

MIDDLETON PARISH COUNCIL

Mr Gavin Ferries
Planning Department
Corby Borough Council
Deene House
New Post Office Square
Corby
Northamptonshire
NN17 1GD

19th March 2014

Re: Outline Planning Application for the development of up to 75 dwellings on land off Bury Close, Cottingham (ref 14/00094/OUT) dated 28 Feb 2014

Dear Sir,

At its meeting of 12th March 2014, Middleton Parish Council resolved to object to this application. The council's reasons for objecting are given in the attached response document.

Yours faithfully

DW Phillipson
Chair
Middleton Parish Council

Correspondence to: Mrs J. Medwell, Parish Clerk, Middleton House, Main Street, Middleton, Market Harborough LE16 8YS

Outline Planning Application for the development of up to 75 dwellings on land off Bury Close, Cottingham (ref 14/00094/OUT) dated 28 Feb 2014

Middleton Parish Council objects to this outline planning application for the following reasons.

Objection 1

The proposal does not accord with the aims and objectives of the National Planning Policy Framework.

The application proposal fails to meet the requirements of the NPPF as a sustainable development on the following grounds:

- **Economic**

It does not contribute to building a strong, responsive and competitive economy for the local community. In this rural location, save for a small community shop, three small public houses and a small golf club, there are no obvious local business beneficiaries of the claimed potential income spend from the new residents of the proposed development. The local community cannot therefore benefit from any re-distribution of this perceived locally generated wealth.

Residents of the development will, like the existing community, be forced to travel and spend their money some distance from the parish for their shopping, leisure activities, medical facilities and employment. There is no evidence of any employment prospects for local people during the construction stage, or afterwards as a result of the development. There is no evidence therefore of any economic benefits to the local community from the proposal, indeed further wear and tear on local roads, footpaths, and increased noise, air and light pollution may well contribute to additional costs for the local community.

The proposed site has the designated long-distance footpath, the Jurassic Way, abutting its southern boundary. This footpath is an important amenity attracting many walkers to the locality who use the village shop and public houses. Because of its overwhelming scale and intrusiveness in the landscape, the proposed development will have a detrimental impact on the quality and enjoyment of the Jurassic Way walking experience. There is a real risk of a reduction in numbers of visiting walkers, and consequent loss of their contribution to the local economy.

- **Social**

It does not contribute to supporting a strong, vibrant and healthy community. The applicant has produced no evidence of housing need, either Market or Affordable from within the local community. The most current data available from the 2009 Cottingham Parish Plan and a 2011 Housing Needs Survey carried out in Middleton indicate little or no requirement for additional housing for local community needs. Based on the significant number of objections to this proposal from the local community, the development may be predicted to create long-term resentment and anxiety within the existing community, which does not accord with the aims of the NPPF in supporting its health, social and cultural well-being.

- **Environmental**

The application proposal, in every aspect, fails to meet the environmental objectives of the NPPF. The proposal does not protect or enhance the natural, built and historic environment. The proposal site is in open countryside, and within a designated Special Landscape Area, which is a local authority designation, but the NPPF states "It (the NPPF) provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities." For this to be meaningful in a planning sense, we must assume that considerable weight should be given to local landscape designations.

Because of the site's rural location and the limited but typical infrastructure of the village, the proposed solutions for providing essential utilities (drainage, sewage, electricity, gas and

communications) demand extensive, high carbon works that are out of proportion for housing in a rural location. There is no reason to believe that the residents of the proposed development will adopt travelling habits any different to existing village residents. It follows that many more motor vehicle journeys will be created, along with increased noise, air and light pollution in the locality. These factors do not accord with NPPF objectives for moving to a low carbon economy.

- **Supporting Sustainable Transport**

The impact of the proposed development on traffic levels in Cottingham and Middleton will be severe. The applicant has provided a comprehensive traffic report, but this deals mainly with traffic well away from the affected villages of Cottingham and Middleton. The applicant claims that because of possible future housing developments on the outskirts of Corby (e.g. West Corby SUE), and the consequent increase in traffic, the proposed development will have a relatively negligible impact on total traffic flows in the future. There is no certainty that any future SUE will happen in the area, so we can only take into account the effects of this proposed development and its effect on the current traffic numbers.

The report shows that significant queuing of traffic occurs on the A6003/A427 junction at peak times, a situation that would clearly be made significantly worse by the additional vehicle journeys created by this proposal. The introduced traffic problem would be much worse on the limited-capacity local village roads, and streets. Even based on the information in the applicant's report, 75 new dwellings could realistically introduce 150 additional cars or vans, each making two two-way trips per day, from/to the villages. This translates to a possible 300 additional vehicle journeys all travelling through the existing small residential street of Bury Close, and out onto Main Street Middleton where they would need to go through the heart of Cottingham village and past the village primary school, or go the other way, past Wellingtons pre-school nursery (data taken from Cottingham Parish Plan 2009-Appendix A).

Main Street is at most times a 'single track' road due to necessary on-street parking for residents, and this increase in traffic will have a severe impact on the villager's quality of life. The traffic report does not appear to take into account the inevitable additional ongoing traffic created by service and delivery vehicles to the site after completion, nor visiting vehicles for social and family reasons, which can be significant for family oriented housing developments.

The applicant's traffic report uses data from the 2001 Census, which is outdated for this purpose, and although it may be the only source of data available, we are entitled to allow a large margin of error to the results, which given the national trend for ever increasing car usage (Department for Transport Forecasts of Road Traffic in England and Vehicles in Great Britain – see Table TRA9905), can only make the inevitable additional traffic a more serious problem than the report suggests, now and in the future.

The application includes a Residential Travel Plan, which suggests that the travel habits and preferences of the residents of the proposed development could be changed to encourage less motor vehicle use. This plan is more suited to an urban development with close proximity to an extensive public transport system and/or a safe network of cycle-ways and footpaths. It is unrealistic to apply this plan to a rural location where there are limited bus services (hourly, last journey time about 6.30 pm, little or no Sunday service). The nearest towns with shopping, post office, leisure and medical facilities are Corby and Market Harborough. Cycling or walking to these towns from the new development is not a realistic prospect for the vast majority of residents, due to the unsuitability of the connecting highways which are national speed limit roads with no cycle tracks and few or no footpaths or pedestrian crossings.

The Residential Travel Plan lacks credibility, and cannot be relied upon to mitigate the inevitable increase in motor vehicle journeys locally and so should not be taken into account when determining this application.

This proposal is for a development that is not sustainable as defined by the NPPF. Accordingly, this application cannot meet the criteria for approval by 'Presumption in Favour of Sustainable Development'. Even in the event that it did meet the sustainable criteria, there are clear adverse

impacts that would significantly and demonstrably outweigh those benefits claimed by the applicant. There are no benefits that can be claimed for this proposal. We address the applicant's claimed benefits below.

- **The applicant claims "...the provision of up to 75 much needed, high-quality, energy efficient family homes (including affordable houses)."**
There is no evidence of need for market or affordable housing from the local community, indeed contrary evidence exists and the term "much-needed" is without foundation, and therefore, no benefit exists in this context.
- **The applicant claims "...in a sustainable location with easy access to local shops and services."**
This is plainly not the case. There are no local shops suited to traditional family shopping, e.g. supermarkets, post office, specialist retailers, fast food outlets. There are no local services such as medical, dental, pharmacy, library, and council offices. If the applicant defines 'easy access' as being easily accessible by motor transport then the claim is correct, but if accessibility is exclusively by motor vehicle, then that cannot be defined as sustainable, and contradicts the applicant's own assertion in the Travel Plan that the travel habits and preferences of the residents of the proposed development could be changed to encourage less motor vehicle use. In realistic, practical terms, these shops and services are only accessible by a motor transport journey of some kind, and accordingly the proposed development site location cannot be connected with a sustainable benefit.
- **The applicant claims "...a significant boost for the local economy through the attraction of additional spending power to the Cottingham/Middleton area, with spin-off benefits for local businesses."**
Apart from one small community shop, three small pubs, and a small golf club, there are no other channels for the claimed "spending power". The vast majority of any spending power will be exercised outside the local area, and cannot be of benefit to the local community. The local economy may actually be damaged by the proposed development, in a special landscape area and alongside the Jurassic Way walk, if it repels potential visitors from the locality. There is an objection to this proposal from a walking club in the district of around 100 members, most of who come to the village from the surrounding towns of Corby and Kettering, which lends weight to this risk. The walking club visits the village twice a week to walk the Jurassic Way.
- **The applicant claims "...the creation of a significant number of jobs during the construction phase."**
There is no evidence nor any guarantee that any new jobs will be created (i.e. defined as people becoming newly employed, who were previously unemployed). Even less evident is how any new employment will come from within the local community.
- **The applicant claims "...the attraction of funding through the New Homes Bonus scheme."**
This is an outline planning application with no known timescale for the completion of any construction, so it is not possible to factor in a time-limited government scheme that may end or change before the development is commenced. There is no guarantee the development will qualify for any such scheme in the future.
- **The applicant claims "...newly landscaped public open space for the local community to use and enjoy."**
This is an outline planning application with no assurances of the final design or layout of the proposed development. Although an indicative plan is provided, it illustrates only approximately 20 dwellings, and it is difficult to see how a public open space (of any practical, useful size) can be accommodated on the site if 75 houses are built. In any event, it is unlikely that a relatively small open space within an intensely developed housing site would be of any interest or benefit to the existing community who already have access to local public open spaces and open countryside.

No weight should be given to any of these so called 'benefits' claimed by the applicant.

Objection 2

The proposal does not accord with the Local Planning Policy. The proposed development would conflict with the following Corby Borough saved Local Plan policies contained within the North Northants Core Spatial Strategy (NNCSS).

Policy P1(E)

"P1(E) Proposals for development should:

- *retain or replace as appropriate, woodlands, trees, hedgerows and other natural features and should include arrangements for future maintenance;*
- *incorporate appropriate landscaping and planting proposals of mainly native species;*
- *in respect of buildings, reflect the general character of the area through layout, siting, design and materials, particularly in Conservation Areas;*
- *not intrude into the setting of important buildings, landscape features or prominent views and should not involve the development of open land within the framework of a settlement, which is important to the general character and appearance of the locality."*

The proposed development would severely intrude on the setting of Cottingham Hall, a Grade 2* listed building. There would also be an intrusion or obliteration of the landscape features and prominent views of the Welland Valley, a designated Special Landscape Area.

The site is visible from significant parts of the villages of Cottingham and Middleton. The site is also visible from many parts of the Welland Valley, including from the village of Bringham. The detrimental impact of this proposal on the general character and appearance of the locality is severe.

Policy P2(V)

"New residential development at Cottingham, Middleton, Stanion and Great Oakley will be on a small scale and within the existing confines of the village. Exceptions to this will only be considered under the terms of Policy P5(V)".

Proposals for development may include small groups of dwellings, infilling and redevelopment or change of use of existing buildings. In determining Proposals for such development, consideration will be given to:

- i) the impact of the proposal on the form, character and the setting of the village, and on
- ii) the community and its local environment;
- iii) the ability of local services to accommodate the development;
- iv) the requirements of agriculture and the need to protect the best and most versatile agricultural land from development, which is irreversible;
- v) the need to protect open land which is of particular significance to the form and character of the village;
- vi) the need to avoid a cramped form of development or one which adversely affects the setting and amenity of existing buildings or open spaces, especially where this would adversely affect the character of a conservation area.

At the time of the 2001 census, the population of Cottingham parish was 912 persons. A proposal to add some 150+ persons cannot be defined as "small in scale". The proposed development is large scale, outside the existing confines of the village, and does not qualify for consideration under policy P5(V).

Policy P5(V)

"In order to help meet specific local needs for affordable housing that would not otherwise be met, the Local Planning Authority may exceptionally consider granting planning permission on land where permission would not normally be granted. Schemes should be small scale and closely related to existing villages and be accommodated without undue harm to the environment. It is important that schemes should ensure that the benefits of low cost housing can be enjoyed by subsequent as well as by the initial occupants. Any land released under this policy will be additional to that allocated to meet general housing demand."

Local Needs – preamble to Policy P5(V) Corby Borough 1997 Local Plan “The District Villages”
“The Council recognises that the provision of affordable housing is important in meeting local needs in the rural areas. It may be possible to grant permission as an exception to the Local Plan Policies for such a scheme, provided that the necessary conditions and requirements are met. In particular, the Council will wish to ensure that the benefits of low cost housing are enjoyed by subsequent, as well as the first, occupants. The use of planning agreements, as well as other management arrangements will be considered.

“Local needs should generally relate to the parish in which the site is located or the immediately adjacent parishes. Planning permission is likely to be granted only where:

- i) a local housing needs survey has been carried out establishing the local need for housing of the type and at the rent or price proposed;*
- ii) affordable housing could not be expected to be provided elsewhere in the settlement in question;*
- iii) the proposal is small in scale and the site adjoins the existing built-up area of the settlement;*
- iv) a housing association or local charitable trust will manage the dwellings and, with the landowner, enter into a planning agreement with the Council to ensure that the benefits of the affordable housing will be enjoyed by all subsequent as well as the initial occupiers.”*

The applicant seeks to use this policy to gain exceptional permission for development outside the village confines. No evidence of local (parish) need exists, indeed there is evidence to the contrary. The applicant cannot offer any commitment to the prices, rents, suitability or location of the proposed affordable dwellings at this stage, because the application is Outline.

In any event, the proposed development would not qualify under this policy due to its large scale, and its severe impact on the local environment and landscape. Accordingly, no consideration should be given to the applicant’s references to Policy P5(V).

Policy P10(E)

“P10(E) Proposals for development in the open countryside will not normally be permitted. Particular regard will be paid to the Special Landscape Areas and the need to avoid visual intrusion, especially in the Welland Valley.”

The proposed development is in open countryside, in a Special Landscape Area and would create a severe visual intrusion in the Welland Valley. The NNCSS lists the Jurassic Way as a key piece of Green Infrastructure – a Sub Regional Corridor. ‘Policy 5 – Green Infrastructure’ (NNCSS, p35) seeks to protect such corridors from inappropriate development. The Jurassic Way runs very close, alongside the proposed development site and the proposal would reduce the visual amenity of users of the route, disturb the historic context and reduce biodiversity, all of which are contrary to ‘Policy 5’.

Conclusion in relation to Local Planning Policy:

The saved Local Plan policies referred to in our submission have been formally reviewed by Corby Borough Council (Local Plans Committee 12/09/2012) and were found to be fully consistent with the aims and objectives of the NPPF. There is no evidence to support the applicant’s claim that “the majority of the saved Local Plan policies are very out of date, and are not consistent with the NPPF.”

The applicant seeks to gain exemptions to the requirements of several Local Planning Policies by claiming that the supply of housing data for Corby is out of date. This has not been proven nor tested, and is disputed, so the claim should not be given any weight. In any case, even if the housing data is out of date, the NPPF is clear that permission should not be given if there are “clear adverse impacts that would significantly and demonstrably outweigh those benefits claimed by the applicant” which we submit applies in this case.

This, coupled with the unsustainable nature of the proposal provides every reason to refuse outline planning permission for this application.

Corby Borough Interim Housing Statement (IHS)

The applicant disputes the validity and/or accuracy of the IHS data, and seeks to justify exceptions and contradictions to national and local planning policies by drawing on out-of-date data from the now

revoked Regional Spatial Strategy. We submit that the Interim Housing Statement agreed by the North Northants Joint Committee on 9th January 2014 provides the most up-to-date data and predictions on Corby borough housing needs, including independent evidence from the Cambridge Centre for Housing and Planning Research (CCHPR) and therefore should be given full weight in the determination of this application.

In any case, both the Regional Spatial Strategy and the Interim Housing Statement contain information based on forecasts and predictions, neither of which may prove to be correct in the future.

These housing data uncertainties, along with this proposal's contradictions with national and local planning policies, the indisputable absence of sustainability and the severe impact on a designated local amenity make the refusal of this application the only possible safe decision.