



The countryside charity
Cambridgeshire
and Peterborough

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Ms Angela Briggs
Planning Case Officer
East Cambs. District Council
The Grange,
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Cambridgeshire, CB7 4EE

Branch President
Christopher Vane Percy
Branch Chair
Alan James
Branch Vice-Chair
Lawrence Wragg

28 October 2020
Planning Application Ref: 20/00996/OUM
Letter Sent by email

Dear Ms Briggs,

With reference to the above outline application for residential development for up to 70 dwellings and the demolition of 18 Wilburton Road (all matters reserved except for access) on Land South of 18 Wilburton Road, Haddenham, Cambridgeshire by Land Allocation Ltd.

CPRE Cambridgeshire & Peterborough objects strongly to this application for the following reasons.

Local Plan

The proposed site is not listed as a potential development site in East Cambs. Local Plan 2015 which successfully completed Examination in Public by a Planning Inspector. The proposed site is outside the established village development envelope defined in the Local Plan 2015 following extensive consultation with the residents of the village. This consultation is well documented in the "Haddenham Village Vision", a Supplementary Planning Document incorporated within the East Cambridgeshire Local Plan 2015.

The proposal is not consistent with Policy ENV 1 of the 2015 Local Plan which states that:
"Proposals for development should be informed by, be sympathetic to, and respect the capacity of the distinctive character areas defined in the Cambridgeshire Landscape Guidelines. Development proposals should demonstrate that their location, scale, form, design, materials, colour, edge treatment and structural landscaping will create positive, complementary relationships with existing development and will protect, conserve, and where possible enhance:

- *The pattern of distinctive historic and traditional landscape features, such as watercourses, characteristic vegetation, individual and woodland trees, field patterns, hedgerows and walls, and their function as ecological corridors for wildlife dispersal.*
- *The settlement edge, space between settlements, and their wider landscape setting.*
- *Visually sensitive natural and man-made skylines, hillsides and geological features.*
- *Key views into and out of settlements"*

The proposal is not consistent with Policy ENV2 of the 2015 Local Plan which states:
"All new development proposals, including new buildings and structures and extensions and alterations to existing buildings and structures will be expected to:

- *Protect important views into and out of settlements"*

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Sustainability

The Local Plan 2015, page 194, anticipated that 103 new dwellings would be built in Haddenham in the period up to 2012 -2031 on two allocated sites plus some infill sites. However, a successful planning application in 2012 granted permission for 24 affordable homes in Northumbria Close which put the village significantly ahead of its planned rate of development prior to the adoption of the Local Plan 2015. Since that date, another successful application for 59 homes, including 19 affordable, also outside the development envelope, at West End has further exceeded the planned number of homes for Haddenham. A further applications, for 40 homes in Station Road was permitted in 2019. These permissions alone have already ensured that the planned development rate for Haddenham to 2031 of 103 dwellings, will be exceeded by 20 dwellings without considering known small infill sites or the two allocated sites in the Local Plan for 39 homes.

The majority of the adult working population of Haddenham commute out of the village by car. All secondary school students have to leave the village for schools in Witchford, Ely, Soham, Cottenham or Cambridge. Existing permissions and plans for Haddenham and Wilburton mean that primary schools in both villages are already coming under pressure for places. To add a further 70 houses to the already excessive rate of growth does not represent sustainable development within the meaning of the National Planning Policy Framework (NPPF).

Health Services

We note that as with a previous application for this site, 19/00214/OUM, no Health Impact Assessment has been provided. We therefore consider that the response of the NHS Cambridgeshire and Peterborough Clinical Commissioning Group to application 19/00214/OUM remains relevant, and most specifically their comment that *"The existing GP practice does not have capacity to accommodate the additional growth resulting from the proposed development."*. This remains clear evidence that this development is not sustainable.

Traffic and Pollution

We continue to agree with the Parish Council's concerns that adding further commuter traffic to the already over-crowded local roads will increase both accident risk and unacceptable pollution. We know from local members that, in normal times, morning peak traffic queues from Wilburton High Street back to the site. We note that County Highways continue to recommend refusal.

Traffic volumes collected by Community Roadwatch over several weeks at a time near the playing field in Hop Row during 2018 and 2019, unlike the single day monitoring carried out by the applicant, show just how consistently busy the A1123 is and the dangerous speeds that some drivers reach in the 30 mph limit. See Table below:

Hop Row - Towards Wilburton

Dates	Total Veh.	Avg Daily Veh.	Top Speed 48mph
25/09/18 - 09/10/18	46,356	3,311	
4/12/18 -31/12/18	91,688	3,275	
1/01/19 - 2/02/19	112,731	3,416	

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Hop Row - Towards Haddenham Top Corner

Dates	Total Veh.	Avg Daily Veh.	Top Speed 58mph
2/02/19 - 2/03/19	89,416	3,193	
1/03/19 -31/03/19	101,637	3,279	
26/06/19 - 31/07/19	95,229	2,721	

Of course, the inbound vehicle numbers from Wilburton will have been reduced by traffic using Wilburton Road and the High Street to avoid Top Corner junction.

In both Wilburton and Haddenham, the District Council is sufficiently concerned about the pollution levels on the A1123 and A1421 that routine monitoring has been introduced. This is supplemented by additional monitoring carried out by a local volunteer group. This group has previously carried out indicative monitoring of particulate (PM2.5) levels in Wilburton High Street which indicated a level at that time more than double the current EU limit value.

Recent monitoring of nitrogen dioxide levels over a period of 12 months in Wilburton by the group continue to show that Wilburton High Street has the most polluted location measured along the A1123, apart from the location outside the entrance to Morrisons supermarket in St Ives.

The EU Air Quality Directive (2008/50/EC) implemented in the UK as the Air Quality Standards Regulations (2010) states in paragraph (11) *"Fine particulate matter (PM2,5) is responsible for significant negative impacts on human health. Further, there is as yet no identifiable threshold below which PM2,5 would not pose a risk."*

The crisis of particulate pollution in the UK is well documented in the Annual Report of the Chief Medical Officer 2017, the report of the Joint Committees of Parliament *"Improving air quality"*, March 2018 and by two reports by UNICEF *"A BREATH OF TOXIC AIR"*, June 2018 and *"HEALTHY AIR FOR EVERY CHILD"*, February 2019.

Data from the Public Health Outcomes Framework, <https://fingertips.phe.org.uk/profile/public-health-outcomes-framework/data#page/1/qid/1000043/pat/6/par/E12000006/ati/101/are/E07000009>, show fractions of population mortality attributable to particulate air pollution. These range from lowest of 2.9 per cent to highest of 7 percent. Rural East Cambridgeshire at 5.2 per cent was already above the England average of 5.1 per cent in 2018.

At a time of national air pollution crisis, following the successful prosecution of UK national government several times for failing to meet air quality standards, including by the EU Commission in 2014 and a second case started in 2019, to propose any developments which will increase polluting car journeys by commuters is at best irresponsible.

Landscape

Housing on this scale on this site, even though attempts have been made to reduce the impact by reducing the number of houses to be built and other measures, will still have a significant negative impact on the long distance views of the Haddenham/Wilburton ridge from the south and south-east, in particular from the A10 and the B1049 Twenty Pence Road when travelling north from Cambridge.

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This hillside is currently farm land providing an open landscape up to the top of the ridge and these views are part of one of the most significant landscape features of the area marking clearly the scale of the Isle of Ely with the Haddenham ridge rising gradually out of the fen from the east near Stretham to the highest point of the Isle in Haddenham. As a previous Planning Inspector said of this landscape *"It has a slightly mystical character that can change with weather conditions. The belts of trees as the land rises slightly towards the A1123 and the higher trees in linear order approaching the ridge add an almost Arcadian hint to the landscape character."*

This landscape must be respected and continue to be protected, not nibbled away at by developers trying to claim black is white and in doing so demonstrating a total lack of respect for the countryside and local communities in pursuit of their financial objectives.

We have reviewed the documents titled "LANDSCAPE AND VISUAL ISSUES RELATING TO Land South of Wilburton Road Haddenham" and "Landscape and Visual Impact Assessment" dated June 2020. We find the choice of viewpoints and the images used fail to illustrate the full effect of the proposal upon upon the eye. We continue to find the assessment of visual impact, particularly the long distance views, consistently under-rated.

The attempt to hide the development from the viewpoint along the A1123 by leaving a green space near the entrance to the site we find just cynical because it will not reduce the effect on the character of the land lower down the hill.

Best and Most Versatile Land

The site consists of 4.05 hectares of Grades 2 and 3a high quality agricultural land, comparable to the best available in many parts of the country. (Grade 1 designation is reserved almost solely for the peat-based soils of the drained fens.) Anticipated sea level rise of at least 1.1 metre by 2100 (IPCC 2019) and possibly up to 4.7 metres (Surging Seas) in the Wash and hence the River Great Ouse, is likely to lead to the loss of much of the UK food supply as the fens become frequently and, eventually, permanently flooded. Such land is therefore an increasingly valuable national asset which must be protected and whose protection is already documented in the NPPF.

Sustainability and Sea Level Rise

Only this week, it has been confirmed that the Arctic Ocean has started to emit significant levels of methane from previously stable deposits held on the seabed (methane clathrates). Last winter it was confirmed by satellite images that the Arctic tundra continued to burn beneath the ice and in many places has therefore continued to burn for a second summer. Coupled with fires in Australia and the USA these 'feedback' contributions to global warming will increase the rate of sea level rise and make the higher estimate given above more likely.

This imminent sea level rise, will once again turn the Isle of Ely into an island. Consequently, any further significant building on the Isle will add to the problems of managing the soon to be stranded population. Such building cannot therefore be regarded as sustainable in the medium term.

Speculative Development

This is the third time an application has been made at this site, the previous applications in 2014 and 2019 having been soundly rejected by the Planning Authority. CPRE finds no good reason in the current application for the Planning Authority to go back on its previous decisions.

CPRE therefore makes no apology for re-iterating in large part its previous objections.

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The reasons for previous refusals have not changed. If anything, they have strengthened.

Conclusion.

CPRE Cambridgeshire and Peterborough objects to the proposed development for the reasons outlined above. We urge refusal of this proposal.

Please note that our submission is in respect of the proposed consultation. 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.

Yours sincerely

Jane Williams
CPRE Cambridgeshire & Peterborough