

**Oakington & Westwick Parish Council Response to Planning Application  
Northstowe 3A Ref: 20/02171/OUT**

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## Oakington and Westwick Parish Council Response to Planning Application Northstowe 3A

Oakington and Westwick PC having examined the Planning Application Northstowe 3 A REF: 20/02171/OUT, wish to raise the following objections and request the following planning conditions.

Objection One: **Excessive increase in traffic through the villages of Oakington and Westwick, and then beyond to Girton/Cottenham.**

According to *The Northstowe Area Action Plan (2007)*:

Page 45: Policy NS/10 D6/g : *To link Northstowe to the main road network whilst **minimising the impact of traffic generation on surrounding communities (our emphasis)**.*

Page 47: Policy NS/10 D6.4: *Links from an improved Hattons Road and from Dry Drayton Road will provide access onto the A14 / parallel distributor roads **so as not to increase traffic passing through local villages***

*Page 47: Policy NS/10, 5: All roads will be designed and located to minimise and where possible avoid any adverse impacts on the landscape and existing residential properties*

However, the statistics provided in *The Traffic Assessment Report* in the Planning Application clearly indicate very significant increases in traffic in peak hours in Dry Drayton Rd, Water Lane, Station Rd and Cambridge Rd. Further, most if not all junctions in the immediate vicinity of the development will be over-capacity

Specifically, the Report indicates that excessive pressure will be placed on:

The Cambridge Rd/Water Lane/Dry Drayton Rd junctions.

The Rampton Rd/Oakington Rd junction in Cottenham.

The Gatehouse Lane/Cambridge Rd junction between Oakington and Girton.

The Girton Rd/Huntingdon Rd junction, Girton.

The Dry Drayton Rd/ new local road (A1307) roundabout.

Table 18 Forecast Change in Existing (2018) and Future Baseline (2036) Link Flows AM Peak (extract)

Junction	Link /Arm	Existing Traffic Flows 2018	Future Base Traffic Flows 2036	% Change

		All Vehicles	HGV	All Vehicles	HGV	All Vehicles	HGV
9	Water Lane	713	12	934	21	31.0%	60.5%
	Cambridge Road	239	5	590	11	147.3%	132.0%
	Dry Drayton Road	489	6	779	5	59.3%	-23.2%
	Longstanton Road	91	0	0	0	-100%	0.0%

Source: Transport Assessment: Page 45, Table 18 (extract)

Junction	Link /Arm	Existing Traffic Flows 2018		Future Base Traffic Flows 2036		% Change	
		All Vehicles	HGV	All Vehicles	HGV	All Vehicles	HGV
9	Water Lane	332	3	419	7	30.3%	106.4%
	Cambridge Road	506	6	781	8	54.5%	38.2%
	Dry Drayton Road	440	7	572	4	30.0%	-36.0%
	Longstanton Road	54	1	0	1	-100.0%	7.3%

Source: Transport Assessment: Page 47, Table 19 (extract)

We note that there is no indication in Transport Assessment that “what if scenarios” have been run, in terms of adopting the 2007 SARE (Ref: Planning Application S/7008/07/F), in comparison to the proposed roundabout.

We suggest that by preventing vehicles from turning left out of the SARE into Dry Drayton Rd (East), the problem of excessive traffic through Oakington and Girton would be partially mitigated.

## Objection 2: **The Proposed Location of SARE on Dry Drayton Rd**

The Northstowe Area Action Plan (2007), Road Infrastructure Policy NS/10, contains a number of points relevant to the proposed SARE.

**Page 46, 3c:** This refers to the location of the SARE in the following terms - *A new road from the A14 or its parallel distributor road in the vicinity of the existing Dry Drayton junction into the southern end of Northstowe.*

**Page 47, 5:** *All roads will be designed and located to minimise and where possible avoid any adverse impacts on the landscape and existing residential properties.*

**Page 48, D6.7:** *Careful consideration will need to be given to the design of access roads and junction layouts to minimise their impact on local residents, for example noise, and ensure there will be no resultant rat-running in the villages. Consideration will also need to be given to the adequacy of existing traffic calming measures to deal with the impact of additional traffic.*

It is our contention that the proposed siting of the SARE exit onto Dry Drayton Rd is NOT in the vicinity of the parallel distributor road (A1307). The SARE should merge directly onto the Dry Drayton Rd/A1307 roundabout, or in the direct vicinity.

Further, that the SARE will impact on the existing residential properties of Poplar Villas to the West and the housing on Dry Drayton Rd/Water Lane/Cambridge Rd to the East of the SARE exit.

We are concerned that the combination of increased traffic and the location of the SARE midway along Dry Drayton Rd will pose an excessive level of danger to cyclists.

Condition 1. **That a cycle path be constructed from the proposed SARE exit on Dry Drayton Rd, east to Oakington crossroads and west to the A1307.**

### Objection 3. **The Proposed Design of the SARE exit onto Dry Drayton Rd**

We appreciate that the detailed design of the SARE/Dry Drayton Rd will be the subject of a future, detailed planning application. However, the principle of a roundabout linking the SARE to Dry Drayton Rd is simply not acceptable. The design will encourage drivers exiting the SARE to turn into the village. The design must actively discourage vehicles using the Oakington section of Dry Drayton Rd to the East of the SARE exit.

We note that the proposed design conflicts with the statement in The Northstowe Area Action Plan (2007)

**Page 48, Policy NS/10 D6.7:** *Careful consideration will need to be given to the design of access roads and junction layouts to minimise their impact on local residents, for example noise, and ensure there will be no resultant rat-running in the villages. Consideration will also need to be given to the adequacy of existing traffic calming measures to deal with the impact of additional traffic.*

We note that there is no indication in Transport Assessment that “what if scenarios” have been run, in terms of adopting the 2007 SARE (Ref: Planning Application S/7008/07/F), in comparison to the proposed roundabout.

We suggest that by preventing vehicles from turning left out of the SARE into Dry Drayton Rd (East), the problem of excessive traffic through Oakington and Girton would be partially mitigated.

The Parish Council note the 2007 proposal Planning Application S/7008/07/F, was in design, if not in location, preferable. However, we believe that a ‘No left turn’ out of the SARE into Dry Drayton Rd would be necessary to conform to the Policy referred to above.

Finally, we note that the proposed SARE will be located to the Western side of the frontage of the Business Park. It will therefore require the removal of all the trees on that site, which have been maturing for the last 10 or more years.

Evidence to support the importance of these trees is provided in the response to the planning application, on the Greater Cambridge Planning Portal, by Mrs Miriam Hill, on behalf of the SCDC Trees Officer, who makes following comment on the destruction of the trees:

*I would note that the 4ha woodland block being removed to facilitate the junction onto Dry Drayton Road was an important contribution to the current 6% canopy cover of Longstanton ward. Replacement canopy cover needs to be carefully considered in future landscape proposals.*

The Northstowe Area Action Plan (2007) Policy NS/10 6.7, Page 48 states:

*Careful consideration will need to be given to the design of access roads and junction layouts to minimise their impact on local residents, for example noise, and ensure there will be no resultant rat-running in the villages. Consideration will also need to be given to the adequacy of existing traffic calming measures to deal with the impact of additional traffic. This should be informed*

*through the use of before and after traffic studies and, where necessary, developers will fund additional improvements, having regard to best practice at that time.*

We find no evidence in the document which conforms to this, and no proposals, apart from some references to “mitigation”, to actively minimise the impact of traffic. We therefore request a condition that Homes England should fund a full, independent study of how traffic flows can be minimised through the village via physical means. That, after consultation, and agreement, with The Parish Council and Cambs County Council Highways, Homes England should commit to fund and implement the agreed scheme.

**Condition 2: That Homes England should fund a full, independent study of how traffic flows can be minimised through the village via physical means; and after consultation, and agreement with The Parish Council and Cambs County Council Highways, Homes England should commit to fund and implement the agreed scheme.**

We would also like to raise an additional, related point regarding the proposed route of the SARE. The proposal incorporates a new roundabout to the South of SARW roundabout located to the immediate west of Longstanton Rd, with an extension of the SARE crossing Longstanton Rd. *Please see design immediately below.*

According to the *Outline Planning Document*, it is proposed to close Longstanton Rd and to use it as a leisure facility for walkers, cyclists and horse riders. However, the proposal to have three major, busy roads cutting this leisure route, seems completely contradictory.

It could be argued by the developers that, in fact there are only two permanent roads to cross Longstanton Rd, as the northern ‘haul road’, is only temporary. However, from its construction and the installation of lighting, it is clearly going to be a permanent road, once construction has finished.

**We would argue that the developers must present a compelling case if they are to construct this third road. If the traffic flows are as predicted, then there is no obvious case for the SARE extension across Longstanton Rd. Rather, traffic can access the SARE directly from the roundabout on the SARW.**



Circled section (red) indicates location of roundabout and SARE extension



**Objection 4: The lack of width of the green separation between Northstowe and Oakington and Westwick.**

1. The Parish Council objects to the proximity of Northstowe to Oakington and Westwick. The proposal contradicts a number of policies included in the Northstowe Area Action Plan (2007). These include:

Page 16, Policy C1.2: *the development should ..... Include proposals for Green Separation between the development and existing communities to **maintain the village character** of Longstanton and Oakington. (Our emphasis)*

Page 17, C1.6: *This site will have the least impact on the wider landscape by containing Northstowe almost wholly in views from the west by Longstanton village and from the south by Oakington village.*

Page 19, NS/4: *. Green Separation will be provided between the village frameworks of Longstanton and Oakington and the built-up area of Northstowe. The green separation will have a high degree of public access where appropriate to character and amenity, having particular regard to the character of conservation areas. It will contain only open land uses, including playing fields, allotments and cemeteries, **which will contribute towards effective separation between these communities**. Where the public has access to land adjoining Longstanton and Oakington, mitigating measures to protect the privacy and amenity of potentially affected properties will be provided. (Our emphasis)*

P19 C2.1 *In order to provide an appropriate landscaped setting for the new town where it is closest to existing villages and to ensure the maintenance of the village character of Longstanton and Oakington as required by the Structure Plan, there will be suitably landscaped green separation between them which will continue to form part of the rural setting of these two villages.*

However, the green separation between Northstowe varies between 60 metres in places to 100 metres. Further, the majority of the green separation is actually taken up by infrastructure related to the needs of Northstowe (e.g. allotments, pocket park, greenway, cycle paths). In effect, there is no separation, with the border of Northstowe running directly onto the back gardens of existing properties and affecting their privacy.

Objection 5: **Inappropriate construction of a large number of overbearing housing units to the South East of the site, bordering Church View and Mill Rd.**

The proposal to locate a large block of housing to the South East of the site is too close to existing properties and will dominate a particularly historic section of the village containing the original Anglo-Saxon heart of the village.

The location of a three storey block of housing, rising above the trees to the north east of Oakington conflicts with the statement in *The Northstowe Area Action Plan* (2007) Page 17, C1.6 where it states that *This site will have the least impact on the wider landscape by containing Northstowe almost wholly in views from the west by Longstanton village and from the south by Oakington village.*

This block of housing was located further North and East in all documents prior to late 2019 and was not included in public consultation events, apart from the final January 2020 event where strong objections were raised by the public.

Homes England stated at that meeting that the housing was moved as a result of the advice of Sport England. This was a misleading statement, as the response to the planning application by Mr. Raiswell, on behalf of Sport England states that:

*It is noted that original discussions with the applicant sited the sports facilities as a buffer between the new housing and the village of Oakington to the south. However, there is now new housing between the eastern sports hub and the existing housing within Oakington.....*

*It should be noted that this is an outline application, full details of siting and layout will be submitted under Reserved Matters, so this is not necessarily the final layout. I'm sure there will be further negotiation in the months to come. **We did feel that having the sports facilities as a buffer would be beneficial.*** (Source: Homes England Planning Application Comment)

The Parish Council propose that the housing to the SE of the site, should be moved to the position, which was indicated in documents prior to 2019, further to the North East of the development and that the playing fields should be between the proposed housing and Oakington (Church View/Mill Rd).

Original Position of Housing to South East of the site



**Objection 6: Inappropriate housing to the South West of the site, to the South of the perimeter road, bordering Lowbury Crescent and Longstanton Rd.**

A second way in which the green separation has been narrowed, has been the addition of a housing to the South of the perimeter road on the west side of the development, near Longstanton Rd and Lowbury Crescent. Almost all the green space between the proposed additional housing and Lowbury Crescent is occupied by constructions related to the requirements of Northstowe, as noted above. We regard this as contrary to the policies contained in the *Northstowe Area Action Plan*, which include the following:

Page 19, NS/4: . *Green Separation will be provided between the village frameworks of Longstanton and Oakington and the built-up area of Northstowe. The green separation will have a high degree of public access where appropriate to character and amenity, having particular regard to the character of conservation areas. It will contain only open land uses, including playing fields, allotments and cemeteries, **which will contribute towards effective separation between these communities**. Where the public has access to land adjoining Longstanton and Oakington, mitigating measures to protect the privacy and amenity of potentially affected properties will be provided. (Our emphasis)*

P19 C2.1 *In order to provide an appropriate landscaped setting for the new town where it is closest to existing villages and to ensure the maintenance of the village character of Longstanton and Oakington as required by the Structure Plan, there will be suitably landscaped green separation between them which will continue to form part of the rural setting of these two villages.*

Page 17, C1.6 *This site will have the least impact on the wider landscape by containing Northstowe almost wholly in views from the west by Longstanton village and from the south by Oakington village.*

We therefore object to this block of housing. Building should stop at the perimeter road.

**Objection 7: Excessive housing height to the South of the proposed development.**

The *Northstowe Area Action Plan (2007)* and the *Planning Application* both refer to *sympathetic treatment of the development edging Oakington*.

The *Northstowe Area Action Plan* also states (Page 17, C1.6) that:

*This site will have the least impact on the wider landscape by containing Northstowe almost wholly in views from the west by Longstanton village and from the south by Oakington village.*

Further, Page 28 of the *Planning Application* makes the following claim:

*The 'Oakington Edge' zone marked on Figure 6.28b in the DAS has been identified as the most sensitive area to height. Height restrictions of up to 2 storeys have been proposed here, which will be located behind substantial natural buffers afforded by the existing tree belts (NAAP NS/25).*

However, the *Building Height Plan* (Ref document 5709 Northstowe\_Parameter Plan\_3A\_Heights\_09-12-2019) contradicts this. *See Map 2 on page 20.*

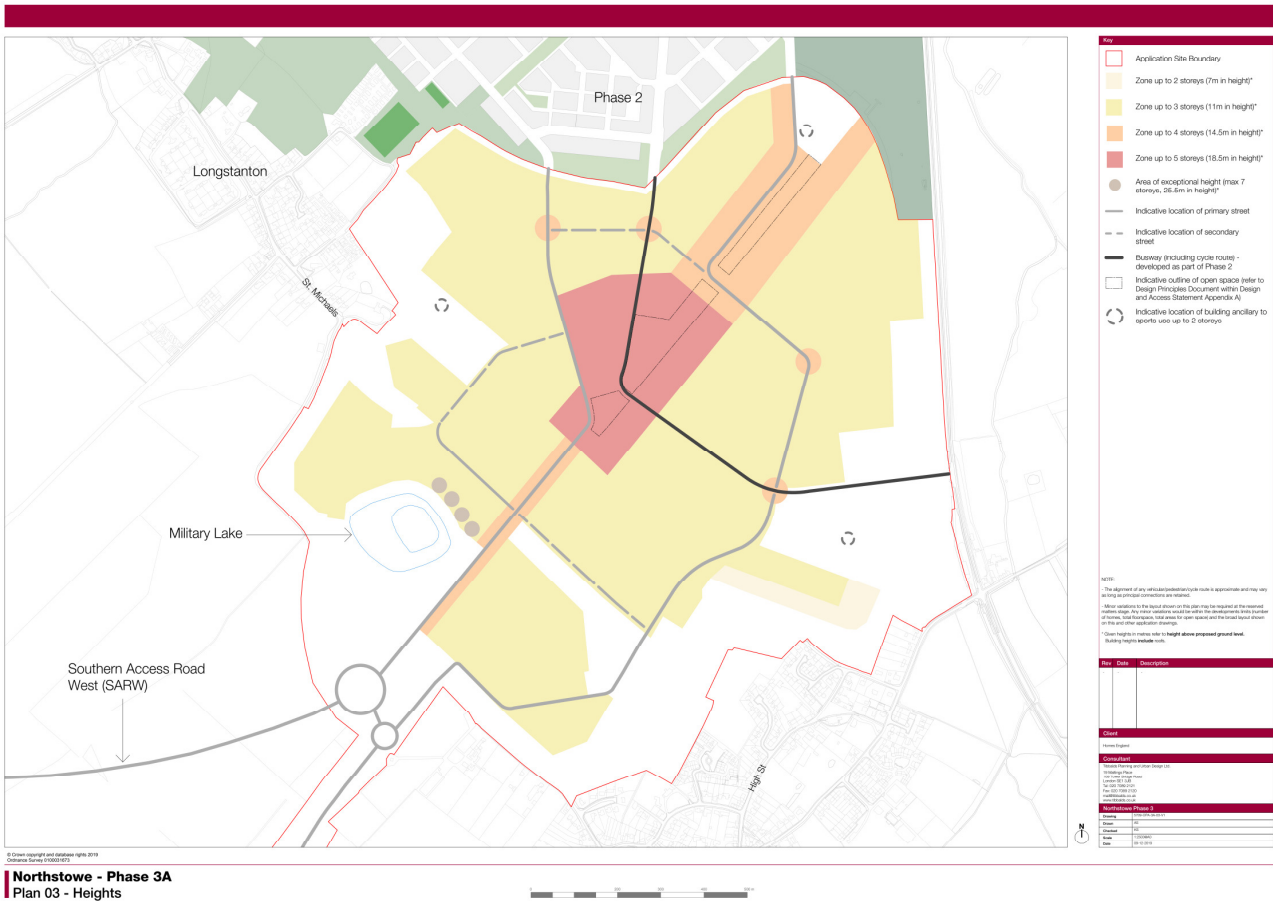
Rather, the planning application reveals that:

(i) to the SE of the site, bordering Church View and Mill Rd. The large majority of housing of the proposed block of properties here are three storeys, with a small section of two storey buildings, which allow the developers to make the misleading claim above. The proposed block will, in fact, dominate a sensitive part of the village, particularly as they are located at a distance of 60 metres from the existing two storey housing. If there is to be any housing allowed, then a maximum height of two storeys is appropriate at all parts of this location.

(ii) to the South West of the development, bordering Longstanton Rd/Lowbury Crescent. All housing in this area will be three storey, contrary to the statement above. These properties will be visible over the trees from much of northern Oakington. A maximum height of two storeys is appropriate at this location.

(iii) there are proposals for seven storey buildings near the military lake on the west side of the site. Buildings of this height are completely inappropriate in the immediate vicinity of water park to the west of the site. These will dominate the skyline on a predominantly flat landscape and destroy the rural aspect of the development from the West. A maximum of three storey buildings are appropriate here.

The argument for lower height structures in the Oakington “edge” is further supported by the policy C1.6 on page 17 of the Northstowe Area Action Plan which requires the Green Separation for Oakington *to be supported wherever possible by locating lower intensity uses on the nearest edges of Northstowe.*



**Objection 8: Excessive Housing Density, specifically to the Southern Edge.**

The *South Cambs Local Plan* (2018) refers to maximum housing density of 40 dph and the *Framework Master Plan for Northstowe* (2012) states, the development will have “a density of about 40 dph with higher densities at the centre reducing towards the settlement edge,” yet the Planning Application states an overall figure of 45 dph.

We are also concerned that there is a contradiction between the submitted plans and the policy C1.6 on page 17 of the *Northstowe Area Action Plan* which requires the Green Separation for Oakington *to be supported wherever possible by locating lower intensity uses on the nearest edges of Northstowe.*

We regard this level of density as excessive and suggest it leads to pressure to construct inappropriately high, and presumably densely populated buildings on the Oakington edge of the development, as referred to earlier (see Objections 6 and 7). We therefore object to the housing density on all parts of the southern edge of the development.



### Objection 9: **Failure to Provide Flood Attenuation on Oakington Brook as agreed in Phase 2**

The issue of flood attenuation is a key concern, given that much of Oakington and the surrounding area is located on a flood plain and the recent history of flood events in the village. The need for the development to provide an **improvement** to the flooding risk in Oakington has been raised on numerous occasions by the Parish Council and the associated Flood Mitigation Group. This concern is explicitly recognised in the Phase 2 Planning Agreement, with a sum of £400,000 allocated for improvements linked to Phase 2, and an associated implication that further sums would be made available in Phase 3A. This funding would be in order to provide an adequate amount for flood improvement for the village by means of the construction of an attenuation pond to control flows in Oakington Brook as it flows through the village.

We are concerned that no reference is made to the commitment made by Homes England (then the HCA) in 2015 to agree a timetable with the SCDC for implementation of the flood mitigation work on the “Dry Drayton Ponds” which were expected to be commenced in 2018-2020. (See extract below from SCDC archives.)

#### *Oakington Ponds*

*REPORT TO: Northstowe Joint Development Control Committee 29 July 2015*

*LEAD OFFICER: Planning and New Communities Director, South Cambridgeshire District Council*

*Application Number: S/2011/14/OL*

*66. The HCA has written to the Council (17 July 2015) to confirm its commitment to improve the issue of surface water flood risk at Oakington, including ponds. This commitment includes continuing to work as part of the Technical Liaison Group to agree the most appropriate site for the proposed ponds, and to agree a timetable for implementation. The HCA aims to have the ponds constructed alongside the major infrastructure works required for Phase 2, anticipated to be 2018 – 2020.*

This is further confirmed in *Appendix 2 of a Meeting of Northstowe Joint Development Control Committee, Wednesday, 29 July 2015*

**We therefore expect that no work should be started on Phase 3A until the Dry Drayton Ponds agreement is put into action.**

Please note that this proposal is separate from the required mitigation works related to the Phase 3A development (and the construction of the SARE), specifically the attenuation pond in the south western corner of the site and controlled discharges into the Award Drain beside Longstanton Road.

We have no objection to the Phase 3A proposals as laid out in the Flood Risk Assessment, but must be assured that all mitigation elements are included in the final proposal and that the pond, pipework and telemetry are all adopted by a responsible Authority (such as Anglian Water) so that regular maintenance is secured for the future.

Further, we seek assurance from SCDC that the award drain 171 along Longstanton Rd should be inspected and maintained on a regular basis to ensure good downstream channel conditions to the Oakington Brook. This is particularly important for the culverted sections.

**Condition 3: We therefore request that prior to any planning permission being granted, commitments are entered into by Homes England regarding the provision of flood attenuation measures on the Oakington Brook, sufficient to reduce the threat of flooding in Oakington to at least the standard of the 1 in 200 year event (plus a 40% climate change allowance). We propose that the site of the ex Tomato Farm, owned by Homes England, should be used for this purpose.**

**Objection 10 That the site contains significant levels of contamination which are dangerous to the health of residents of Northstowe and Oakington and Westwick**

The airfield was in continuous use as a military site from 1939 until its closure. The site has a history of pollution from a range of chemicals, aviation fuels and oils, and ordnance. The larger size ordnance has been cleared from the site, but substantial quantities of small arms ammunition, live and practice, remain.

**Condition 4: That a comprehensive survey, which reconciles the findings of the 2007 NAAP Environmental Statement Volume 8 (December 2007) containing evidence from test pits and bore holes, is carried out. The results of such a survey to be published in full detail before construction commences.**

Objection 11: **Enforcement of Working Hours/Dust and Pollution/ Noise/Lighting**

Re: *Strategic Construction Environmental Management Plan*

The Parish Council is deeply concerned about the impact in terms of noise, pollution and the movement of construction traffic for a construction project which will last **in excess of ten years**. We have reservations regarding the provisions contained in the *Strategic Environmental Management Plan*, given that SCDC has itself concerns over the flouting of regulations by contractors engaged in Phase 2.

We refer to the letter of 11<sup>th</sup> June 2020 from Greater Cambridge Planning to Homes England: *Concerns have been previously raised by local residents and Ward Councillors with regard to the dust and noise impact of construction to the amenities of local residents and issues in enforcing site management in accordance with the agreed Construction and Environmental Management Plan (CEMP).*

*There has been no concrete action, despite repeated requests, for there to be noise or dust mitigation measures introduced for residents, or any tangible proof of effective site management and engaging with the local communities to mitigate these issues during the Covid period to manage construction impacts.*

The *Strategic Construction Environmental Management Plan* contains a range of statements regarding work practices which we know have not been adhered to in Phase 2 and we are concerned that, with work continuing for 10 years, there will be very considerable nuisance to Oakington and Westwick residents over this extended period of time.

It would require an additional extensive document to comment in detail on the Strategic Construction Environment Management Plan and its deficiencies, but it may be useful to illustrate our concerns by highlighting a few examples of areas of concern.

(i) *3.2.2 No continuous 24-hour activities are envisaged and there will be no Sunday or Bank Holiday working unless otherwise agreed with SCDC beforehand. Some instances may occur when specific activities, such as long concrete pours, are unable to be stopped within the core working hours or it may be unsafe to do so. In these instances, out of hours working will be required and the council will be notified of any such occurrences.*

The plan suggests that “no continuous 24 hour activities are envisaged”. The statement is meaningless. Envisaged simply means that they are not yet being thought about. However, possibly 23 hours are? If the work stops for lunch break, it is not “continuous”.

Homes England fail to state that there will be no work on Saturdays. Therefore, residents will have to endure 6 days working for 10 years. The Plan suggests that if Homes England consider it necessary to continue working, they will “inform the council”. Clearly, they should have to ask for permission prior to the activity.

(ii) 6.2.2 *The predicted noise levels are based on a possible worst case, unmitigated scenario, and it should be noted that construction noise tends to fluctuate and is usually of fairly short duration.*

No evidence is produced that noise is “usually of fairly short duration”. The sloppiness of terminology here is clearly deliberate - “usually” (?) and “fairly short” (?). We would remind the Planning Committee that this project will last for ten years.

(iii) 5.1.2 *Concrete crushers / sorters / ridders would be needed to crush the remaining concrete pads and sort/grade materials from demolition and excavation.*

Immediately before the section of the document which suggests there will be limited noise levels, is the statement 5.1.2 above which illustrates the type of work which will be carried out on the site for a considerable period. Crushing and sorting concrete is extremely noisy as well as dusty and polluting. No statement is provided on how long this work will take and how the noise will be mitigated.

(iv) 6.3.3 • *Recording all dust and air quality complaints, identify cause(s), taking appropriate preventative measures to reduce emissions in a timely manner, and record the measures taken;*

Regarding 6.3.3: According to the letter cited earlier, this statement is not substantiated by current practice in Phase 2.

As stated earlier, there are numerous other examples of vague, misleading and inaccurate statements made throughout this document. We would be happy to work through this document in detail with planners to indicate our concerns.

Oakington and Westwick PC suggest that the *Strategic Construction Environmental Management Plan* **should be rejected in its current form and be resubmitted when it contains accurate, measurable and adequate actions to limit pollution, noise and disturbance to residents.**

(v) Finally, we note point 4.2.2 of the *Strategic Construction Environmental Management Plan*: *All construction traffic entering and leaving the Application Site will be closely controlled. Vehicles making deliveries or removing material will travel via designated routes, which have been previously agreed with CCC/SCDC.*

See Condition 6 below.

**Condition 5: That the developers should fund the post of an additional enforcement officer, for the duration of construction at SCDC to ensure that sufficient means are available to enforce a revised *Strategic Construction Environmental Management Plan* document**

**Condition 6: That all vehicles related to the Phase 3A construction be forbidden to use Station Rd, Water Lane, Dry Drayton Rd, Longstanton Rd and Dry Drayton Rd in Oakington and Westwick.**

End.