

# Foxton Neighbourhood Plan

## Response Form



This form has two parts to complete (please use black ink):

**PART A – Your Details**

**PART B – Your Response**

If you need any further information or assistance in completing this form please contact the Greater Cambridge Shared Planning Policy Team on: 01954 713183 or

[neighbourhood.planning@scambs.gov.uk](mailto:neighbourhood.planning@scambs.gov.uk)

**All comments must be received by 5pm on Tuesday 28 April 2020.**

### Data Protection

We will treat your data in accordance with our Privacy Notices: [www.scambs.gov.uk/planning-policy-privacy-notice/](http://www.scambs.gov.uk/planning-policy-privacy-notice/). Information will be used by South Cambridgeshire District Council solely in relation to the Foxton Neighbourhood Plan. Please note that all responses will be available for public inspection and cannot be treated as confidential. Representations, including names, are published on our website. **By submitting this response form you are agreeing to these conditions.**

**The Council is not allowed to automatically notify you of future consultations unless you 'opt-in'.**

Do you wish to be kept informed of future stages of the Foxton Neighbourhood Plan?

Please tick: Yes  No

### PART A – Your Details

Please note that we cannot register your comments without your details.

<b>Name:</b>	Prof JSL McCombie	<b>Agent's name:</b>	
<b>Name of organisation:</b> (if applicable)	N/A	<b>Name of Agent's organisation:</b> (if applicable)	
<b>Address:</b>	██████████ ██████████ ██████████	<b>Agent's Address:</b>	
<b>Postcode:</b>	██████████	<b>Postcode:</b>	
<b>Email:</b>	██████████████████	<b>Email:</b>	
<b>Tel:</b>	██████████	<b>Tel:</b>	

**Signature:**

**Date:**

*If you are submitting the form electronically, no signature is required.*

## PART B – Your Response

For office use only

Agent number:

Representor number:

Representation number:

**What part of the Neighbourhood Plan do you have comments on?**

**Policy or Paragraph Number** (please state)



**Do you Support, Object or have Comments?**  
(Please tick)



**SUPPORT**



**OBJECT**



**COMMENT**

**Reason for SUPPORT, OBJECT or COMMENT:**

Please give details to explain why you support, object or have comments on the Neighbourhood Plan. If you are commenting on more than one policy or paragraph, please make clear which parts of your response relate to each policy or paragraph

If you consider that the referendum boundary should be extended please outline your reasons.

Please see attached document

Section 8. Employment and Policy and FOX/16

**Summary of Comments:**

If your comments are longer than 100 words, please summarise the main issues raised.

Site Allocation of Burlington Park for commercial development. Two errors of fact and suggestions for improving the text of Section 8 of the FNP

**COMPLETED FORMS MUST BE RECEIVED BY 5PM ON 28 APRIL 2020 AT:**

Email: [neighbourhood.planning@scambs.gov.uk](mailto:neighbourhood.planning@scambs.gov.uk) or post it to:

Greater Cambridge Shared Planning Policy Team  
South Cambridgeshire District Council,  
Cambourne Business Park, Cambourne,  
Cambridge, CB23 6EA

**Comments on *Foxton Neighbourhood Plan (February 2020)* [FNP] and *Foxton Neighbourhood Plan Consultation Statement (December 2019)* [FNPCS] with respect to Section 8. Employment and Policy FOX/16 of the FNP.**

My comments are primarily confined to issues arising from Section 8. Employment, pp. 72-73, (together with Figure 30B, p.86) and Policy FOX/16, "New Employment Provision in Foxton", of the FNP (February 2020).

In a previous comment on the pre-submission Foxton Neighbourhood Plan (April 2019), I questioned the desirability of the FNP allocating a green-field part of Burlington Park as a site for commercial development. This is because it presupposes that some form of development should occur, even though there is no demand from Foxton residents for new employment in the Village and there are serious problems of access to the site. (See below.) Of course, not specifying part of Burlington Park as a development site does not preclude a planning application for development being made. This site allocation still remains as a policy in the FNP (February 2020).

My first two observations below are based on issues arising from my previous comments on the pre-submission version of the FNP (February 2010) and the response to these, as reported in the Foxton Neighbourhood Plan Consultation Statement (FNPCS, p.57). *The latter contains two important factual errors which, given that the FNPCS is a formal planning document and is part of the planning process, should be corrected.*

1. **Local Employment in Foxton.** An objective in the FNP with regard to employment policy FOX/16 is "**To provide appropriate high-value local employment**" (p.72). This is to be accomplished, *inter alia* by expansion of businesses on the Burlington Park site. In my original response, I noted by extrapolating from a survey of Foxton businesses, less than **3 percent** of employees live in Foxton. The FNPCS, p.57 mistakenly reports my figure as **30 percent**. (The FNP, p.23, confirms my figure as it states that the number is 3 out of 112 employees). This error is misleading to Foxton residents assessing the FNP as the 30 per cent figure suggests that a high proportion of any

new employment is likely to live in Foxton, whereas the converse is true. The benefit of expansion of commercial activities on the Burlington Park site in terms of a "wider range of *local* employment opportunities" (South Cambridgeshire Local Plan, 185, emphasis added) is likely to be of very small benefit to Foxton residents.

2.1 **Access to and from the Burlington Park Site.** One of the major problems with any further development on the Burlington Park site is the impact of increased traffic entering and leaving the site on to the High Street and Station Road. There is already a planning restriction on the High Street entrance to the Burlington Park Site, in that traffic is only permitted to enter, and not leave, from this access. As pointed out in my initial response the AECOM assessment of suitability of the Burlington Park Site for development surprisingly did not consider the adverse impact of the generation of additional traffic. Furthermore, the Parish Council in its objection on a subsequently refused application to build an office on this site (S/0604/18/FL) highlighted this problem (complete with photographs). (See Annex 1 below).

2.2 In response to my comments on this serious traffic issue, FNCS, (p.57) merely states "***In refused application, access to the site was from A10 so may mitigate traffic impact***". This is factually incorrect. The Design, Access and Planning Statement (DAP), (Pleasance, Hookham & Nix, February 2017) of the S/0604/18/FL application states "access will be from the entrance off the High Street". (The DAP seems to be unaware of the prohibition of exiting from this access point.) There is no mention of access to the A10. Furthermore, from FNB, Figure 30B, it can be clearly seen that there is no possibility of access to the A10 from the site. It is disconcerting that this error may have affected the arguments used in favour of FOX/16 in the FNP.

2.3 The increased vehicular traffic generated by any business development of this site is likely to contradict the intent behind Policy FOX/18 "New Development and Connectivity" (p.79) to reduce traffic congestion in the Village.

- ❖ I suggest that in the Policy Box FOX/16 (p.73) "• do not create unacceptable additional traffic impacts" should be amended to include "including those arising from access to the site", or some such phrasing. I appreciate the latter is implied by the former, but questions of access are likely to be of major concern in any planning application.

## Other Comments

3.1 **The demand for new employment by the Villagers.** The FNP, para. 8.6, states that there was "strong support for redeveloping vacant business premises, followed by expanding existing sites" by the Foxtton residents. However, the FNP omits to state that there is **no** strong support for the expansion of *any* employment in Foxtton. For example, in the Foxtton Parish Council's *Taking Control of Foxtton's Future* in answer to the question "Which potential developments are perceived as beneficial to Foxtton?" only 14% identified "more jobs and businesses", which was ranked 15th out of 17 categories in descending order of priority. Furthermore, in answer to the question "What worries residents about future development in Foxtton?" only 6% reported "fewer jobs and businesses". The FNP itself seems to concede this point, as the objective "To facilitate employment of Foxtton residents" in the FNP (April 2019) has been deleted from the revised submission plan (February 2020).

- ❖ I suggest that under 8.6 of the FNP (**New Employment Provision in Foxtton: Background and Justification**) the inclusion of the sentence "There was little support for new local employment by Foxtton residents", or some such wording. While this is not a requirement of the National Planning Policy Framework (February 2019), it is desirable that it be included in the FNP in the interest of balance and objectivity.

4. **The AECOM Assessment of the Burlington Park Site.** As noted above, the AECOM assessment of the site ignored the problems of traffic access to the site. Nevertheless, the report characterised the site as having "High sensitivity to development". This is defined in the report as "High Sensitivity. Development would be within an area of high quality landscape or townscape character and/or would significantly detract from local character. Development would lead to the loss of important features of local distinctiveness – *without the possibility of mitigation*" (emphasis added). This is a conclusion that I would agree with. But it is difficult to see the rationale for the report not concluding that "The site is not appropriate for allocation", even ignoring the vehicular access problem.

5.1 **Other suggestions to clarify certain issues in FOX/16.** These are the following proposed changes to the FNP.

- ❖ Paragraph 8.2 (FNP, p.72). "Although a small village" should read "Although a small **Group** village". This is because the designation as a Group village has important implications for Foxton in the South Cambridgeshire Local Plan.
  
- ❖ Paragraph 8.5 (FNP, p.72). "Local Plan Policy E/12 New Employment Development in Village supports new employment or expansion in villages" should contain the following sentence "Only very small scale proposals are likely to be acceptable at Group [such as Foxton] or infill villages". This quotation is taken from the South Cambridgeshire Local Plan ( para.8.52, p.185). The concept of "small scale" is important for the consideration of any commercial development in Foxton.
  
- ❖ In Box FOX/16, the following changes are suggested:

“Development proposals for commercial use are supported provided that **they fulfil the relevant planning requirements,** including.” This is because the subsequent list does not cover the full planning requirements, although it highlights some important ones.

  - “Do not unacceptably affect residential amenity arising from disturbance such as noise, **environmental and light** pollution. HGV vehicle movements". Light pollution from an office block that is very close to a residential area, such as the nearby 22 houses in Burlington Place, can be obtrusive.
  
  - "Include appropriate landscaping to minimise the impact on adjacent listed buildings, **conservation area and residential buildings**". The last two are also important.

5.2 Finally, there is no mention, in either the text or the maps of the FNP, of the recent development of **22 houses in Burlington Place**. This residential development is very close to the allocated site and will clearly be affected by it and will need to be taken into account in any planning application. It should be explicitly mentioned in the FNP.

6. While it is apparent that I have some reservations about the proposals in the section "8. Employment" of the FNP and their justification, generally the FNP has been prepared with a great deal of care and effort and all those involved are to be congratulated.

I should like to emphasise have no reservations about any other aspect of the FNP, which I fully commend.

16 April 2020

## Annex One

A.1 The Foxton Parish Council in its objection to this application (S/0604/18/FL) highlighted the traffic congestion problem on the High Street and Station Road. It states:

The problems that will be caused by intensification of the access off Foxton High Street are dismissed by a wholly inadequate and unqualified statement on page 5 of the Design, Access and Planning (DAP) Statement. This takes no account of the narrow High Street or the adjacent junction with Station Road (which has no visibility when turning right out of Station Road to Burling Park access). The DAP Statement makes no mention of the relevant planning history on this site – planning permission for application S/1043/09 (access from Foxton High Street) was granted subject to stringent conditions, which renders intensification of this access inappropriate. Access and egress from the site onto Station Road (via the existing large commercial access) would be more appropriate, but the Parish Council would highlight the current problems and safety issues experienced by residents, which is clearly shown on the following photograph:

