Brett Associates, reference 24213/4005, dated June 2019
- C1- Environmental Statement – Volume 1: Main Report, Chapter 13) Hydrology Flood Risk and Drainage, prepared by XXX, dated June 2019
- Site Location Plan, prepared by Urban and Civic, reference UAC048/005 C, dated May 7th 2019

The current proposal is to intercept surface water through trapped gullies and rainwater harvesting systems, with conveyance via a surface water sewer and ditches to one of eight proposed attenuation ponds. The ponds will discharge to a tributary of Bury Brook, which bisects the site from west to east, discharging to a siphon just outside the red line boundary, beneath the East Coast Mainline (managed by Network Rail).

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

### 1. Source Control

Section 7.7.2 of the submitted Flood Risk Assessment and Water Management Strategy (FRA&WMS) indicates that source control methods will be used ‘subject to feasibility’ and Section 7.7.4 indicates that ‘as a minimum’, surface water will be intercepted by trapped gullies. Water quality treatment will be addressed through use of catch pits, petrol interceptors, vegetation in attenuation ponds and where possible, swales.

Whilst the LLFA welcomes the proposal for vegetation in attenuation ponds and use of swales, there is a lack of source control SuDS measures across the site. This restricts the potential for both silt removal and discharge at the greenfield runoff rate.

We would only accept the use of catch-pits and petrol interceptors if they are downstream of an additional stage of treatment such as permeable paving. This would reduce the runoff rates, and filter silt from the runoff, reducing the risk of blockage to the siphon.

## **2. Insufficient evidence from blockage analysis**

Section 3.4.4 of the FRA&WMS, states that a CCTV found the siphon to be in adequate working order, however survey data submitted in Appendix D of the FRA&WMS indicates a history of blockage. The applicant has modelled the siphon for 50%, 75% and 90% blockages, at the request of the LLFA. Item 8 of the Technical note on page 150 of the FRA&WMS indicates a maximum increase in depth of 0.15m for a 1:100 year +25% climate change event at 90% blockage.

The LLFA requests flood volumes for each model node and plans of the flood extent for each of the following scenarios:

- 1:100 year baseline
- 1:100 year 50% blockage
- 1:100 year 75% blockage
- 1:100 year 90% blockage

The analysis indicates that the blockage would have a minimal impact on the site as flood water would overtop the headwall and spill into the railway cutting. This is an increase in flood risk to the East Coast Mainline – a nationally significant infrastructure asset.

## **3. SuDS design**

Section 7.6.1 of the FRA&WMS proposes use of trash screens to prevent access and mitigate blockages to the piped network. The LLFA does not support the use of trash screens as they pose a maintenance liability, other methods of blockage mitigation should be considered such as a perforated riser. Please visit chapter 28 of the CIRIA SuDS Manual C753 for further information.

Section 7.6.1 also indicates that SuDS features will have side-slopes with a minimum gradient of 1:2.5. This is too steep. The minimum allowable gradient is 1:3 as outlined in section 22.2 of the CIRIA SuDS Manual C753, to reduce maintenance related risks. We would encourage the gradients to be as shallow as 1:4 where reasonably practicable, to ensure that the SuDS features fit in with the surrounding landscape.

## **4. No betterment proposed**

The present submission does not comply with Paragraph 157/c of the National Planning Policy Framework. This requires the site to use 'opportunities ...to reduce the causes and impacts of flooding (where appropriate through the use of natural flood management techniques)'. The Alconbury area has significant existing flood risk and there is a natural flood management project currently underway in Alconbury Brook. The site should look to

use natural flood management measures to slow the flow of water, allowing discharge from the site to closer represent the greenfield runoff rate.

#### **5. Climate Allowances for storage estimates**

The applicant has used outdated climate change allowances for the surface water storage requirement calculations in section 7.6.2 of the submitted FRA&WMS. As outlined in paragraph 5.1.12 of the Flood & Water Supplementary Planning Document, the climate change allowance should be based on the proposed lifetime of development, using the relevant central estimate for design purposes. The upper estimate should be used to assess the potential flood risk implications. Further information on how these changes should be applied can be found here on the .GOV website.

#### **6. Inadequate Storage Estimate Calculations**

The storage estimates provided in section 7.6.2 of the FRA&WMS are dimensionless. The LLFA requests that the applicant resubmits these with the dimensions stated, so that these storage estimates may be compared with the 2D hydraulic model results.

### **Informatives**

#### **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.

#### **Assistance For Developers**

- 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.
- 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.