

The Town Hall, Market Hill St Ives, Cambridgeshire PE27 5AL www.cprencambs.org.uk Tel: 01480 396698 Email: office@cprecambs.org.uk

Branch President Christopher Vane Percy Branch Chair Alan James

Mr Asif Ali - Planning Officer Planning Services, , Sand Martin House, Bittern Way, Fletton Quays Peterborough PE2 8TY

Letter sent by email to:

planningcontrol@peterborough.gov.uk 23rd May 2024

Dear Mr Ali

Ref. 24/00483/OUT - Outline permission for up to 250 dwellings, with public open space, landscaping, sustainable drainage system and vehicular access point with access secured and all other matters reserved (appearance, landscaping, layout and scale). Land South Of Peakirk Road Glinton Peterborough.

CPRE Cambridgeshire & Peterborough strongly objects to this application.

Following a request by local residents, CPRE have reviewed this application and the documents and papers associated with it. We consider the application to be unacceptable for the following reasons.

(1) Effect on Community. The proposed development is on a green area at the edge of Glinton and Peakirk parishes. It is best and most versatile agricultural land providing a valuable countryside aspect to the village setting. Access to countryside and views of the countryside are proven to have major positive effects on health and, in particular, on mental health. Yet this development proposal would create a semi-urban environment and increase the risk of eventual coalescence of the two parishes.

CPRE notes the comments of residents that the proposed development of 250 homes will place additional strain on local infrastructure and services, particularly schools and healthcare for Glinton, Peakirk and other local villages which are reportedly already oversubscribed.

(2) Traffic and Travel. Residents have raised the issues that significant additional traffic created by the development will cause. During construction the necessary HGV and other construction traffic will further damage local roads which are in a poor state of repair and cause noise and disturbance.

On average, modern households operate two cars each, effectively increasing car ownership in Glinton by c.500 vehicles. These will be using the very busy B1443 Peakirk - Glinton Road which, according to local speed sign data already has 500,000 journeys per year travelling between the two villages. 500 vehicles, effecting just two trips per day have the potential to increase this figure by 365,000.

We are told that children from Werrington exit Foxcovert Road onto the busy B1443. The access to the proposed development will be close to Foxcovert Road and vehicles exiting and turning across the B1443 into the development will increase the traffic hazards for these children.

No mention is made of providing additional employment space on the site and therefore, we assume that most working people from the development will commute by car, probably via Peakirk and hence causing additional congestion at the Thorney Road junction.

CPRE considers that an **independent** traffic estimate and/or modelling study would be appropriate.

- (3) Amenity and Services. The village hosts a community-run village hall, a public house, a pharmacy, a health centre, a post office/general store and places of worship, including a church with a needle spire considered to be the finest in England after Salisbury Cathedral. However, for all other facilities such as supermarkets, banks, hardware and clothing the nearest location is Peterborough. With many residents wishing to avoid driving or travelling by bus, this proposal could cause over-loading of the available village facilities. We are also concerned that the considerably increased number of residents, some of whom will no doubt have chronic conditions, others who may be taken ill or be injured during their stay, could cause a difficult capacity situation for local medical services.
- **(4) Water and Drainage.** The Cambridgeshire Fens is one of the driest areas in the country and potable water supply is becoming an increasing issue. Water companies are obliged by law to supply all properties given planning permission with potable water and with sewage services. However, we are concerned that the cumulative effects of such permissions are not being properly estimated and that this is already causing overload on existing services. A good example of this is the increasing occurrence of releases of untreated sewage into streams and rivers all across the UK. We are therefore concerned to ensure that this application does not create a local tipping point for service quality.

There are clearly surface water drainage issues on and around the site. CPRE considers that the advice of the Lead Local Flood Authority and the Welland and Deepings Internal Drainage Board, (IDB), must be followed as a minimum.

Given the increasing occurrence of prolonged heavy rainfall across the UK and the rapidly increasing rate of sea level rise, both due to climate change. We are concerned that current standards of protection and drainage being used in planning applications in relatively low-lying locations may well be insufficient by mid-century.

We are also concerned that the additional run-off caused by this application will add to the IDB's pumping costs recharged to the council which in many areas have become overwhelming due to the massively increased cost of electricity. According to the Local Government Chronicle published on 21 May 2024:

"Some councils have warned that they may have to cut services due to "unprecedented" cost rises from the internal drainage board levy.

Councils are charged a levy to fund IDBs to manage water levels in their area. Previously the funding for IDBs was included in the revenue support grant from central government but since 2016 councils have been expected to fund it through council tax, which they have not been able to increase at a rate to match the increase in the levy without holding a referendum.

The Association of Drainage Authorities has collated the financial impact of the levy, which shows it has increased by £10.9m in two years. In 2022-23 councils paid £38.9m and by 2024-25 this has reached £49.9m."

This potential financial effect upon the council should be taken into the consideration of this application.

- **(5) Landscape.** A desk study indicates that the proposed addition of 250 houses to the edge of the village will have a major negative effect upon the local landscape and the setting of the village. Views from within the village will be obscured. Views towards the village will be irreparably damaged. CPRE considers this to be unacceptable.
- **(6) Greenspace and Wildlife.** Much of the proposed area of development is clearly a considerably appreciated green space. Because it is in productive, agricultural use, it does enjoy any protective designation, such as that of Local Green Space.

Nevertheless, the edges of the area provide hedgerows and some tree cover and hence valuable wildlife habitats which CPRE considers should not be disturbed. We are aware of the proximity of the site to known locations of Great Crested Newts.

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In this respect CPRE notes and supports the Objections of the Wildlife Officer and the gaps in information received from the applicant and the additional information requested.

CPRE is also concerned by possible additional noise and light disturbance on wildlife and the village. This is a very tranquil area with low night light levels.

(7) Planning Policy – Local Plan. The proposed development appears to be inconsistent with the following planning policies of the current Peterborough Local Plan 2016 to 2036.

Policy LP2: The Settlement Hierarchy and the Countryside

Glinton is identified in the policy as a Medium Village and Peakirk as a Small village.

The policy states:

"The village envelope for each village is identified on the Policies Map. Proposals within the village envelope will be supported in principle, in line with policy LP1, subject to it being of an appropriate scale for the settlement. Land outside the village envelopes and outside the Peterborough Urban Area boundary is defined as countryside. Development in the countryside (i.e. outside the boundary of all settlements in the hierarchy) will be restricted to that which is:

demonstrably essential to the effective operation of local agriculture, horticulture, forestry, outdoor recreation and access to natural greenspace, transport or utility services; or

residential development which satisfies the 'exception' test set out in policy LP8; or

development in accordance with Policy LP11; or

minerals or waste development in accordance with the separate Minerals and Waste Development Plan Documents.

All other residential development outside of village envelopes and outside of Peterborough Urban Area boundary will, by definition, be contrary to the vision, objectives, development strategy and policies of this Local Plan, and should be refused, unless otherwise acceptable within a made Neighbourhood Plan."

Clearly, this proposal is outside the villages development envelopes, and does not meet the exception test set out in policy LP8. It is also not part of a made Neighbourhood Plan. See below.

Policy LP3: Spatial Strategy for the Location of Residential Development

The policy states:

"Elsewhere, the strategy for planned growth will be on Large Villages and, to a lesser extent, on Medium and Small Villages. In these categories of settlement, new residential development sites for 10 dwellings or more and employment allocations have been allocated in some of the settlements. Other development in these villages will be limited to infill or redevelopment of sites of a scale appropriate to the village."

Clearly, this proposal is not a development site for of the scale envisaged above and neither is it infill or redevelopment of a site of a scale appropriate to the village.

Policy LP8: Meeting Housing needs.

This proposal is for development of a rural site adjacent to a Medium Village. In this respect CPRE believes it should be expected to meet the Rural Exception site tests of Policy LP8, which states:

"Rural Exception Sites

Development proposals for affordable housing outside of but adjacent to village envelopes may be accepted, provided that:

- 1. It meets an identified local need for affordable housing which cannot be met within the village envelope; and
- 2. There is demonstrable local support for the proposal; and

3. There are no fundamental constraints to delivering the site or significant harm arising.

The term 'demonstrable local support' means at the point of submitting a planning application to the council, there should be clear evidence of local community support for the scheme, with such support generated via a through, but proportionate, pre-application community consultation exercise. If, despite a through, but proportionate, pre-application consultation exercise, demonstrable evidence of support or objection cannot be determined, then there will be a requirement for support from the applicable Parish Council."

There is no clear evidence of local identified community support for the scheme. Indeed, from the number of objections submitted and listed on the council website, the evidence is quite the opposite. Furthermore, it is clear that the Parish Council does not support the scheme and neither does the neighbouring Peakirk Parish Council. The Rural Exception Site testing therefore fails on all three counts.

- **(8) Planning Policy Neighbourhood Plans.** The proposed development must be consistent with the following made Neighbourhood Plans.
 - a) Peakirk Neighbourhood Plan 2016-2030, which contains the following statements:

PK1 Preventing the Coalescence of Peakirk and Glinton.

Development outside the Village Envelope, as defined on Map 1, must not, either individually or cumulatively, increase the coalescence of Peakirk and Glinton by reducing the physical gap between the two settlements.

PK2 Views Important to the Historic and Cultural Setting of Peakirk

2. From the southern edge of the village looking along the B1443 towards Glinton

Development proposals that would have an unacceptable impact on the identified important local views through closing off or reducing the view, or through detracting from important features that make the view important, will not be supported.

PK3 Protect and Enhance our Heritage and Rural Landscape Character

Outside of the Village Envelope, as shown on Map 3, development proposals will be limited to that which is demonstrably essential to the effective operation of local agriculture, horticulture, forestry, outdoor recreation and access to natural greenspace, transport or utility services, and to residential development on rural exception sites.

Any development within the Plan area will only be permitted where it would not have a detrimental impact, by way of size, scale, design, positioning, layout, or use, on the setting of the village and/or its satellite housing at Meadow Road and Foxcovert Road.

b) Glinton Village Neighbourhood Plan 2016-2036, which contains the following statements:

Policy GNP1: Housing Growth

The housing growth will be managed across the plan period to ensure that Glinton grows steadily and sustainably. This growth will amount to around 5% in dwelling numbers as calculated at 1 April 2018, through the development of up to 34 dwellings by 2036 *. If a development proposal together with other dwellings built after 1 April 2018 or with a live permission would result in the total number of dwellings exceeding this 34 dwelling growth level, it must be accompanied by evidence of clear local community support, or the written support of Glinton Parish Council, for the proposed scheme, demonstrated through a thorough and proportionate pre-application community consultation exercise.

Policy GNP2: Location of New Development

Development proposals outside of the village envelope should not result, either in isolation or in conjunction with other developments, in the physical or visual coalescence of Glinton with any neighbouring settlement.

Policy GNP10: Traffic

Proposals to improve bus access for students to Arthur Mellows Village College or the provision of improved drop off facilities for parents and students will be supported. Proposals which would increase the number of road access points onto the B1443 (Lincoln Road and High Street) or onto Helpston Road, or that would result in an increase in vehicle movements in or through the village should demonstrate through accompanying evidence that any potential impacts of the proposal can be adequately addressed.

It is CPRE's view that the current application is not consistent with any of the policies of the two Neighbourhood Plans quoted above.

(9) Development Process.

We would point out to the Planning Authority that Gladman Developments Ltd is not a company which carries out development of any site it obtains planning permission for. It is merely a skilled agent acting for site owners who usually then sell the site on to a local or national development company.

Therefore, there is no guarantee that any of the promises made in the documents submitted by Gladman Developments Ltd will ever be delivered and will not be the subject of subsequent change requests made by the actual developer.

A frequent such request is to reduce the volume of affordable housing on the grounds of site economics. Another, is to press more houses into the site. We believe the council should take this risk very seriously.

Conclusions

- 1. The local community, as evidenced by the submission by the Parish Councils and the many objections of local residents, does not support the proposed development.
- 2. There will be a negative effect upon the setting of the village and likely excess pressure on village amenities and services, including health services.
- 3. The proposed development would contribute to coalescence of the villages of Glinton and Peakirk.
- 4. There is concern and uncertainty about the likely traffic flows to and from the completed development and the effects upon road safety, particularly for school children.
- 5. The additional commuting to workplaces, for shopping and other services will cause additional emissions and pollution affecting both climate change and health.
- 6. The climate costs of the construction process and the building materials used should be evaluated.
- 7. The proposed development will take a significant amount of best and most versatile farm land out of production at a time when the Environmental Audit Committee has warned government that more food must be grown in the UK to counteract the effects of climate change on food supply.
- 8. CPRE have concerns about the effects of this development on the provision and costs of drainage and the provision of wastewater treatment.
- 9. There will be negative effects on the tranquil rural landscape of the area, including additional light pollution.

CPRE request the Council to reject this application.

Finally, please note that our submission is in respect of the proposed application. While we have taken every effort to present accurate information for your consideration, as we are not a decision maker or statutory consultee, we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching your decision.

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Yours sincerely

Dr Alan James CEnv. On behalf of CPRE Cambridgeshire and Peterborough