

23/01088/FUM

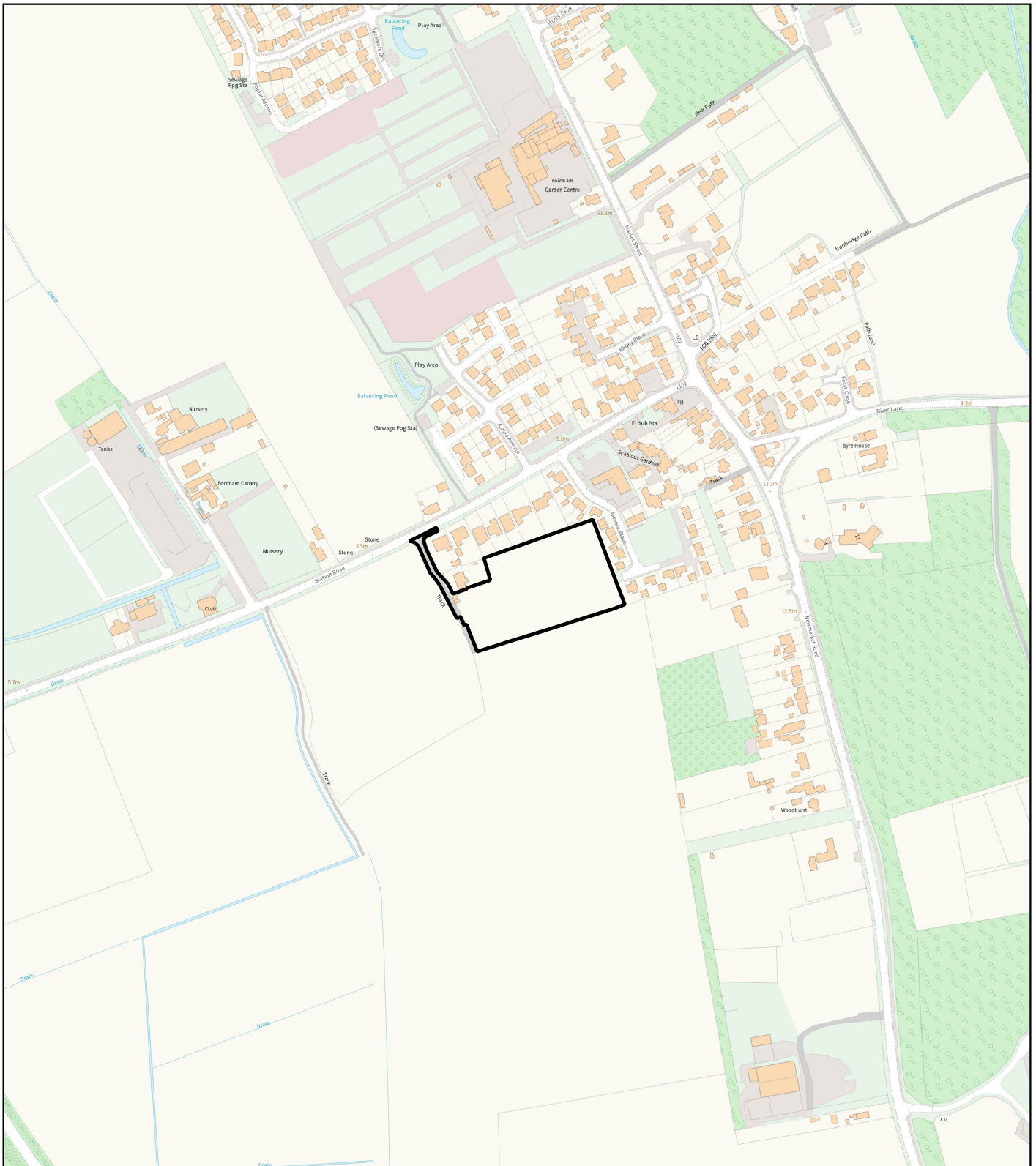
Land East Of 19
Station Road
Fordham
Cambridgeshire

Full planning permission for the development of retirement housing with support (use class C3) (age restricted to over 60s) comprising 21 dwellings, a residents community building, landscaping, access and associated infrastructure

To view all of the public access documents relating to this application please use the following web address or scan the QR code:

<https://pa.eastcamb.s.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S1YJX4GGG0K00>





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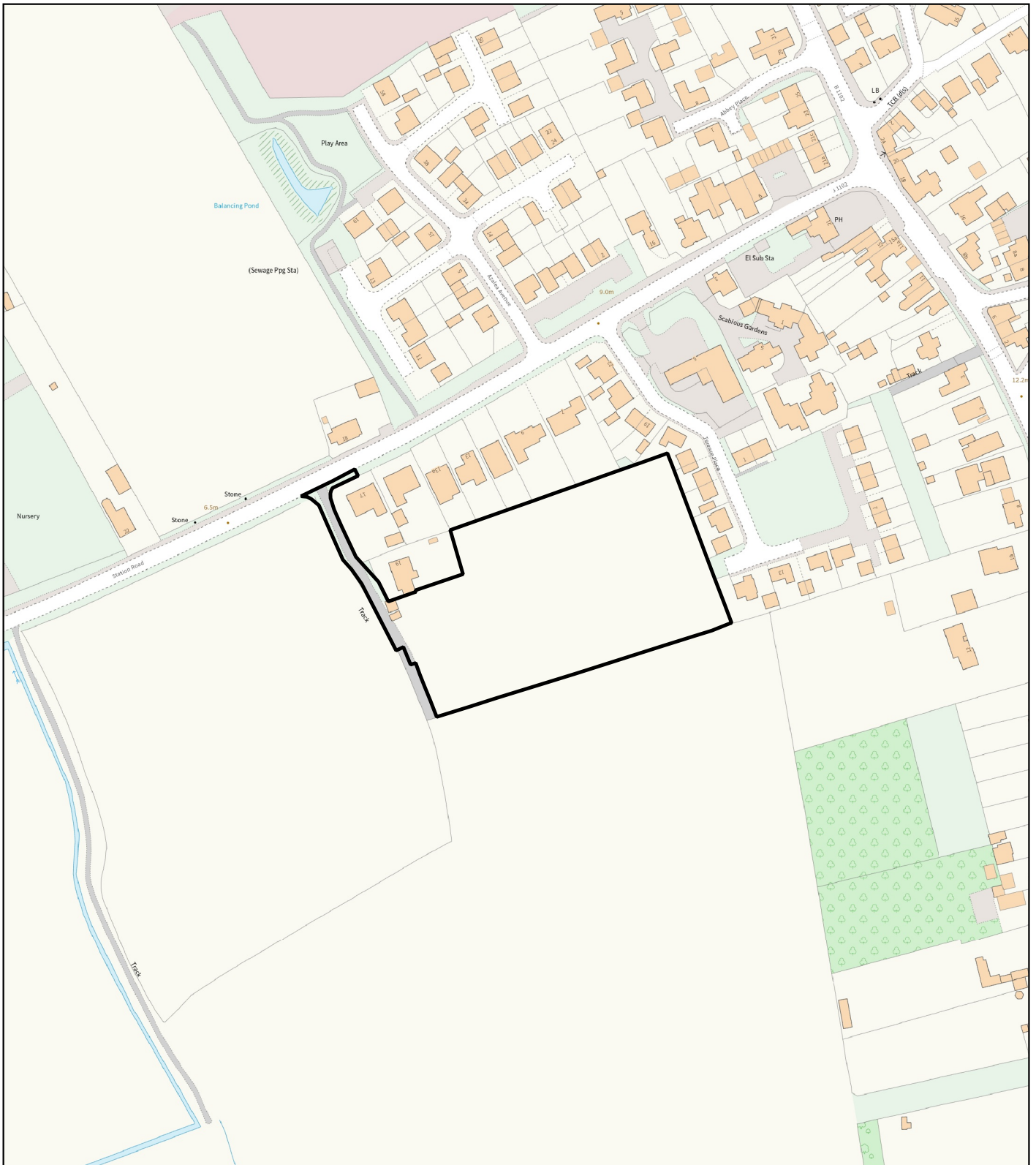


East Cambridgeshire
District Council

Date: 24/10/2024
1:5,000



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23/01088/FUM

Land East Of
19 Station Road
Fordham



East Cambridgeshire
District Council

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TITLE: 23/01088/FUM

Committee: Planning Committee

Date: 6 November 2024

Author: Senior Planning Officer

Report No: Z82

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Site Address: Land East Of 19 Station Road Fordham Cambridgeshire

Proposal: Full planning permission for the development of retirement housing with support (use class C3) (age restricted to over 60s) comprising 21 dwellings, a residents community building, landscaping, access and associated infrastructure

Applicant: SageHaus Living

Parish: Fordham

Ward: Fordham And Isleham

Ward Councillor/s: Julia Huffer
Kelli Pettitt

Date Received: 6 November 2023

Expiry Date: 09 October 2024

1.0 RECOMMENDATION

- 1.1 Members are recommended to APPROVE the application subject to the following terms:
- a. The Committee delegates authority to finalise the terms and completion of the S.106 legal agreement covering the Heads of Terms set out within this report to the Planning Manager; and,
 - b. Following the completion of the S.106, application 23/01338/OUM be approved subject to the planning conditions at **Appendix 1** (and summarised below); or,
 - c. The Committee delegates authority to refuse the application in the event that the Applicant does not agree any necessary extensions to the statutory determination period to enable the completion of the S106 legal agreement.

Recommended Conditions

- 1 Approved Plans
- 2 Time limit
- 3 On and off-site highway works
- 4 Construction Ecological/Environmental Management Plan
- 5 Archaeological investigation
- 6 Detailed drainage scheme
- 7 Surface water run off during construction
- 8 Tree protection measures
- 9 Hard landscaping
- 10 Fire hydrant(s)
- 11 External materials
- 12 Accessibility measures
- 13 Soft landscaping
- 14 Maintenance of soft landscaping
- 15 Air source heat pumps and photovoltaic panels
- 16 Biodiversity enhancements
- 17 Parking provision, access and hardstanding drainage
- 18 Noise Management Plan (community building)
- 19 Removal of permitted development rights – gates, fences and walls
- 20 Unexpected contamination
- 21 Hours of use – community building
- 22 Piling foundations
- 23 Sustainability and energy efficiency measures
- 24 Removal of permitted development rights for dwellings (extensions/alterations)

2.0 SUMMARY OF APPLICATION

- 2.1 The application proposals comprise the erection of 21 age-restricted (over 60s) retirement bungalows (Use Class C3 – residential). A 100m² (1076sqft) community building is also proposed at the site's entrance, with associated landscaping, access and associated infrastructure.
- 2.2 The proposed 2-bed and 3-bed bungalows are arranged largely in pairs around a central oval green which contains a SuDS pond. Each property has its own driveway with parking for two cars. Each parking space has an additional buffer to allow for restricted mobility.
- 2.3 The proposed community building is intended as a multi-purpose space for prospective occupiers, with an outdoor/patio terrace area. The building is designed to act as an amenity and well-being space. The community building has designated parking of four spaces.
- 2.4 The proposals seek to utilise Modern Methods of Construction (MMC) and renewable energy technologies (solar photovoltaic panels and Air Source Heat Pumps). As a result, the dwellings are expected to have an upfront embodied carbon saving of 47% compared to the Royal Institute of Chartered Surveyor's whole life benchmark and energy consumption is expected to be reduced by over 50%.

- 2.5 Regarding the type of retirement living proposed, as set out within the Applicant's Planning Statement: *"SageHaus Living retirement living model is most comparable to Sheltered Living with all homes coming with a 24-hour monitored alarm and the Site Manager/ Warden on site who will be available to assist residents with any issues. For those residents who require additional care the SageHaus Living domiciliary care package will be made available via the applicant's care partner Oak Retirement."*
- 2.6 Each dwelling will also be fitted with the following devices to allow independent living:
- Motion sensors – to track occupiers' daily habits to detect emergencies;
 - Video doorbell intercoms - to provide an extra level of security;
 - Smart home control - allowing temperature and light to be controlled via automation;
 - Smart Smoke and Carbon Monoxide detectors;
 - Voice activated assistants - to allow easier control of devices around the house.
- 2.7 All homes will be Part M4(ii) compliant with Building Regulations and as such they will benefit from level access thresholds both internally and externally. All dwellings have been designed in accordance with the Housing LIN Age Friendly design guidelines. This means that all internal spaces are large enough for wheelchair access and include design features such as flush skirting boards, which will enable residents to adapt and install mobility equipment if needed in the future.
- 2.8 The development proposals will be underpinned by a comprehensive soft landscaping scheme including attenuation pond, with upgrades to the site's vehicular and pedestrian access onto Station Road with an uncontrolled pedestrian crossing, linking to the existing northern-edge footpath.
- 2.9 The application has been called into Planning Committee by Cllr. Julia Huffer (Ward Member) on the following basis: *"My objections remain the same and I would ask that should you be inclined to recommend approval for this scheme it is called into committee for further scrutiny"*.
- 2.10 The application was also automatically referred to Planning Committee on the basis that it represents a departure from the Development Plan. This is in line with the Council's Constitution.
- 2.11 The full planning application, plans and documents submitted by the Applicant can be viewed online via East Cambridgeshire District Council's Public Access online service, via the following link <http://pa.eastcambs.gov.uk/online-applications/>.

3.0 PLANNING HISTORY

- 3.1 The application site does not have any related planning history.

4.0 THE SITE AND ITS ENVIRONMENT

- 4.1 The application site comprises an existing largely rectangular agricultural field along the southern edge of Station Road. The site immediately adjoins but falls outside of the development envelope as set out within the Fordham Neighbourhood Plan 2018. It is therefore located in the countryside for the purposes of planning policy.
- 4.2 The site sits behind existing residential development along Station Road and to the west of Terrence Place, a recently completed residential development. To the south and west lie agricultural fields. An existing back-land bungalow sits adjacent to the application site's north-western corner and is to be retained, falling outside of the Applicant's ownership.
- 4.3 The site measures c.1.06 hectares (c.2.6 acres) and has an existing singular vehicular access point onto Station Road.
- 4.4 There are no listed buildings, structures or monuments within the vicinity of the site. The site is within Flood Zone 1 (low risk of flooding) and is also at a low risk of surface water flooding.
- 4.5 The site is not covered by any landscape designations and does not fall within any Sites of Special Scientific Interest (SSSI), Special Protection Areas (SPA), Special Areas of Conservation (SAC) or RAMSAR sites. It does nevertheless fall within a SSSI Impact Zone (Brackland Rough SSSI and Chippenham Fen SSSI/Ramsar/SAC).

5.0 RESPONSES FROM CONSULTEES

- 5.1 Responses were received from the following consultees, and these are summarised below. The full responses are available on the Council's web site.

Parish – 29th November 2023

This application falls outside of Fordham's Development Envelope and Neighbourhood Plan.

Fordham Parish Council expect all applicants or their representatives to have familiarised themselves with the East Cambridgeshire District Council (ECDC) website. This includes having a full understanding of Trees, Hedgerows and Wildlife. This can be found on the website under 'P' for Planning.

One of the Parish Council's values is 'biodiversity' we uphold this value very seriously. The precious but limited land we have should be preserved and protected for future generations including the wildlife that lives within it.

As a Parish Council we want to support local enterprise and development, but by not respecting our values or to comply with our values may result in a fine by ECDC or a referral to the Cambridgeshire Police Force.

Parish – 18th January 2024

Having spoken to my Chair our updated position is as follows: ' We object to the plans because they fall outside the development envelope, and should therefore not be considered'.

Parish – 21st May 2024

As Fordham Parish Council we would refer you back to our original comment on the 18th January, we object to this development as it is outside the Fordham Development Plan and should therefore not be considered.

Parish – 21st August 2024

We would refer you back to our comments made on the 29th November 2023, 18th January 2024 and 21st May 2024, we object to this application as it falls outside the Fordham Development Plan and should not be considered.

Cllr. Julia Huffer - Ward Councillor, Fordham & Isleham – 25th September 2024

My objections remain the same and I would ask that should you be inclined to recommend approval for this scheme it is called into committee for further scrutiny.

East Cambs Ecologist – 16th August 2024

Headline: Net loss of biodiversity, trading rules not satisfied.

With the information provided with the application currently I Object to this application in its current form.

Non mandatory Biodiversity Net Gain

This application has used the appropriate metric at the time of submission. But the scheme does not provide a gain overall. Trading rules by the v4 standard of like for like or better have not been met at the overcompensation of hedgerow does not make up for the loss of other habitats of a different heading.

In the v4 user guide it states "If trading rules have not been satisfied then a net gain in biodiversity cannot be claimed unless trading rules are resolved. The trading rules are not influenced by the spatial risk multiplier and are applied before any spatial risk multiplier deductions." This is clearly marked on the metric see image.

There is a deficit of 2.28 to achieve no net loss to biodiversity.

Conclusion:

In its current form I Object to this application for the above reason.

East Cambs Ecologist – 30th September 2024

Offsite information missing/inaccurate

Purchasing units from an offsite provider or creating their own? Metric says the site is in formally identified strategic area but there are no maps to confirm offsite location or details included in the accompanying report. No link to a registered provider to as evidence or information to validate the metrics input. Says "theoretical" option in the notes this needs to be decided.

Current onsite area habitats net loss -6.81% and relies on the offsite provision to create net gain for area habitat units. The metric is stating that 3.38 units of other neutral grassland to be provided offsite in a strategically significant location but provides no details.

Given the small area for biodiversity improvements I would expect to see offsite provision for this site, however this is costly.

Conflicting information/ inaccurate

Does this BNG plan supersede the landscape plans? They do not seem to correlate. For example Unknown orchard trees and bulb planting is not consistent

with traditional orchard. Heritage fruit trees with species rich grassland would be expected for traditional orchard. Fruit trees and bulbs is more of a garden. Landscape plan shows Allotment - missing from Metric or are these the ground level planters? Buffer strip of wildflowers or other neutral grassland - high hedges, lots of trees and fences tend to mean poor growing conditions for Other Neutral Grassland, they are narrow areas shaded and often not managed successfully. Trees near allotments tend to result in the trees being removed when overshadowing occurs, careful consideration to species is needed to assure that BNG isn't lost along with the trees.

Management of onsite habitats

Currently there is no HMMP or LEMP submitted to assess the viability of these habitats succeeding to the set targets. Understanding how these habitats will be created and managed long term will be crucial in assessing the viability of the habitats selected. Please note that the site isn't expected to have the habitats in the condition stated for another 27 years from when the habitats have been created and this will only happen if the right management is in place.

Having several habitats in such a small area keeping them at a moderate quality will be difficult, potentially costly and could result in further onsite BNG losses in time.

At this stage I am unconvinced that the site can achieve these habitat goals.

Environmental Health (Domestic) – 7th December 2023

Due to the proposed number of dwellings and the close proximity of existing properties I would advise that construction times and deliveries during the construction phase are restricted to the following:

07:30 - 18:00 each day Monday - Friday
07:30 - 13:00 on Saturdays and
None on Sundays or Bank Holidays

I would also advise that prior to any work commencing on site a Construction Environmental Management Plan (CEMP) shall be submitted and agreed in writing with the Local Planning Authority (LPA) regarding mitigation measures for the control of pollution (including, but not limited to noise, dust and lighting etc.) during the construction phase. The CEMP shall be adhered to at all times during the construction phase, unless otherwise agreed in writing with the Local Planning Authority (LPA).

If it is necessary to undertake ground piling I would request that a method statement be produced and agreed in writing with the Local Planning Authority (LPA) before work takes place. This document should include the commitment to notifying nearby properties prior to the work commencing to advise how long the works will last. This notification should also provide a contact number so that if there are any concerns while the piling is taking place they can contact the contractor. If the method of piling involves impact driving I would request a commitment to the following restricted hours specifically for piling - 09:00 - 17:00 each day Monday - Friday and None on Saturdays, Sundays or Bank Holidays.

If there is no intention to utilise ground piling then I would request this be confirmed in writing and a condition which prevents it be attached until such time as a ground piling method statement is agreed with the LPA.

From reading the D&AS it would appear as though there is the possibility of ASHPs forming part of this proposal. As this department does receive noise complaints concerning ASHPs I have attached some guidance for the applicant to consider when choosing, siting and installing the ASHPs. I would ask that these details are either provided before determination or as a Condition to be discharged later. I would also recommend the following condition -

"The specific rated noise level emitted from the air source heat pump shall not exceed the existing background noise level. The free field sound level shall be measured and/or calculated at the boundary of the nearest noise sensitive property. The noise level shall be measured and/or calculated in accordance with BS 4142:2014+A1:2019."

I would be seeking hours of use for the Community Building but I would be happy to discuss this element with you at a later date.

No other comments to make at this time but please send out the environmental notes.

Environmental Health (Domestic) – 25th July 2024

There doesn't appear to be anything additional specifically for me to comment on but if I'm mistaken, please let me know.

Environmental Health (Scientific) – 5th January 2024

I have read the Factual Ground Investigation Report dated February 2023 prepared by Delta Simons. Although the investigation was carried out to support drainage design rather than for land contamination purposes the report states that the site is assumed to have been in continuous agricultural use and the borehole logs show no obvious signs of contamination. I recommend that a condition requiring site investigation, etc. is not required. I recommend that standard contaminated land condition 4 (unexpected contamination) is attached to any grant of permission due to the proposed sensitive end use (residential).

Housing Section – 15th November 2023

The Strategic Housing Team does not support the above application as the proposed site is located outside of the development envelope and cannot be brought forward unless as an exception site. In principle, however, the application will support East Cambridgeshire District Council to address housing need.

In accordance with policy HOU 3 of the East Cambridgeshire Local Plan a minimum of 40% of the total number of dwellings to be provided will be required for affordable housing provision (9 units).

Developers will be encouraged to bring forward proposals which will secure the affordable housing tenure as recommended by the most up to date SHMA at 77% rented and 23% intermediate housing.

It is recommended that the space standards for the affordable dwellings should meet the minimum gross internal floor area as defined within the DCLG; National Described Space Standards. Please see link: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf

Should consent be granted, I would request the s106 Agreement contains the following Affordable Housing provisions:

1. That 30% Affordable Housing is secure with the tenure requirement of 77% rented and 23% intermediate housing.
2. That the dwellings will be Affordable Housing in accordance with the definition contained in NPPF.
3. That the dwellings will transfer to a provider of social housing approved by the Council, either a Private Registered Provider or an alternative affordable housing provider (including but not limited to a housing trust or company, a community land trust or an alms-houses society).
4. That the tenure of each dwelling will be Affordable Rent, Social Rent or Shared Ownership, and no subsequent alteration will be permitted without the Council's prior approval.
5. That the rent charged for the Affordable Rented properties will not exceed Local Housing Allowance rate for the equivalent property size.
6. That the Affordable Dwellings are constructed to DCLG, National Described Space Standards or as a minimum all new dwellings should meet Building Regulation Part M (Volume 1), Category 2, unless there are exceptional design reasons why this is not possible.
7. That the affordable dwellings are not clustered in parcels larger than 15 dwellings as this will help to create a balanced and sustainable community.
8. That the Provider will not dispose of any dwelling by outright sale (except any sale to a tenant under statutory provisions)
9. That occupation will be in accordance with a nomination agreement.
10. That these affordable housing conditions shall be binding on successors in title, with exceptions for mortgagees in possession and protected tenants.

ECDC Trees Team – 21st November 2023

Tree T1, T10 and group G8 require crown pruning in order to facilitate the planned layout this indicates that there will not be sufficient room for the trees future development and will likely result in conflict between the tree and the residents resulting in either further excessive pruning or the removal of the trees. BS 5837:2012 states that 'Structures should therefore be designed and/or located with due consideration for a tree's ultimate growth, so as to reduce the need for frequent remedial pruning or other maintenance'. And that 'Buildings and other structures should be sited allowing adequate space for a tree's natural development, with due consideration given to its predicted height and canopy spread'. The current layout does not appear to have considered these points.

The Arboricultural reports tree protection plan indicates that the trees in group G5 will be removed but the report itself does not include any information in relation to this?

The indicated removal of sections of hedge H3 in order that the sections will fit between the garden fences will remove the linear connection of the feature as a whole likely resulting in a messy appearance where sections are maintained at different heights and with some sections removed. H3 is a mixed native species hedge of ecological importance according to the submitted ecology report as such it should be retained as a whole and there are ways this can be achieved while still providing a secure garden boundary. The hedges on site should be assessed in accordance with the criteria in the 1997 Hedgerow regulations to assess if they are important hedgerows.

Due to the indicative nature of the soft landscaping scheme it is not possible to fully assess its suitability but this could be confirmed by condition. When developing the soft landscaping scheme it will be vital that the characteristics of the trees are taken into consideration such as fruiting habit (soft fruit and hard surfacing is not a good combination especially if there are mobility difficulties with occupiers), desirable aphid habitats (the resulting Honey Dew on cars and other surfaces can result in early tree removal) and mature size (trees that will develop to significant dimensions are unlikely to be retained if they are in close proximity to properties or over shadow gardens). As such it may be more appropriate to plant no native species of tree in some of the proposed locations as they could be more suitable for long term retention, right tree for the right location.

Due to the issues detailed above in relation to the trees and hedges it is not possible to support this application at this time.

ECDC Trees Team – 21st August 2024

The revised layout has reduced the impacts on the trees on site though it does now require the removal of 1 category B tree (T10), to comply with policy SPD.NE8: Trees and Woodland Natural Environment Supplementary Planning Document 2020 nine new trees will be required as part of the soft landscaping scheme and the indicative soft landscaping scheme illustrates that it would be possible to comply with this stipulation. Subject to the submission of a suitable soft landscaping scheme (which could be provided by condition) there are no tree related objections remaining. Previous comments regarding the soft landscaping should be taken into consideration when designing the scheme.

Waste Strategy (ECDC) – 9th November 2023

East Cambs District Council will not enter private property to collect waste or recycling, therefore it would be the responsibility of the owners/residents to take any sacks/bins to the public highway boundary on the relevant collection day and this should be made clear to any prospective purchasers in advance, this is especially the case where bins would need to be moved over long distances; the RECAP Waste Management Design Guide defines the maximum distance a resident should have to take a wheeled bin to the collection point as 30 metres (assuming a level smooth surface).

Considering the site layout and the number of properties in the development, enough space should be allowed for on the highway boundary to present bins. Arrangements should be made to ensure bin presentation does not affect the street scene appearance and the neighbouring property. We would advise to provide further details on any arrangement that has been planned.

Under Section 46 of The Environmental Protection Act 1990, East Cambridgeshire District Council as a Waste Collection Authority is permitted to make a charge for the provision (delivery and administration) of waste collection receptacles, this power being re-enforced in the Local Government Acts of 1972, 2000, and 2003, as well as the Localism Act of 2011.

Each new property requires a set of receptacles; the contribution is currently £57 per set. We would recommend the developer made the contribution on behalf of the residents. Please note that the bins remain the property of East Cambridgeshire District Council.

Payment must be made in advance of bins being delivered; East Cambs District Council Account Number 43135897, Sort Code 52-41-19, reference should be the planning application number followed by (bins) i.e. 15/012345/FUL (bins) a separate e-mail should also be sent to waste@eastcambs.gov.uk detailing the payment amount and the planning reference number.

Anglian Water Services Ltd – 29th November 2023
ASSETS

Section 1 - Assets Affected

Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary.

WASTEWATER SERVICES

Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Soham Water Recycling Centre that will have available capacity for these flows

Section 3 - Used Water Network

This response has been based on the following submitted documents: Flood Risk Assessment and Drainage Strategy report issued date May 2023 Part 1 and part 2 The sewerage system at present has available capacity for these flows. If the developer wishes to connect to our sewerage network they should serve notice under Section 106 of the Water Industry Act 1991. We will then advise them of the most suitable point of connection. 1.

INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. 2. INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on

this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water.

3. INFORMATIVE - Building near to a public sewer

No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087.

4. INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

Section 4 - Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

From the Flood Risk Assessment and Drainage Strategy report issued date May 2023 Part 1 and part 2 submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments in the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

Technical Officer Access – 15th November 2023

All development should comply with BS8300:2009 and Building Regulation Part M.

Areas of concern

Approach

Parking, Transport links, Street furniture, External steps/ramps

Principal entrance

Visibility, Entry controls, Doors, Thresholds, Lobbies, Reception area, Reception desk, Signs, Visual & acoustic factors

Horizontal Circulation

Ease of navigation, Corridors, Doors, Internal surfaces

Vertical circulation
Internal steps/ramps, Stairs, Lift

Facilities
WCs, Changing areas, Baths/showers, Refreshments, Service areas, Meeting rooms

Emergency Egress
Escape routes, Refuges, Alarms, Fire protected lifts, Emergency lighting

Signs & Wayfinding
Overall layout, Landmark features, Sign, type & location, Maps & Guides, Colour & contrast, Lighting: General & workplace

Other
Communication systems (Telephones, Voice announcers/ Audio-visual, Displays), Controls & Equipment (Coin & card operated devices, Building service controls, Alarms/entry systems)

Preferable to have ensembles in main bedroom. The shown ensuite bathroom is not wheelchair accessible in terms of the door opening inwards and the shower being a small cubicle. The bathroom on the other hand looks like it could be a wet room. Preferably the other way around.

The front doors open against the wheelchair cupboard. Preferably to have the front door handed.

Refuse collection has been confirmed will be kerbside from Station Road, this would not be possible for those with disabilities and is excessive even for able bodied people. The refuse team will not enter a private gated community.

Where are wheelie bins stored at properties and set aside in a non obstructive location on Station Road for collection?

Are there ramps into properties?

No lighting on pathways indicated on plans.

If this is a gated community, how are deliveries to be made, refuse collection, fire engines and removal lorries entering the site? If the driver of a car is wheelchair bound are the gates openable by a remote control or does the driver need to get out of the car?

Paths and shared surfaces should be firm, level and slip resistant.

There should be a clear distinction between paths and roads in shared surface areas for the visually impaired.

More details of allotments required. Will there be raised beds and footpaths around the area for wheelchair access? The artists impression in the design statement looks much larger than the actual space on the drawing.

There should be firm, level and slip resistant footpaths into green spaces, so that people in wheelchairs can sit alongside people on the bench.

It would appear the gate to the development cuts across the two parking bays of the first property.

The location of the television in the lounge is on the wall behind their seating layout. Difficult for an able-bodied person, impossible for someone with physical disabilities.

We would welcome contact from the applicants to discuss this site.

Design Out Crime Officers – 22nd November 2023

Thank you for the opportunity to comment on this planning application, I have read the design and Access Statement (DAS) and all associated documents, in relation to crime, disorder, and the fear of crime. I have searched the Constabulary crime and incident systems for the last 2 years I would consider this to be an area of low/medium risk to the vulnerability to crime at present.

Crimes and Incidents of note:

All Crime	Fordham Ward Total = 353	All Incidents	Fordham Ward Total = 1762
Burglary Residential	20	Suspicious Circumstances	104
Burglary Business	9	Rowdy Nuisance and Anti-social Behaviours	16
Robbery Personal		Vehicle Nuisance	45
Theft From Vehicle	44	Malicious Nuisance	13
Theft Of Vehicle	9	Burglary Other	6
Vehicle Interference	3	Crime Other	7
Other Theft	32		
Public Order	24		
Criminal Damage	19		
Possession Drugs	4		
Trafficking Drugs	1		
Possession Weapons	1		
Violence	124		

While there is no specific crime prevention or security section in the Design and Access Statements (DAS), some security measures have obviously been mentioned and considered. It is important that security and crime prevention are considered and discussed at the earliest opportunity to ensure that the security of buildings, amenity space and the environment provide a safe place for employees and visitors.

NPPF Para127 (f) - Developments should create places that are safe, inclusive, and accessible and which promote health and well-being, with a high standard of

amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

I note that some of the below have been considered within the design and layout of this proposed development.

- Natural Surveillance of public and semi-private spaces entrances to a development, paths, play areas, open spaces, and car parks, which allows for vehicles to be parked in curtilage of homes and overlooked from active rooms in a property.
- Defensible space and the clear definition, differentiation, and robust separation of public, private, and semi-private space, so that all the spaces are clearly defined and adequately protected in terms of their use and ownership.
- External lighting should be column lit all to the standard of an adopted road to include shared parking courts and footpaths. This office would not support bollard lighting in shared parking court areas.
- Design and layout of pedestrian, cycle, and vehicle routes into and within the site, including how these integrate with existing patterns in the village.
- Landscaping and planting potential hiding places which ensures that dark or secluded areas are not created.

Whilst I note that this will be a gated community, I do have the following comments.

The layout and general appearance look to be acceptable in relation to crime prevention and the fear of crime providing reasonable levels of natural surveillance from neighbour's properties with many homes facing each other, the majority have been provided with back-to-back protected rear gardens which reduces the risk and vulnerability to crime, and most properties have some defensible space to their front. Vehicle parking in-curtilage between and to the sides of properties, vehicular and pedestrian routes are aligned which should encourage natural surveillance on this development.

External:

Doors -

- All door sets allowing direct access into to the home, e.g. front and rear doors, interconnecting garage door sets, French doors, bi-fold or sliding patio door sets, dedicated private flat or apartment entrance door sets, communal door sets, easily accessible balcony door sets (Note 23.4a), etc., shall be certificated to one of the following standards:

- PAS 24:2022 (Note 23.4b), or
- PAS 24:2016* (Note 23.4b), or
- STS 201 Issue 14:2021 (Note 23.4c), or
- LPS 1175 Issue 7.2:2014 Security Rating 2+ (Note 23.4d), or
- LPS 1175 Issue 8:2018 Security Rating A3+, or

- STS 202 Issue 10:2021 Burglary Rating 2 (Note 23.4d), or
- LPS 2081 Issue 1.1:2016 Security Rating B (Notes 23.4d and 23.4e), or
- STS 222 Issue 1:2021
- PAS 24:2016 has been withdrawn by the British Standards Institute and replaced by PAS 24:2022, however PAS 24:2016 will continue to be an acceptable route to compliance until 31st December 2024.

Windows -

- All easily accessible (Note 24.2a) windows (including easily accessible roof lights and roof windows) shall be certificated to one of the following standards:
- PAS 24:2022 (Note 24.2b), or
- PAS 24:2016* (Note 24.2b), or
- STS 204 Issue 6:2016 (Note 24.2c), or
- LPS 1175 Issue 7.2:2014 Security Rating 1 (Note 24.2d), or
- LPS 1175 Issue 8:2018 Security Rating 1/A1, or
- STS 202 Issue 10:2021 Burglary Rating 1, or
- LPS 2081 Issue 1.1:2016 Security Rating A, or STS 222 Issue 1:2021

Easily accessible is defined within Approved Document Q Appendix A as:

A window or door set, any part of which is within 2 metres vertically of an accessible level surface such as a ground or basement level, or an access balcony, or

A window within 2 metres vertically of a flat roof or sloping roof (with a pitch of less than 30 degrees) that is within 3.5 metres of ground level

- External lighting - It would be good to see a full External lighting plan (adoptable and private) including calculations and lux levels when available. For the safety of people and their property our recommendation is that all adopted and unadopted roads, any private driveways, shared drives, and parking areas should all be lit by columns to BS5489:1 2020. Bollard lighting is only appropriate for wayfinding and should not be used as a primary lighting source for any roads or parking areas, where they are also prone to damage. Care should be taken in relation to the location of lighting columns with the entry method for most dwelling burglary being via rear gardens. Lighting columns located next to rear/side garden walls and fences with little surveillance from other properties can be used as a climbing aid to gain entry to the rear gardens. Home security lights both front and rear should be dusk to dawn LED lights. (There are column lights fitted with a back shield that are sympathetic to the environment and work alongside wildlife ecology and light pollution!).

The DAS mentioned cycle storage, Unfortunately I couldn't see where these are proposed to be positioned. Please could you provide a design for the cycle storage. If sheds or stores are to be provided, please see below.

- Cycle Sheds - Will there be sheds provided in rear gardens - If being provided I would like to see a design for these once available.
- The issues we are trying to prevent are cycle hoops bolted into the ground; they need to be cemented 300mm into the floor and should be within view of active windows (to make you aware there is now a Sheffield stand that has been SBD accredited)
- Door hinges should be coach-bolted through the shed structure or secured with security/non-return screws.
- Two hasp and staples that meet 'Sold Secure' Silver should be used. One positioned 200mm - 300mm down from the top of the door, and one positioned 200mm - 300mm up from the bottom of the door. Additionally, hasp and staples should be coach bolted through the shed structure or secured with either security or non-return screws.
- Both padlocks should meet 'Sold Secure' Gold or LPS 1654 Issue 1.1:2014 Security Rating 1.
- Shall be securely fixed to a suitable substrate foundation. See "Secured By Design" (SBD) website link below
- Within secure garden sheds care must be taken to ensure that this will be robust and secure enough to protect what is being stored in it, particularly cycles or similar e.g. (gardening equipment). There should be No Windows.

I would encourage the applicant considers submitting a "Secured by Design" (SBD) residential 2023 application as I believe this development could attain accreditation with consultation.

Guide and application form attached for your reference.
HOMES_GUIDE_2023_web.pdf (securedbydesign.com)
securedbydesign.com/images/HOMES_APP_FORM_REGCHECKLIST_2023_v2.pdf

I am happy for the above to be conditioned.

If you require any further assistance, please do not hesitate to contact me.

Design Out Crime Officers – 1st August 2024

Having viewed the documents, I note the changes made to the layout and I am supportive of these, most properties still benefit from protected rear gardens, including some natural surveillance over the central landscaped communal space from active rooms.

The Design and access statement mentions gated vehicular access to the site, will this be access-controlled residents only, or will it be opened in the mornings and closed at night? I would like to see a design for the proposed gate once available.

Also, the re-design of the bungalows shows a large store, is this for wheelchairs? - What provisions/safety measures will be implemented to ensure electric/battery

chairs are safe when charging? Or will there be provision of an external store for mobility scooters?

My previous comments 22nd November 2023 still stands.

As previously mentioned, I would encourage the applicant considers submitting a "Secured by Design" (SBD) residential 2024 application as I believe this development could attain accreditation with consultation.

I have no further comment at this time, I am happy for the above to be conditioned.

Cambridgeshire Archaeology – 20th November 2023

I am writing in regards to the archaeological implications of the above referenced planning application.

Our records indicate that the development sits in an area of high archaeological potential to south-east of the historic core of Fordham. Archaeological investigations have been undertaken to the adjacent north of the development area, which revealed evidence for early to middle Saxon pitting, and Iron Age to Roman ditches including the find of a Roman brooch (Cambridgeshire Historic Environment Record reference. MCB27160). This evidence is likely a continuation of activity found during investigations at Scotsdale Garden Centre to the north, where pits, ditches and buried soils relating to Saxon to medieval activity were encountered (CHER ref. MCB25851). The post-medieval period saw the development of gardens around Shrubland House to the north of the development area (CHER ref. MCB19367). Investigations within the bounds of the gardens revealed post-medieval activity, as well as medieval pitting and ditches of 12th to 14th century date (CHER ref. MCB25852). Activity to the south of the development area consists of a yet undated series linears and enclosures known from cropmarks to the south (CHER ref. MCB23914), lying close to an area of prehistoric activity found during investigations to the south-east (CHER ref. MCB26616).

Due to the archaeological potential of the site a further programme of investigation and recording is required in order to provide more information regarding the presence or absence, and condition, of surviving archaeological remains within the development area, and to establish the need for archaeological mitigation of the development as necessary. Usage of the following condition is recommended:

Archaeology Condition

No demolition/development shall commence until the applicant, or their agents or successors in title, has implemented a programme of archaeological work, commencing with the evaluation of the application area, that has been secured in accordance with a Written Scheme of Investigation (WSI) that has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition/development shall take place other than under the provisions of the agreed WSI, which shall include:

- a) The statement of significance and research objectives;
- b) The programme and methodology of investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;

- c) The timetable for the field investigation as part of the development programme;
- d) The programme and timetable for the analysis, publication & dissemination, and deposition of resulting material and digital archives.

REASON: To safeguard archaeological assets within the approved development boundary from impacts relating to any demolitions or groundworks associated with the development scheme and to ensure the proper and timely preservation and/or investigation, recording, reporting, archiving and presentation of archaeological assets affected by this development, in accordance with national policies contained in the National Planning Policy Framework (MHCLG 2021).

Informatives:

Partial discharge of the condition can be applied for once the fieldwork at Part c) has been completed to enable the commencement of development.

Part d) of the condition shall not be discharged until all elements have been fulfilled in accordance with the programme set out in the WSI.

A brief for the recommended programme of archaeological works is available from this office upon request. Please see our website for CHET service charges

Please let me know if you require anything further.

Cambridgeshire Archaeology – 25th July 2024

We have reviewed the amended documentation and can confirm that they do not alter the advice given by this office previously. Namely that due to the archaeological potential of the site a further programme of investigation and recording is required in order to provide more information regarding the presence or absence, and condition, of surviving archaeological remains within the development area, and to establish the need for archaeological mitigation of the development as necessary. Usage of the following condition is recommended:

Archaeology Condition

No demolition/development shall commence until the applicant, or their agents or successors in title, has implemented a programme of archaeological work, commencing with the evaluation of the application area, that has been secured in accordance with a Written Scheme of Investigation (Wintertree Software Inc.) that has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the Wintertree Software Inc., no demolition/development shall take place other than under the provisions of the agreed Wintertree Software Inc., which shall include:

- a. The statement of significance and research objectives;
- b. The programme and methodology of investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;
- c. The timetable for the field investigation as part of the development programme;
- d. The programme and timetable for the analysis, publication & dissemination, and deposition of resulting material and digital archives.

REASON: To safeguard archaeological assets within the approved development boundary from impacts relating to any demolitions or groundworks associated with the development scheme and to ensure the proper and timely preservation and/or investigation, recording, reporting, archiving and presentation of archaeological assets affected by this development, in accordance with national policies contained in the National Planning Policy Framework (DLUHC 2023).

Informatives:

Partial discharge of the condition can be applied for once the fieldwork at Part c) has been completed to enable the commencement of development.

Part d) of the condition shall not be discharged until all elements have been fulfilled in accordance with the programme set out in the Wintertree Software Inc..

A brief for the recommended programme of archaeological works is available from this office upon request. Please see our website for CHET service charges

Cambridgeshire Fire And Rescue Service – 15th November 2023

With regard to the above application, should the Planning Authority be minded to grant approval, the Fire Authority would ask that adequate provision be made for fire hydrants, which may be by way of Section 106 agreement or a planning condition.

The position of fire hydrants are generally agreed upon when the Water Authority submits plans to:

Water & Planning Manager
Community Fire Safety Group
Hinchingbrooke Cottage
Brampton Road
Huntingdon
Cambs
PE29 2NA

Where a Section 106 agreement or a planning condition has been secured, the cost of Fire Hydrants will be recovered from the developer.

The number and location of Fire Hydrants will be determined following Risk Assessment and with reference to guidance contained within the "National Guidance Document on the Provision of Water for Fire Fighting" 3rd Edition, published January 2007.

Access and facilities for the Fire Service should also be provided in accordance with the Building Regulations Approved Document B5 Vehicle Access. Dwellings Section 13 and/or Vol 2. Buildings other than dwellings Section 15 Vehicle Access.

If there are any buildings on the development that are over 11 metres in height (excluding blocks of flats) not fitted with fire mains, then aerial (high reach) appliance access is required, the details of which can be found in the attached document.

I trust you feel this is reasonable and apply our request to any consent given.

Should you require any further information or assistance I will be pleased to advise.

[NB: Full response also included technical specification details of Scania fire trucks and associated apparatus.]

Cambridgeshire Fire And Rescue Service – 8th August 2024

With regard to the above application, should the Planning Authority be minded to grant approval, the Fire Authority would ask that adequate provision be made for fire hydrants, which may be by way of Section 106 agreement or a planning condition.

The position of fire hydrants are generally agreed upon when the Water Authority submits plans to:

Water & Planning Manager
Community Fire Safety Group
Hinchingsbrooke Cottage
Brampton Road
Huntingdon
Cambs
PE29 2NA

Where a Section 106 agreement or a planning condition has been secured, the cost of Fire Hydrants will be recovered from the developer.

The number and location of Fire Hydrants will be determined following Risk Assessment and with reference to guidance contained within the "National Guidance Document on the Provision of Water for Fire Fighting" 3rd Edition, published January 2007.

Access and facilities for the Fire Service should also be provided in accordance with the Building Regulations Approved Document B5 Vehicle Access. Dwellings Section 13 and/or Vol 2. Buildings other than dwellings Section 15 Vehicle Access.

If there are any buildings on the development that are over 11 metres in height (excluding blocks of flats) not fitted with fire mains, then aerial (high reach) appliance access is required, the details of which can be found in the attached document.

I trust you feel this is reasonable and apply our request to any consent given.

Lead Local Flood Authority – 22nd November 2023

Thank you for your consultation which we received on 8th November 2023

At present we object to the grant of planning permission for the following reasons:

1. Infiltration testing results

The applicant has provided infiltration testing that is not in accordance with BRE365 guidance. The following provides good practice minimum requirements:

- Minimum of 3 tests undertaken in quick succession at each location/trial pit
- Lowest value obtained across the site to be used for calculating the required volume of soakaways. It is noted that the applicant has used an average of two infiltration test results which is unacceptable.
- Depth of testing to be representative of drainage proposals (i.e. shallower tests for permeable paving and deeper tests for conventional soakaways)

The minimum infiltration rate the LLFA accepts is 1.0×10^{-6} m/s. Please note that extrapolated results will not be accepted.

To protect groundwater from pollution, the applicant should show that the infiltration structure will be constructed with the base set at a minimum of 1.2 m above the anticipated groundwater level, not be located within an area of contaminated land or in made ground. The applicant must demonstrate that water quality has been adequately addressed.

It is noted that the proposed infiltration basin has a proposed depth of 1.0 m; however, the groundwater levels monitored on the 13th of February 2023 appears to indicate that DS101 recorded groundwater at 1.87 m bgl (below ground level). Therefore, the infiltration structure will be located 0.87 m above the anticipate groundwater level which is unacceptable. Should infiltration be deemed not feasible, a second viable option must be proposed.

2. Detailed drainage layout plan

The applicant should provide a detailed drainage layout plan which is fully labelled and show details (e.g. pipe numbers, gradients, diameters, locations and manhole details) of every element of the proposed drainage system (including all SuDS and pipes). This should align with the associated hydraulic calculations. Full details of the type and size

of any flow controls should be included either with the report or on the detailed drainage layout plan.

3. Hydraulic calculations

The applicant has provided hydraulic calculations that are insufficient in details. Therefore, the LLFA requires that the applicant address the following points:

- The applicant has used a 'Quick Storage Estimate' to calculate the volume of attenuation required. This is not appropriate for a full planning application where a greater level of detail is required.
- Full network hydraulic calculations are required for the LLFA to suitably review the proposed system showing pipe 'node numbers', SuDS and flow controls. These should show the full pipe network and results for the 100%, 3.3% and 1% Annual Exceedance Probability (AEP) storm events.
- The surface water strategy must demonstrate that the infiltration rate and storage volume required to attenuate surface water run-off from the critical 1% Annual Exceedance Probability (AEP) critical storm event, including an appropriate allowance for climate change can be provided on site.
- The correct factor of safety should be applied to the infiltration structure. Paragraph 5.15.5 in the Cambridgeshire County Council's Surface Water Drainage Guidance document outlines the appropriate safety factors for development areas and potential consequence of failure.
- In the simulation settings, the drain down time should be set to 1440 minutes (1 day) minimum and the additional storage (MADD factor) should be set to 0.

- The lowest mass balance values should be >99%. Please note, that the lower values suggest that the network calculations may not account for all surface water entering the drainage system, which could imply an unstable simulation.
- Since the modelling is for the impermeable area, Cv values (volumetric runoff coefficient) for the winter and summer storms should be set to 1.0 to account for the total runoff during storm events.

4. Water quality treatment

Section 6.5 of the SPD states that runoff from a site should be of an acceptable water quality to protect receiving waters. The applicant proposes using proprietary systems for water quality treatment. Above ground SuDS (e.g. swales, filter drains, permeable paving) should be prioritised for pre-treatment of surface water. Only if such features are demonstrated as not viable, then approved proprietary engineered pollution control features may be used. However, the applicant has provided no justification for the proposed utilisation of proprietary systems. Furthermore, it is unclear why the proposed permeable paving and the infiltration basin is not included in the mitigation indices table.

5. Exceedance flow plan

An exceedance flow plan illustrating flow conveyance routes that minimise the risks to people and property both on and off site should be provided to consider the safe routing of floodwater in the event of blockage or the design event is exceeded.

Informatives:

Signage

Appropriate signage should be used in multi-function open space areas that would normally be used for recreation but infrequently can flood during extreme events. The signage should clearly explain the use of such areas for flood control and recreation. It should be fully visible so that infrequent flood inundation does not cause alarm. Signage should not be used as a replacement for appropriate design.

Pollution Control

Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

Lead Local Flood Authority – 31st July 2024

At this time, the LLFA remain unable to recommend the grant of planning permission. The applicant has not provided any new information since our last response. Therefore, the LLFA would like to reiterate the following:

1. Infiltration testing results

The applicant has provided infiltration testing that is not in accordance with BRE365 guidance. The following provides good practice minimum requirements:

- Minimum of 3 tests undertaken in quick succession at each location/trial pit
- Lowest value obtained across the site to be used for calculating the required volume of soakaways. It is noted that the applicant has used an average of two infiltration test results which is unacceptable.
- Depth of testing to be representative of drainage proposals (i.e. shallower tests for permeable paving and deeper tests for conventional soakaways)

The minimum infiltration rate the LLFA accepts is 1.0×10^{-6} m/s. Please note that extrapolated results will not be accepted.

To protect groundwater from pollution, the applicant should show that the infiltration structure will be constructed with the base set at a minimum of 1.2 m above the anticipated groundwater level, not be located within an area of contaminated land or in made ground. The applicant must demonstrate that water quality has been adequately addressed.

It is noted that the proposed infiltration basin has a proposed depth of 1.0 m; however, the groundwater levels monitored on the 13th of February 2023 appears to indicate that DS101 recorded groundwater at 1.87 m bgl (below ground level). Therefore, the infiltration structure will be located 0.87 m above the anticipate groundwater level which is unacceptable. Should infiltration be deemed not feasible, a second viable option must be proposed.

2. Detailed drainage layout plan

The applicant should provide a detailed drainage layout plan which is fully labelled and show details (e.g. pipe numbers, gradients, diameters, locations and manhole details) of every element of the proposed drainage system (including all SuDS and pipes). This should align with the associated hydraulic calculations. Full details of the type and size of any flow controls should be included either with the report or on the detailed drainage layout plan.

3. Hydraulic calculations

The applicant has provided hydraulic calculations that are insufficient in details. Therefore, the LLFA requires that the applicant address the following points:

- The applicant has used a 'Quick Storage Estimate' to calculate the volume of attenuation required. This is not appropriate for a full planning application where a greater level of detail is required.
- Full network hydraulic calculations are required for the LLFA to suitably review the proposed system showing pipe 'node numbers', SuDS and flow controls. These should show the full pipe network and results for the 100%, 3.3% and 1% Annual Exceedance Probability (AEP) storm events.
- The surface water strategy must demonstrate that the infiltration rate and storage volume required to attenuate surface water run-off from the critical 1% Annual Exceedance Probability (AEP) critical storm event, including an appropriate allowance for climate change can be provided on site.
- The correct factor of safety should be applied to the infiltration structure. Paragraph 5.15.5 in the Cambridgeshire County Council's Surface Water Drainage Guidance document outlines the appropriate safety factors for development areas and potential consequence of failure.

- In the simulation settings, the drain down time should be set to 1440 minutes (1 day) minimum and the additional storage (MADD factor) should be set to 0.
- The lowest mass balance values should be >99%. Please note, that the lower values suggest that the network calculations may not account for all surface water entering the drainage system, which could imply an unstable simulation.
- Since the modelling is for the impermeable area, Cv values (volumetric runoff coefficient) for the winter and summer storms should be set to 1.0 to account for the total runoff during storm events.

4. Water quality treatment

Section 6.5 of the SPD states that runoff from a site should be of an acceptable water quality to protect receiving waters. The applicant proposes using proprietary systems for water quality treatment. Above ground SuDS (e.g. swales, filter drains, permeable paving) should be prioritised for pre-treatment of surface water. Only if such features are demonstrated as not viable, then approved proprietary engineered pollution control features may be used. However, the applicant has provided no justification for the proposed utilisation of proprietary systems. Furthermore, it is unclear why the proposed permeable paving and the infiltration basin is not included in the mitigation indices table.

5. Exceedance flow plan

An exceedance flow plan illustrating flow conveyance routes that minimise the risks to people and property both on and off site should be provided to consider the safe routing of floodwater in the event of blockage or the design event is exceeded.

Informatives

Signage

Appropriate signage should be used in multi-function open space areas that would normally be used for recreation but infrequently can flood during extreme events. The signage should clearly explain the use of such areas for flood control and recreation. It should be fully visible so that infrequent flood inundation does not cause alarm. Signage should not be used as a replacement for appropriate design.

Pollution Control

Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

Construction Surface Water Maintenance

Prior to final handover of the development, the developer must ensure that appropriate remediation of all surface water drainage infrastructure has taken place, particularly where the permanent drainage infrastructure has been installed early in the construction phase. This may include but is not limited to jetting of all pipes, silt removal and reinstating bed levels. Developers should also ensure that watercourses have been appropriately maintained and remediated, with any obstructions to flows (such as debris, litter and fallen trees) removed, ensuring the condition of the

watercourse is better than initially found. This is irrespective of the proposed method of surface water disposal, particularly if an ordinary watercourse is riparian owned.

Lead Local Flood Authority – 16th August 2024

At this time, the LLFA remain unable to recommend the grant of planning permission for the following reasons:

1. Infiltration in chalk

Single point Infiltration features must be located no less than 5 metres from any building or road, or no less than 10 metres when used in areas of chalk. Since the site is underlain by bedrock deposits described as West Melbury Marly Chalk Formation, the applicant should demonstrate that the infiltration basin is located no less than 10 metres from any building or road.

2. Hydraulic calculations

The applicant has provided hydraulic calculations that are insufficient in details. Therefore, the LLFA requires that the applicant address the following points:

- Full network hydraulic calculations are required for the LLFA to suitably review the proposed system showing pipe 'node numbers', SuDS and flow controls. These should show the full pipe network and results for the 100%, 3.3% and 1% Annual Exceedance Probability (AEP) storm events. The applicant has only provided 1% AEP storm event calculations. Please note, the drainage system should be designed under full pipe conditions to accept a 1 year design storm without surcharging above the pipe soffit on sites with average ground slopes of greater than 1%.
- In the simulation settings, the drain down time should be set to 1440 minutes (1 day) minimum and the additional storage (MADD factor) should be set to 0.
- The lowest mass balance values should be >99%. Please note, that the lower values suggest that the network calculations may not account for all surface water entering the drainage system, which could imply an unstable simulation.
- Since the modelling is for the impermeable area, Cv values (volumetric runoff coefficient) for the winter and summer storms should be set to 1.0 to account for the total runoff during storm events.
- The applicant has used FSR data which is unacceptable. For storm durations less than 1 hour, Flood Studies Report (FSR) rainfall data should be used. For storm durations greater than 1 hour, Flood Estimation Handbook (FEH) rainfall data should be used.
- The applicant appears to not have applied a climate change allowance for the 3.3% AEP storm event. In accordance with the latest climate change peak rainfall intensity allowances, a climate change allowance should be incorporated into the surface water management scheme for the 3.3% AEP rainfall event. The allowance used should be based on the lifetime of the development and therefore should include a 35% climate change allowance on the 3.3% AEP hydraulic calculations.

Informatives:

Signage

Appropriate signage should be used in multi-function open space areas that would normally be used for recreation but infrequently can flood during extreme events. The

signage should clearly explain the use of such areas for flood control and recreation. It should be fully visible so that infrequent flood inundation does not cause alarm. Signage should not be used as a replacement for appropriate design.

Pollution Control

Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

Construction Surface Water Maintenance

Prior to final handover of the development, the developer must ensure that appropriate remediation of all surface water drainage infrastructure has taken place, particularly where the permanent drainage infrastructure has been installed early in the construction phase. This may include but is not limited to jetting of all pipes, silt removal and reinstating bed levels. Developers should also ensure that watercourses have been appropriately maintained and remediated, with any obstructions to flows (such as debris, litter and fallen trees) removed, ensuring the condition of the watercourse is better than initially found. This is irrespective of the proposed method of surface water disposal, particularly if an ordinary watercourse is riparian owned.

Lead Local Flood Authority – 9th October 2024

At present we object to the grant of planning permission for the following reasons:

Having reviewed the revised documentation we can confirm that the LLFA has no further comments beyond those set down in our response of the 16th September 2024. Our position therefore remains opposed to the development.

Lead Local Flood Authority – 10th October 2024

We have reviewed the following documents:

- o Infodrainage Results, Dated: 10th September 2024
- o Proposed Surface Water Drainage Plan, Delta Simons, Ref: 88167, Rev: -, Dated: September 2024
- o Flood Risk Assessment and Drainage Strategy, Delta Simmonds, Ref: 88167, Rev: 3, Dated: 17th May 2024

Based on these, as Lead Local Flood Authority (LLFA) we have no objection in principle to the proposed development.

The above documents demonstrate that surface water from the proposed development can be managed through the use of tanked permeable paving and central infiltration basin. All buildings are clear of the 10m buffer zone from chalk infiltration features, despite some of the roads being within the buffer due to the site constraints this is acceptable.

Water quality has been adequately addressed when assessed against the Simple Index Approach outlined in the CIRIA SuDS Manual.

We request the following conditions are imposed:

Condition 1

No laying of services, creation of hard surfaces or erection of a building shall commence until a detailed design of the surface water drainage of the site has been submitted to and approved in writing by the Local Planning Authority. Those elements of the surface water drainage system not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved management and maintenance plan.

The scheme shall be based upon the principles within the agreed Flood Risk Assessment and Drainage Strategy, Delta Simmonds, Ref: 88167, Rev: 3, Dated: 17th May 2024 and shall also include:

- a) Full calculations detailing the existing surface water runoff rates for the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events;
- b) Full results of the proposed drainage system modelling in the above-referenced storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance;
- c) Detailed drawings of the entire proposed surface water drainage system, attenuation and flow control measures, including levels, gradients, dimensions and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it);
- d) Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections);
- e) Site Investigation and test results to confirm infiltration rates;
- f) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants;
- g) Demonstration that the surface water drainage of the site is in accordance with DEFRA non-statutory technical standards for sustainable drainage systems;
- h) Full details of the maintenance/adoption of the surface water drainage system;
- i) Measures taken to prevent pollution of the receiving groundwater and/or surface water

Reason

To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development and to ensure that the principles of sustainable drainage can be incorporated into the development, noting that initial preparatory and/or construction works may compromise the ability to mitigate harmful impacts.

Condition 2

No development, including preparatory works, shall commence until details of measures indicating how additional surface water run-off from the site will be avoided during the construction works have been submitted to and approved in writing by the Local Planning Authority. The applicant may be required to provide collection, balancing and/or settlement systems for these flows. The approved measures and

systems shall be brought into operation before any works to create buildings or hard surfaces commence.

Reason

To ensure surface water is managed appropriately during the construction phase of the development, so as not to increase the flood risk to adjacent land/properties or occupied properties within the development itself; recognising that initial works to prepare the site could bring about unacceptable impacts.

Informatives:

Pollution Control

Surface water and groundwater bodies are highly vulnerable to pollution and the impact of construction activities. It is essential that the risk of pollution (particularly during the construction phase) is considered and mitigated appropriately. It is important to remember that flow within the watercourse is likely to vary by season and it could be dry at certain times throughout the year. Dry watercourses should not be overlooked as these watercourses may flow or even flood following heavy rainfall.

Construction Surface Water Maintenance

Prior to final handover of the development, the developer must ensure that appropriate remediation of all surface water drainage infrastructure has taken place, particularly where the permanent drainage infrastructure has been installed early in the construction phase. This may include but is not limited to jetting of all pipes, silt removal and reinstating bed levels. Developers should also ensure that watercourses have been appropriately maintained and remediated, with any obstructions to flows (such as debris, litter and fallen trees) removed, ensuring the condition of the watercourse is better than initially found. This is irrespective of the proposed method of surface water disposal, particularly if an ordinary watercourse is riparian owned.

Local Highways Authority – 14th February 2024

Following review of the plans and information submitted as part of this application, I have no objection in principle. However, please note my following recommendations and concerns.

Upon reviewing plan reference: 21.072_SP(XX)02_XX, the proposed internal road layout is not designed to CCC adoptable standards. If it is the applicants' intention is to get the internal roads adopted, changes to the layout will need to be made in line with the CCC general principles document, see link below.

<https://www.cambridgeshire.gov.uk/residents/travel-roads-and-parking/roads-andpathways/highways-development>

I note that a plan has been provided within the design and access statement for the junction proposals. Please provide this as a standalone plan for more accurate review. The proposals included within this plan appear to cross outside of the red line application boundary.

The visibility splays included will need to be increased to 2.4m x 160m as the stopping sight distance for a 50mph speed limit is 160m. If the required 160m visibility splay cannot be achieved, a speed survey will be required to determine the 85th%tile speed of the vehicles using Station Road.

The footway proposals included should be 2m in width in line with Department for Transport inclusive mobility guidance. This is to allow two wheelchairs to pass safely within the full footway width. Given the nature of this development, a wider footway of 2m would be preferable to the 1.5m width as currently shown. The proposed uncontrolled pedestrian crossing will require the footway on northern side of Station Road to be widened locally.

I note from plan reference: 21.072_SP(XX)02_XX that a shared surface road is proposed as the main form of access. Accessing a 23-house retirement village via a shared surface would not be recommended. Instead, a full height kerbed road would be more advisable as it offers better pedestrian protection and is easier to use for pedestrians with visual impairments to use.

Please inform me if the applicant is unwilling or unable to update the plans, to allow me to make further comment or recommendation.

Local Highways Authority – 5th August 2024

Following review of the updated plans and information submitted as part of this application, I note that all of my previous concerns and recommendations have been address.

In the event that the LPA are mindful to approve the application, please append the following Conditions and Informative to any consent granted:

Conditions

HW8A: Notwithstanding the provision of Class A of Schedule 2, Part 2 of the Town and Country Planning (General Permitted Development) Order 2015, (or any order revoking, amending or re-enacting that order) no gates, fences or walls shall be erected across the approved vehicular access, as shown on plan reference: ITY18022-GA Revision A.

HW22A: The access and all hardstanding within the site shall be constructed with adequate drainage measures to prevent surface water run-off onto the adjacent public highway and retained in perpetuity.

Non-Standard Condition: Before the dwellings hereby permitted are occupied, the vehicular access from the nearside footway edge shall be constructed to include the provision of a metalled/sealed surface for a minimum length of 5m from the existing carriageway edge.

The Ely Group Of Internal Drainage Board – 16th November 2023

This application for development is outside of an Internal Drainage Board area.

The Board have no comment to make on this application.

The Ely Group Of Internal Drainage Board – 30th September 2024

This application for development is outside of an Internal drainage Board District. Therefore we have no comment to make.

Natural England – Standing Advice

Using Natural England's recently created advice tool, the Local Planning Authority can generate automatic advice for development proposals which may affect protected and designated sites of ecological importance. This is based upon DEFRA's Magic Map tool.

Using the tool for the application site directs Officers to consider recreational pressures upon the nearby Sites of Special Scientific Interest (SSSI) – Chippenham Fen SSSI and Brackland Rough SSSI.

CCC Growth & Development - No Comments Received

Cambs Wildlife Trust - No Comments Received

Strategic Planning - No Comments Received

Enforcement Section - No Comments Received

5.2 A site notice was displayed near the site on 25th July 2024 and a press advert was published in the Cambridge Evening News on 16 November 2023.

5.3 Neighbours –16 neighbouring properties were notified and the responses received are summarised below. Full copies of the responses are available on the Council's website.

The application has received both neighbouring comments of support for the proposed development and objections. The concerns have been summarised:

- Concerns of the retention of the existing sycamore tree and its potential effects on the proposed dwellings gardens.
- Concerns of increased vehicular traffic and parking on station road and the potential for increased overspill parking on Terence Place.
- Loss of natural habitats
- Over urbanisation of the village
- Out of date plans
- Insufficient infrastructure for the retirement village function
- The proposed access meeting highways requirements.

6.0 THE PLANNING POLICY CONTEXT

6.1 East Cambridgeshire Local Plan 2015 (as amended 2023)
GROWTH 1: Levels of housing, employment and retail growth
GROWTH 2: Locational strategy
GROWTH 3: Infrastructure requirements
GROWTH 4: Delivery of growth
GROWTH 5: Presumption in favour of sustainable development
HOU 1: Housing mix
HOU 2: Housing density
HOU 3: Affordable housing provision
HOU 6: Residential care accommodation
ENV 1: Landscape and settlement character
ENV 2: Design

ENV 4: Energy and water efficiency and renewable energy in construction
ENV 7: Biodiversity and geology
ENV 8: Flood risk
ENV 9: Pollution
ENV 14: Sites of archaeological interest
COM 7: Transport impact
COM 8: Parking provision

6.2 Fordham Neighbourhood Plan 2018

Policy 1: Housing Growth
Policy 2: Character & Design
Policy 8: Wildlife & Habitats
Policy 9: Services and Facilities
Policy 11: Car Parking
Policy 12: Cycle Parking & Storage

6.3 National Planning Policy Framework 2023 (December)

2 Achieving sustainable development
4 Decision-making
5 Delivering a sufficient supply of homes
8 Promoting healthy and safe communities
9 Promoting sustainable transport
11 Making effective use of land
12 Achieving well-designed places
14 Meeting the challenge of climate change, flooding and coastal change
15 Conserving and enhancing the natural environment
16 Conserving & enhancing the historic environment

6.4 Supplementary Planning Documents

Design Guide 2012
Flood and Water 2016
Contaminated Land 2015
Natural Environment 2020
Climate Change 2021
Developer Contributions 2013
Hedgehog SPD

6.5 Planning Practice Guidance (March 2014 onwards)

6.6 Other Material Documents

- Written ministerial statement UIN HCWS161 – The Next Stage in Our Long Term Plan for Housing Update - 19 December 2023
- ECDC - Interim Guidance Prior to Mandatory Biodiversity Net Gain – November 2022

7.0 PLANNING COMMENTS

7.1 Specialist Housing for Older People

7.2 The application proposals seek to deliver 21 age-restricted bungalows (over 60s) on the edge of Fordham village, outside of the development envelope. The proposals will benefit from a community building, and a site warden/manager.

7.3 The types and definitions of specialist housing for older people is very varied. This means that terminologies and definitions can be difficult to translate across assessments of need. However, as a material consideration to the assessment of this application, Planning Practice Guidance (Paragraph 010) defines the types of specialist housing for older people as follows:

- **Age-restricted general market housing:** This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.
- **Retirement living or sheltered housing:** This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24 hour on-site assistance (alarm) and a warden or house manager.
- **Extra care housing or housing-with-care:** This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.
- **Residential care homes and nursing homes:** These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

7.4 The proposed development aligns with the **retirement living/sheltered housing** bracket of the above definitions, which is also known as '*housing with support*' or '*housing without care.*'

Older Persons Housing Need Assessment – Local, District and National

7.5 With regard to need, at the local level, the Housing Needs for Specific Groups (2021) report identifies at Paragraph 8.60 that within Cambridgeshire and West Suffolk "*all areas show a significant shortfall of leasehold housing with support (retirement housing) and also shortfalls of housing with care (i.e. extra-care and enhanced sheltered) in both the leasehold and rental tenures.*"

7.6 The report also provides the following assessment of provision and need:

Table 98: Specialist housing need using SHOP@ assumptions, 2020-40 – East Cambridgeshire (units)

Housing type	Housing demand per 1,000 75+	Current supply	2020 demand	Current shortfall/surplus	Additional demand to 2040	Shortfall/surplus by 2040
Rented Housing with Support	43	724	356	-368	280	-88
Leasehold Housing with Support	74	127	614	487	482	969
Rented Housing with Care	19	154	155	1	121	122
Leasehold Housing with Care	23	77	195	118	153	271
Total	158	1,082	1,320	238	1,036	1,274

Source: Derived from demographic projections and housing LIN/HOPSR/EAC

7.7 The Fordham Neighbourhood Plan also notes at Paragraph 2.17 that the population of the village is ageing much like the rest of East Cambridgeshire with *“older people often gravitating to quieter village life, and having the income and savings to achieve this.”*

7.8 The Local Plan also notes at 4.7.2 that *“The forecast change in population by broad age groups for the period 2011-2031 predicts significant growth in the over 60 age group. The proportion of people aged 75+ years will rise by 93% and those aged 85+ years will grow by 144%.”*

7.9 At the national level, Practice Guidance (001) is also clear:

“The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; by mid-2041 this is projected to double to 3.2 million. Offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking.”

7.10 The Written Ministerial Statement underpinning the December 2023 version of the NPPF also set out the following:

“The Government will also encourage the delivery of older people’s housing, including retirement housing, housing-with-care and care homes by requiring these to be specifically considered in establishing need.”

7.11 The requirement to establish this need was then realised within the most recent NPPF, as is the delivery of housing to meet the needs of groups with specific housing requirements, stating at Paragraphs 60 and 63:

“60. To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.

63. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.”

7.12 Echoing much of the above, the Applicant prepared their own Older Persons Needs Assessment (prepared by Tetlow King). Officers sought an independent review of this report to understand the existing provision, surplus and deficits in supplies of housing with and without care within the district. This review, prepared by SPRU, also considered this provision at a ward (Fordham and Isleham) and village (Fordham) level.

7.13 The findings of this report for East Cambridgeshire as summarised as follows:

- There will be a 69% increase in the number of residents over 75 by 2043.
- 864 persons per 1000 over the age of 75 reside in a market dwelling, but market older persons housing is just 26 units per 1000.
- Of existing owner occupiers over 75, some 93% reside in dwellings with 3 or more bedrooms.
- There are 2,348 residents of market dwellings aged 75 and over who occupy a dwelling with 3 or more bedrooms and are deprived in health and disability.
- Only 2.6% of residents over 75 currently reside in specialist older persons market housing with care.
- The net need for specialist older persons housing to 2043 is 330 units for dwellings without 24/7 care, and 1,088 dwellings with care.

7.14 A tabular summary of the need at a district, ward and village level as provided within the independent review is provided below (with the red/negative values representing surplus):

Table 1. Summary of older persons housing need for the period to 2043 for East Cambridgeshire, Fordham and Isleham Ward, and the Settlement of Fordham

Type	Tenure	East Cambridgeshire	Fordham and Isleham Ward	Fordham Settlement
Older Persons Housing without Care	Social Landlord	-24	-39	-53
	Market	330	34	15
Older Persons Housing with Care	Social Landlord	141	21	10
	Market	1,088	77	35

7.15 An important distinction to note is that the use of the 75-age-bracket is common for assessing prevalence rates across many different methodologies. The SPRU report is however clear at 1.21 that *“In these circumstances it would be incorrect to assume that the need calculated by the model is a need for just those who are over 75 years of age.”*

7.16 The report specifically highlights the lack of market provision for both housing with and without care; the prevalence for older persons to occupy larger dwellings; and the very low levels of individuals over the age of 75 who live in specialist accommodation. This is despite a high number of these individuals being deprived in health and disability.

7.17 It is therefore established that at a local, district and national level, there is an urgent need for the delivery of specialist housing for older people.

7.18 Principle of Development

7.19 The proposed development is immediately adjoining but outside of the policy-defined development envelope of Fordham on two sides. Policy GROWTH 2 of the Local Plan and Policy 1 of the Neighbourhood Plan seek to strictly control development in the countryside, with a number of limited exceptions. It is therefore important to consider whether any of these exceptions would support the delivery of the development proposals.

7.20 Policy HOU 6 for ‘Residential care accommodation’ is one such exception to GROWTH 2, and the policy of most relevance to the application proposals. This policy states:

“Residential care accommodation should be located within a settlement that offers a range of services and social facilities. The design and scale of schemes should be appropriate to its setting and have no adverse impact on the character of the locality or residential amenity. Applicants will be expected to provide evidence of need for the provision.

As an exception, proposals for care or nursing homes may be acceptable on sites outside development envelopes where:

- *The site is located adjoining or in close proximity to a settlement which offers a range of services; and facilities, and there is good accessibility by foot/cycle to those facilities.*
- *The proposal would not cause harm to the character or setting of a settlement or the surrounding countryside; and*
- *There is an identified need for such provision that is unlikely to be met within the built-up area.”*

7.21 The first paragraph of the policy is relevant to the application proposals while the second is not, as the proposals do not comprise a care or nursing home. The application site is not within the Fordham settlement, and therefore there is a conflict with the locational requirement of Policy HOU 6 of the Local Plan, and thus also Policy 1 of the Neighbourhood Plan. Whilst there is a locational conflict, it is noted that for

the reasons set out elsewhere within this report, there are no other conflicts with the policies identified.

- 7.22 Noting the locational conflict, in discussion with the Applicant, consideration was given to whether there were suitable sites which could accommodate the development within the villages of Fordham and Isleham, which falls within the same ward. A sequential site search was submitted by the Applicant and reviewed by Officers.
- 7.23 This site search considered thirteen sites within Fordham and Isleham, and Officers also conducted a further review as part of the assessment process. All sites identified were discounted for the following reasons:
- Sites were already built out / under construction;
 - Too small;
 - Landlocked;
 - Not available due to applications for other dwellings/uses already consented and/or pending;
 - Contracts exchanged and not available for purchase.
- 7.24 Consideration was given to whether the site could be split across multiple parcels, however, the nature of the site and its management meant that this was not a suitable option. The successful function of the community building was also uncertain when considering a potentially segregated approach.
- 7.25 On the basis of the site assessment, Officers are content that the application site presents a logical location for the proposed development, with no other suitable alternatives put forward. It is relevant that neither the Local Plan nor Neighbourhood Plan contain site allocations for specialist housing for older people. The location of the proposed development is therefore considered to be expected for these types of developments at this point in the plan period.
- 7.26 Whilst therefore a technical conflict with Policies GROWTH 2 and Policy HOU 6 and Policy 1 of the Neighbourhood Plan and a departure from the Development Plan, the application proposals are nevertheless considered to satisfy the main thrust of the policies in delivering high quality, specialist housing for older people in a sustainable location.
- 7.27 Consideration must then be given to any material considerations that could outweigh the policy conflicts identified.
- 7.28 The need for specialist housing for older people nationally and within the district has been evidenced above. At a ward level, the local need is also evident. The need for 'housing-without-care' is prevalent, and whilst the short-fall is not as significant as 'housing-with-care,' a notable short-fall still exists and particularly at the market/leasehold level, which the application proposals seek to deliver. National and local guidance is also clear that the needs of older people are to be met through a variety of specialist housing types, and that the emphasis is on keeping people living independently in their own homes as long as possible. The application proposals align with this objective.

- 7.29 The bungalows would also benefit from optional care packages, to be delivered by Oak Retirement. A site warden would manage the site day-to-day, ensure properties were inspected, well-being checks and regular interaction with residents, assisting with the securing of extra services, managing the community building, and managing bins/refuse. This is not an exhaustive list.
- 7.30 The proposals themselves provide high quality, accessible bungalows in a woodland setting with a community building to meet the needs of residents and beyond. The proposals provide opportunity for individuals under-occupying dwellings to down-size or 'right-size' into dwellings that do not compromise on quality or space, with the possibility of this freeing up existing properties within the village and potentially further afield.
- 7.31 The application site is also considered to be in a sustainable location for the nature of the development proposed, with a variety of facilities in walking, wheeling and cycling distance. Fordham is also well-connected to higher-order settlements such as Ely, Cambridge and Newmarket via the regular bus services from Carter Street, Harry Palmer Close, and River Lane.
- 7.32 In line with Paragraph 83 of the NPPF, the development is considered to enhance and maintain the village's vitality and contributes to meeting a need across both Fordham and Isleham for specialist older person's housing.
- 7.33 The Applicant has also committed to the provision of a cascade principle within the S106 legal agreement to ensure priority is given to local people, widening out to the district, and then to further afield after a 9-month total period. This follows a similar approach to affordable housing allocations for rural exception sites.
- 7.34 It is the cumulation of the above material considerations that are considered to outweigh the technical policy conflict with Policies GROWTH 2 and HOU 6 of the Local Plan and Policy 1 of the Neighbourhood Plan, and warrant support of the proposed development in this location.
- 7.35 Housing Mix and Affordability**
- 7.36 In accordance with Policy HOU 3 of the Local Plan, residential schemes over 10 units are required to provide a percentage of affordable housing. In Fordham, this value is 40% of the scheme, requiring 8.4 (or rounded to 8) units of affordable housing. The Neighbourhood Plan echoes this requirement under Policy 1.
- 7.37 The application proposals seek to deliver 21 retirement bungalows, three of which will be offered at Discount Market Sale (DMS). The three DMS units will be offered at 80% of open market value and are a recognised type of affordable housing as set out within the NPPF. The provision of affordable housing therefore falls short of the policy requirement.
- 7.38 The application proposals were supported by viability appraisals, which were then independently reviewed by a property consultant appointed by the Council.

7.39 Whilst making some minor adjustments to the Applicant's calculations, the independent review concluded overall that:

"This appraisal based on a scheme including 3 Discount Market Sale units derives a residual land value of £186,252 which is £84,491 below the Benchmark Land Value and therefore we consider that this is the maximum level of Affordable Housing that can be delivered on site, bearing in mind the applicant's stated target of a 15% profit margin blended across all uses/tenures.

This result is contingent on the Community Hub generating no income (rent) except enough to maintain it for the future. The right for it to be freely available to the community as well as residents of the scheme is a large cost to the scheme. If the viability is to remain as assumed, then this benefit must be secured in the S.106 agreement."

7.40 On the basis of the independent review, Officers are content that the proposed development is seeking to deliver the maximum level of affordable housing that the scheme is viably able to. This is in accordance with Policy HOU 3 which allows for a reduction in the provision of affordable housing where that is justified by assessment of financial viability.

7.41 The weight to be attributed to the viability appraisal is the responsibility of the decision maker. It is considered that the evidence is up-to-date and has been verified by independent experts. Officers find no reason to dispute the appraisal. It should also be noted that age-restricted housing is a form of restricted sale, and whilst not fully meeting the targeted affordable housing contributions it is meeting another identified need as outlined above.

7.42 Given the under-provision of affordable housing, it is also considered necessary to secure a viability review mechanism within the S106 legal agreement.

7.43 Regarding mix and tenure, the proposed two and three-bedroom units are considered to satisfy the need for smaller units as identified in the Housing Needs of Specific Groups (October 2021) report prepared by GL Hearn, which states:

"2.21 Evidence from the Cambridge Sub-Region Strategic Housing Market Assessment indicates that East Cambridgeshire needs more 2 and 3-bed dwellings to cater to smaller families and older people. This need feeds into Policy HOU1 Housing Mix where developments of 10 or more should provide an appropriate mix of dwelling types and sizes to contribute to future needs."

7.44 It is on the above basis that the proposed development is considered to comply with Policies HOU 1 and HOU 3 of the Local Plan and Policy 1 and Policy 2 of the Neighbourhood Plan, as well as Chapter 4 of the NPPF.

7.45 Residential Amenity

7.46 The proposed development comprises the erection of 21 no. single-storey bungalows (with a maximum height of 3.4-metres / c.11.2-feet), and a single-storey community building.

- 7.47 Where back-to-back relationships between existing and proposed dwellings exist, these exceed the 20-metre requirement within the Design Guide. The proposed development is not considered to give rise to any significantly detrimental residential amenity impacts upon nearby existing occupiers in terms of overlooking, overshadowing, overbearing, loss of light or loss of privacy by virtue of their scale, location and design.
- 7.48 It is recognised that the rear gardens for several of the proposed bungalows are small proportionate to the dwellings they serve and curtailed by tree cover. The development is however a product of its intended end-user, this being individuals aged 60+ and looking to move into a retirement property, often downsizing or 'right-sizing'. The mixture of plot sizes reflects the fact that these bungalows are not intended to be family homes, but instead seek to provide their occupants with a choice of curtilage sizes. This includes smaller gardens for those who do not wish to maintain large areas of amenity space, to more regular and larger sizes for those who desire this option. In any case, each dwelling benefits from an integral terrace area to the rear of the property, connecting to the main living space. This terrace provides a semi-open amenity space that is supplemented by the variably sized gardens.
- 7.49 Prospective residents of the proposed development would also benefit from the use of the community building and on-site orchard, as well as policy-compliant levels of open space in accordance with Policy GROWTH 3 of the Local Plan and the Developer Contributions SPD 2013; this is noting that specialist older persons housing does not attract contributions towards children's play space. The central SuDS feature also contributes to the overall public open space and landscaping strategy for the site.
- 7.50 The Environmental Health (Domestic) Officer has requested several conditions relating to a Construction Environmental Management Plan, piling, hours of opening for the community building and Air Source Heat Pump specifications (including noise level controls). These are considered necessary in the interests of residential amenity.
- 7.51 On the basis of existing community centres and village halls within the village and wider district, the Applicant has proposed the hours of 8:00am to 10:00pm each day. These are considered to be acceptable given the small size of the hall itself. As the community building is envisaged to also serve the wider community for a number of events, it is considered that a Noise Management Plan would be required prior to the commencement of use of the community building. This is in the interests of residential amenity both within and outside of the site.
- 7.52 The comments of the Access Group and Designing Out Crime Officer are noted. It is considered that the nature of the scheme itself is designed to facilitate walking, wheeling and cycling, with level shared-surface roads and accessible dwellings. Notwithstanding, many of the details requested by these consultees will be secured via conditions.
- 7.53 It is on the above basis that the proposed development is considered to be acceptable in accordance with Policy ENV 2 of the Local Plan regarding residential amenity, Policy 2 of the Neighbourhood Plan and Chapter 8 of the NPPF.

7.54 Visual Amenity

- 7.55 The application site comprises an existing field, bounded by hedgerows and trees, on the edge of Fordham's settlement. The site lends itself to a natural infill and rounding off of development along Station Road, being bordered by development along its entire frontage and eastern edge. An existing access track runs along the site's western edge, serving an existing bungalow in a back-land position.
- 7.56 The proposed bungalows are modest in their height and footprint and would be clad in real timber which would weather over time. The site's landscaping strategy, including retention and enhancement of the existing hedgerows, create a woodland setting to the development.
- 7.57 Whilst open the site is influenced by its already urbanised setting, and the addition of the proposed development is considered to assimilate well into this existing character. The stepping down in scale of the proposed development, materials palette and landscaping strategy also help to create a softer edge to the development envelope and complement existing bungalows both along Station Road and set into the site itself. With regard to overall density, the proposed development is comparable to Terrence Place adjoining to the east.
- 7.58 The development is supported by a landscape visual impact assessment (LVIA), which concludes the following:
- "11.1.10 The proposals would lead to a localised change in character through the loss of an enclosed grassland field and the introduction of a low-level single storey residential scheme. There would be beneficial effects arising from the mitigation planting across the Site which would assist in assimilating the scheme into its setting. The loss of the grass field and introduction of built form would have an adverse effect on landscape character. However, this would be a very localised and limited effect on landscape character, due to the low profile nature of the proposed dwellings and the containment provided by the existing built form and vegetation. The proposals would also accord with the landscape management and development guidelines for LCT 13.*
- 11.1.11 Visual effects are localised and mainly affect locations close to the Site and mainly limited to road users, pedestrians and some residents most noticeably from Station Road. There are few public rights of way within the locality but views are largely screened by vegetation, with effects limited to a section of one public footpath.*
- 11.1.12 It is considered that the Site could accommodate the proposed development with only limited effects arising on landscape and visual receptors."*
- 7.59 Officers concur with the LVIA's overall conclusions. Whilst some minor residual visual and landscape harm is likely to remain from the proposed development it is at a very localised level. This harm is also countered by the delivery of a high-quality development scheme, which itself is considered to result in modest beneficial effects both in terms of dwelling design and landscaping scheme.

- 7.60 Given the nature of the development proposals and the modular construction, it is considered important to restrict several permitted developments rights for extensions and alterations to the dwellings, and erection of boundary treatments within the site. This is to safeguard the design quality of the proposals, assimilate the development proposals within the wider landscape, and ensure the openness within the site is not eroded.
- 7.61 On this basis, the proposed development is acceptable in accordance with Policies ENV 1, ENV 2 and HOU 2 of the Local Plan 2015 (as amended 2023), Policy 2 of the Neighbourhood Plan and Chapter 12 of the NPPF.
- 7.62 Highways, Access and Safety**
- 7.63 The Local Highways Authority has no objection to the proposed development following amendments to the layout and access road leading into the application site.
- 7.64 The internal shared-surface access road is to be arranged around a central green space and attenuation pond. Whilst the internal 'ring' road is not intended to be offered for adoption by the LHA, in discussion with the LHA there are no highway safety concerns with the internal layout.
- 7.65 The access road has been designed with a full-width (2-metre/6.5-foot) wide footpath leading to Station Road. A new section of footpath along the southern edge of Station Road and an uncontrolled pedestrian crossing is proposed as part of the development proposals, connecting to the existing footpath along the northern edge of Station Road. There are several dwellings already served by this northern footpath to the north and south of the road, and it provides access to Fordham's main services. This includes the new convenience shop as part of the residential development around Scotsdales Garden Centre, and the garden centre itself. The creation of the footpath and crossing does require works in the highway boundary and outside of the Applicant's ownership and red line, and a Grampian condition will therefore be required to ensure these works are undertaken prior to delivery of the proposed development itself. This is an acceptable and a standard practice for highway works.
- 7.66 A vehicular turning head has been provided at the end of the access road to the Local Highway Authority's satisfaction to allow for larger vehicles and waste vehicles to manoeuvre. The Fire Service and Waste Team have both been consulted and no objections raised regarding access for these services, with the Waste Team noting the need to provide appropriate bin storage facilities near the highway boundary.
- 7.67 Regarding bin storage, a communal bin store is provided, as is a covered mobility scooter store attached to the proposed community building. It is relevant that the site would be managed by a Warden, who would be responsible for collecting and delivering bins to the appropriate bin store when required.
- 7.68 All dwellings benefit from policy-compliant levels of car parking (2 per dwelling). All properties benefit from secure rear gardens for the storage of bicycles as well as semi-enclosed terraces.

7.69 The application proposals are therefore considered to be acceptable in accordance with Policies COM 7 and COM 8 of the Local Plan.

7.70 Ecology & Trees

7.71 The application was submitted in October 2023, and is therefore pre-mandatory Biodiversity Net Gain under the Environment Act 2021. Local policies regarding net gain therefore apply (Policy ENV 7 of the Local Plan and Policy 8 of the Neighbourhood Plan).

7.72 Net gain is measured across area-based habitat units (i.e. grassland), linear units (i.e. hedgerows) and watercourse units (i.e. ditches). In very simple terms, the trading rules of these units means that one unit type cannot ordinarily be traded for another.

7.73 Policy ENV 7 requires all development proposals too:

- *Protect the biodiversity and geological value of land and buildings and minimise harm to or loss of environmental features, such as trees, hedgerows, woodland, wetland and ponds.*
- *Provide appropriate mitigation measures, reinstatement or replacement of features and/or compensatory work that will enhance or recreate habitats on or off site where harm to environmental features and habitat is unavoidable; and*
- *Maximise opportunities for creation, restoration, enhancement and connection of natural habitats as an integral part of development proposals.*

7.74 The Natural Environment SPD supplements Policy ENV 7 of the Local Plan and requires a 'significant' net gain in biodiversity for development proposals. 'Significant' is not defined, but the following statement is provided:

"whilst 'significantly' is not defined precisely in this SPD, it should be taken to read that very minor net gains (such as a new bird box) would not constitute a significant gain. The gain should be more considerable, preferably creating habitat gains which support a larger variety of biodiversity. Where space is tight, integrating a variety of measures within the development may be appropriate, such as targeted bird boxes, insect 'hotels', bee blocks, bat boxes, hibernation holes and 'green' roofs."

7.75 Policy 8 of the Neighbourhood Plan requires:

"Development proposals that would have a significant adverse effect (including through recreational pressure) on the nationally and internationally protected sites at Fordham Wood or Chippenham Fen will not be approved.

Development proposals should, wherever possible, seek to enhance connectivity of green networks through the inclusion of strong landscaping schemes that include trees, shrubs, hedgerows, green roofs and green walls, for example.

Wherever possible, development proposals should avoid the loss of wildlife habitats or natural features such as trees, hedgerows, watercourses or ponds. Where the loss of a feature is unavoidable, mitigation may be acceptable through the introduction of new features that will result in at least a neutral impact on the wildlife.

Overall a net gain in biodiversity should be achieved, demonstrated by appropriate evidence prepared by a suitably qualified person on behalf of the applicant.”

- 7.76 The application proposals are underpinned by an Ecological Assessment, Biodiversity Impact Assessment and completed Metric 4.0 (non-mandatory).
- 7.77 The Ecological Assessment notes that impacts upon birds, bats and hedgehogs should be included as mitigation within the development proposals but concludes no significant effects. No other impacts to protected or notable species are concluded.
- 7.78 On-site enhancements include tree planting, hedgerow retention and enhancement, and planting of wildflower grassland. A SuDS pond with reed planting and a sedum roof on the community building is also proposed.
- 7.79 Overall, the development proposals would result in a significant net gain in hedgerow units. For habitat units (predominantly grassland), the metric and impact assessment conclude that, following on-site enhancements, the proposed development would result in a -6.81% loss. The Applicant would therefore need to purchase 2.68 ‘units’ of other neutral grassland off-site to achieve a 12.95% net gain and satisfy trading rules.
- 7.80 The Council’s Senior Ecologist has raised objection to the proposals given the absence of information regarding where the off-site units are to be purchased and the viability of the habitats on-site achieving target condition. This is largely due to the lack of a management plan to understand how the target conditions of these habitats would be achieved, and conflicts between the landscaping plan and metric.
- 7.81 Regarding the suitability of habitats and species proposed, a full soft landscaping scheme can be secured via a condition. Regarding management and achievement of these target habitats, a Landscape Ecological Management Plan (LEMP) condition could suitably cover the creation and management of the proposed on-site habitats.
- 7.82 Within their viability appraisal, the applicant has also committed a total of £99,500 to cover S106 obligations. Originally, £42,000 was identified to address biodiversity net gain enhancements off-site through the purchase of units from a registered habitat bank. However, following a review of biodiversity unit pricings in July 2024 by Biodiversity Units UK, ‘Other Neutral Grassland’ unit prices from habitat banks within the north and south of the UK were between c.£27-29,000. The Applicant has therefore committed the majority of the £99,500 (minus wheeled bin provision) to cover off-site net-gain, which is considered likely to be sufficient and necessary to cover the 2.68 units required as a minimum to achieve a net gain. The purchasing of these units or allocation of money for this use will be secured via a S106 legal agreement.
- 7.83 The use of planning conditions and a S106 legal agreement can therefore be used to secure further details as to the types of habitats, their management, and a degree of off-site habitat creation to mitigate some of the on-site loss. It is not however possible to confirm the exact percentage of net gain achieved at this stage, on the information provided.

- 7.84 Notwithstanding, it should be noted that the securing of 10% minimum net gain is not a requirement of the Local or Neighbourhood Plan but is targeted where possible on non-mandatory sites (Interim Statement, 2022). The proposed development cannot therefore be held to the delivery of 10% as a minimum.
- 7.85 It is clear that the development will deliver on-site landscaping and enhancements, as well as mitigating for its impacts upon protected species. The introduction of new above ground SuDS features and sedum roofing introduces new infrastructure to the application site that can support a larger variety of biodiversity, and the proposed development will be required to deliver a scheme of other biodiversity enhancements such as hibernacula via a condition. The development also targets a net gain in habitat units for other neutral grassland through the purchasing of off-site units, albeit the exact net gain is not known at this stage. Off-site provision is also in line with the mitigation hierarchy as set out within the NPPF.
- 7.86 On this basis, whilst it is not possible to quantify the exact net gains in habitat units on the basis of the information submitted, the scheme will deliver several on-site enhancements and ecological benefits that are also not reflected in the metric and seeks to mitigate for its own impacts as well as providing net gains wherever possible. A contribution to off-site enhancement also ensures a net gain overall will be achieved for the development proposals.
- 7.87 Regarding recreational pressure upon the SSSI, the site provides suitable on-site open space to compensate for the needs of the development proposal.
- 7.88 The Council's Trees Officer has raised no objection to the proposed development scheme following amendments to the arboricultural reports and suitable mitigative tree planting being indicated. A full soft landscaping scheme and tree protection measures will be secured via conditions.
- 7.89 It is on this basis that the proposed development on-balance accords with the objectives of Policies ENV 7 of the Local Plan and Policy 8 of the Neighbourhood Plan, Chapter 15 of the NPPF and the Natural Environment SPD.
- 7.90 Flood Risk and Drainage**
- 7.91 The application site is in excess of 1-hectare (c.2.5-acres) in size, and whilst at a low risk of flooding (Flood Zone 1) and low risk of surface water flooding, this means a Flood Risk Assessment must be undertaken for the development proposals.
- 7.92 After several amendments, the application proposals were supported by an acceptable Flood Risk Assessment and Drainage Strategy, Surface Water Drainage Plan and Info-drainage results. As confirmed within the Lead Local Flood Authority's (LLFA) October 2024 consultation response, these documents demonstrate that surface water from the proposed development can be managed through the use of tanked permeable paving and central infiltration basin. All buildings are also clear of the 10m buffer zone required by the LLFA from chalk infiltration features, and despite some of the roads being within the buffer due to the site constraints this is deemed to be acceptable.

- 7.93 Water quality issues have also been adequately addressed when assessed against as confirmed within the LLFA's response.
- 7.94 The IDB and Anglian Water raise no objections to the proposed development.
- 7.95 The Sequential Test and Exception Tests are not applicable to the development proposals given the low risk of flooding at the site from all sources.
- 7.96 On this basis, the proposed development is considered to be acceptable in accordance with Policy ENV 8 and ENV 9 of the Local Plan, Policy 2 of the Neighbourhood Plan, Chapter 14 of the NPPF and the Flood and Water SPD.

7.97 Historic Environment

- 7.98 The application site is not located within proximity to any heritage assets, designated or non-designated. It is therefore considered that the proposed development would not result in any harm to these identified heritage assets.
- 7.99 Regarding archaeological heritage assets, the County Council's Historic Environment Team has requested a pre-commencement condition securing a programme of archaeological work. It is considered that this condition is necessary to appropriately safeguard any archaeological heritage assets in accordance with Policy ENV 14 of the Local Plan and Chapter 16 of the NPPF.

7.100 Contamination

- 7.101 The Council's Environmental Health (Scientific) Officer has reviewed the submitted contamination reports and concludes that no further investigative testing is required prior to the development of the application site. Notwithstanding, as a precautionary approach, a condition requiring the reporting of unexpected contamination will be imposed upon any consent. The proposed development is therefore considered to be acceptable in accordance with Policy ENV 9 of the Local Plan, the Contaminated Land SPD and Chapter 8 of the NPPF.

7.102 Climate Change

- 7.103 The proposed dwellings are to be constructed using Modern Methods of Construction (MMC). In this instance, the proposed development will use structurally insulated panels (SIPS) rather than bricks and mortar. These SIPS are manufactured off-site and minimise wastage, material use and vehicle trips to site. They are also thermally efficient.
- 7.104 As set out within the Applicant's Energy and Sustainability Statement, because of the use of MMC and other embedded sustainability measures, the proposed dwellings will benefit from the following:
- Overall energy efficient building fabric exceeding Part L1:2021 Edition
 - All units designed to meet EPC A Rating
 - Air source heat pumps to all plots
 - Dedicated energy efficient lighting throughout

- Solar Photovoltaic arrays to all plots
- Carbon emission savings of 109% over the baseline (TER) standard
- Water efficiency of no more than 110l per person per day
- Predicted energy cost savings of around £2000* year over the minimum Building Regulations compliant specification (**at the time of writing – August 2023*)

7.105 The scheme is considered to be wholly compliant with the objectives of Policy ENV 4 of the Local Plan, Policy 2 of the Neighbourhood Plan, the Climate Change SPD and the objectives of Chapter 14 of the NPPF.

7.106 Heads of Terms – S106 Legal Agreement

7.107 Following recommendations of the independent viability report and the nature of the development proposals, the following heads of terms have been agreed:

1. Cascade principle to give priority to local individuals for the affordable housing units and market units as follows:

DMS units to be restricted to persons who satisfy the Residency of Local Connections Test for Fordham and its immediate hinterland (3 miles) in perpetuity.

For the units to be sold on the open market all prospective occupiers of the development shall be selected in accordance with the following priorities:

- *Firstly, persons who satisfy the residency or local connection test for Fordham and the immediate hinterland (3 miles);*
 - *Secondly, in addition to those continuing to qualify as per the above, if places remain within a period of not less than 3 months of the date of first advertising the sale of the residential units' persons who satisfy the residency of local connection test for East Cambridgeshire and or Newmarket.*
 - *Thirdly, in the absence of sufficient persons falling within these categories to complete occupancy of the development by the end of a period of not less than 6 months of the date of first advertising the sale of the residential units' persons from beyond the above catchments*
2. Securing of affordable housing (3 DMS units) in perpetuity;
 3. Ensuring age-restriction to 60+ years – to ensure that the scheme is retained for older persons;
 4. Delivery of the community building and ensuring that it does not generate a profit – this is because the right for it to be freely available to the community as well as residents of the scheme is a large cost to the scheme. If the viability is to remain as assumed, then this benefit must be secured in the S.106 agreement;
 5. Viability review mechanism – as the scheme falls below the policy requirement of affordable housing provision on the basis of viability;

6. Open space and SuDS management – to ensure that these spaces are appropriately maintained for the life of the development;
7. Biodiversity net gain – financial contribution to the purchase of habitat units to ensure that the scheme can achieve a net gain and mitigate biodiversity impacts;
8. Wheeled bin contribution - £57 per dwelling;
9. Site Management and Care Packages – securing the provision of a site warden/manager and care packages with SageHaus’ care partner Oak Retirement (or alternative provider), including:
 - **Remote Care:** This package is an affordable option that ensures residents have access to care and assistance in the event of an emergency. All homes are single level and highly accessible that comply with Building Regulations Part M4 (3). All homes include smart technology to monitor the running of services and wellbeing of residents as well as personal 24-hour monitored alarms ensure residents stay connected in the event, they become unwell. Concierge services are offered for residents in order relieve the burden of daily tasks and enhance everyday lifestyle.
 - **Domiciliary Care:** A range of expert and personalised home care services are provided by trained professions including registered nurses and clinical experts that mean our residents can be cared for in the comfort of their home. These tasks may include housekeeping, meal preparation and personal care or mobility support. The frequency and intensity of care will be distinctive to each resident need and economic plan.
 - **Live in Care:** Residents that reached a critical stage can receive on-to-on specialist 24-hour care whilst staying in their homes as all dwellings are built with two bedrooms as standard meaning a live in carer can be easily accommodated.

7.108 The above contributions and stipulations are considered necessary and satisfy the tests set out under Paragraph 122 of the CIL Regulations.

7.109 Planning Balance

7.110 The application proposals comprise the erection of 21 age-restricted bungalows (over 60s), a community building, landscaping and associated works.

7.111 The proposed development is located outside but immediately adjacent to the development envelope of Fordham. The proposals would therefore conflict with the locational requirement of Policies GROWTH 2 and HOU 6 of the Local Plan and Policy 1 of the Neighbourhood Plan.

7.112 On the basis of viability, the proposed development would result in an under-provision of affordable dwellings by five units, delivering three Discount Market Sale units at 80% open market value. The proposals would result in a very localised minor adverse impact upon the character and visual amenity of the area through its introduction.

- 7.113 All of the above considerations weigh negatively against the application proposals.
- 7.114 Notwithstanding, it has been evidenced that the development proposals seek to address a deficit in specialist older persons housing within the village of Fordham, as well as Isleham falling within the same ward. The need for specialist older persons housing is deemed critical at the national level, and the Council's own data and commissioned independent report have highlighted the under-delivery of this type of housing within the district, particularly within the market/leasehold tenure.
- 7.115 The construction and delivery of the proposals will also deliver several social, economic and environmental benefits.
- 7.116 The proposals represent a scheme that is fully designed around its intended occupiers. The proposals provide a choice of high quality, accessible and future-proofed bungalows in a sustainable location, with variably sized gardens to suit a variety of needs. Each dwelling will be designed to enable independent living in later life, supported by smart technology and a site warden to aid day to day living and optional care packages available. The community building will also benefit residents and the wider community alike, facilitating engagement and reducing isolation.
- 7.117 The provision of the retirement bungalows will also likely release local market housing and family homes back into the villages of Fordham and Isleham.
- 7.118 The dwellings are constructed to a very high level of efficiency and sustainability, with EPC A ratings and significantly reduced energy and water usage. The Modern Methods of Construction also encourage sustainable practices within the fabrication and construction of the dwellings, with wastage also reduced.
- 7.119 Whilst below policy targets for affordable housing, the site will deliver a mix of tenures across the site, including the three DMS units, making a contribution to local affordable housing stock.
- 7.120 No other conflicts with the Development Plan are identified, and the proposed development seeks to mitigate for its own impacts through conditions and a S106 agreement.
- 7.121 Cumulatively, all of the above benefits are considered to weigh significantly in favour of the application proposals to warrant a departure from the Development Plan. It is on this basis that the application proposals are recommended for approval.

8.0 COSTS

- 8.1 An appeal can be lodged against a refusal of planning permission or a condition imposed upon a planning permission. If a local planning authority is found to have acted unreasonably and this has incurred costs for the applicant (referred to as appellant through the appeal process) then a cost award can be made against the Council.
- 8.2 Unreasonable behaviour can be either procedural i.e. relating to the way a matter has been dealt with or substantive i.e. relating to the issues at appeal and whether a local

planning authority has been able to provide evidence to justify a refusal reason or a condition.

8.3 Members do not have to follow an officer recommendation indeed they can legitimately decide to give a different weight to a material consideration than officers. However, it is often these cases where an appellant submits a claim for costs. The Committee therefore needs to consider and document its reasons for going against an officer recommendation very carefully.

8.4 In this case members' attention is particularly drawn to the following points:

- Local and national policy on the specialist housing for older people.
- The findings of the Applicant's Older Persons Housing Needs Assessment Report, the independently prepared SPRU report prepared on behalf of the Council, and the Housing Needs of Specific Groups (2021) report (Cambridgeshire Insight).

9.0 APPENDICES

9.1 Appendix 1 – Recommended Conditions

Background Documents

23/01088/FUM

National Planning Policy Framework (December 2023)

[National Planning Policy Framework](#)

East Cambridgeshire Local Plan 2015 (as amended 2023)

[East Cambridgeshire Local Plan 2015 \(as amended 2023\) | East Cambridgeshire District Council](#)

Supplementary Planning Documents

[Supplementary Planning Documents | East Cambridgeshire District Council](#)

Fordham Neighbourhood Plan 2018

[Fordham Neighbourhood Plan | East Cambridgeshire District Council](#)

Housing Needs of Specific Groups (2021)

[Housing Needs of Specific Groups](#)

Appendix 1 – Recommended Conditions

1 The development shall be carried out in accordance with the following plans and drawings:

Ecological Assessment	C	4th October 2023
Oak Retirement Care Plan July 2023		3rd October 2023
Sustainability and Energy Statement		3rd October 2023
9898-AIA	A	5th July 2024
ITY18022-GA-0	A	5th July 2024
Flood Risk Assessment and Drainage Strategy	3	5th July 2024
21.072-SA-GF-ZZ-DR-A-20-01 TYPE 2.2	P10	23rd July 2024
21.072-SA-RF-DR-A-20-07 TYPE 2.5	P10	23rd July 2024
21.072-SA-RF-DR-A-27-05 TYPE_3.1	P10	23rd July 2024
21.072-SA-RF-DR-A-27-06 TYPE_3.2	P10	23rd July 2024
21.072-SA-RF-XX-DR-A-27-01 TYPE 2.1	P10	23rd July 2024
21.072-SA-RF-XX-DR-A-27-02 TYPE 2.2	P10	23rd July 2024
21.072-SA-ZZ-DR-A-20-10 TYPE 2.5	P10	23rd July 2024
21.072-SA-ZZ-DR-A-20-10 TYPE 3.1	P10	23rd July 2024
21.072-SA-ZZ-DR-A-20-11 TYPE 2.5	P10	23rd July 2024
21.072-SA-ZZ-DR-A-20-11 TYPE 3.2	P10	23rd July 2024
21.072-SA-ZZ-DR-A-20-12 TYPE 2.5	P10	23rd July 2024
21.072-SA-ZZ-DR-A-20-13 TYPE 2.5	P10	23rd July 2024
21.072-SA-ZZ-ZZ-DR-A-20-01	P10	23rd July 2024
21.072-SA-ZZ-ZZ-DR-A-20-02 TYPE 2.1	P10	23rd July 2024

21.072-SA-ZZ-ZZ-DR-A-20-03 TYPE 2.2	P10	23rd July 2024
21.072-SA-ZZ-ZZ-DR-A-20-10	P10	23rd July 2024
21.072_LP(XX)01_XX	P10	23rd July 2024
21.072_SP(XX)02_XX	P10	23rd July 2024
21.072-SA-GF-DR-A-20-06 TYPE 2.5	P10	23rd July 2024
21.072-SA-GF-DR-A-20-08 TYPE_3.1	P10	23rd July 2024
21.072-SA-GF-DR-A-20-08 TYPE_3.2	P10	23rd July 2024
21.072-SA-GF-ZZ-DR-A-20-01 TYPE 2.1	P10	23rd July 2024
88167.645624.001		16th September 2024
ID Calcs		16th September 2024
Biodiversity Impact Assessment		18th September 2024

- 2 The development hereby permitted shall be commenced within 3 years of the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990, as amended.

Grampian

- 3 No development shall commence until details of the proposed uncontrolled pedestrian crossing and footpath along Station Road, and a timetable for their implementation, have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall be based upon Drawing Ref. ITY18022-GA-0 REV A. The agreed works shall thereafter be implemented in accordance with the approved timetable prior to first occupation or commencement of use of the hereby approved development.

Reason: In the interests of Highway safety in accordance with Policy COM 7 of the East Cambridgeshire Local Plan 2015 (as amended 2023) and Chapter 9 of the National Planning Policy Framework (December 2023). This is a Grampian condition as it requires works on highways land that is not within the Applicant's control.

Pre-Commencement

- 4 No development shall commence until a Construction Environmental / Ecological Management Plan (CEMP) has been submitted to and agreed in writing with the Local

Planning Authority regarding mitigation measures for noise, dust and lighting during the construction phase. Details shall include, but not be limited to, construction times and deliveries, ecological protection measures, access points for deliveries and site vehicles, and proposed phasing/timescales of development etc. The CEMP shall be adhered to at all times during all phases.

Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015, Policy 2 of the Fordham Neighbourhood Plan, and Chapter 8 of National Planning Policy Framework (December 2023). The condition is pre-commencement as it requires details of safeguarding measures prior to construction starting on site.

- 5 No development shall commence until the applicant, or their agents or successors in title, has implemented a programme of archaeological work, commencing with the evaluation of the application area, that has been secured in accordance with a Written Scheme of Investigation (WSI) that has been submitted to and approved by the Local Planning Authority in writing. For land that is included within the WSI, no demolition/development shall take place other than under the provisions of the agreed WSI, which shall include:
- a) The statement of significance and research objectives;
 - b) The programme and methodology of investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works;
 - c) The timetable for the field investigation as part of the development programme;
 - d) The programme and timetable for the analysis, publication & dissemination, and deposition of resulting material and digital archives.

Reason: To safeguard archaeological assets within the approved development boundary from impacts relating to any demolitions or groundworks associated with the development scheme and to ensure the proper and timely preservation and/or investigation, recording, reporting, archiving and presentation of archaeological assets affected by this development, in accordance with Policy ENV 14 of the East Cambridgeshire District Council Local Plan 2015 (as amended 2023) and the National Planning Policy Framework (December 2023). This condition is pre-commencement as it requires below-ground investigations.

- 6 No development shall commence until a detailed design of the surface water drainage of the site has been submitted to and approved in writing by the Local Planning Authority. Those elements of the surface water drainage system not adopted by a statutory undertaker shall thereafter be maintained and managed in accordance with the approved management and maintenance plan.
The scheme shall be based upon the principles within the agreed Flood Risk Assessment and Drainage Strategy, Delta Simmonds, Ref: 88167, Rev: 3, Dated: 17th May 2024 and shall also include:
- a) Full calculations detailing the existing surface water runoff rates for the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events;
 - b) Full results of the proposed drainage system modelling in the above-referenced storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance;

- c) Detailed drawings of the entire proposed surface water drainage system, attenuation and flow control measures, including levels, gradients, dimensions and pipe reference numbers, designed to accord with the CIRIA C753 SuDS Manual (or any equivalent guidance that may supersede or replace it);
- d) Full detail on SuDS proposals (including location, type, size, depths, side slopes and cross sections);
- e) Site Investigation and test results to confirm infiltration rates;
- f) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants;
- g) Demonstration that the surface water drainage of the site is in accordance with DEFRA non-statutory technical standards for sustainable drainage systems;
- h) Full details of the maintenance/adoption of the surface water drainage system;
- i) Measures taken to prevent pollution of the receiving groundwater and/or surface water

Reason: To ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the proposed development and to ensure that the principles of sustainable drainage can be incorporated into the development, noting that initial preparatory and/or construction works may compromise the ability to mitigate harmful impacts. This is in accordance with Policies ENV 8 and ENV 9 of the East Cambridgeshire District Council Local Plan 2015 (as amended 2023) and the National Planning Policy Framework (December 2023). This condition is pre-commencement as it requires works below ground.

- 7 No development, including preparatory works such as site clearance, shall commence until details of measures indicating how additional surface water run-off from the site will be avoided during the construction works have been submitted to and approved in writing by the Local Planning Authority. The applicant may be required to provide collection, balancing and/or settlement systems for these flows. The approved measures and systems shall be brought into operation before any works to create buildings or hard surfaces commence.

Reason: To ensure surface water is managed appropriately during the construction phase of the development, so as not to increase the flood risk to adjacent land/properties or occupied properties within the development itself; recognising that initial works to prepare the site could bring about unacceptable impacts. This is in accordance with Policies ENV 8 and ENV 9 of the East Cambridgeshire District Council Local Plan 2015 (as amended 2023) and the National Planning Police Framework (December 2023). This condition is pre-commencement as it requires details prior to commencement of works on site.

- 8 No development, site works or clearance shall commence until the tree protection measures as shown on 9898-D-AIA Rev A have been in accordance with the approved details. Thereafter the measures shall be maintained and retained until the development is completed. Within the root protection areas the existing ground level shall be neither raised nor lowered and no materials, temporary buildings, plant, machinery or surplus soil shall be placed or stored thereon. If any trenches for services are required within the fenced areas they shall be excavated and backfilled by hand and any tree roots encountered with a diameter of 25mm or more shall be left unsevered.

Reason: To ensure that the trees on site are adequately protected, to assimilate the development into its surroundings, and to enhance biodiversity, in accordance with Policies ENV1, ENV2 and ENV 7 of the East Cambridgeshire Local Plan 2015 (as amended 2023), Policies 2 and 8 of the Fordham Neighbourhood Plan 2018, and Chapter 12 and 15 of the National Planning Policy Framework (December 2023).

Above Ground

- 9 No above ground construction shall commence until full details of hard landscape works have been submitted to and approved in writing by the Local Planning Authority. These details shall include boundary treatments (including gates), details of the proposed communal bin store, hard surfacing materials (including but not limited to roads, paths, driveways and private gardens), street-furniture, a lighting scheme in accordance with 'Bats and Artificial Lighting at Night' Guidance Note 08/23 or any guidance superseding this (including low level lighting and wayfinding) and CCTV. The works shall be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with an implementation programme submitted to and approved in writing with the Local Planning Authority prior to first occupation.

Reason: To safeguard the character and appearance of the area and protect biodiversity, in accordance with Policies ENV2 and ENV 7 of the East Cambridgeshire Local Plan 2015 (as amended 2023), and Policies 2 and 8 of the Fordham Neighbourhood Plan 2018, the Natural Environment SPD and Chapters 12 and 15 of the National Planning Policy Framework (December 2023).

- 10 No above ground construction shall take place until a scheme for the provision and location of fire hydrants to serve the development to a standard recommended by the Cambridgeshire Fire and Rescue Service or alternative scheme has been submitted to and approved in writing by the Local Planning Authority. The hydrants or alternative scheme shall be installed and completed in accordance with the approved details prior to the occupation of any part of the development.

Reason: To ensure proper infrastructure for the site in the interests of public safety in that adequate water supply is available for emergency use. This is supported by paragraph 101 of the National Planning Policy Framework (December 2023).

- 11 No above ground construction shall take place on site until details of the external materials (including walls, roof covering, windows, doors, rainwater goods) to be used on the development have been submitted to and approved in writing by the Local Planning Authority. Development shall be carried out in accordance with the approved details.

Reason: To safeguard the character and appearance of the area, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015 (as amended 2023), Policy 2 of the Fordham Neighbourhood Plan 2018, and Chapter 12 of the National Planning Policy Framework (December 2023).

- 12 No above ground construction shall take place until a detailed scheme of accessible measures (including smart home monitoring and assistance devices) for each dwelling

and the community building hereby approved has been submitted and approved in writing by the Local Planning Authority. The hereby approved development shall be carried out in accordance with these approved details.

Reason: The development has been submitted and found acceptable on this basis.

First Occupation / Commencement of Use

- 13 Prior to first occupation of any dwelling hereby approved a full schedule of all soft landscape works shall be submitted to and approved in writing by the Local Planning Authority. The schedule shall include, planting plans, a written specification; schedules of plants noting species, plant sizes, proposed numbers/densities; and a detailed implementation programme. It shall also indicate all existing trees and hedgerows on the land and details of any to be retained. The works shall be carried out in accordance with the approved details prior to the end of the first planting season following occupation of the development. If within a period of five years from the date of the planting, or replacement planting, any tree or plant is removed, uprooted or destroyed or dies, another tree or plant of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.

Reason: To assimilate the development into its surroundings, and to enhance biodiversity, in accordance with Policies ENV1, ENV2 and ENV 7 of the East Cambridgeshire Local Plan 2015 (as amended 2023), Policies 2 and 8 of the Fordham Neighbourhood Plan 2018, and Chapter 12 and 15 of the National Planning Policy Framework (December 2023).

- 14 Prior to first occupation of any dwelling hereby permitted, a scheme for the maintenance of the soft landscaping scheme for a minimum period of 15 years from last occupation, shall be submitted to and agreed in writing by the Local Planning Authority. All landscaping shall be maintained in accordance with the agreed scheme. The scheme shall include the following:
- i) methods for the creation of and maintenance regime for on-site habitats and landscaping scheme;
 - ii) detailed schedule of works;
 - iii) details of who will be responsible for the continuing implementation;
 - iv) details of any phasing arrangements

Reason: To ensure the longevity of the landscaping scheme, and in the interests of enhancing biodiversity, in accordance with Policies ENV1, ENV2 and ENV 7 of the East Cambridgeshire Local Plan 2015 (as amended 2023), Policies 2 and 8 of the Fordham Neighbourhood Plan 2018, the Natural Environment SPD and the National Planning Policy Framework (December 2023).

- 15 Prior to first occupation of any dwelling hereby approved, details of the air source heat pumps and photovoltaic panels for each dwelling and community building shall be submitted to and approved in writing by the Local Planning Authority. The approved

measures shall be installed and operational prior to first occupation of any dwelling hereby approved and thereafter maintained for the lifetime of the development.

Reason: To ensure that the proposal meets with the requirements of sustainability as stated in Policy ENV4 of the East Cambridgeshire Local Plan 2015 (as amended 2023) and Chapter 14 of the National Planning Policy Framework (December 2023).

- 16 Prior to first occupation of any dwelling hereby approved a scheme of biodiversity enhancement measures shall be submitted to and agreed in writing with the Local Planning Authority. The scheme shall be based upon the conclusions of the Ecological Assessment prepared by DWA Ecology (Revision C – dated 31st August 2023). The biodiversity improvements shall be installed prior to the first occupation any dwelling hereby approved and thereafter maintained for the lifetime of the development.

Reason: In the interests of protecting and enhancing biodiversity, in accordance with Policy ENV 7 of the East Cambridgeshire Local Plan 2015 (as amended 2023), Policies 2 and 8 of the Fordham Neighbourhood Plan 2018, the Natural Environment SPD and the National Planning Policy Framework (December 2023).

- 17 Prior to the first occupation of any dwelling, the proposed access, footpath, parking and turning areas shall be laid out, demarcated, levelled and surfaced in accordance with the approved plan reference 21.072_SP(XX)02_XX Rev P10 and the details approved under Condition 9. They shall also be constructed so as to drain entirely within the site and avoid any surface-water run-off onto the adjacent public highway. Thereafter they shall be retained for the specific purpose of access, parking and turning.

Reason: In the interests of highway safety, and to prevent surface water discharging to the Highway, in accordance with policies ENV2, ENV8, ENV 9 and COM7 of the East Cambridgeshire Local Plan 2015 (as amended 2023), Policy 11 of the Fordham Neighbourhood Plan, and Chapter 8 and 9 of the National Planning Policy Framework (December 2023).

- 18 Prior to first use of the community building hereby approved a Noise Management Plan shall be submitted to and approved in writing by the Local Planning Authority which will detail how the applicant will maintain appropriate noise levels. This shall include, but not be restricted to, details of the layout and position of any speaker system, along with mitigation measures to reduce the impact of noise from music on nearby residents. The details agreed within the Noise Management Plan shall thereafter be implemented whenever the community building is in use. A management log shall be kept by the site owner/manager, recording the checks that have been made to ensure compliance with the Noise Management Plan for each event held, together with the time and date of these checks. This log shall be made available to the Local Planning Authority within 3 days of any request to view it.

Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015 (as amended 2023), Policy 2 of the Fordham Neighbourhood Plan 2018 and Chapter 8 of the National Planning Policy Framework (December 2023).

Other Conditions

- 19 Notwithstanding Condition 9 and the provision of Class A of Schedule 2, Part 2 of the Town and Country Planning (General Permitted Development) Order 2015, (or any order revoking, amending or re-enacting that order) no gates, fences or walls shall be erected within the application site, unless planning permission is first granted by the Local Planning Authority.

Reason: In the interests of highway safety and to safeguard the character and appearance of the area, in accordance with Policies ENV1, ENV2, COM7 and COM8 of the East Cambridgeshire Local Plan 2015 (as amended 2023), Policy 2 of the Fordham Neighbourhood Plan 2018, and Chapters 9 and 12 of the National Planning Policy Framework (December 2023).

- 20 In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported to the Local Planning Authority within 48 hours. No further works shall take place until an investigation and risk assessment has been undertaken and submitted to and approved in writing by the Local Planning Authority. Where remediation is necessary, a remediation scheme must be submitted to and approved in writing by the Local Planning Authority. The necessary remediation works shall be undertaken, and following completion of measures identified in the approved remediation scheme a verification report must be prepared, and approved in writing by the Local Planning Authority.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors, in accordance with policy ENV9 of the East Cambridgeshire Local Plan 2015 (as amended 2023) and Chapter 8 of the National Planning Policy Framework (December 2023).

- 21 The use of the community building hereby approved shall not take place other than between the hours of 0800 to 2200 each day.

Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015 (as amended 2023) and Policy 2 of the Fordham Neighbourhood Plan 2018, and Chapter 8 of the National Planning Policy Framework (December 2023).

- 22 In the event that the foundations from the proposed development hereby approved requiring piling, prior to the use of piling the applicant shall submit a report/method statement to the Local Planning Authority, for approval in writing, detailing the type of piling and mitigation measures to be taken to protect local residents from noise and/or vibration. Noise and vibration control on the development shall be carried out in accordance with the approved details.

Reason: To safeguard the residential amenity of neighbouring occupiers, in accordance with policy ENV2 of the East Cambridgeshire Local Plan 2015 (as amended 2023) and Policy 2 of the Fordham Neighbourhood Plan 2018, and Chapter 8 of the National Planning Policy Framework (December 2023).

- 23 Notwithstanding Condition 14, the hereby approved development shall be carried out in accordance with the submitted Sustainability and Energy Strategy (Quoda – June 2024) and these measures thereafter retained for the lifetime of the development.

Reason: To ensure that the proposal meets with the requirements of sustainability as stated in Policy ENV4 of the East Cambridgeshire Local Plan 2015 (as amended 2023) and Chapter 14 of the National Planning Policy Framework (December 2023).

- 24 Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (or any order revoking and re-enacting that Order with or without modifications), no development within Class(es) A, B, C, D or E of Part 1 of Schedule 2 of the Order shall take place on site unless expressly authorised by planning permission granted by the Local Planning Authority.

Reason: To safeguard the character and appearance of the area and protect biodiversity, in accordance with Policies ENV2 and ENV 7 of the East Cambridgeshire Local Plan 2015 (as amended 2023), and Policies 2 and 8 of the Fordham Neighbourhood Plan 2018, the Natural Environment SPD and Chapters 12 and 15 of the National Planning Policy Framework (December 2023).