South Cambridgeshire Proposed Submission Local Plan (July 2013)

Formal response

on behalf of

Histon & Impington Parish Council

#### **Summary**

Histon & Impington Parish Council (HIPC) wishes to make specific comments on:

- 1. Reinforcing the wording to accurately reflect the status of "Major Rural Centre" to remove current misinterpretations,
- 2. Each and every one of the spatial areas within Histon and Impington with a specific policy in the draft local plan
- 3. Reinforcing the responses made to previous versions of the local plan

### **Major Rural Centre**

Histon and Impington is proposed to retain its existing status of "Major Rural Centre". We have recently seen a submission made by professional planners which clearly misunderstands the concept.

The main misinterpretation comes from the interpretation that sustainable means that the settlement is self-contained. In particular it is assumed that the retail and commercial businesses are viable with only the custom from the village.

The wrong assumption is that all the custom from other settlements goes to Cambridge. That there is unsatisfied provision within these settlements is demonstrated by them not being classified as Major Rural Centres. When New Road (which joins Oakington Road/Cambridge Road - the "back route" to Histon) was closed for an extended period to enable the construction of the Guided Busway Crossing all the local shops found trade decreased by at least 30%. This indicates significant custom from Oakington, Girton and other villages accessible via Park Lane. The volume of custom from villages accessed via the B1049 (Cottenham, Rampton etc) has not been assessed. It is said that some of this trade is related to two bank branches in the Histon High Street and the availability of parking making access much easier than branches in Cambridge.

The professional submission on the "the station site" dismisses the existence of destination shops in major rural centres which will be news to Lighthouse Toys, Station Cycles, Daisy Chain (gift shop), Anglia Fireplaces, Print-Out, Jane's Frames (among others) all of whom have more trade from customers outside the settlement than within it. Reports from some of the destination shops that were open during the CGB construction closure (eg Lighthouse Toys, Daisy Chain) reported more than a 40% drop in trade.

We wish the policy on Major Rural Centres to make it clear that the retail and commercial businesses serve a wider community than the settlement itself: indeed for many this is vital for their viability. Also, the policy should endorse the Major Rural Centres as locations for destination shops which build on the access available to attract customers from a wider area: customers that might then also use the more common types of shops to ensure, in part, their viability. We strongly believe that this understanding of the need for the Major Rural Centres to provide services for a wider area than just the settlement ensures that the policy is achievable.

Furthermore, the policy states that these centres need to be sustainable, without providing (like the NPPF) with a coherent definition of the concept. HIPC strongly believes that sustainability must include:

- 1. Reducing travel to work distances
- 2. Enabling travel to work by sustainable means
- 3. Enabling families to continue to live in the same settlement

To this end we note that the employment to residents' ratio has in the last six years in Histon and Impington halved from near unity to 0.5. This is not consistent with continuing sustainability. We have lost two major employers (Unwins and the packaging factory) but also find that residents' start-up businesses find there is not provision for small business premises in the settlement (either as live/work opportunities, small workshops or modern small offices).

Hence we propose that at least in the major rural centres that:-

- Positive encouragement is given to mixed use developments that provide the opportunity for the small business premises types we have highlighted: we believe that this is in the long term interest of all developers as it is key to maintaining the attractiveness of the settlement (and hence the returns to be achieved from development)
- Major employers are consulted over their development needs on an on-going basis
- New developments are not encouraged if the employment prospects cited are relocating employers from existing major rural centres (as was the case with the original Northstowe Master plan submission which announced that the Phase 1 office space would be occupied by the then largest office based employer in Histon)

## Specific Policy areas in the Local Plan

There are some aspects of the draft Local Plan that directly refer to locations within the Parish boundaries of Histon and Impington. Apart from the comments made in the previous submissions made by HIPC to earlier consultations in the preparation of the Local Plan, the following comments are in addition.

# E/8 The "Station Site"

HIPC continues to receive significant support from a majority of residents for the concept of a special area for the villages at the Guided Busway stop.

We have seen one professional response that includes many misinterpretations and misrepresentation of the proposal. A whole set of these seems to arise from an erroneous understanding of the SCDC Major Rural Centre policy. As these misinterpretations could be applied by others to both other sites in this settlement and other Major Rural Centres we have placed our request for a more explicit definition of the policy in the earlier part of this submission.

We believe that we should amplify our understanding of the term "mixed development" and how this should be applied to the two developable sites in the area. We note:-

- We were not expecting the development to necessarily be a row of shops with flats/residences above.
- Our vision looked for some commercial premises within an overall development where the commercial offerings could be retail outlet, small artisan work/live, offices that are visited by customers/clients
- The development should leave an open space towards the Guideway, the stop and the road

HIPC note that the previous DIY warehouse successfully for many years attracted custom from an area greater than the village settlement and the Guided Busway increases the opportunity for customers to come to the site. HIPC have themselves asked for passengers alighting at the stop and have been informed

by the operators that no data is kept on persons alighting. Hence the previously mentioned objection that lists the passengers leaving from the site is missing the point. The number of users on the Guideway has steadily increased.

One major source of passengers alighting is the nearby offices in the Vision Park and the Hain Spread Factory (formerly the Chivers Jam factory). When the Guideway opened it would have been unrealistic for many to change their travel to work method, but HIPC expects that as time proceeds new employees will have the option of the Guideway and hence a wider (and cheaper) range of housing along the Guideway axis. This will lead to a gradually increasing use for passengers coming to the stop. This has been noticed by the convenience store (Station Stores) and is a welcome increase in footfall: the shutting of the DIY warehouse so reduced footfall that the viability of the convenience store was challenged but thankfully the drop in custom has been reversed. Adding some destination commercial operations (in line with the already successful ones in the High street and the two in the buildings adjacent to the convenience store) would increase overall footfall and assist mutual viability.

## H/1 (d) Two sites north of Impington Lane

Two adjacent greenfield sites are included for development. The owners during the consultation process suggested an extension of the sites (further into the green belt) and SCDC planners rejected the extension as not being able to justify this use of the green belt. HIPC fails to see if that was the conclusion for the extra area, that the same does not apply to the original small sites. Obviously the number of houses is not strategic to the achievement of the overall housing provision target. HIPC also considers that the sites have totally inadequate access onto what the County Council classify as a "C" category road: one which has considerable school walking and cycling use in both directions to the Village College in Impington and the Infant and Junior schools in Histon. Those with experience of past planning applications suggest that even if the land were designated for development, planning permission would be withheld on the grounds of the poor access.

Given the extent of local opposition to this unjustified intrusion into the green belt, HIPC strongly urges removal of these sites from the draft plan. HIPC notes that in the recent past considerable green belt in Impington was removed for the creation of Orchard Park, and that the current plan envisages an even greater loss of green belt in the Darwin Green 2 and 3 allocation. HIPC maintains that a significant fraction of our green belt has thus been removed and even more stringent examination should be made of any further erosion.

# SC/1(2g) By Pass Farm

Since the original submissions, HIPC have had confirmation of County Farms' willingness to lease the land to HIPC for recreational purposes. This intention differentiates this area of potential public open space from any other in the environment of the settlement as none of the other sites (including the two defined in the LDF) have landowner intention to proceed. The shortage of open space for recreational purposes has already been documented by SCDC and HIPC are delighted that this option to practically rectify some of the shortage has been included.

The Parish Council has leafleted near neighbours of the site and has only received adverse comments from three householders: many regard keeping the field in perpetuity (or as close as is possible to that) as green open space is preferable to the inevitable further seeking of land for development as the population rises further resulting in housing development.

A public meeting has been arranged in the villages for November 4<sup>th</sup> to gain views on the use of the space.

#### **Darwin Green 2**

This development is entirely within the Impington Parish.

We have commented earlier on the predictions for jobs, and consequently housing, in the Cambridge sub area in our consultation submissions. We also have commented on the balance of development options and would not wish to comment again on either facet.

However, there are some concerns that affect our approximately 8000 residents in the provision of the Darwin Green development.

- 1. Our settlement is recognised widely, including by the Environment Agency as a settlement which through its geography and geology can be vulnerable to flooding and other drainage issues. The drainage from Darwin green will pass through a single award drain. Recent urgent works have been undertaken to clear the 400m stretch of that drain under Water Lane (B1049) and other stretches need maintenance. We require a clear statement that Darwin Green 2 will only proceed once clear evidence has been provided that the drainage system will not put Histon and Impington at risk. The confirmation that this condition has been met should be part of the Development Control process.
- 2. Histon and Impington residents have already suffered from the reflective noise barrier built contrary to the plans which called for an absorptive noise barrier separating the A14 from Orchard Park. Many residents, throughout the settlement, have complained of having to close all bedroom windows to sleep at night. HIPC notes that the Planning Inspector for the Guided Busway required compliance with the WHO standard of noise attenuation: the acceptable level of noise is said in the standard to be that level of noise that still permitted sleeping with open bedroom windows.
  - The Highways Agency has already stated in public that in the short term projects on the A14 they will ensure that nose levels are within acceptable standards: this is excellent news for the residents in the south west of the settlement for whom the noise levels from the A14 have risen from initial levels to unacceptable to health threatening as the traffic levels have grown. HIPC requires that the policy for Darwin Green 2 that the noise barriers put up for that site do not return our long suffering residents to enduring unacceptable noise levels.
- 3. HIPC have expressed their concerns that the proposed layout of the eastern vehicular access to the entire Darwin green development from Histon Road, Cambridge/Cambridge Road, Impington (the access is very close to the SCDC/City of Cambridge border) is too close to the junction for Arbury Road. Further the traffic volume in and out from junction predictions appear to us as being significantly low: The knock on effect on the roundabout over the A14 (and hence on the flow of traffic down the B1049 in the peak morning travel hour where we are informed the flow exceeds that at the bottom of the A10) will cause considerable hardship to those travelling into Cambridge.

# **Reiteration of Previous Submissions**

HIPC stands by its previous submissions (as appendices to this submission) but would like to stress again:

- 1. The Buxhall Farm site is not supportable by the local infrastructure. HIPC would vigorously object if the site were to be reintroduced to the Local Plan in order to offset removal of sites elsewhere
- 2. The B1049 is in danger of gridlock and developments elsewhere (either further up the B1049 or up the A10) could result in overload