



**Comberton Parish Council Response to 23/01448/OUT
Resubmission**

Land at Branch Road, Comberton, Cambridgeshire

September 2024



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2. Summary

Comberton Parish Council Strongly Objects to the Proposed C2 Retirement Village on the Land South of Branch Road, Comberton. This document states the reasons for that objection and concerns that our community has raised. Public meetings were held by Comberton Parish Council on 23rd September 2024 and 5 May 2023 to allow Parishioners to voice their opinion.

Much of our updated response is similar to our previous response of July 2023 as we have not identified material changes to the application that alleviate our concerns. We will highlight where the updated application has raised new, or serious past concerns still not addressed. This document should be read together with our previous response.

Comberton Parish Council is concerned that the number of discrepancies and omissions still within the application lead to an incorrect view of the proposal. This is especially evident in travel times (not corrected), the Green Belt Assessment, the Landscape and Visual Impact Assessment, the Balance Assessment and the Biodiversity Assessment. Many statutory consultees have raised concerns and objections.

The Planning Balance within the applicant's Planning Statement assigns 'weightings' (assumed by Comberton Parish Council to be self assessments of performance) in categories. **We very strongly feel that the weightings assigned are a misrepresentation of the application and impact.** Given that these weightings form the justification for use of Green Belt Land, we request that attention is given to them.

The application does not reflect the needs of a C2 level development (architecture, layout of houses, features to highlight needs of people with extra care - especially mobility-support needs) nor shows that this is the best location in the district for this development. The needs of future residents are not at the forefront of design, and the location and design do not have sustainability as a priority. **We are extremely concerned about the remaining lack of an alternative site assessment.**

The impact on the rural village of Comberton is high. The location of an **oversized**, out of keeping set of buildings in the middle of a green lung space is insensitive and inappropriate. This area has a particularly rural feel. **The view impact from the recreation Ground has still not been addressed in the Green Belt Assessment.** The necessary lighting and development will impact many species, including Red-listed birds and highly protected Barbastelle bats.

The changes to Branch Road will forever change a rural lane and its verges and hedgerows. The **removal** of the shared used pavement from the planning application, while necessary due to the road width, will remove a key walking link from the village. Proposed re-wilding of wild areas, in an effort to increase biodiversity figures, will change the rural centre of our village.

Services for C2 and other residents over 65 have not been adequately considered. Both the GP Surgery and ICB have **reiterated** that the treatment rooms in the proposed clubhouse building cannot be used by the NHS for treatment **and will not be CQC registered**. No adequate travel has been proposed to enable residents to get to the GP surgery. Comberton & Eversden GP Practice is already over capacity and does not have any more physical space to accommodate a larger patient list. **In fact, the GP surgery has indicated they may have to apply to close their list should the development go ahead.** The S106 monies proposed does not enable expansion to the GP Surgery.

Residents are very concerned about impact to the drainage and sewage systems as the village regularly experiences flooding, both of rainwater but also foul water. **The Local Flood Authority is again opposing the planning application on the grounds that inadequate drainage calculations have been performed. Anglian Water acknowledges concerns from residents due to regular foul water flooding in the village.**



Figure 1. Overdevelopment and scale in the rural centre of a village



Figure 2 (left). The verge and hedgerows to be removed along Branch Road



Figure 3 (right). Barton Road/Harbour Avenue Junction; several times a year at this level, mixed rainwater and Raw Sewage. Picture: 1st Oct 2024.



Negative impact areas	To current residents	To proposed development residents
Healthcare services	Increased waiting times at GP surgery for appointments and dispensary. Potential closure of GP list.	Long waiting times at GP surgery for appointments and dispensary. Potential closure of GP list.
Drainage and sewage	Increased surface water and foul water flooding of highway and houses	Mostly N/A as upstream
Integration in the village	Low use of development due to cost barriers and location	Low integration with other areas of the village due to high distances and poor travel links
Parking	Increased on-road parking and decreased road-safety in village	Poor access to village amenities due to lack of parking
Walks and paths	Loss of circular walk due to loss of Branch Road link. Loss of rural character to recreation ground if new surface path built	No walking path north of the development. Potential isolation if a surfaced path across the Recreation Ground is not agreed. High walking distance from all amenities.
Wildlife	Loss of particular wildlife, green corridor and dark sky area	

Table 1. Summary of negative impact areas identified by the Parish Council.



3. Discrepancies

Comberton Parish Council are concerned about a number of discrepancies in the application.

We note that some of them remain in the updated application and some having been reiterated. These discrepancies lead to a misrepresentation of the reality and should be addressed before a final decision is made.

These have made it difficult to review the information and also concern the Parish Council that relevant, accurate information is not available to the consultees for SCDC. The main discrepancies evident to Comberton Parish Council are summarised; more information on these is provided in relevant sections of this document.

a. Occupancy Level

Given the design of buildings, which vary from 1 bed apartments to 3 bed houses, estimates for occupancy are particularly low. This underestimation has a major impact on estimates of the true impact of the development; from the sewage impact, to NHS needs, parking and amenity provision. Realistic occupancy should be between 400 - 700 persons.

b. Travel Times

The **Transport Additional Information document** provides distances and walking/cycling times measured from the site to various services in Comberton. However, it uses the western-most boundary of the development, where the Parish Council footpath from the Recreation Ground meets Green End. This point is several hundred metres from the closest unit. Thus the travel plan significantly underestimates the distances. In addition, the walking and cycling times are calculated with speeds for the average population. We consider that the residents of the development will have lower walking and cycling speeds than the general population.

None of the distances and travel times have been corrected in the updated document. They provide a severely skewed view of how integrated the development is and we urge the Planning Authority to consider this misrepresentation.

For example the Transport Additional Information document states that it would take a resident one minute to walk from the 'site' to the Surgery (95 m). Our calculations suggest 5 min instead (516 m). In addition, Comberton Library is said to be within 5 mins walking distance (350 m), when our calculations suggest a 21 min walking journey (1.2 km). Note that calculations are from the pedestrian access point to the side (South-West). Distances would be even longer for residents in dwellings further north. Most distances include a portion in the recreation ground on paths which are currently not surfaced. In addition, the



recreation ground is only open from dawn to dusk, year round. Distances would be longer via Harbour Avenue.

As a result the travel plan presents a totally unrealistic and misleading assessment about the accessibility and sustainability of the site. **Amenities presented as being at walking-distance from the development are instead likely to be reached by car.**

3.4.5 As such direct continuous pedestrian access to local facilities is achieved through a number of routes to the south of the development. As set out in the TA, the following amenities are located to the south and west of the site:

- » Comberton Surgery - 95m
- » Village Hall - 250m
- » Village College and Library - 350m
- » Hairdresser - 350m
- » Budgens and Post Office - 400m
- » Apple Tree Dental Surgery - 400m
- » Three Horseshoes Pub - 550m

Figure 4. Distances Provided by Applicant in Transport Additional Information document

Category	Facility/Amenity	Walking/cycling distance from pedestrian site access point (metres)	Travel time walking (minute)
Health	Comberton surgery	516	9
	Apple tree dental practice	646	11
Retail/Food and drink	Budgens (at risk of closure)	565	10
	Pub	802	14
	New village shop (Co-Op)	1100	19
Community	Village Hall	691	12
	Hairdresser	646	11
	Library	1200	21
Distances measured on Google maps along existing paths, Average walking speed for >65 yo: 57m / minute			

Table 2. Distances and Travel Time Provided Calculated by Comberton Parish Council, from the nearest access point to main site (all units will be further away)



c. Lighting along Branch Road

This is confusing throughout the documents. Lighting suggested is not within the requirements for nocturnal animals. Lighting is required in the 30 mph application and Branch Road. It does not state, however, that Branch Road will, in fact, be lit. The Green Belt Assessment states that it will not be lit (which is a positive for that assessment).

d. Pathways

There is a need for pathways in order to integrate the development into the village:

- Across the Recreation Ground. These are critical for access and integration to amenities in Comberton, yet do not form part of the application. Therefore no assessment can be made as to the design and safety aspects of these.
- The path next to Meridian School, the most vital link between the development and the village, has not been shown to be wide enough to support, safely, walkers with extra needs or on a mobility scooter.

e. C2 Care Class

The use of C2 Care Class underpins the use of Green Belt Land and also means that no affordable housing is required. However, many aspects of the design do not lead to a good provision of care, both within the design of accommodation, layout and use of the space.

f. Treatment Rooms

The GP Partners and the ICB have both, in discussion with the applicant, informed them that the suggested treatment rooms in the application cannot be used by them and will not be CQC registered. To keep this in the application is a discrepancy to the known reality.

g. Care Package

The GP Partners have assessed the Care Package which claims the benefit to the NHS. They confirm, in their response, that there is no benefit from any of the measures proposed.

h. Safety

The walking routes across the Recreation Ground to village amenities, including the GP Surgery are not safe as the only walking access points. They are far from any houses, unlit and the Recreation Ground operates a dawn/dusk opening period.



i. Ecology

Failure to acknowledge impact to Red List species within the Ecology Reports. These include Grey Partridge, Barbestrelle Bats and certain vascular plants.

j. Green Belt Assessment

The update to this still has discrepancies with SCDC consultee and therefore still provides misleading impact assessment. Critically, it only assesses the impact to landscape from the top of the site, rather than the view from the centre of Comberton. This is the view that we deem to be most critical to Comberton and the impact to be greatest. It also states that lost hedgerow on Branch Road is to be replanted - this is false as the widening of Branch Road now makes that impossible and is not shown to be replaced in the Biodiversity Calculations.

k. Bus service

The GCSP transport assessment states that the number 18 bus is available. This service is not every hour, as stated, very frequently does not turn up and does not operate in the evenings nor on Sundays.

l. Height of Buildings

The design statement uses buildings in Toft, along with two historical buildings to justify the very large height of design. This is misleading.

m. Branch Road Design

The alterations to the junction do not consider farmyard and large vehicles that will need to continue along Branch Road to access businesses, which cannot pass down Green End.



4. Planning Balance

The table below summarises the Planning Statement benefits and weighting assigned by the applicant in the Planning Statement, as well as the Parish Council weighting. Explanatory notes on the Parish Council weighting are provided below the table.

Area	Planning Statement	Parish Council assessment	Notes
Meeting an identified unmet need for older persons accommodation	<i>Very Substantial Weighting</i>	Not shown in application. Should be C2	1
Freeing up/release of existing housing stock back onto the market	<i>Very substantial weight</i>	Not shown in application	2
Delivery of a Net-Zero Carbon in Operational Energy development	<i>Very substantial weight</i>	Limited weighting	3
High-quality design and provision of services and facilities available for use by the wider community.	<i>Substantial weight</i>	Limited weighting	4
Water Efficiency Measures, exceeding adopted policy	<i>Additional Benefit</i>	No view	
Social Infrastructure Contributions	<i>Substantial Weight</i>	Moderate weighting	5
Economic benefits including job creation and additional spending into the local economy	<i>Substantial Weight</i>	Moderate weighting	6
Green Infrastructure and Biodiversity Net Gain including the restoration of traditional orchards, allotments, and high-quality areas of publicly accessible open space	<i>Substantial Weight</i>	Negative Weighting	7
Reducing the burden on the NHS and primary care services and provision of on-site clinical treatment facilities (or alternative to be agreed)	<i>Substantial Weight</i>	Negative weighting	8
Improvements/upgrades to footpaths and securing of improved, more accessible, permissive footpaths within the site	<i>Moderate Weight Benefit</i>	Not enough information	9
Flooding	<i>Not adverse</i>	Negative weighting	10

Table 3. Planning statement benefits and weighting assigned by the applicant and parish council



Using information from South Cambridgeshire Statutory Consultees and Key Stakeholders Comberton PC believe the following is a more accurate representation and provide evidence that the applications weighting should be amended;

- Flooding - LLFA objects.
- Drainage - Anglian Water state that pre-development enquiry is out of date. Anglian Water states that there is a known issue of Flooding in the area.
- NHS - Local NHS services have stated negative benefit to the local community.
- Land usage/landscape - GCSP Landscape Object due to non-compliance to S/4, S/7, HQ/1 and NH/2.
- Ecology - GCSP Natural Environment Ecology have stated insufficient evidence to be able to assess.
- Housing Strategy - Housing Strategy Team do not support the application.

Notes on Parish Council weighting:

1-The Parish Council does not seek to dispute the need for older people's housing within South Cambridgeshire, although notes the need for affordable units which this proposal does not address. **The Criteria for this category should, however, be the need for C2 housing rather than general older persons housing.** The Planning Statement contains contradictory comments on the weight to be given to meeting local need, with paragraph 6.19 referring to very significant weight (i.e. less than substantial) and paragraph 6.52 referring to very substantial weight. Based on the lack of evidence regarding the availability of alternative sites, and the absence of any affordable units, the Parish Council considers that this is not accurate.

2-The Planning Statement says that very substantial weight should be given to the release of existing housing stock back into the market. None of the appeal decisions cited by the applicant give more than substantial weight to this consideration. Little evidence is provided by the applicant in the Planning Statement to support its claim.

3-The Planning Statement says that very substantial weight should be given to the delivery of a net-zero carbon development at paragraph 6.57. However, at paragraph 6.30 the statement only refers to this as a significant benefit. While the energy efficiency measures are admirable, it has not been demonstrated that they are of such a magnitude to merit more than moderate weight, and, indeed, they are part of the necessary design rather than an added benefit from such a development.

4-The Planning Statement considers that substantial weight should be given to the high-quality design and the provision of services and facilities available for use by the wider community. However, the Parish Council has serious concerns about the design in terms of its scale and other effects, while it does not consider that the development would complement and enhance local services.



5-The Planning Statement gives Substantial Weight to Social Infrastructure due to the S106 money they are allocating, namely to village Pavilion project and Bowls Club/Recreation Ground. Whilst this is welcomed, it is at the detriment of social opportunities within the Retirement Village, such as restaurant space and access to swimming pool.

6-The economic benefits are important, but they are not of a scale that warrants the substantial weight afforded by the Planning Statement. The Parish Council considers such benefits to carry no more than moderate weight.

7-While the development can deliver biodiversity net gain, the percentage increases are only 10 % greater than the SPD requirement. Given that it could be possible to increase the amount of biodiversity enhancements within the site (e.g. by reducing the number of units and increasing areas of planting), the Parish Council disagrees that substantial weight should be given to this matter and considers instead that it carries only limited weight.

8-The Parish Council accepts that there are NHS and social care benefits from housing for older people. However, none of the cited appeal decisions give this more than substantial weight and the effect to the local community is negative.

9-The Planning Statement gives moderate weight to highways improvements and the provision of new permissive footpaths within the site. The Parish Council considers that to some extent these works are required to mitigate the effect of the development on the highway network and ensure the development is not isolated from the village in terms of pedestrian movements. Furthermore, details of the main footpath links are not provided in the application so the feasibility is not known. As such, these are not benefits.

10-Finally, The Planning Statement does not account for the effect on Sewage flooding downstream of the development. As there is no mitigation effort by the applicant of Anglian Water, it is a certainty that the Sewage Flooding into peoples homes and gardens will only increase.

None of the benefits relied upon carry more than moderate weight and many are negative.

The development would result in harm to the Green Belt (including significant harm to openness and major countryside encroachment) which carries substantial weight. There are also several other negative effects including which should be given significant/substantial negative weight.

Therefore, any benefits of the development would not clearly outweigh the harms and so no very special circumstances exist to justify granting planning permission.



5. Care Class

From South Cambs District Demand Profiles for Older People's Accommodation 2021 – 2036;

'The District Demand Profiles present a shared view of forecasted demand for Older People's accommodation and domiciliary care in each of the five Cambridgeshire districts and Peterborough City. They have been developed by Cambridgeshire County Council, Peterborough City Council, the five district councils within Cambridgeshire, and the Cambridgeshire and Peterborough CCG. The documents aim to explain what accommodation is needed, from a care perspective, including how much, when and where; they cover the whole market.'*

The South Cambs District Demand Profiles for Older People's Accommodation 2021 – 2036 details the forecasted need for units in each area. For South Cambridgeshire, this is shown to be 289 new Extra Care units to be developed in the 2021 to 2036 timeframe. This proposed development significantly exceeds demand for the whole of South Cambs while the design provides for age-restricted general market housing rather than Extra Care Units.

The report also details what would make a site suitable as a location for Care Units. A criteria is listed, as shown in the table below. Comberton Parish Council have assessed the proposed development location against these and it shows that the location is not suitable for Extra Care Units.

South Cambs District Demand Profiles for Older People's Accommodation 2021 – 2036		
Profile Requirements for a Site	CPC view	CPC Comments
Sites need to be in locations with good access to local facilities eg shops, community groups	NO	Poor access to local facilities - would be dependent on vehicular transport or Class 3 motorised scooters from this site.
Ideally the locations would have good access to transport	NO	Poor public transport, and no public transport associated with this site.
Located in areas where there is likely to be a pool of potential workers or alternatively be able to travel to the scheme via local transport	NO	Proximity to Cambridge and other villages. but no reliable public transport links. May provide some local residents with work and people from Cambridge who have a car. Poor parking provision.
We would welcome innovative schemes which prioritise intergenerational activity	NO	None provided. Application will compound the skewed demographic of Comberton, i.e. further dilute intergenerational activity.



South Cambs District Demand Profiles for Older People's Accommodation 2021 – 2036		
Profile Requirements for a Site	CPC view	CPC Comments
Good design, fully accessible environment that includes designing for mobility, sensory and cognitive impairments, and incorporating TAPPI principles TAPPI - Design - Topics - Resources - Housing LIN	NO	Minimum accessible provision according to BS 6465 and Part M. Accessible, inclusive environment appropriate for designated older and ageing users not demonstrated, and lack of inclusive design or features. Lack of inclusive measures addressing mobility, sensory and cognitive impairments. Health & Safety considerations not evident - balconies, ponds, lighting and pathways.
Dementia friendly developments	NO	Building configurations and views according to architectural and urban design requirements, not neuro-architecture.
Designed to HAPPI standards	NO	1) Generous internal space standards with 3 hab rooms: Application exceeds space standards without providing an inclusive environment. 2) Window and daylight provision and design: Application includes distinctive feature windows (bays) but lack of adequate provision (no bathroom windows, rooflights). 3) Application design does not maximise natural light, or provide open plan layouts. Lack of inclusive design markers such as focal elements pointing way, circulation and routes. 4) 'Care ready': Application does not demonstrate digital / smart technologies as part of an integrated care strategy. 5) Shared socialised circulation spaces in reality corridors adhering to wheelchair accessible standards.

Table 4. Assessment against criteria of SCDC Demand Profiles for Older People's Accommodation, showing that this development does not meet any of the necessary criteria

Throughout the application, the terminology is confusing, and reference is made to facilities not evidenced: reference to C2, extra care, close care, assisted living and retirement village. The C2 class allows for no affordable housing to be proposed and allows for weighting to be given in the balance document to demonstrate exceptional need for this site. This design is at the very minimal level of Care provision, indeed, rather than being a specialised service delivery, it is more of a 'gated lifestyle' development.



Provision for C2 needs is not seen in the application.

The Clubhouse facilities are not designed for people with extra care needs; the restaurant and cafe are not a meal provision service with dedicated care staff, separate members of the public and those with less care needs.

The Clubhouse, which has all the central facilities, is stated to be 'within close proximity' of the C2 units for residents who have more independence, yet the Clubhouse is sited at one end of the proposed development so is not central to the units.

The design of apartments and cottages is not consistent with the C2 needs:

- Lifts are not large enough to reasonably accommodate anticipated use, such as Class 2 mobility scooters, and groups travelling together e.g with attendants or carers.
- There is no provision for storage of mobility scooters for apartments not on the ground floor.

As stated by the Applicant during the Disability Consultative Panel (4 July 2023) provision is made for M4(2); while adaptable, no M4(3) units are provided. The proposed provision does not, in effect, exceed requirements that form part of general housing provision.

In respect to the Clubhouse accommodation:

- All apartments are single aspect, while only binstores and stair cores are dual aspect.
- Design reflects general housing provision rather than principles for Extra Care Units - for example, living units exceed groups of 10 or less, and common / dining areas are all combined on ground floor.

Considering the proposed building services (such as MVHR), storage provision and layout appears to be inadequate.

- Though spacious, the internal layout of apartments and cottages do not provide an inclusive environment for elderly people ageing in place. Typically no legible open plan layouts.
- The layout of apartment buildings does not have wayfair points and leads to windows which can be confusing.
- It is not shown how the interiors will be fully adaptable to meet C2 needs with only the minimum necessary standards being applied.

The outside area is not shown to have C2 needs at the forefront:

- The landscaping will be confusing for people with memory decline, with no wayfair points.



- The rainwater storage ponds are a potential hazard, and notably located close to the primary school.
- The suggested walking routes and times to Comberton Village do not account for the true distances and walking times of people with C2 needs.
- Proposed landscaping includes potential hazards such as hawthorn trees, which have sharp thorns.

Care Class is not evident through design. The impact of a C2 Care Class is that it justifies Land Usage, building on the Green Belt. Comberton Parish Council are very concerned that the design does not match with the suggested C2 level.



6. Location of proposed development

a. Green Belt

The site of the proposed development is on Green Belt land.

The National Planning Policy Framework (NPPF), which sets out the government's planning policies for England, and how those are to be applied, states ([para 137](#)) that the essential characteristic of Green Belt land is its openness and permanence.

It states ([para 147](#)) that inappropriate development is, by definition, harmful to the Green Belt, and should not be approved except in 'very special circumstances'.

New housing development in the Green Belt is considered inappropriate development unless it provides limited affordable housing for local community needs, limited infilling within villages, limited infilling or the partial or complete redevelopment of previously developed land, or the replacement of an existing building.

The proposed development does not fall into any of the above categories and is therefore inappropriate development in the Green Belt. Planning authorities are required to give substantial weight to any harm to the Green Belt when considering any planning applications. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations ([para 148](#)).

The scale and intensity of development is not compatible with a rural village setting, and substantially damages a highly sensitive section of the Green Belt. The height of buildings, and the location of the highest buildings at the south edge of the site is highly damaging, and will irreparably change the rural context of Comberton village, as a settlement placed among fields.

The entire site lies within the Green Belt. Development of the site would result in a degree of encroachment on the countryside in conflict with National Green Belt policies. The development conflicts with two recognised purposes of Green Belts as set out in the National Planning Policy Framework: 'to assist in safeguarding the countryside from encroachment' (Purpose 3, Para 138); and 'to preserve the setting and special character of historic towns (Purpose 4, Para 138)¹; and This development precisely represents such encroachment and damage to the setting of the village.

¹ National Planning Policy Framework, 27 March 2012, Department for Levelling Up, Housing and Communities, UK Government.
<https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>.



The National Planning Policy Framework further states that 'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries'. This application does not respond to any exceptional circumstance, and the case for removal of this land from the Green Belt is not substantiated by any evidence and is not part of the local plan. In the application there is no evidence that the applicant has made a strategic assessment of alternative sites for their project, and there does not appear to have been any consideration of the possibility of utilising brownfield sites in Cambridgeshire, as the National Planning Policy Framework requires (paragraph 40).

The National Planning Policy Framework notes that 'when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt' (paragraph 148). It further notes that 'A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt' (paragraph 149).

The proposed development of a 'Retirement Village' does not qualify as one of the exceptions to the prohibition of development on Green Belt (paragraph 159). It will not re-use previously developed land, it will not contribute to an identified housing need in the village, and it will have a substantial new impact on the openness of the Green Belt.

The Green Belt Assessment carried out by LDA Design² fails to recognise the importance of the development site to the Green Belt around the village. Its focus is on the importance of the site to Cambridge as a whole, and its assessment of the site assumes that the development will be viewed from Branch Road, downhill towards the village. **This is a direct reversal of the main way in which the site is viewed from the village** from which the site is viewed uphill, from the edge of the Recreation Ground and the Village's Millennium Wood (Figures 1 & 2).

The proposed development will cause significant harm to the Green Belt, as defined in the National Planning Policy Framework (paragraph 148) through loss of openness. The *Green Belt Assessment* notes that 'the site maintains an overall sense of openness', increasing towards the north 'where it exhibits a strong sense of openness in Green Belt terms' Section 4.5). The degree of harm will be 'Major' ('Total or major alteration to key elements, features or characteristics relevant to Green Belt openness or purposes, such that post development the baseline will be fundamentally changed').

² Land South of Branch Road, Comberton Green Belt Assessment April 2023, LDA Design Consulting Ltd., 17 Minster Precincts, Peterborough, PE1 1XX



The *Green Belt Assessment* notes that ‘the site forms part of a wedge of countryside that extends into Comberton from the north’ (Paragraph 4.4.2). However, it mistakenly suggests that it makes ‘a relatively modest contribution to the rural character of the village’, because the site is separated from its historic core. In fact, the importance of this part of Green Belt to the village of Comberton has been recognised for many decades in planning documents precisely because of its connectivity to the historic core.

The original 1972 Village Plan recognised the landscape importance of the connection between the green space of the Recreation ground south to the church and north towards Branch Road (see Figure 3). This is precisely the connectivity that will be permanently destroyed by the proposed development. It further noted ‘it is necessary that the contribution of the green ‘open spaces’ to the appearance of the village should be acknowledged and retained’³. This is re-iterated in the more recent Village Design Guide in 2012 where an aerial photograph of the areas important to keep as green spaces for the village are outlined and include the site proposed for development (see Figure 4).

The *Green Belt Assessment* also argues that the value of the site is limited because of ‘The significant existing urban influences on the character of the site’. Again, this is a misreading of landscape and the way it is used. In fact, the site rises directly from the edge of the village recreation area to Branch Road from which it is viewed. The land on which the development would be built currently provides an open rural outlook from the recreation ground adjacent to Meridian School.

The entire development (including the south-facing solar farm) will be visible from the edge of the recreation ground, except where it is screened by the large buildings that comprise the ‘Centre’ of the development complex. The noise of traffic and buildings is inserted into what is currently an area of land of tranquil rural character, transforming a rural to an urban environment.

The development will permanently change the rural character of Branch Road and bring a new road and associated traffic into the core of the Green Belt on the northern fringe of the village.

- The *Green Belt Assessment* argues that ‘the extent of land encroached represents a small part of the rural landscape around the village’ (paragraph 5.2.1). This development might be small in the context of Cambridgeshire, but it is the largest development since the second estate was built in the village in the 1970s, and it

³ Mellor, B.H. (1972) *Comberton Village Plan*, April 1972, Cambridgeshire and Isle of Ely County Council, Cambridge (p. 15)



urbanises open land that was recognised as of importance as part of the Village Plan that allowed that estate to be built.

- The *Green Belt Assessment* suggests that ‘the rural setting of the village will remain intact and the rural character of the remainder of the Green Belt and the landscape north and north-east of the village will be retained’ (paragraph 5.2.1), but this claim is not supported by evidence in the report. The degree of harm in terms of conflict with this Green Belt purpose will be Major and not Minor as they claim.
- The *Green Belt Assessment Consultation Response* claims that the proposed access road and footway along Branch Road will be ‘medium, until the replaced hedgerow grows’. This is not the case - **the Biodiversity Report shows this hedgerow as permanently lost**. The importance of the rural context of Branch road is underestimated. Branch Road is an important part of the walking route around the village, used extensively by walkers (including pushchairs), runners and cyclist and horse riders. The proposed re-engineering to cope with the traffic entering and leaving the development will change its much-loved rural character (loss of wide grassy verges and hedgerow), and render it unsafe for non-motorized users.
- The *Green Belt Assessment* is quite wrong to suggest there will be ‘a Negligible degree of conflict with National Purpose 4’ (‘to preserve the setting and special character of historic towns’⁴). The proposed development, on a permanent basis will result in a major degree of harm to the rural setting of the village.
- The *Green Belt Assessment* is correct to conclude that ‘Overall, the development proposals will have an adverse effect on the openness of the Green Belt’ (Paragraph 5.3.5.). It notes that there will be a change to ‘the visual perception of openness and the degree of activity associated with the site as a result of the development’ (paragraph 5.3.5.).

These impacts are unacceptable.

⁴ <https://www.gov.uk/guidance/national-planning-policy-framework/13-protecting-green-belt-land>, paragraph 138.



b. Green Lungs

Openness can be considered both in a spatial and visual sense. The development will permanently change the rural character of the north fields, adjacent to the Recreation Ground. It will place intrusive large buildings right next to the Millennium Wood, closing views of the Green belt to the North. This wedge of Green Belt land links to open land through the village core and south to the church. It has been recognised as valuable since the 1970s, when the Janes Estate was constructed. Its value is highlighted again in the 2012 Comberton Village Design Guide as 'an area of green space that must be preserved' (Page 20).

This area of Comberton, along with the Protected Village Amenity Area linking the area south of Barton Road to the church are the Village Green Lungs. This area literally gives the rural character and breathing space of the whole village.

The Parish Council is of the view that this development will result in a significant loss of openness, both in spatial terms and visual terms.

The loss of openness would not only be experienced by the occupiers of existing properties and users of land around the site (including the recreation ground to the south), but would also be very apparent to the many residents, staff and visitors to the development. It is misleading to downplay the effect on openness based on the presence of adjoining built form and boundary planting when a large open field beyond the village edge would be lost to development.

One of the purposes of the Green Belt is to safeguard the countryside from encroachment. The proposed development will clearly be a major encroachment into the countryside and result in the loss of a significant part of the current green lung of land which runs from Branch Road southwards to meet up with the northern boundary of the Recreation Ground.



Figure 5. View of the development Area from the South.

This photograph shows the rural character of the Green belt where the proposed urban development will be based.



Figure 6. View of the proposed development site



Figure 7. View of the proposed development site from Comberton recreation ground from application visuals, with the Clubhouse dominating visually.

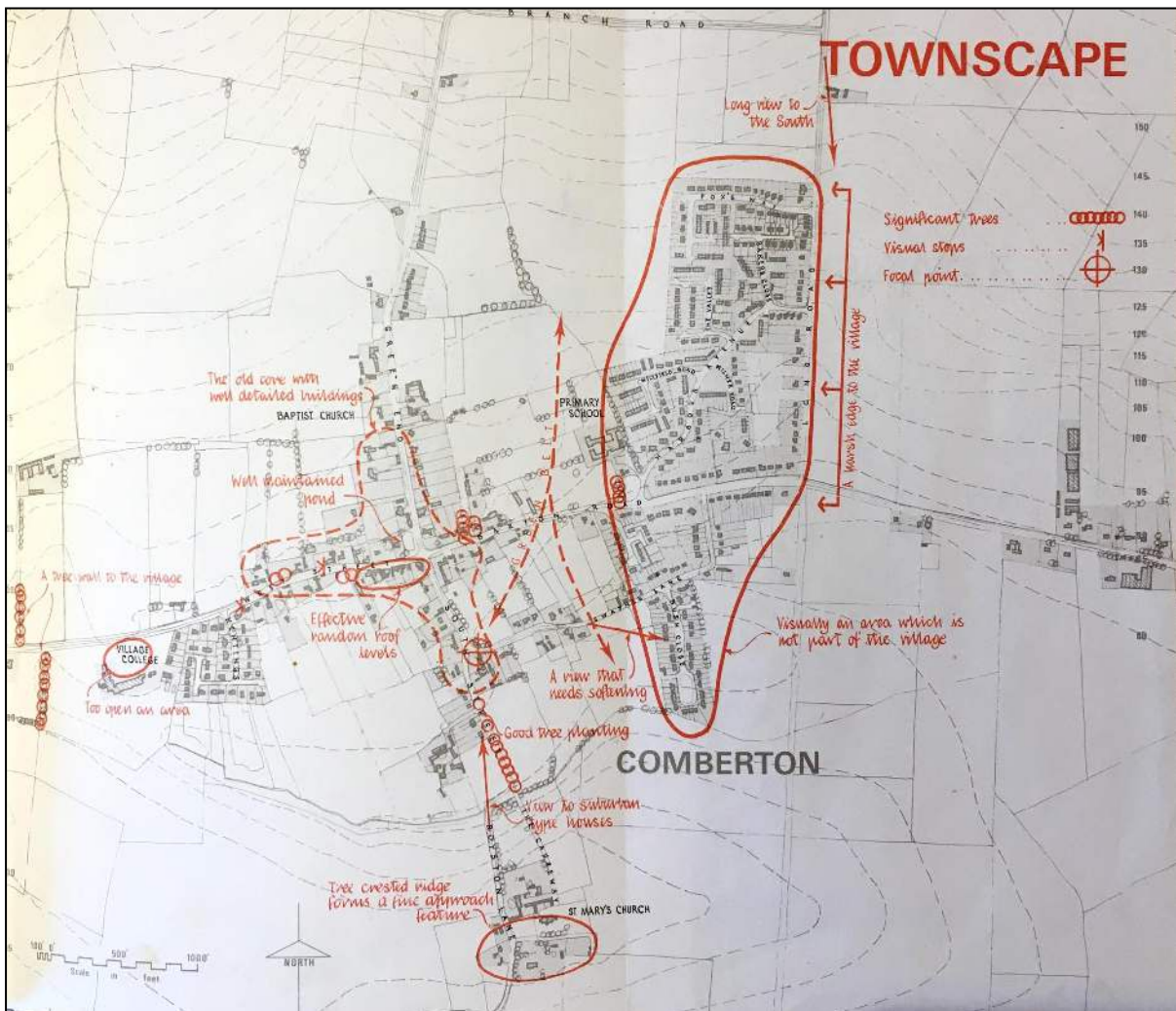


Figure 8. 'Townscape map of Comberton, from the 1972 Comberton Village Plan (Mellor, B.H. (1972) Comberton Village Plan, April 1972, Cambridgeshire and Isle of Ely County Council, Cambridge)

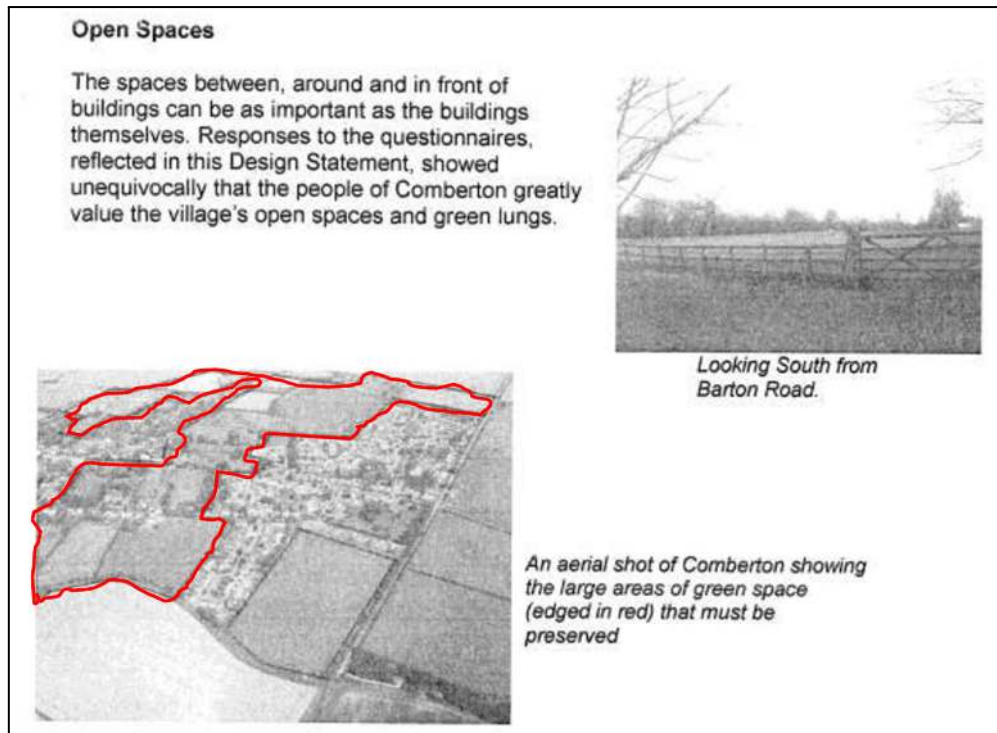


Figure 9. From Page 20 of the 2012 Comberton Village Design Guide, showing the continuing importance placed on the proposed development site as one to be kept in the green belt as a green space free from development.

c. Alternative Sites Assessment

The applicant has **still not submitted an Alternative Sites Assessment (ASA)** to attempt to demonstrate that there are no potential sites outside the Green Belt, (or more sustainable locations within the Green Belt) where the proposed development could be located.

The application references an ASA submitted with a planning application for a retirement village scheme in Stapleford in 2020. The Parish Council is of the view that this document is out of date and that the current application should be accompanied by its own ASA.

The applicant does not demonstrate why Comberton is considered to be a suitable location to accommodate 69% of the currently identified need for market extra care units across the whole of South Cambridgeshire. Within South Cambs, the estimate is for need of further 289 Care Units (*South Cambs District Demands Profiles for Older People's Accommodation 2021-2036*)

The Local Plan (Greater Cambridge Local Plan 2023) shows existing allocations for residential building in the area, including at Bourn Airfield (5 miles away), Cambourne, Northstowe, Waterbeach and North East Cambridge.

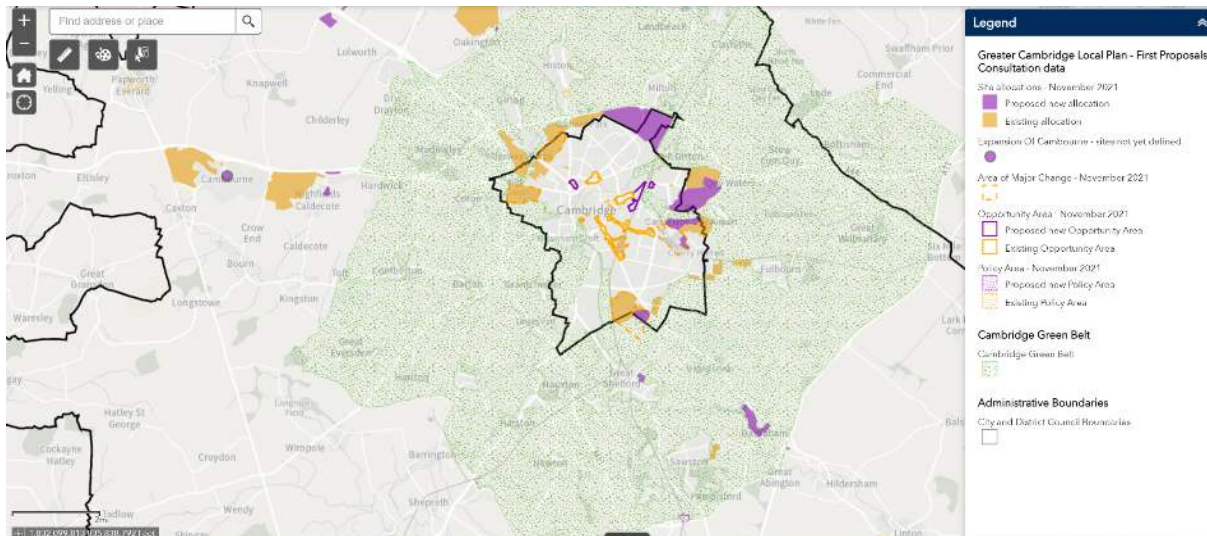


Figure 10. Greater Cambridge Local Plan, showing Existing and Proposed Allocation for Development

The Parish Council is of the view that any development of this type and scale would be better sited in the planned new settlements and larger development areas within the South Cambridgeshire area, which are in more sustainable locations, and not in smaller villages such as Comberton.

Comberton is poorly served by transport, the bus service is limited during the daytime, non-existent on Sundays and frequently doesn't come at scheduled times leaving people stranded. Larger development areas will have more transport options and therefore be more sustainable.

Just outside the Parish border is Comberton Village College, one of the largest schools in the district. Comberton, by accommodating this county facility, is already absorbing extra traffic and movement of people.

The application also does not demonstrate that proposed extra care homes will be affordable to those persons identified as being in need of this type of accommodation in the South Cambridgeshire area.



7. Impact to Medical Services

Comberton Parish Council considers that the effect of this development on local health services will be negative.

a. Capacity at the local GP practice

The statements below, most of which were made in our response to the original application, still stand:

The application health assessment already shows that the percentage of population above 65 years old is higher in Comberton (25%) than it is nationally (18%). The proposal suggests that the new residents will come from the local area but we do not believe this to be a reasonable assessment. Comberton residents are unlikely to be able to afford the proposed units and new residents are likely to move to the area from elsewhere to be closer to family.

Therefore, we believe that the proposed development will bring the percentage of over 65 years old to 32% in Comberton. This figure, widely different from the national average, will lead to a lack of funding for the Comberton General Practice due to the current funding algorithm used which does not factor for age of patient, and the increased GP needs for older patients. In addition, while the eligibility criteria for residents in the new development are not clear, there are suggestions that the majority of residents will have additional medical needs.

The General Practice located in Comberton serves 16 villages.

The Health Assessment is misleading in indicating a population decline, as the figure quoted is limited to Comberton. There have been 700 new houses built in the area recently, including the Bennell Farm development, which falls within the Toft Parish boundary and is located at the edge of Comberton. The General Practice has indicated that their patient list has been steadily increasing over the past few years, from 9342 in April 2021 to 9,835 in September 2024. At the Public Meeting organised by the Parish Council on 23rd Sept 2024, **GP Partners have indicated that their practice already operates over capacity and they may need to apply to close their list if this development goes ahead. This would be detrimental to local residents, and also mean that residents of the new development cannot be seen at the local GP practice.**

700 new units have been built in the GP practice catchment area since 2018. In addition, the planning authority has indicated that there are 290 new units in the catchment area of the



General Practice which have had their planning application approved, indicating imminent further growth of the patient list.

The General Practice has already exceeded maximum capacity by 750 patients due to space constraint.

The Partners cannot hire further staff to provide more appointments due to those space constraints, and cannot extend the practice building due to lack of funds and land. As a result, new developments in the area will increase waiting lists and decrease the quality of care, not only to the new residents but to the catchment area of the Comberton General Practice.

The Integrated Care Board has requested a sum of £164,000 to contribute to extensions costs for the GP practice, and this sum is included in the head of terms. This sum is the result of an algorithm used by the NHS to determine S106 funds required for GP practices building extensions as a result of housing developments. We understand that **this algorithm applies to a general population, and does not take into consideration the specific age and health demographics of the development proposed by the applicant.** As such, we consider this sum to be an underestimate of the impact of the development on the GP practice in Comberton. It is vital that the GP assessment, in their response, is well considered.

b. Medical Provision Proposal

The proposal includes two treatment rooms. Both the Comberton Medical General Practice and the Integrated Care Board have clearly stated, repeatedly, that **these two rooms will not be CQC registered** and therefore will not be used for NHS care. We also note that **none of the elements listed in the care package proposed for this development will replace care provided by the GP practice. This has been assessed by the GP Partners.** Given that the provision of this medical space is part of the argument the applicant makes towards reducing impact on medical services, and the space cannot be used by NHS services, **we request that funds in lieu are provided to the Comberton and Eversden General Practice.**

The proposal states that the dispensary, which is on the same site as the Comberton GP Practice is within walking distance (it is actually over 500m from nearest Retirement Village access point) and will serve the residents. The reality is that the dispensary is also operating at capacity and the delays for repeat prescriptions are over 5 working days at present. No pharmacy provision is proposed in the Retirement Village.

The proposal states that this Retirement Village will 'alleviate pressure on the NHS'. This is not the reality. Residents who move into the Retirement Village are unlikely to change their

lifestyle; if they enjoy using the gym and swimming pool already then they will continue to do so. If they do not then they may not move to this location.

c. GP Location

The location of Comberton GP is on Green End, a narrow, unmarked village road. There is parking for 8 cars within the car park. There is no safe, reliable walking route from the Retirement Village to the GP practice. To walk would be over 500m across the recreation ground. The recreation ground is unlit, operates a dawn to dusk licence, is an open space without access to any houses or amenities should someone need help. **It is not safe for anyone with extra care needs, especially in the dark, to be undertaking. There is no cycle route to the GP surgery from the Retirement Village.**

Therefore, the only way to access appointments will be through car usage and parking. We are aware of worries that a planning application for an extension of the Comberton GP practice may be opposed due to the lack of parking.



Figure 11. Map showing distance from development to surgery along shortest pedestrian route, which goes along the recreation ground (no surfaced path, no lighting, no houses nearby), therefore not a safe route



8. Design and Visual Impact

The design of the development is not in keeping and is far too big for the size of the village. Comberton Parish Council considers it overdevelopment for the site.

It will consist of approximately 200 dwellings and associated built structures and hard-surface facilities with a total footprint of approximately 18,900 m². The scale and intensity of development is not compatible with a rural village setting, and substantially damages a highly sensitive section of the Green Belt. The height of buildings, and the location of the highest buildings at the south edge of the site is highly damaging, and will irreparably change the rural context of Comberton village, as a settlement placed among fields.

Policy S/7 goes on to say that even on sites within development frameworks proposals should be of a scale, density and character appropriate to the location. A development of 200 dwellings would represent a 20% increase in the housing stock of the village. The scale would therefore be totally out of character with the current rural character of the area. The proposed development does not comply with Policy S/7.

In addition Policy S/9 of the Local Plan 2018 identifies Comberton as a Rural Growth Settlement where new residential development on sites within the development framework is restricted to a maximum indicative scheme size of 30 dwellings. This designation is based on the services and facilities available to the village. Policy S/9 states that permission will not be granted on sites capable of accommodating scheme sizes greater than 30 dwellings. The scale of the proposed development is nearly 7 times greater than that considered to be a sustainable scale of development for Comberton.

a Scale of Proposed buildings

The application includes full details of the proposed buildings in the southernmost section of the site. These buildings include the proposed clubhouse and apartment buildings.

The proposed clubhouse building in the south west corner of the site will be up to 15m tall (excluding chimneys) and over 70m long. This is an inappropriate size for a rural village, right next to the village's only wooded amenity and open space.

The apartment blocks will be up to 12.6m tall.

By way of comparison the height of the houses in Normandy Close, the closest dwellings to the development, when measured from the drawings submitted for that development, range between 7.5 to 8m. The total width of all the houses in Normandy Close is just over 70m.



Figure 12. Visualisation of Clubhouse Building from furthest end of the Recreation Ground

The scale of the proposed clubhouse and apartment buildings is totally out of character with any other development in this part of the village and will represent a visually prominent and intrusive development when viewed from the surrounding area.

b Accommodation and Occupancy

Considering Phase 1 detail design, all unit sizes exceed the Nationally Described Space Standard (Dept for Communities and Local Government - Technical Housing Standard - Nationally described space standard):

- Cottages and Bungalows with 11 square metres - 68 square metres GIA.
- Apartments and Clubhouse with 3 square metres - 35 square metres GIA.

For reference, 68 square metres equals a 2 bedroom 4 person dwelling.

The over provision of accommodation contradicts the proposed solution of providing smaller, more suitable accommodation:

“0.4 Very often, faced with accommodation unsuited to their needs/requirement, the elderly’s desire to move to smaller, more suitable accommodation is frustrated by the shortage of suitable housing, and in particular, housing that can also cater for future care requirements.” (Planning Statement).

It is of concern that the application proposes units that may very well be converted to dwellings housing up to 6 persons (Cottage C01). When considering occupancy of Phase 1, the following is noted:

- Minimum occupancy of proposed scheme: 57 persons.
- Maximum occupancy of proposed scheme: 168 persons.
- Possible maximum occupancy based on space standard: 182 persons.



When these occupancy levels are extrapolated to include phases 2-4, based on the designs of Phase 1, occupancy may mean 400 - 700 persons.

The scale of proposed accommodation should be assessed regarding C2 Care implementation or realistic occupancy figures to assess the demands of this development on all infrastructure and amenities.

c Scale of Siting of Proposed Solar Array Provision

Large ground mounted PV development (outlined in section 9) on the highest point of the site and facing south towards the village, will present as a visual feature in the rural setting. The location, elevated siting and orientation will visually intrude on the rural landscape and adversely impact on the village - contrary to Policy CC/2: Renewable and Low Carbon Energy Generation.

d Design of Buildings

The Landscape and Visual Impact Assessment submitted in the application looks at the impact the development would have on both the landscape and the character of the area, through both location and design.

Design Principles (HQ/1) includes;

- *All new development must be of high-quality design, with a clear vision as to the positive contribution the development will make to its local and wider context. As appropriate to the scale and nature of the development, proposals must:*
 - *Preserve or enhance the character of the local urban and rural area and respond to its context in the wider landscape.*

The proposed 3-storey 'Centre' building will be the most visible from the village recreation ground, creating a visually intrusive hard urban boundary immediately abutting the Jubilee Wood, planted by the village to provide a green space for recreational use, and intensively used all the year round by adults and children.

The Recreation Ground is the only large open space available for villagers, and the only substantial area of tranquil natural greenspace within the village. It functions as a green lung both physically and mentally for people of the village. Part of its beauty and tranquillity are given by the green and rural view that it currently has, unspoiled by urban development.

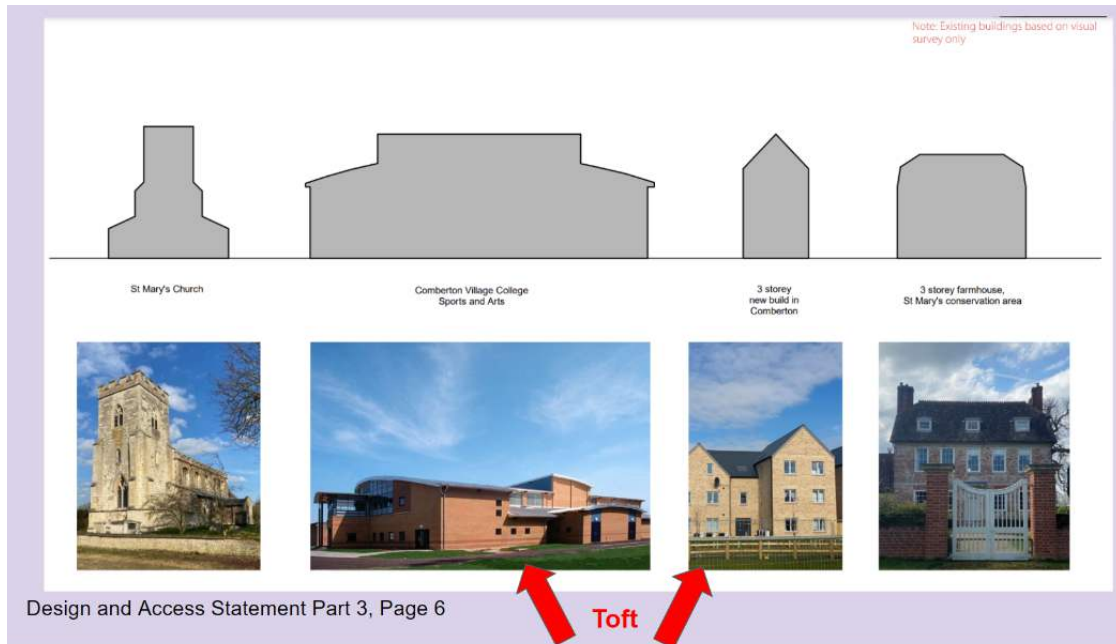


Figure 13. Design and Access Statement justification for proposed building heights.

The Design and Access Statement is misleading as it uses non applicable examples to justify the height of the buildings within the development and refers to these incorrectly.

- The Parish Church in a rural village is almost without exception, the tallest building, often sited on a higher area of land for prominence.
- Comberton Village College and the 3-storey new building, are in fact in the Parish of Toft, the neighbouring Parish. They should not be used as justification as they do not reflect the Comberton Village Design.
- The final example is a Manor House of the village, built several centuries ago. The facade is not of a 3 storey building and due to its historical context should not form the basis for a modern development. The rest of Comberton has not taken design aspects from the Church or Listed Manor building and is formed of smaller, low density cottages and 2 storey houses.

The Design principles developed for the cluster typology describes buildings of various heights in a green / landscaped setting, enclosing a courtyard. The courtyard is presented as primarily an open amenity space.



Figure 14. Illustrative Formal Cluster of New Cottages & Apartments showing buildings - Design Commitment Statement page 24.

However, the proposed cluster design, a distinctive feature of the development, takes shape around a parking area, not a social open space, as illustrated below - extract from Phase 1 (Masterplan).



Figure 15. Cluster typology in Phase 1 - illustrating buildings around a hardscaped parking area.



Policy S/7 of the Local Plan 2018 says that even on sites within development frameworks proposals should be of a scale, density and character appropriate to the location. A development of 200 dwellings would represent a 20% increase in the housing stock of the village. The scale would therefore be totally out of character with the current rural character of the area. The proposed development does not comply with Policy S/7.

In addition Policy S/9 of the Local Plan 2018 identifies Comberton as a Rural Growth Settlement where new residential development on sites within the development framework is restricted to a maximum indicative scheme size of 30 dwellings. This designation is based on the services and facilities available to the village. Policy S/9 states that permission will not be granted on sites capable of accommodating scheme sizes greater than 30 dwellings. The scale of the proposed development is nearly 7 times greater than that considered to be a sustainable scale of development for Comberton.

Comberton Parish Council are concerned that occupancy levels are not determined and that the potential levels indicated by the applicant are lower than suggested by the design.

The proposal is therefore contrary to Settlement policies of the Local Plan 2018.



9. Drainage and Sewage

Comberton Parish Council is extremely worried about the impact of this development on sewage and drainage due to the **extensive issues** residents are currently encountering. While we understand that the removal of foul water is the responsibility of the water company, we consider that **no new housing development should be built in Comberton until the matters are resolved.**

a. Sewage

Most of Comberton has a mixed waste system. Whenever there is heavy rain, the whole system becomes overloaded and raw sewage flows up and out of manhole covers. Swaynes Lane, Bush Close and Barton Road, at the bottom of the hill of the proposed development, are **regularly flooded with raw sewage**, which then enters the water courses in ditches along the roads. The roads are then covered in foul water for days, with any resident walking there (including dogs, children on bikes, etc).

In addition, residents in Bush Close, Swaynes Lane, Nursery Way, Harbour Avenue, Westlands, and other streets, report sewage issues within their houses. These include **toilets backing up, the impossibility to use toilets, showers and washing machines, or even wet rooms flooded by foul water.**

Our current understanding is that the foul water piping network is extremely narrow on the east of the village, resulting in water moving back up the pipes and into residences. However, other problems exist, as even residences on the west of the village are affected.

Comberton Parish Council is extremely concerned at the lack of response from the water company relating to these incidents, and considers it unacceptable that residents are faced with such issues each time there is heavy rainfall, which typically happens several times a year. While the Parish Council is now building up a case to resolve this issue with the water company, we are extremely concerned at the addition of 200 dwellings upstream from areas regularly flooded. **Even if surface water from the development was not to enter the foul water system, there would still be an increased flow to the waste water system.**



Figure 16. Photos demonstrating foul water flowing up through manhole covers on Swaynes Lane and Barton Road.

a. Drainage

The drainage design indicates reliance on pipes, tanked paving for footpaths and a storage rainwater pond in a SuDS system. We note the addition of water harvesting to the plans, which is likely to reduce the amount of surface water drainage required. However, Comberton Parish Council still has concerns regarding the drainage. **We note that, despite the applicant indicating in their response that “all previous comments have been addressed and agreed with the LLFA”, and modifications to the drawings, no updated calculations have been provided and the Lead Local Flood Authority is once again opposing the proposal due to incorrect calculations and missing information. The LLFA states “No new information has been provided since our previous review.”**

Comberton sits in the Bourn Brook valley and the proposed site is on the upstream hillside, on arable farmland. It regularly floods throughout the village. This has been seen to be worse in the last year with the addition of 93 units at Bennell Farm in Toft, which is part of the Comberton drainage network. Anglian Water regularly spends nights pumping the system into tankers to protect local residences.

It is known that gardens and ditches surrounding the site, including The Valley, St Thomas Close, Green End, Barton Road and Swaynes Land regularly flood so there is no margin to make the situation worse.

By removing the permeable field area, and replacing it with a rainwater storage area with one entry point to the village drainage network there is a high risk that there will be local flooding at this point or further downstream where the culvert and ditch meet. We are also concerned about the maintenance of the rainwater harvesting storage tanks over the years as they are likely to become clogged with silt.

Any surface water not catered for by the SuDS proposed will likely drain downstream to areas where surface water goes into the foul water sewage system, exacerbating issues noted above relating to foul water flooding.



*Figure 17. Flooding (typical of several times a year at this very high level and many times a year to a high level) on the highway on Barton Road, in gardens near the top of the applicant site, and in meadow behind Swaynes Lane. **This is a mixture of surface water and Raw Sewage.***



The pond, being above ground, poses several potential issues:

- Danger to residents with extra care needs who may not understand the danger of water.
- Danger to children given the proximity to the Primary School and the Recreation Ground.
- Given the nature of the water, being runoff, may be prone to mosquitos in warmer months.

10. Roads and Paths

a. Footpaths

The application suggests that a new footpath link will be created to link the existing Parish Council footpath which currently runs from Green End to the Recreation Ground to the development site.

We note that the linking piece of land which is *'in applicant's ownership'* that was present on the original application has been removed. **The applicant now entirely relies on a new path being provided on Parish Council land to link the development to Green End.** Without such a path, there would be no accessible footpath to the GP surgery. Currently, residents can walk on grass in that area in clement weather. However, it gets extremely muddy in autumn and winter. It is also not accessible to wheelchairs, mobility scooters, or those with mobility restrictions. In addition, the recreation ground is only open from dawn to dusk. Though the Parish Council has had discussions with the applicant about the possibility of adding a surfaced path in this area, for example using path binding gravel, no formal agreement has been made. We note that the updated Heads of Terms mention a Recreation Ground Footpath Improvement Strategy (a scheme outlining the details of the improvements to the footpath from across the Recreation Ground and agreement of the routes and details of the improvements with Comberton Parish Council and a financial contribution for their delivery) yet no indication of the level of the financial contribution is included in the financial contributions. **We consider that the planning application cannot be fully assessed without information relating to this path.**



Figure 18: Illustrative masterplan showing the removal of the link north of the recreation ground from the application.

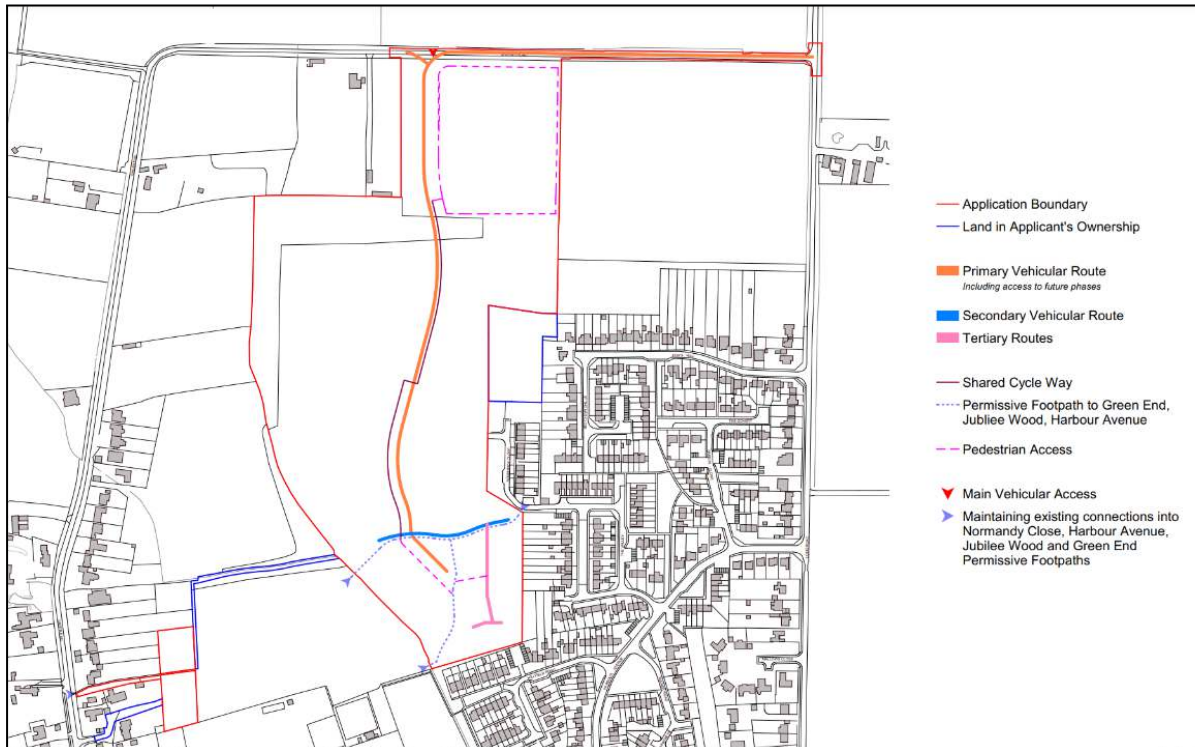


Figure 19. Access and Movement Plan, showing route for path linking the two parts of the site

Any hardcore or lit path through this area of the landscape would have a very negative effect on the rural openness, black sky status and Green Lungs of Comberton Village.

Full details of this footpath link, including the need for any lighting should be submitted at this stage. This pathway should be assessed from a safety aspect, especially as the applicant has identified it as the main walking route to the GP Surgery, Village Hall, Library and Post Office.

Comberton Parish Council is concerned to see the comments of the Crime Prevention Officer suggesting that the Public Right of Way should be lit given the potential further impact on rural character and wildlife

Travel routes on Recreation Ground to access facilities are not suitable for wheelchairs, mobility scooters, poor mobility, low visibility residents. **They are not lit and the recreation ground is only open from dawn to dusk. These routes are the only pedestrian routes into Comberton Village promoted by Endurance.**

Therefore, many people will be isolated within the development.



b. Access Road

Comberton already supports a significant large county facility in the form of Comberton Village College. This leads to significant overuse of the narrow village roads throughout the day but especially around school delivery and collection times. There are times when the village becomes gridlocked as a consequence.

Road access to the development site will come via Branch Road. To accommodate the growing traffic, Branch Road would need to be widened. **In response to the Local Highway Authority comments about lack of width on the highway, the applicant has retained the widening of the road but has removed the proposed shared use path.** In addition, hedgerow would be impacted by the road widening.

The Parish Council is extremely concerned about the revised plan. The widening of Branch Road to support the additional traffic will remove a significant portion of verges. **Branch Road is currently a quiet country lane that local residents use for walks.** It links the permissive path along Long Road to the footpath to Hardwick (accessed in the bend on Branch Road). It is also part of a circular route around the village. The increased traffic stemming from the proposed development, the removal of verges where pedestrians could stand when cars are coming, and the absence of a pavement are extremely detrimental to the village. We also note that the pavement initially proposed all the way north along the spine road has now been shortened, so residents wanting to walk towards the Long Road permissive path and the Harwick footpath will need to walk on the road, when space would have been available to create a footpath.

There is no obvious mitigation to the increased risk to pedestrians on Branch Road, except opposing the development.

In addition to the issue of Branch Road widening, it is noted by the Local Highway Authority that there is a national speed limit in place on Branch Road. The lack of visibility at the new junction between Branch Road and the spine road means the proposal should not go ahead until a lower speed limit (maximum 30 mph) has been approved.

It is also noted that Branch Road is used by many patients to the GP surgery coming from neighbouring villages to access the GP. It is felt that the new junction design, with priority given to the spine road over Branch Road West, would disadvantage these users. In addition, farm vehicles that regularly use Branch Road need to be taken in consideration in technical drawings of this junction.

The proposed junction is completely inappropriate for farm traffic which includes combine harvesters, tractors towing multiple implements etc. They use this route to avoid Barton Rd which is now part of the greenway. Articulated vehicles also supply fertiliser and take away grain and straw bales used for fuel.

The village cannot support another large traffic-generating facility that would essentially be for the benefit of non-villagers. The applicant will be advertising the facility nationally and internationally so there is no expectation that the facility is for the villagers of Comberton.



Figure 20. Showing that the pavement on the spine road stops at the biodiverse grassland and the absence of pavement on Branch Road in the updated application.

The Parish Council notes the proposal to contribute to the Greenways by providing funding for a crossing point. We would recommend that such a crossing point remains located near the junction with Branch Road such that cyclists going toward the development, Green End and the West of Comberton can exit the Greenway at that location and cycle on the road on Branch Road. The Parish Council will discuss this point with the Greater Cambridge Partnership.

The Parish Council would also like to voice concerns about the state of Long Road. **Long Road has been in a state of disrepair for several years and many residents describe it as “scary”.** The edges of the road are collapsing in the ditches, and are plagued with potholes. The new development will increase traffic on this road significantly. While a recent Traffic Regulation Order is reducing the speed on Long Road to 40 mph (outside Comberton) and 20 mph (inside Comberton), it is yet to be implemented. Also, the construction of this development is likely to generate significant traffic of heavy construction vehicles. If the planning application was to be approved, we ask that **Long Road is rebuilt** - given that the regular patching does not remedy the issue of the edges constantly collapsing - **before construction starts** such that residents can use Long Road in a safe manner.



c. Parking

The Parish Council concerns about parking remain as no changes have been made.

The level of parking provided on the site is inadequate in several areas:

- Cars: the number of parking places provided is lower than the average car parking needs in other Inspired Villages. Any excess of cars will lead to spill out parking on Normandy Close and the Valley, which is not appropriate given these streets already suffer from excessive on-road parking. We also note that no parking is provided next to the proposed allotments.
- Bikes and mobility scooters: Calculations in the proposal seem to be based on a single bike OR mobility scooter per unit, omitting that bikes and mobility scooters carry only one person. The bike parking proposal is too low in our opinion.

The parking provisions are particularly at odds with the suggestion that Comberton residents from outside the development may use the facilities provided. A very low provision for parking by visitors has been made in the application. Comberton residents would be likely to cycle to the development, for example to attend classes or visit the cafe.

The Parish Council is also concerned about the misrepresentation of distances in the Transport Additional Information document which suggests that residents will visit local amenities mainly on foot. Comberton currently suffers from a lack of parking. This is particularly problematic at the GP surgery (such that it could lead to an opposition to a planning application for premises extension), on South Street (where a regain of popularity of the pub and the installation of a new cafe lead to unsafe on-road parking at junctions and along the road), and near the new convenience store (where the Parish Council has recently obtained the addition of parking restrictions due to excessive on-road parking). The proposed development would likely exacerbate these parking issues.

d. Retirement Village Transport Service

We have not found any clarification to the Retirement Village Transport Service in the recent update and our concerns remain.

The Travel Plan gives little detail about the remit of the proposed Retirement Village Transport Service. However, it specifies that the service will be available for group travel, for leisure or shopping.

The Travel Plan fails to acknowledge that one reason for travel will be to attend medical appointments, either at the local GP surgery or at Addenbrooke's hospital. As detailed above, the walking and cycling provision is misleading in the application.



The application suggests a 1 min walking time to the surgery from the development. In reality, the walking time would be 5 min for those residents closest to the south west boundary, more for others, and the path is not suitable after dusk, in wet conditions, or for those with low mobility.

Comberton is lucky to have a volunteer community driver service, particularly used for visits to the hospital, but this is currently extremely stretched and would not be able to cater for the additional demand.



11. Biodiversity and Green Space

Comberton Parish Council have always had Green Space and Biodiversity at the forefront of objectives. 20 years ago, the Parish received the piece of land directly south and west of the application site. This was transformed by many volunteers to open green space, used for sports activities and a substantial area of woodland Jubilee Woods, with managed pathways cut through it. As a rural village, many residents are particularly interested in wildlife and supporting it.

- Ramblers weekly club.
- Wildlife talks at the village hall.
- Comberton St Mary's Churchyard is part of the Wildlife Trusts' Churchyard Conservation and has received a silver award.
- Nature projects, open to the public such as owl and badger watching on Swaynes Lane.
- A new orchard has been planted on the recreation ground.
- 200 new trees have been planted last year in public spaces around the village.
- The village pond has been renovated to ensure water levels remain constant for wildlife.

Comberton Parish Council still has significant concerns about the impact this development would have on the Biodiversity within this area of Comberton. Key issues with the application still remain;

- Meadow usage and maintenance is not detailed.
- The report fails to understand the importance of this area in context with surrounding areas, notable the North/South green corridor.
- More hedgerow on the south side of Branch Road has been removed.
- The presence and mitigation for Grey Partridge has not been adequately assessed.
- The enhancement of the orchard area fails to consider the change from no public access to public usage and the effect on biodiversity.
- Surveys have not looked for Red-listed species and have not been carried out at the right time of year. These surveys should be performed again by an independent surveyor.
- There is no information on whether Branch Road will be illuminated and its junction with Long Rd and also by the woodland along the spine road in the north of the site.
- The lighting levels proposed along the spine road exceed the current new maximum allowed with respect to nocturnal animals.
- No survey for bats has occurred on Branch Rd.

The Green Space (meadow) provided in the development at the north is to be sited on arable land. Comberton Parish Council are concerned not only with the location of this (not easily accessible to most residents) but also that a large effort would be needed to convert this into a haymeadow and maintain it.

To obtain the required visibility splay length, ~160 m, at the spine road junction with Branch Road, the whole length of the hedgerow along the northern boundary of the site will be removed (the original submission required a 43 m splay length). Given that this hedgerow is so significant for both the rural aspect of Branch road, and, notably, for the wildlife it supports, **Comberton Parish Council request that this calculation be reconsidered** with a 30 mph speed limit, which is what will be imposed on Branch Road.

The planning application, via Ecology Solutions, acknowledges the presence of Grey Partridge, a Section 41 and Red Listed species. Whilst it now accepts that these birds will be displaced from the site it is stated that there are very large areas of similar habitat nearby which they can use. We dispute this statement. We believe that they are attracted to the development field because of the shelter provided by the extensive woodland, spinney etc on the western side. This summer they have been heard calling from this area and have also been seen with chicks for which adequate cover would be required to raise them. To our knowledge, Grey Partridge are rarely if ever seen on nearby fields, which are basically open with no cover other than boundary hedges. In addition, Grey Partridge are very territorial birds and so the chance of them finding a suitable alternative habitat is low. There seems to be no adequate mitigation for loss of these birds other than to provide opportunities for more common species that are essentially well catered for.



Figure 21. Photograph of Grey Partridge on Proposed Site, as taken by a Member of the Public



Badger setts have not been adequately surveyed as further setts exist than in the report. The area around the Branch Road junction is also heavily used by badgers with latrines appearing regularly and the route of their path en route from the site's western spinney to the north along the margin of the field North of Branch Rd can be clearly seen.

There is no mention of whether illumination is proposed or not along Branch Rd and also that there has been no monitoring for bats along the eastern portion of Branch Rd which is considered as part of the site. Lighting of the development and of Branch Road will impact many species found in Comberton. These included owls and bats, who use the dark sky corridor as their hunting ground.

Wildlife Surrounding the Site

Although the site is arable land, the importance of it to Comberton is great and of higher importance than when taken in isolation. Comberton has maintained a green corridor through the middle of the village, from the Churchyard in the south through to the north of the village at Branch Road. This development is on this green corridor and will impact species which use it to feed and travel from the north to the south. Therefore the impact of this development is wider than just to species on the site.

This has been noted in 22/03918/SCRE, Ecology Consultation Response where it states;

'The site sits within the Impact Risk Zone of the Eversden and Wimpole Woodland SAC and SSSI, cited for its maternity colonies of barbastelle bats (SAC) and ancient woodland (SSSI), Madingley Wood SSSI cited for its ancient woodland and contributions to scientific research, and Hardwick Wood SSSI cited for its ancient woodland and ground flora.'

The development will have a significant impact on bats in the parish of Comberton. The area's hedgerows provide part of the extended habitat network used by bats, particularly the rare and protected Barbastelle bat. There are only 5000 of these bats remaining in Britain. The document 22/03918/SCRE, the Ecology Consultation Response from the applicants screening application describes that there are Barbastelle bats in the vicinity.

Branch Road verges are also floriferous in summer and contain 2 near-endangered red list species of vascular plant. In addition the ecological impacts of this development have to be looked at as part of the significant cumulative impacts of developments around Comberton including the proposed East West rail corridor on the western edge of the village.



Figure 22. Tall hedgerows on South side of Branch Road which will be lost

It is disappointing that South Cambs Ecology Dept has not considered the previous PC response and therefore not been made aware of these issues to comment. We request that they are asked to consider the evidence we have provided in terms of ecology, both here and in our response July 2023.



12. Sustainability

The updated application now considers rainwater storage and re-use as the main change affecting sustainability. The following issues, previously raised by the Parish Council, still remain;

a. Energy Strategy

Building fabric specification (EJ1464 - Energy and Water Strategy, Rev A0 - page 7) equals the Future Home Standard, which is **the expected minimum standard** for newbuild houses to be introduced circa 2025. Except for the 'thermal bridging value' which will be higher than both Part L1 2021 Notional Values and Future Homes Standard - i.e. poorer performance. Thermal bridging can cause heat loss, condensation, and mould growth.

As such, proposed values do not represent a 'fabric first' approach.

Proposed air tightness and U-values do not indicate an effective containment for MVHR. In addition, most bathrooms have no windows (with associated purge ventilation) and would be dependent on mechanical ventilation only.

Unregulated Energy Calculations seems to underestimate typical living patterns / lifestyle of seniors. It is not clear if Regulated Energy Calculations incorporate higher room temperatures constantly maintained (e.g. higher energy consumption) typical to home environments of elderly people.

Bearing the above in mind, the application concludes that proposed roof-mounted Solar PV cannot offset regulated and operational energy and carbon (EJ1464 - Energy and Water Strategy, Rev A0 - page 14). The application proposes to compensate with a large ground mounted solar PV development.

The PV development will be located to the northern edge of the development, 10m higher than the southern boundary adjoining existing houses (drawing BA9974-2012 Existing Site Plan Existing Topography & Tree Survey). Elevated siting of the south-facing panels (facing the village) will adversely impact on the village. The application does not consider proper siting, angling or orientation, or glare and view analysis.

The ground mounted Solar PV proposal seems excessive considering the lack of providing high quality building fabric for energy efficient performance.



It is particularly important to note that the provision of the Solar PV proposal is not part of the detailed area of this hybrid application, therefore there is no timescale as to when the energy generation from the PV farm will be available. Comberton PC request that it be a condition of the development to have energy generation prior to building works.

Air source heat pumps to cottages and bungalows are located externally, closest to boundaries with neighbouring villagers. Those on the South side are very close to Hillfield Road, where properties do not have much distance between the boundary and their dwelling. No details on screening or noise attenuation are provided.

b. Other Sustainability Measures

No detail has been included for shuttle bus services, how they would be organised and run or how easy to access they would be.

c. Walking times

The misleading walking distance times provided in the Hydrock report, which have been taken from a part of the application not connected to the residential site are so misleading that sustainability assessment cannot be performed adequately. Comberton Parish Council highlighted this issue more than 1 year ago and yet it has not been corrected. The result is that most village amenities are beyond walking reach for residents within this development. Comberton Parish Council requests that necessary statutory consultees are re-consulted, prior to determination, with the correct distances.



13. Integration

The Parish Council has worked with the applicant to address some of the concerns raised in the initial application. Amenities in the village will receive some S106 monies towards the Bowls club, Pavilion and Recreation ground. Whilst these do help with integration into the village, there are still areas to be addressed, currently detrimental to integration and a missed opportunity to ensure a cohesive Comberton;

Cafe in the Clubhouse

- a. The dimensions and seating capacity is too small to provide for a mixed population. With the cafe and restaurant, seating is only about 80 persons. It is unlikely that this will allow for people from the rest of Comberton to use this facility at busy times of the day.
- b. No detail on the type of menu/pricing structures, which are needed to assess whether this meets the needs of people with extra needs in the retirement village, and whether it provides an integration opportunity.

Leisure facilities

- c. There was much discussion regarding public use of the swimming pool, school usage, and of the gym facilities. The details of this have now been omitted from the Heads of Terms, leading to the question, does this facility have the capacity to welcome people outside of the Retirement Village.
- d. The swimming pool dimensions are small and so capacity for a school class is unlikely.

Footpaths

- e. The removal of footpath and verge from Branch Road leads to members of the public losing an access and integration route.

Design

- f. The clubhouse design and usage do not suggest integration into the village is well considered. The recreation ground is right next to it, and the design of the space around it has not changed. The Parish Council would like to see shared spaces.

14. Archaeology

The Archaeological Evaluation Report makes clear that the development area has significant archaeological features that would be damaged or destroyed by the development⁵. These include remains of a significant Romano-British settlement to the north of the site, and a significant Middle Iron Age settlement in the central part of the site. The archaeological features form part of the larger late iron Age and Roman settlement visible on the north side of Branch Road⁶. The archaeological evidence of former village people in Comberton is of cultural significance to the current inhabitants of the village.

Recently, local detectorists have found evidence of Roman coins in the area.



Figure 23. Air photo at Historic England, Settlement, Comberton 29365_001

⁵ Oxford Archaeology Report 2060, 3 01448 *OUT Archaeological Evaluation report 6182064.pdf*

⁶ Historic England, *Settlement, Comberton 29365_001*,



15. Conclusion

In conclusion, having considered the application as submitted Comberton Parish Council strongly objects for the reasons stated above.

The response of the Parish Council also reflects the views of Parishioners as expressed at a public meeting held on 24th May 2023, attended by over 175 people and a public meeting held on 23rd September 2024, attended by over 125 people.

Comberton Parish Council requests that this application be considered by the SCDC planning committee following a members site visit.

Sincerely,

Comberton Parish Council
September 2024

16. Appendices

Please see Appendices A and B in the Parish Council July 2023 Objection.
