



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

Land at Branch Road, Comberton, Cambridgeshire

September 2024



1. Contents

1. Contents.....	2
2. Summary.....	4
3. Discrepancies.....	7
a. Occupancy Level.....	7
b. Travel Times.....	7
c. Lighting along Branch Road.....	9
d. Pathways.....	9
e. C2 Care Class.....	9
f. Treatment Rooms.....	9
g. Care Package.....	9
h. Safety.....	9
i. Ecology.....	9
j. Green Belt Assessment.....	10
k. Bus service.....	10
l. Height of Buildings.....	10
m. Branch Road Design.....	10
4. Planning Balance.....	11
5. Care Class.....	14
6. Location of proposed development.....	18
a. Green Belt.....	18
b. Green Lungs.....	22
c. Alternative Sites Assessment.....	25
7. Impact to Medical Services.....	27
a. Capacity at the local GP practice.....	27
b. Medical Provision Proposal.....	28
c. GP Location.....	29
8. Design and Visual Impact.....	30
9. Drainage and Sewage.....	36
a. Sewage.....	36
a. Drainage.....	37
10. Roads and Paths.....	40
a. Footpaths.....	40
b. Access Road.....	42
c. Parking.....	44
d. Retirement Village Transport Service.....	44
11. Biodiversity and Green Space.....	46



12. Sustainability.....	50
a. Energy Strategy.....	50
b. Other Sustainability Measures.....	51
c. Walking times.....	51
13. Integration.....	52
14. Archaeology.....	53
15. Conclusion.....	54
16. Appendices.....	54



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 Barbastrelle 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.**

<p>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:</p> <ul style="list-style-type: none"> » Comberton Surgery - 95m » Village Hall - 250m » Village College and Library - 350m » Hairdresser - 350m » Budgens and Post Office - 400m » Apple Tree Dental Survey - 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.

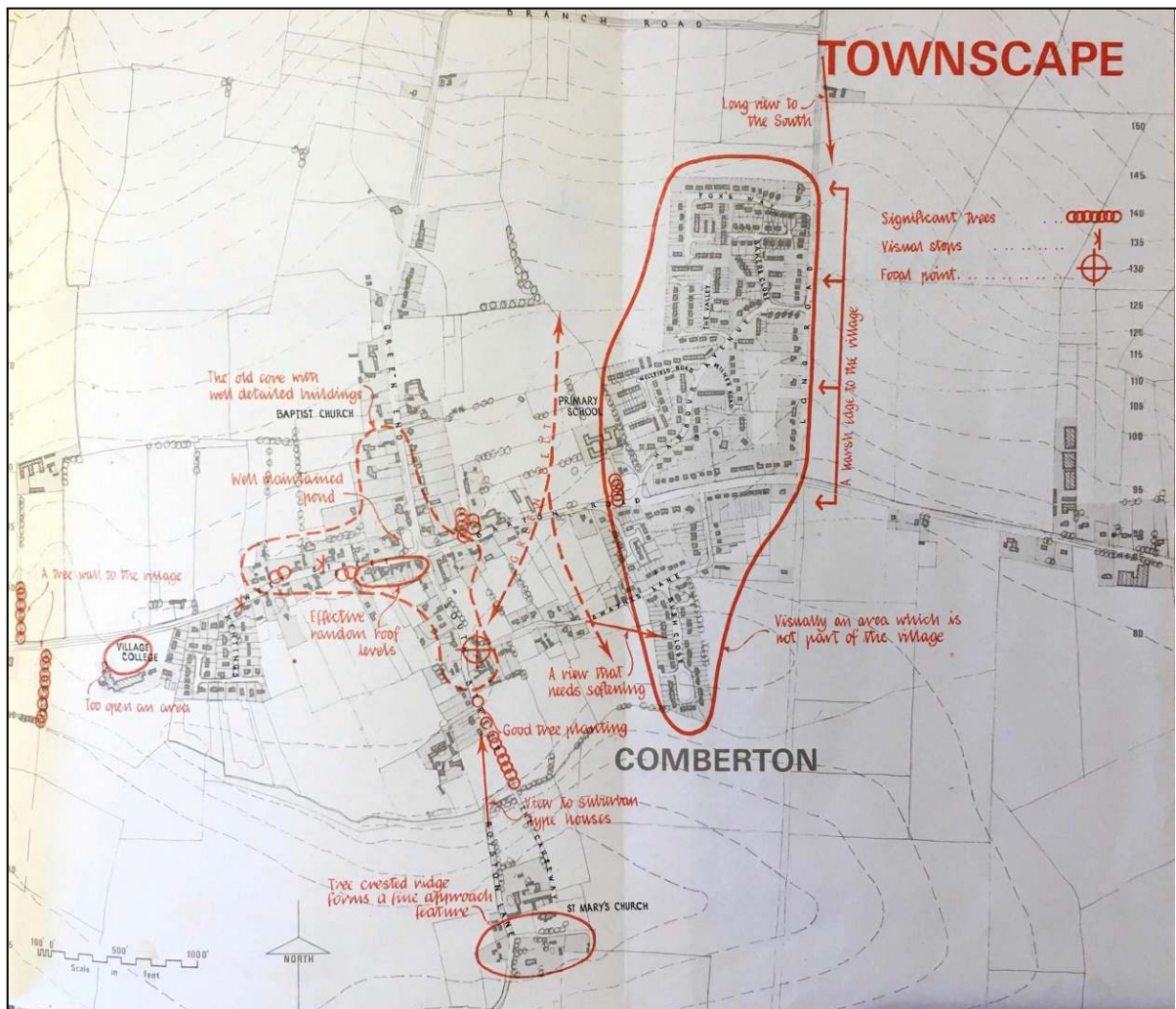


Figure 8. 'Townscape map of Comberton, from the 1972 Comberton Village Plan (Mellor, B.H. (1972) Comberton Village Plan, April 1972, Cambridgeshire and Isle of Ely County Council, Cambridge)

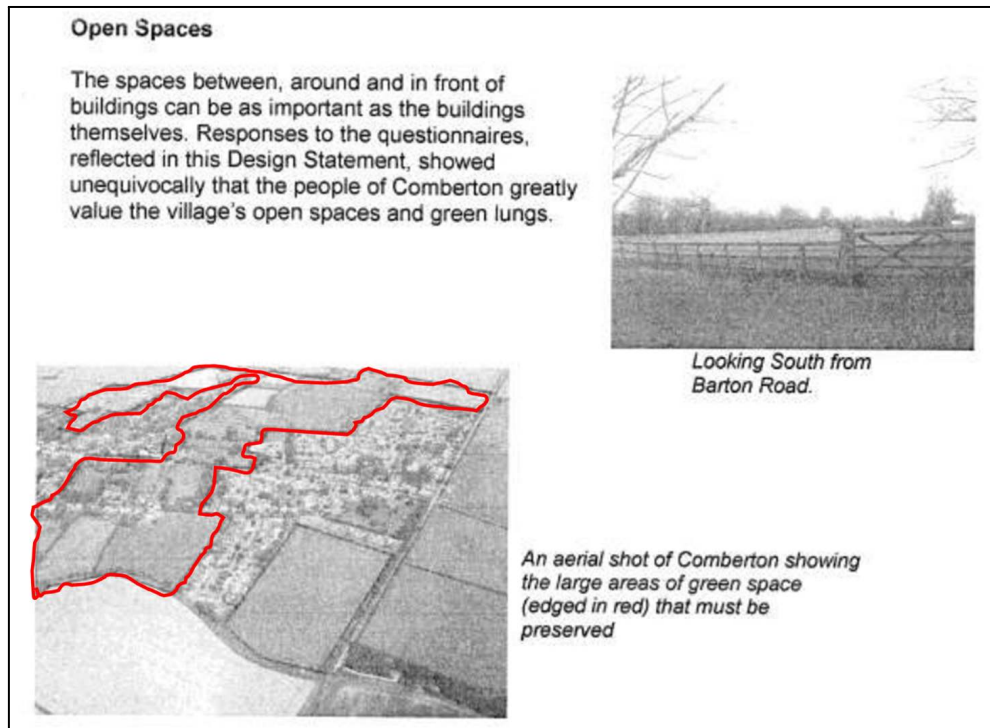


Figure 9. From Page 20 of the 2012 Comberton Village Design Guide, showing the continuing importance placed on the proposed development site as one to be kept in the green belt as a green space free from development.

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.