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Cottenham Parish Council response to CSD&C consultation – September 2019

Cottenham Parish Council is responding on behalf of 6,700 Cottenham residents to the consultation on the draft Sustainable Design & Construction Supplementary Planning Document (SPD) prepared by the Greater Cambridge Shared Planning service.

There are some important background details which differentiate Cottenham and many other villages in South Cambridgeshire from each other and the city it surrounds as regards requirements for sustainable design and construction:

- Cottenham is a large village in South Cambridgeshire, approx. 6 miles north of Cambridge city. Its current population is approx. 6,700. Public transport is limited to a thrice hourly bus service to Cambridge involving a long detour around Histon and Impington. Other than Histon and Impington, access to Waterbeach for the railway, and neighbouring villages is predominantly by private car due to distance or perceived safety issues.
- A substantial population expansion will occur over the coming few year due to construction of more than 500 new homes on an edge of the village; that expansion of the south-west edge of Cottenham is well beyond 800 metres walking distance of the central facilities and beyond 1200metres from some key facilities. Without care, the character of the village will be lost to the character of pattern-book estates.
- Within Cottenham, although many of the amenities and facilities are located within 800 metres of the centre, many residents live further out, well beyond the good bus routes, requiring many to depend on private, often diesel-powered cars for education, leisure and work. Attrition of these cars and the road network directly weakens the sustainability of such villages. Support for electrification – and electric cars - will help ensure their survival and economic and social health.

Cottenham lies on the B1049 in a ‘no man’s land’ between A14/M11 and Guided Bus to the West and the A10, rail connection (Waterbeach) and, potentially, the Autonomous Metro to the East. The current lack of radial (i.e. East-West) public transport connections or cycle routes mean that accessing key transport routes is usually by private car or taxi, most of which are diesel-powered.

The closeness of many properties on High Street/B1049 to the carriageway, particularly older houses, adversely affects quality of life through loss of sleep, exposure to traffic pollution and noise/vibration. Traffic-related issues were cited as the most significant downside to living in Cottenham in a village-wide survey (973 respondents) conducted in 2016. which will expand to approx. 8,000 over the next 10 years due to unplanned development taking advantage of an inadequate housing land supply, exacerbated by a sluggish planning and development control system. Because this expansion has not been planned, there are few associated strategic improvements in infrastructure to mitigate it. This SPD seems unaware of unplanned developments.

Conclusion

Cottenham may, through increased regulation, be adversely affected by the SPD, but could benefit if imaginative regulation is developed and deployed for the villages of South Cambridgeshire to:

- provide the private and public electric vehicle infrastructure so necessary for the continued viability of many rural communities;
- protect communities against the real danger of isolation through surface water flooding;
- focus more on deregulation of measures to improve sustainability of built properties and less on increased regulation of new build.

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Observations: We have a number of observations on aspects of the SD&C SPD in terms of its value to South Cambridgeshire and Cottenham:

Aspect	Comment	Issue
Risk equalisation	<p>The draft SPD is heavily biased towards new build in large developments, yet:</p> <ul style="list-style-type: none"> • many, if not most properties will be extended or renovated during their life; • many new developments are too small to apply all the guidance in the SPD; and • there is little or no consideration of heritage assets, including Conservation Areas. <p>Sustainability is not due to energy/carbon usage alone; these are magnified by population increase, the development that comes with it, and people’s behaviour.</p> <p>The SPD would be improved if the key sustainability consequences – probably:</p> <ul style="list-style-type: none"> • temperature (overheating?) / energy consumption, • flood risk and • construction waste (inevitably linked to fly-tipping) <p>were summarised first, given deepest consideration, and then given a priority for mitigation in, say:</p> <ul style="list-style-type: none"> • north, south or central Greater Cambridge and by • new build v extensions and renovations <p>to ensure practical rather than theoretical relevance to specific situations.</p> <p>This could be overlaid with the restrictions necessary in Conservation Areas and for other Heritage Assets.</p> <p>Further, the weight given to some topics seems to have more to do with the amount of technical material that is readily available than its direct relevance to sustainable design and construction. This should be re-balanced in light of the impact / value prioritisation.</p>	<p>SPD should perhaps distinguish between what is necessary to comply with national, district and neighbourhood plans and helpful additional advice on environmental and other issues.</p> <p>Coverage is:</p> <ul style="list-style-type: none"> • not prioritised by relative impact of various technical areas (noise, energy, carbon, water, waste etc.) on sustainability • patchy in terms of evidence for the approaches suggested in various technical areas (noise, drainage, energy etc), and • too narrow in application areas (new build, heritage, renovation etc)
Neighbourhood Planning	<p>There is no mention of how Neighbourhood Planning integrates with Local Planning and can help climate change adaptation and/or community regeneration; yet adopted NPs are becoming a key part of the decision-making process.</p>	<p>“Bottom-up” planning has a key role to play in a geographically large and diverse community like SC, exacerbated by integration with the city’s needs and priorities.</p>

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General	<p>Section 3 aims to interpret policies drawn from adopted national, and local (city and district) plans with selected additions to further “sustainability”</p> <p>In consequence, the SPD will add a considerable administrative load to developers, builders and building owners at all planning, construction and operation stages.</p> <p>While admirable in theory, this increased regulation will make it even more difficult to maintain a 5-year supply of housing land and, although a material consideration (p23) like Village Design Statements and other advisory material, its importance will be seriously diminished.</p>	<p>While the complexity of translating requirements drawn from National, District (and Neighbourhood) policies is essential, the document is only supplementary and advisory.</p> <p>Adding a series of informal policies for environmental issues such as noise, water etc. adds complexity and inevitably risks dilution, over-regulation and challenge.</p>
Surface Water management	<p>Almost nothing here from SCDC (the City part has got it almost right) yet this subject is critical to Cottenham and most of the northern “fen-edge” villages covered by SCDC. As a minimum the three planning conditions that aim to ensure sustainability should be included and explained:</p> <ul style="list-style-type: none"> • SUDS pre-build design approval as “fit for purpose” • SUDS implementation pre-occupation verification by Building Control • SUDS arrangements for long-term maintenance by enduring parties. 	<p>Flood is a key risk to SC and the flood risks increases with development and redevelopment yet this is not covered.</p>

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Noise	<p>Many houses, especially those on major roads like the B1049, are set close to the road with no front garden to provide a noise attenuator - and these are already built.</p> <p>The SPD offers nothing by way of road, roof, window or wall improvements to mitigate this, despite devoting around 20% of its content (s3.6 and App8) to noise.</p> <p>Retrofitted improvements could be far more cost-effective than marginal gains on new build.</p> <p>New-build MUGAs or similar will need careful design if they are to help deliver our health and well-being objectives, despite being embedded within communities.</p> <p>In many SCDC villages, advisory material related to improvements of heritage assets, including Conservation Areas, would be useful.</p>	<p>Sustainability of our environment must include upgrading of existing housing stock to render it habitable into the future unless there are successful measures to reduce ambient noise – e.g. from road vehicles and/or outdoor activities promoted to improve health and well-being.</p>
Vibration	<p>Many houses, especially those on the B1049, are set close to the road with no front garden to act as a vibration attenuator.</p> <p>The SPD offers nothing by way of foundation, road, window or wall improvements to mitigate this..</p> <p>All Cottenham’s 66 Listed Buildings and most of the Conservation Area are subject and vulnerable to road noise and vibration. – in all, about 15% of Cottenham’s 6,500 residents are probably affected.</p>	<p>Sustainability of our environment must include upgrading of existing housing stock to render it habitable in future unless there are successful measures to reduce damage due to vibration – especially from road vehicles.</p>
Insulation	<p>Many village houses were constructed in Victorian times and lack the thermal insulation of modern housing. All Cottenham’s 66 Listed Buildings have limited scope to enhance insulation to future-proof standards – what do they do?</p>	<p>Sustainability of our environment must include upgrading of existing housing stock to render it habitable in future unless there are successful measures to reduce energy consumption and emission.</p>

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<p>More sustainable forms (s2.2)</p>	<p>Walkable neighbourhoods are a great idea in theory, allowing residents or visitors to park up, then “multi-task” once in the neighbourhood, potentially increasing footfall and viability of businesses and shops.</p> <p>However, they are almost impossible to achieve outside city centres – especially at a 400 metre scale which, apart from village pubs, requires inappropriately high buildings and densities to achieve the footfalls necessary to sustain business within that radius.</p> <p>Cottenham’s draft Neighbourhood Plan examined this issue in detail as a means to regenerate the village centre which has been denuded of businesses as housing development has sprawled ever further from the centre, increasing dependence on private cars and encouraging a wider choice of activity destination.</p> <p>As a pragmatic compromise, Cottenham’s NP uses 800 metre distances from the centre and “focal points” to focus future developments;</p> <p>As in the Cottenham Neighbourhood Plan, we welcome efforts to extend the reach of segregated cycle networks which will benefit a minority of residents but cannot be a substitute for a full range of private and public transport solutions, including cars.</p> <p>Future availability of improved e-infrastructure, including electric Community Transport, will substitute some carbon-based private car usage. Nevertheless, even villages as large as Cottenham rarely achieve 100 people per hectare and are unlikely ever to sustain a rich enough public transport infrastructure to eliminate the need for substantial use of private cars.</p> <p>Reliance on walking, cycling and public transport discriminates against the disabled, elderly and residents of smaller villages; such a plan would contravene the Equality Act.</p>	<p>Our populations are ageing, especially in villages.</p> <p>Many villages are too large for most residents to live within 400 metres walking distance of its amenities and facilities and many villages do not support a full set of such amenities and facilities.</p> <p>Cycling extends the range to those able and willing but is not a complete solution for many.</p> <p>Public transport is not pervasive within villages and never can be as we apply that 100 people per hectare principle so vilifying private cars – even diesel-engined ones is no answer.</p> <p>Only electric infrastructure supporting private vehicles can resolve the current pollution/energy issue – and yes, we need better roads too.</p>

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Air pollution (s2.2)	<p>SCDC's AQMAs are centred on the A14 and its interchanges which are being radically re-engineered currently to remove the congestion and associated air pollution..</p> <p>Few of SCDC's villages can support a "good" bus service based on 100 people per hectare unless they are suburbs adjacent to the city boundary and have young family populations. They are too far separated for residents to rely on cycling and walking.</p> <p>Improvements to e-infrastructure are vital to the "5-miles from everywhere" villages, like Cottenham, Willingham etc. that are beyond comfortable walking and cycling distance of neighbouring communities for most residents.</p>	Over - emphasised outside Cambridge city centre.
Viability (s3.1)	<p>We live in turbulent times. Desktop considerations of viability may not be enough to ensure that Greater Cambridge continues to attract developers in sufficient quantities to ensure an adequate supply of housing.</p> <p>A cooling in housing demand led by reduced economic migration and immigration, market-pricing and constraints on capital or interest rates may lead to developers focusing their resources elsewhere, rendering absolute measures of viability unsustainable.</p>	Strange place to put a justification of policies.

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Energy & Carbon reduction (s3.2)	<p>SCDC approach seems to be “design to Part L of the Building Regs”, then certify how your plan reduces non-renewable consumption by 10% - requiring an Energy Statement to confirm it.</p> <p>There is no evidence provided for the adoption of an arbitrary 10% reduction figure, which will lead to ambiguity in compliance, especially at appeal.</p> <p>Extensive tutorial material seems unnecessary now the technologies are well-established. It should also be possible to simplify certification.</p>	<p>Measures to reduce energy consumption from built stock should be deregulated, planning-wise.</p> <p>Some of the data used (efficiency of bulk power generation) seems out of date.</p>
Water reduction (s3.3)	<p>It is difficult to see how this strategy can be much more than a “nudge” rather than rationing approach, especially as the number of occupants cannot be reliably known and technology is evolving.</p> <p>There seems to be no correlation between the number of occupants and number of bathrooms, including how well-equipped they are, including the control of the water efficiency of the dish/washing machines.</p> <p>Nevertheless we want designs to restrict usage to 90% of the Building Regs allowance. Is there a basis for this arbitrary figure?</p> <p>Maybe more use could be made of segregated grey and potable water supplies within new build?</p>	<p>Measures to reduce water consumption from built stock are mostly deregulated planning-wise, depending more on which appliance you buy and how long it is operated.</p> <p>Water-metering, like energy-metering, is ineffective as an incentive to reduced consumption.</p> <p>There could be incentives in new build to use grey water far more.</p>

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Climate change adaptation (s3.4)	<p>Needs to define “overheating”. Cooling hierarchies are good but difficult to assess at the planning stage; thermal modelling sounds good but can only be an indication of performance in smaller and/or individually-designed properties so may just increase application costs.</p> <p>The benefits of “green infrastructure”, similarly, are difficult to quantify; there may be a lowering of external and internal wall temperatures by use of Virginia Creepers but neither the risk of long-term damage to the walls nor the annual cost of restrictive maintenance has been reliably assessed.</p> <p>The “tree canopy” tends to be reduced year on year as SCDC is reluctant to invest in TPOs to protect any trees, even within Conservation Areas. Any restrictions tend to be limited to the developer; protections required in planning should be published and made more accessible at least to Parish Councils who review requests for tree work in CAs. With Cambridgeshire County Council’s refusal to adopt trees, there is a conflict here.</p> <p>“Green/brown roofs” remain an expensive and difficult to maintain feature with limited quantifiable benefits.</p> <p>“Materials” have a high impact and “sustainable drainage systems” can be very important in rural applications both as a means of reducing flood risk and holding cooler water in ditches and ponds around developments as in Cottenham and Swavesey.</p>	Does this material actually help?

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Biodiversity (s3.5)	<p>Need to offer a map showing biodiversity and geodiversity important sites?</p> <p>Most Cottenham sites will need at least a preliminary desktop assessment – could these be pre-packed in some way to minimise cost through duplication?</p>	Desktop assessments are wasteful when repeated for each property in an area.
Pollution (s3.6)	<p>Does this warrant 68 pages?</p> <p>Light (10pp) – tutorial when submission could be reduced to a statement of need/benefit weighted against possible harm to receptors and subsequent mitigations.</p> <p>Contaminated land (3pp) – need v. harm + mitigations</p> <p>Noise / Vibration (24pp) – pedantic tutorial (mostly noise) without explanations (Grampian condition? “digital twins”) check 3.6.81 and 3.6.82! Almost nothing on vibration, a major issue on some Cottenham’s streets (High Street and Denmark Road) where housing abuts the carriageway.</p> <p>Air Quality (32pp – mostly Cambridge) – arguments for encouraging e-infrastructure and parking provisions mostly ignored elsewhere.</p> <p>Odour control – useful re Milton sewage plant relocation</p>	Mostly repeats material included elsewhere.

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SUDS (s3.7)	Mostly Cambridge - s3.7.5 is pretty good. But NOTHING for SCDC yet its flood strategy was virtually copied by CCC. Should at least cover the pre- in- and post-development conditions.	Given fen-edge's vulnerability, much more attention should be paid to the prevention and mitigation of flooding.
BREEAM (s3.8)	Only non-residential in CCC? Fashionable, like PassivHaus, but said to add 10% or more to construction cost.	Necessary?
Sustainable Show Homes (s3.9)	Developers to nudge buyers towards optional environmentally-friendly extras.	Necessary?
Heritage assets (s3.10)	Nothing much to help a home-owner wishing to improve environmental friendliness of a heritage asset (seems to ignore CAs?)	SCDC villages have many heritage assets that will become uneconomic and uninhabitable unless adapted to emission reduction and flood resilience yet there are many planning restrictions on works to achieve those.
Construction waste etc (s3.11)	Very thin - when 1/3 of all waste is alleged to come from construction and demolition and a substantial portion of that is then fly-tipped. Beyond scope here, but there has to be a better solution to charging / disposing of waste.	Maybe all construction waste should be disposed of within 400 metres of its source – banning movement of waste and the resultant land-fill and fly-tipping.

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Health & wellbeing (s4.2)	Good , general stuff – hopefully familiar to developers and planners but is it needed? That said, in planning, open space for sport is often neglected, as are indoor facilities.	Is this relevant and supported by National and Local Plans?
Modern methods of construction (s4.3)	Very thin – interesting to see if SCDC means 4.3.3 and whether acceptable to Parishes.	Is this relevant and supported by National and Local Plans?
Food growing (s4.4)	Allotments and community orchards in POS alongside sports pitches etc? – have they forgotten that villages still have farms?	Is this relevant and supported by National and Local Plans?
Smart technologies (s4.5)	Technology to improve construction; smart mobility (very anti-car); and smart grids with dated efficiency data based on coal-fired generation. Smart cities and smart places deploy toys and infrastructure that are more appropriate to high density wifi-rich places like San Francisco (and maybe Cambridge) than rural SCDC.	Is this relevant and supported by National and Local Plans?
Responsible sourcing (s4.6)	Source verification of materials is likely to add significant costs with minimal tangible benefit.	Is this relevant and supported by National and Local Plans?

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App 1 Checklist (p174)	Not clear how this is “marked” Is there a pass/fail? How will appeals work? Is it a “general conformance” or “absolute compliance” test?	
App2 Carbon reduction (Cambridge) (p184)	Cambridge specific	
App 3 Gas-fired CHP (p185)	Probably irrelevant to SCDC as AQMA should be eliminated by A14 work.	
App 4 Home Energy questionnaire (p190)	Cambridge specific	
App 5 Carbon-reduction (p194)	SCDC Report carbon reduction form	
App 6 Lighting schemes (p196)	More guidance on lighting – would this be enough on its own?	
App 7 Contaminated Sites (p200)	Noddy’s guide to development process for contaminated sites	
App 8 Noise (p221)	27pp. Yet more on noise pollution	

Comment

This may affect you one day. The full 250+ page draft SPD is here: <https://www.scambs.gov.uk/media/13754/draft-sustainable-design-and-construction-spd-without-foreword.pdf>

There is loads of supporting material, including how to comment, here: <https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/sustainable-design-and-construction-consultation-spd/>