



Stapleford Parish Council

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South Cambs District Council
South Cambridgeshire Hall
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Dear Sirs

Response by Stapleford Parish Council – 22/04303/REM

Reserved matters application for additional access points, layout, scale, landscape and appearance following outline planning permission 20/02929/OUT (The outline planning for the development of land for a retirement care village in Use Class C2 comprising housing with care, communal health, wellbeing and leisure facilities, public open space, landscaping, car parking, access and associated development and public access countryside park with all matters reserved except for access)

1. Introduction

1.1 Stapleford Parish Council recognises that the principle of Class C2 development which provides specialist housing for a growing elderly population, on this site, within the Cambridge Green Belt has been accepted.

1.2 The Parish Council provided an online response to Rangeford Village's draft plans in June 2022 and has met Rangeford representatives. Following a consultation, revised plans were prepared over a 4 week period and displayed publicly at a short, midweek, afternoon event in Stapleford. There followed a further two meetings between Parish Councillors and Rangeford, and some revisions to the design of the retirement care village. However, the Parish Council's objections remain unresolved.

1.3 The Parish Council's response reflects a strong desire to ensure that the development reflects: the distinctiveness of Stapleford; represents a sustainable, high quality scheme that promotes the wellbeing of both the existing and new community;

protects and enhances the edge of village location, including the Cambridge Green Belt, its sensitive landscape setting, and biodiversity; secures appropriate parking provision for the new community and the countryside park; and is integrated into the community, securing connectivity and permeability to the village and beyond.

2. Scale, Layout and Density

2.1 Condition 19 of the outline planning consent sets a maximum threshold floorspace of 17,825 sqm and reflects the floor area identified in the outline planning application form. The Design and Access Statement states the Gross Internal Floorspace is 17,780 sqm.

2.2 The outline planning consent also identifies Parameter Plans which set out the principles for the proposal. The development area is 3.12ha with the height of buildings decreasing from broadly south to north across the site. The zones range from 2 storey (ridge height 9m); 2 storey (ridge height 8m) and single storey (ridge height 7m). The lowest zone is adjacent to the proposed countryside park. The parameter plan shows the requirement for 1.8 ha of amenity/open space, structural landscaping to the perimeter of the site, the countryside park extending to 19.1ha, and a 15 metre safeguarding corridor to allow for the route of the Cambridge South East Transport busway.

2.3 Parameter Plan 'J002745 008A Land Use Heights' was submitted as part of the appeal submissions to reduce the maximum height of the zone closest to Gog Magog Way from 12m to 9m. However, the total floorspace figure was not commensurately reduced. Despite the applicant's suggestion that this resulted in the loss of a pitched roof only, the Parish Council consider that it effectively resulted in the loss of one floor on the main institution building. The increased footprint, scale and mass of the development proposals in the REM application reflect the applicant's desire to accommodate the same floorspace within stricter height controls resulting in buildings which are wider and deeper than that shown in the outline application Illustrative Masterplan.

2.4 It is important to remember that the site remains within the Cambridge Green Belt at the edge of the village. Stapleford is characterised by generally spacious, residential development within a setting that forms a strong visual tie between the surrounding open farmland/countryside and the village of Stapleford. These aspects all contribute positively to the rural character of the area and are recognised in the Stapleford Landscape Character Assessment 2019, the Great Shelford Village Design Statement adopted as Supplementary Planning Guidance by South Cambridgeshire District Council, and the Stapleford Draft Conservation Area Appraisal 2021. The rural character is recognised by Strategic Local Plan policy S/8 which designates Great Shelford and Stapleford as a rural centre, and the southern rural cluster policies in the emerging Greater Cambridge Plan, which clearly identify the area as rural rather than urban or urban edge.

2.5 The layout, scale and density of the proposed development has no regard for this spacious and rural character. Any sense of openness, views, or any ability for the rural character to penetrate the development, are obscured by the location, depth and bulk of

the majority of the built units. The applicant argues that the width and depth of the buildings is required for functionality and is less dense than other retirement village locations. However, the Parish Council would refer the District Council to other Rangeford Villages (Mickle Hill, Pickering and Wadswick Green, Corsham) which demonstrate how extra care housing has been successfully accommodated in a way which is sympathetic to an open and rural village environment with apartments which are not excessively deep and wide.

2.6 Views from Magog Down and the route along Haverhill Road into the village are historically significant to Stapleford's location. The most damaging effects would occur where the development would block a view of a treed skyline (as in views north from the part of Haverhill Road within the existing built-up area) and a view from Little Trees Hill. Having so many wide, linked buildings running across the development site, including the Pavilion, obstructs and effectively removes these views both from within and outside the village and removes any sense of openness.

2.7 The development as proposed will result in a significantly more urbanised scale, mass and density of development with a form and character reflective of developments within, or at the edge of Cambridge, and other urban 'Retirement Village' locations such as Leicester and Stoke on Trent, shown as illustrated examples in the Design and Access Statement.

2.8 National and Local Plan policies seek to ensure that all new development is of a high quality design that preserves or enhances the character of the area, respects the local context and its local distinctiveness. The scale and density of the proposed retirement care village is not considered to reflect or respect the strong rural characteristics of Stapleford or respond to the need to retain the openness of the Green Belt.

2.9 The proposal is therefore contrary to: NPPF (para 130) which requires development to be sympathetic to the local character, including the surrounding environment and landscape setting; NPPF (para 149) which seeks to ensure development would not substantially harm the openness of the Green Belt; Local Plan Policy S/7 which requires development to be of a scale, density and character appropriate to the location; Local Plan Policy HQ/1 which requires proposals to preserve or enhance the character of the local urban and rural area and appropriate in terms of scale, density, mass, and form responding to the local context and local distinctiveness; and Policy NH/2 which seeks to respect and retain the local character and distinctiveness of the local landscape which is identified in the Stapleford and Great Shelford Landscape Character Assessment and the Great Shelford Design Statement SPD.

2.10 Stapleford Parish Council would recommend Rangeford Villages look to its own edge of village and rural locations such as Mickle Hill. Within the constraints of the Parameter Plans, the development should reduce the footprint and bulk of buildings, introducing gaps between rows of buildings running from north to south. This would more closely reflect the character of Stapleford, assimilate the development within the village and its surrounding

landscape and promote the retention of important views through the development to the surrounding countryside.

3. Appearance and Building Design Principles

3.1 The District Council adopted the Great Shelford Village Design Statement as Supplementary Planning Guidance in 2004. Although focussing on development within Great Shelford, the Parish Council consider that given the proximity and close-knit relationship between the built-up part of the parishes, and given the very limited amount of development and change since 2004, the Supplementary Planning Guidance provides policy advice which is entirely appropriate to Stapleford. Reflecting this, the two parishes are also preparing a Neighbourhood Plan with the designated Neighbourhood Plan Area (2016) covering both Great Shelford and Stapleford. Initial community engagement and consultations identify Design as a key issue for the Neighbourhood Plan to address.

3.2 The Great Shelford Design Statement confirms that new development should embody a mixture of use and types of building in scale with the existing development in the village and should reflect local character in a meaningful way. It also states the priorities that development should mirror existing domestic scale and diversity of style, embody good design and relate intelligently to the character and context of the village.

3.3 Section 12 of NPPF stresses the need for well-designed places and states that the creation of high-quality buildings and places is fundamental to what planning and development process should achieve. Developments should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping. Development of poor design that fails to take the opportunities available for improving the character and quality of the area should be refused.

3.4 South Cambs Policy HQ/1 stresses the need for place responsive design that is compatible in terms of scale, mass, form, siting, design, proportion, materials, texture and colour in relation to the surrounding area.

3.5 The applicant's Design and Access Statement describes the conceptual evolution of the development's design by defining three character areas within Stapleford. First, 'Bungalow Close' is defined as single storey housing to be used for the most northern part of the site. Secondly, a 'block house' character area describing semi-detached houses such as those located in Haverhill Road. The distinct characteristics of 'Block House' are that they are pairs of semi-detached homes, with gardens to the rear and long frontages to the street. The final 'Farmstead' Character Area concept illustrates traditional, single aisle, individual barns with black timber cladding and pantile roofs set in a loose knit format around a spacious open courtyard. The definition of these character areas and their attributes provide a sound basis on which to intelligently relate the development to the character and context of Stapleford.

3.6 Whilst recognising and accepting the design concepts, which have the potential to align with the principles within the Great Shelford Design Statement, there is a complete disconnect between the character areas as they are described in the Design and Access Statement and the building design proposals submitted with this application. Simply, the proposed design does not take the existing built vernacular of the village, as described in the three character areas, into sufficient and appropriate consideration.

3.7 The two farmstead 'courtyard blocks' (Blocks C, D, I and J) create a dense, enclosed, urbanised form around small, tight and imposing courtyards with limited natural daylight. The design does not reflect the need for a looser, more 'farmstead' concept which allows for an open character, views and permeability through the development. The Parish Council would ask the applicant to commission a Daylight and Sunlight Report to assess whether the impact of the courtyard design will adversely affect the amenity of the new residents due to lack of daylight and sunlight (particularly blocks I and J). The blocks are significantly wider than the barn aisle's characterised by the 'farmstead' approach. The Design and Access statement includes examples of this type of design at Pilgrim Gardens, Leicester and sites in Belgium. Blocks C, D, I and J are distinctly uncharacteristic and an alien urban form of development at the edge of Stapleford.

3.8 The Design and Access Statement comments that a Design Review Panel has commented upon the Bungalow Design and particularly pitched roofs running perpendicular to the street. This 'gable end' to the road design is not shown in the Concept character areas and does not reflect the distinct characteristics of Stapleford which should also include extended front gardens. Bungalows should not be positioned gable end to the road.

3.9 The Central Green apartment blocks and the Neighbourhood Street blocks have been designed to look more akin to traditional dwellings than apartment buildings, with pitched roofs and recesses in the elevations to break up the massing. However, homes in Gog Magog Way and Chalk Hill are formed into semi-detached pairs and short terraces of four. Stapleford has no wide, multi-storey residential units or extended terraces of the nature proposed by Rangeford. The bulk and scale of proposals (Blocks E, F and G), the fenestration detailing, the lack of any green space to the front of blocks and the choice of materials do not appropriately reflect any characteristics prevalent in Stapleford. The Parish Council is of the view that apartments do not need to be of the proposed width and depth to function, given examples of Rangeford Villages designs elsewhere.

3.10 There is no conceptual process to outline the design of the Pavilion. It is described as a long and low, contemporary design with a flat roof and a horizontal expression to be softened by a carefully considered material palette. The Appeal Inspector concluded that there is no reason to presume that an institution like a care home need have the appearance of an institution.

3.11 The Parish Council consider that the Pavilion has characteristics more akin to a retail supermarket with a long, full height glass frontage, extended blockwork, overhangs, and an extensive two storey flat roof. It has no design references to any building in Stapleford.

There are significant expanses of flat roofing, covered by solar panels. Such features will be highly visible from Magog Down and surrounding higher land, creating an exposed and contemporary eyesore in a rural setting. By removing the first floor over the Pavilion it would enable the opportunity for a more traditional roofscape.

3.12 The outline masterplan included a significantly more interesting building towards the southern edge of the site leaving the opportunity to provide a larger amenity area forward of the building that can be used by residents and visitors. The Design and Access Statement at the time also suggested that a building in this location would ensure that the retirement village was better integrated and more accessible to the wider village. Currently, due to the location of the Pavilion, the associated amenity area is small (despite the Design Review Panel saying it needed to increase in size), congested and encompassed by on-street car parking, access roads and parking courts.

3.13 In terms of other design considerations:

- The Drainage Strategy submitted to satisfy an outline planning condition suggests that the applicants do not have the benefit of a Water Drainage Assets Map detailing the existing water sewerage drainage systems. The layout and design of the retirement village cannot be approved until it is clear that the development will not cause any additional on-site or off-site flooding downstream (Bar Lane, allotments, school, Rose Public House and the River Granta).
- Any design features which are merely aesthetic and not functional (e.g. very high chimneys) are undesirable features, creating additional paraphernalia, blocking and interrupting views in a rural setting.
- The significant amount of full height glazing in the design will lead to massive solar gain and Rangeford seek to address this with roof overhangs and external blinds on south-facing windows. A more appropriate design solution is needed to ensure the health and well-being of its elderly community.
- A 1.5m high wire fencing with two rows of barbed wire on top and a lockable gate on the western boundary of the retirement village and countryside park is inappropriate. The Parish Council understands that this particular feature has already been removed following feedback but wishes to ensure that it will not be reinstated.

3.14 The overall design has an 'urban retail estate' and 'institutionalised' feel. It lacks genuinely different materials and styles, as you would expect to see in a village, with extensive lengths of unbroken frontages (e.g. blocks C, D, J, I and E, and the Pavilion) and solar panelled covered flat roofs. As a whole, the design does not reflect the local vernacular and is based on city, urban and edge-of-Cambridge developments, e.g. Ninewells, Trumpington, Great Kneighton, Aura and Eddington, and on other developments on

brownfield sites (Chertsey), major conurbations (Stoke on Trent, Leicester) and Belgium, as detailed in the Design and Access Statement.

3.15 The Parish Council asks the District Council to ensure that the design is significantly amended to reflect the local, rural context and the distinctiveness of the village identified by the three character areas.

4. Public Amenity Space

4.1 The approved Parameter Plans require an area of 1.8 ha to be used as public amenity space.

4.2 The proposed amenity space between Blocks C, D and E and the southern boundary of the site is dominated by a multi-functional SuDS designed as an integral part of the green infrastructure. This is located at the lowest point of the retirement village, close to the boundary with existing properties at Chalk Hill and Gog Magog Way. The Parish Council is concerned about the impact on the local water table in these areas and is aware of significant flooding problems in Chalk Hill, Gog Magog Way and Haverhill Road, confirmed in the applicant's Planning Statement. Farmland immediately across Haverhill Road is at the time of writing partially under water following heavy rain (and this is why Haverhill Road was built at a level above that of what is now farmland but was previously marsh). Other SuDS detailed on the plans lie within the amenity spaces but are clearly inaccessible as bridges are needed to cross over them.

4.3 The area, particularly in the southern part of the site, is prone to flooding and, due to the location of the proposed SuDS, the Parish Council considers that it is unlikely the proposed public amenity spaces will be managed and able to function as accessible and useable amenity spaces for much of the time. The development should be amended to provide alternative, replacement public amenity space to meet the parameter plan shown in the outline consent (i.e. 1.8ha) or provide evidence that demonstrates that the SuDS will be available for the residents for the majority of the time. The Parish Council is mindful of problems with a 'multifunctional' attenuation basin at Ninewells, approx. 1.5 miles to the north of Rangeford's site and in a comparable geological setting. Here, a playground located in the attenuation basin was out of use for many months because the basin was filled with water, as the following photograph illustrates.



4.4 The applicant should demonstrate that its amenity spaces are safe for residents, their visitors and people passing through the retirement village en route to the countryside park (SuDS are likely to be flooded or contain muddy water for significant periods), that they are accessible (will not be surrounded by fencing) and that they are compatible with wildlife and biodiversity.

4.5 The Parish Council is not convinced that the provision of amenity space is consistent with the approved Parameter Plan, principles in the NPPF and Local Plan Policy SC/7 which seek to secure a network of high quality open spaces which are important for the health and well-being of the community.

5. Access

5.1 No gates should be installed at access points into the retirement community to ensure that it looks and feels part of the village and not separate from it. If added security is needed, this should be at the exit points of specific buildings. Such an approach would accord with Local Plan policy HQ/1 which seeks to achieve a permeable development, linking with its surroundings and existing and proposed facilities and services.

5.2 Vehicular circulation around the retirement village is poor. The turning areas at either end result in difficult areas for elderly residents to navigate and will cause consequent noise disturbance to the amenity of residents.

6. On-site Parking

6.1 The Parish Council objects to the lack of parking spaces for staff, residents and visitors within the retirement village and failure to meet the Council's parking standards. At the outline application stage, it was confirmed within the transport assessment:

- the number of car parking spaces for the development will be the subject of a suitable reserved matters submission, and will accord with the standards.
- cycle parking for the residential units and employment space will also be provided in accordance with the standards of the Council relating to cycle parking provision.

6.2 The application makes provision for 139 parking spaces and 62 cycle spaces for residents, employees and visitors. Additionally, it provides 47 cycle storage spaces and storage for 44 mobility vehicles. The Travel Plan notes that there are 50 employees, 25 of whom will be on site at peak times with 75% expected to travel by car or van. This equates to a demand for 18 staff on-site car parking spaces. With the introduction of the Travel Plan, this number is not assumed to reduce significantly. If successfully implemented, the Travel Plan will result in approximately two fewer staff travelling to work by car. The applicant's Travel Plan assumes it will have very limited impact upon vehicle movements and parking needs.

6.3 Residential parking is provided in parking courts and on-street parking. One space is provided for each of the 18 bungalow units. Therefore, the residual car parking for the remaining 129 units is 103 spaces, equating to 0.7 car parking spaces per household, which can comprise up to 3 bedrooms. The applicant notes in the Design and Access Statement that the District Council has asked them to reduce the number of parking spaces on site. The number of car parking spaces is judged, by Rangeford, to be the minimum operationally tolerable although no comparisons with other retirement villages is provided. The lack of parking will be compounded by the lack of any designated visitor or delivery provision within parking courts or on-street parking.

6.3 Local Plan Policy TI/3 seeks to secure parking provision to adopted Parking Standards set out in Figure 11 of the Local Plan. NPPG 'Housing for Older and Disabled People' stresses the need for the design to secure the wellbeing of its residents by ensuring parking spaces and setting down points in close proximity to entrances. This is supported by Local Plan Policy HQ/1 which seeks to ensure car parking is integrated into the development and does not dominate the development and its surroundings.

6.4 In the applicant's view, there is no standard within the Council's development plan that is directly applicable. However, the applicant considers the most relevant standard to be those for C3 residential dwellings. This standard requires 2 spaces per dwelling, 1 cycle space per bedroom and additional provision for visitors, service vehicles and salespeople. This standard equates to a requirement of at least 296 car parking spaces for residents only, far in excess of that provided on site. Additional car parking provision is needed for the

retail and commercial elements of the scheme, each of which are additionally detailed in Local Plan Figure 11. The District Council must ensure that sufficient parking is provided to meet the Local Plan standards and the demonstrated and evidenced operational needs of Rangeford Villages.

6.5 As a retirement village with extra care housing the availability of sufficient parking for residents and visitors is a key issue. The applicant has confirmed that car parking requirements peak when new residents move in and with churn among village residents it is anticipated that the need for parking will not abate. Statistics show that the highest proportion of car ownership is in those over 60 years old and almost 30% of over 80 year olds have a blue badge. A report by Housing LIN¹ examines the impact of car ownership on the sense of well-being for older people and considers the policy and practice responses to an ageing society. The report concludes that the laudable desire to reduce car dependence needs to take account of the well-being of older people, emphasising the way in which car ownership secures accessibility and flexibility needed by older people to support their independence. The report explains that accessibility and flexibility for older people is not secured through access to public transport.

6.6 The Travel Plan and its analysis does not specifically address these issues, providing conclusions on a whole population rather than a travel plan which addresses the needs of those who are elderly, less mobile and require access to a car for independence and wellbeing. It concludes that the village will be car-free or car light. However, this is in direct contrast to the Travel Plan itself, which estimates that only 20% of journeys to the retirement village will be by 'active travel or public transport'².

6.7 The Design and Access Statement seeks to explore residents'/staff/visitors' experiences of using the retirement village. The nearest bus stops are located 120m from the site and have a very poor frequency of only five buses per day. Shelford Railway Station is 1.5 km to the west of the development site, offering direct services to Cambridge and London Liverpool Street. Pedestrian and mobility vehicle links are poorly constrained by poorly maintained and narrow footpaths, and a lack of made up footpaths forcing users onto the road. Any assumption that employees, visitors or residents will use public transport or walk/use mobility vehicles in preference to private vehicles to get to/from the retirement village and the countryside park is fundamentally flawed. As discussed above, the Housing LIN report above concludes that older people use public transport in a very limited way.

6.8 It is understood that residents are required to pay an annual fee for a parking space. Given the lack of on-site car parking and the potential for an additional charge to park a car within the retirement village, it is clear that car users will park their vehicles in surrounding residential streets or the already congested sports field car park. The dispersal of cars to

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https://www.housinglin.org.uk/_assets/Resources/Housing/Support_materials/Briefings/HLIN_Briefing_CarOwnership.pdf

² Table 4.1 – Rangeford Travel Plan September 2022, Transport Planning Associates.

narrow, residential streets with 20mph speed limits is unacceptable as a solution to the lack on-site car parking.

6.9 A significant number of employees and visitors should be accommodated including deliveries, family members, healthcare visitors and domestic support staff. Within an extra care housing setting, far more frequent visitor numbers will be expected. For example, health care visitors may visit one household, 3 times a day. Public transport is not a suitable option in this respect – each visitor will want to readily park and access the apartments.

6.10 In the Parish Council's view the parking courts, on-street parking and parking areas are not located conveniently for either residents, staff or visitors. The provision is dominated by on-street car parking and car parking courts which will dominate the streetscape, particularly around the already congested, central green space to the Pavilion, reinforcing the urban, retail and institutional layout contrary to Local Plan policy HQ/1.

6.11 The applicant simply states that 'car parking provision has been minimised to the minimum level judged to be operationally tolerable by Rangeford without giving rise to negative internal or external displacement impacts'. There is no demonstrated evidence why the Council should depart from its own residential, retail and commercial parking standards. As such, the Parish Council objects to the lack of vehicle and cycle parking which does not meet the Council's standards set out in Policy T1/3. It will create an unsafe, congested and unsustainable community environment which does not consider the wellbeing of its resident as required by NPPG Housing for Older and Disabled People and which is a key tenet of the emerging Greater Cambridge Plan. Moreover, such congestion could prejudice access for emergency vehicles both within the site and nearby residential areas. Additionally, the applicant should demonstrate that the provision for mobility vehicle parking is appropriate using examples of other rural retirement village locations.

6.12 If the Council is minded to approve the application, a legal agreement should secure the implementation of the Travel Plan and the provision of a free, electric bus for residents, staff and visitors to key locations as outlined by Rangeford in discussions with the Parish Council.

7. Countryside Park – Access and Parking

7.1 The Parish Council welcomes the provision of the countryside park to provide new, socially inclusive recreational space for the local community that will have enhanced connectivity³ where there is notable deficit of publicly accessible open space⁴. The provision of the countryside park supports Green Belt policy and Policy CSF/5 (2) of the Cambridge Southern Fringe Area Action Plan which seeks to create new footpaths, cycle paths and bridleways, creating routes through the area and linking to Wandlebury Country Park/Magog Down.

³ Design and Access Statement

⁴ Cambridgeshire Green Infrastructure Strategy

7.2 However, the Parish Council strongly objects to the lack of a parking area or parking strategy for the countryside park. Magog Down is a popular leisure location and it is envisaged that the new countryside park will be equally as attractive to the local community and people from much further afield. The Parish Council is concerned that due to the lack of any off-street parking provision, on-road parking will cause highway safety issues. Similar situations are already experienced at Magog Down Car Park by users who do not wish to pay the carpark charge. On-road parking along Haverhill Road and Drift Track (private permissive track only) would be extremely dangerous, given the lack of lighting, road markings, poor off-road surfaces and absence of crossing points.

7.3 Local roads are narrow, generally unmarked and have 20mph speed limits and are entirely unsuitable for countryside park visitors' vehicles. Rangeford Villages should support an appropriate and safe solution for visitors to the countryside park. This should include additional parking provision and upgrading the off-road path to bridleway standards from Magog Down Car Park. The off-road path must be suitable for all non-motorised users and include provision for non-motorised users (including equestrians) to safely cross Haverhill Road.

7.5 The site is located on the fringe of Stapleford and is well connected to key walking routes. It is important that countryside park users should be able to access the retirement village and countryside park in several ways via multiple-user paths. We note the proposals include a 2 metre wide public right of way from Gog Magog Way to the countryside park, with a route between Haverhill Road and Hinton Way. The Parish Council notes that cycle parking is to be provided at access points at Haverhill Road and Hinton Way. The footpaths, cycle and bridleways routes should be adopted as public rights of way to ensure permanent public access irrespective of future change of management/ownership of the retirement village or countryside park. Access also needs to be compliant with the British Horse Society's advice on access.

7.6 The Parish Council will of course be pleased to work with Magog Trust to support the safe and successful operation of the countryside park, including ensuring that all non-motorised users are appropriately accommodated whilst enhancing the ecology and biodiversity of the site. This includes resolving any conflicts between accessibility and safety if/when the CSET busway programme is delivered.

8. On-site landscaping

8.1 The landscape parameter plan accompanying the outline application indicates an area of proposed new structural planting around the part of the site proposed for built development. It varies in depth from about 3m to 8m with deeper pockets at the northern and eastern corners of the site. This is presented as a mitigation of the intrusion of development into the openness of the Green Belt.

8.2 The Parish Council wants to ensure that the site has high quality landscaping that integrates the development with its surroundings in accordance with Local Plan Policy HQ1. The treescape will have to provide a robust tree population, featuring longevity, diversity, seasonal and year-round interest, and species which will be better adapted to increasingly hot, dry conditions. It is equally important that the landscaping plan reflects the landscape characteristics of the locality. The tree survey accompanying the application suggests a greater variety of trees and hedgerow species than included within the planting plan. The scheme is currently dominated by sycamore, birch and beech. Further species are needed to add variety and resilience to the planting scheme. Species such as Ash, Norway Maple, Walnut, Hornbeam, Whitebeam and Hazel are suitable additional alternatives.

8.3 Mature hedgerows already exist. The Parish Council seeks to retain the existing hedgerows and infill with complimentary hedging species. This is more environmentally friendly and would help to screen larger buildings from view from the outset, rather than waiting years for new landscaping to establish. Protection of the existing hedgerows should be a condition of any consent. The hedgerows should be enhanced with species typically seen in the locality: Hawthorn, Blackthorn, Dogwood, Golden Chain and wild privet.

8.5 It is also not clear the extent to which the planting plan has been informed by the drainage strategy and vice versa. To eliminate the risk of dissolution features, SuDS that are located close to the buildings are proposed to be lined. This causes them to be impermeable and serve as water conveyancing features. As a result of the lining to these features, tree planting cannot be included within them due to the lack of available rooting soil volume above the lining. The Parish Council requires confirmation that the planting scheme is deliverable and sustainable given the extent of non-permeable areas across the development. As an example, the typical tree pit plan does not include this non-permeable SuDS scenario and therefore we cannot be convinced that there is compatibility between the planting and water drainage schemes.

8.6 We are all aware of the impact of climate change and extreme weather events. The planting management plan for the residential area and the countryside park suggests that inspection on its successful implementation should take place every 5 years. The Parish Council asks the applicant to submit a risk assessment and mitigation strategy to address the potential risk that the planting scheme and chalk grassland is not successfully implemented, how any failed landscaping will be replaced, supported by annual inspections over a 10 year period. This would be consistent with Policy NH/8 (2): Mitigating the Impact of Development In and adjoining the Green Belt.

8.7 A safeguarded area of 15m is to be secured for the implementation of the busway. It would provide confidence if the landscaping plan and arboriculture method statement recognised the potential impact of the busway and any measures needed to ensure the success of the countryside park on the implementation of the landscape plan. Additionally, the applicant should demonstrate the extent to which it has safeguarded the amenity of its residents should the busway be implemented and to work closely with the Greater Cambridge Partnership to achieve the best outcome.

9. Biodiversity

9.1 There is an opportunity for ecological and landscape enhancements throughout the retirement community as well as the countryside park. This would be consistent with Local Plan policy NH/4 which seeks to secure opportunities to achieve positive gain through the form and design of development. Measures may include creating, enhancing and managing wildlife habitats and networks, and natural landscape within the residential area.

9.2 'Wild' areas, rather than just ornamentally planted ones, are needed within the development as pathways for wildlife and to link wildlife to the surrounding countryside and new park area. Hedgerows around the perimeter are insufficient to achieve this goal.

9.3 Measures identified in the Greater Cambridge Biodiversity SPD February 2022 - Issue B5 should be included in the design to meet policy requirements HQ/1, NH/4, Policy 57 and Policy 59. Examples of interventions include an equal number of integrated bird box features as dwellings for building-dependent birds (breeding Swifts, House Sparrows, Starlings and House Martins), provided individually or clustered in appropriate locations within the development. 25% of the units should have integrated bat box features; provision to be clustered next to appropriate foraging habitats. All fencing should include Hedgehog Highway Gaps. Durable tree-mounted nest boxes, bat boxes and insect boxes should be incorporated into the landscaping scheme.

9.4 The Parish Council would also make the following comments:

- we leave many verges within the village unmown and support NoMowMay. If the retirement village is to blend into the wider village, it needs to embody these features and values in its landscaping.
- How will the inclusion of an 'attenuation basin' be a genuine pond that will benefit wildlife whilst also providing open space?

10. Community Facilities

10.1 There are inconsistent comments about the accessibility of on-site facilities. Stapleford residents require clear reference to community-accessible facilities, including a swimming pool, which were offered in initial plans submitted for outline planning approval. The 'next steps and community benefits' section makes it very clear that the extensive 'communal' facilities of the development are only for residents' use, which is contradicted by the Planning Statement. There is precedent for exclusive on-site facilities: Rangeford's website, for example, refers to the "exclusive onsite amenities" of its Homewood Grove development in Chertsey. Without shared facilities, the retirement community will remain an exclusive entity separate from the rest of Stapleford.

11. Pavilion Name

11.1 Stapleford village already has a Pavilion at Stapleford Recreation Ground, which is signposted, on emergency signs locating the defibrillator and has 'what3words' locations for emergency services. Having another building called the Pavilion is unnecessary, confusing and could cause delays for emergency services.

12. Affordable Housing

12.1 Stapleford Parish Council is aware of the need for affordable retirement accommodation in Stapleford and Great Shelford, freeing up larger properties for families to purchase and maintaining the community by allowing different generations of the same family to live near each other. This was recognised as a benefit by the Planning Inspectorate.

12.2 However, figures from April 2019 show there were 13 applicants aged >60yrs in Great Shelford and Stapleford on the housing register, and 247 applicants aged >60yrs on the housing register in South Cambridgeshire as a whole. More recent data would no doubt show an increased need in both respects. Additionally, there are currently 47 households in the village needing affordable and social rented properties and a further 27 households requiring 2 or 3 bedroom affordable and social rented properties⁵. Notwithstanding the exceptions provided by NPPF⁶, the Parish Council is disappointed that, despite conversations with Rangeford Homes, it has chosen to adopt an exclusively open market approach and does not seek to address in any way the demonstrated need for 'affordable specialist housing for the elderly'.

12.3 As noted in National Planning Practice Guidance - Housing for Older and Disabled People, 'Local planning authorities can encourage the development of more affordable models and make use of products like shared ownership. Where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need'⁷. The Parish Council would expect SCDC to take such an encouraging and positive approach and seek to negotiate an 'affordable specialist housing model' within the development proposed.

13. Conclusions

13.1 In light of the preceding comments, Stapleford Parish Council objects to the application as proposed. Significant amendments are required to make the development acceptable and the Parish Council looks forward to working with Rangeford Villages to secure a design which reflect its location in the Cambridge Green Belt and its sensitive rural location at the edge of Stapleford village.

⁵ Housing Development and Policy Research Officer, SCDC, June 2022.

⁶ National Planning Policy Framework – para 65(b)

⁷ National Planning Practice Guidance on Housing for older and disable people. Paragraph: 016 Reference ID: 63-016-20190626

13.2 If the Council is minded to approve the application, the Parish Council would ask that a safeguarding condition is applied to secure an off-site parking strategy to be agreed between the developer, the District Council and the Parish Council for both the retirement village and the countryside park which ensures the safety of road users and the amenity of nearby residents by ensuring no 'overspill' parking is permitted in residential streets in Stapleford or in Haverhill Road.

13.3 Condition 16 of the outline planning consent requires the applicant to submit a Construction Method Statement. The District Council should ensure that HGV and construction traffic should access the site via the A1307 to Haverhill Road only. Other access points result in construction traffic using narrow, 20mph roads which are in close proximity to the nursery and primary school and playgrounds where safety is a key concern. Construction should be limited to between 8am and 6pm on weekdays only (no Bank Holidays).

Yours faithfully

Stapleford Parish Council