

Burloes development comments – June 2024

24/01013/OP

Hybrid application for residential development of up to 325 dwellings comprising (a) full planning application for Phase 1 comprising 102 dwellings and associated infrastructure including access from Newmarket Road, emergency and pedestrian/cycle access from Burloes Hall Drive, internal highways, public open space, landscaping and drainage and b) outline application for up to 223 dwellings and associated infrastructure with all matters reserved apart from primary means of access and emergency and pedestrian/cycle access from Burloes Hall Drive.

Summary

As a ward councillor for this area, I accept the principle of development on this site – it has had outline planning previously approved and the site is in the Local Plan. I also recognise the need to meet local housing needs within the district.

However the application documents raise a number of significant concerns which I would like to flag for further consideration and/or to seek assurances over.

These concerns fall into the following categories:

1. Transport Assessment – First School
2. Transport Assessment – Middle/Secondary School
3. Transport Assessment – Food Retail
4. Transport Assessment – Leisure
5. Highways Access suitability
6. Valley Rise / Bury Plantation pedestrian access
7. Open space provision
8. Affordable housing provision
9. Eco statement vs Sustainability SPD
10. Overhead powerline
11. Healthcare provision

1. Transport Assessment – First School

Concerns:

- Table 3.1 (page 11) of the Transport Assessment lists Icknield Walk First School is the closest primary school, at a distance of **950m**.
- 3.2.3 states *The proximity demonstrated in Table 3.1 ensures that these trip attractors can be accessed by modes other than the private car and realistically on foot by most able-bodied residents*
- This assumption is flawed since it is unlikely that IWFS will accommodate children from this site.

- Hertfordshire admissions data from 2023 shows that the school received **193** applications for **60** available places.¹ It is consistently the most oversubscribed primary school in the town.
- The same admissions data shows that in 2023, the distance of the furthest child admitted to the school in 2023 was **851.66** metres – **98 metres** closer than the distance provided in the Transport Assessment for this site. The school allocated only one place based on distance.
- The Hoy development (north of the development site) for which IWFS is also the nearest school, is also still under construction. This is closer to the school than the proposed development, further reducing the likelihood that IWFS will be able to accommodate.
- It cannot therefore be assumed that children living on this development would be wholly accommodated within IWFS. It seems likely that they would instead be reliant on transport routes to other schools within the town.
- I note there is provision being made for an additional primary school at Ivy Lane in the west of the town. This is necessary to provide additional capacity, but it does not mitigate the transport impact of this development since it is on the other side of the town.
- Even assuming that children from this development could be accommodated at IWFS, the net effect of this development would be to displace children living in other parts of the town who would otherwise have attended IWFS i.e. they will now need to travel to other schools in the west of the town, or across the county border into Cambridgeshire, with the consequent increase in travel distances this implies.
- These factors point to the development driving an increase in journeys and travel time across the town for primary school attendance. By their nature (i.e. transport of primary school age children), it seems reasonable to assume a high proportion of those additional journeys will be by private car, and at peak times.
- I therefore cannot see that the statement in 3.2.3 is accurate and I am concerned that the impact of the development on traffic movements has been underestimated.

Questions:

- Have these considerations been taken into account within the Travel Plan and Highways Assessment?
- What mitigations are being considered to reduce the likely increase in transport by private car arising from the development for primary school purposes?

2. Transport Assessment – Middle/Secondary School

Concerns:

- Table 3.1 (page 11) of the Transport Assessment lists Greneway Middle School and Meridian Secondary school as the nearest Middle/Secondary school provisions.

¹ <https://www.hertfordshire.gov.uk/media-library/documents/schools-and-education/admissions/previous-years-stats/23-24/application-allocation-stats-primary-allocation-day-23-24.pdf> - page 35

- These schools ceased to exist in September 2019, following the merger into King James Academy.
- Whilst inconsequential in terms of transport impact, this suggests that the report has not been adequately reviewed since the time of the original application.

Questions:

- Was the Transport Assessment and Travel Plan reviewed and updated prior to the submission of the new application?

3. Transport Assessment – Food Retail

Concerns:

- Table 3.1 (page 11) of the Transport Assessment lists Morrisons, Icknield Stores and Tesco Express under Food Retail.
- Morrisons closed in 2021 and is currently owned by McCarthy Stone, who are widely expected to bring forward a planning application for change of use.
- Icknield Stores and Tesco Express are small convenience stores and cannot serve the food retail needs of a development of this size.
- Since the closure of Morrisons, the Food Retail market in Royston has been dominated by the large Tesco Extra, recently joined by Aldi and M&S, all within the North-West of the site. These stores are approx. 2.5km away from the proposed development - out of realistic reach for even able-bodied shoppers, particularly when laden with shopping on the return journey.
- People will drive to get food. This development will contribute to more cars on the roads around Royston and I am concerned based on the flawed assumptions within the transport assessment that the impact of this on the local traffic network has been understated.

Questions:

- Have these considerations been taken into account within the Travel Plan and Highways Assessment?
- What mitigations are being considered to reduce the likely increase in transport by private car arising from the development for food retail purposes?

4. Transport Assessment – Leisure

- Table 3.1 (page 11) of the Transport Assessment lists Royston Leisure Centre (24 mins), Royston Town Football Club and Royston Town Centre as available leisure options.
- 3.2.4 states *It is acknowledged that, for some residents, some of these walk distances maybe excessive* - and presents the town bus service as a mitigation.
- The travel distances listed in this section highlight that this development will be largely isolated from the rest of the town and that access to leisure options will be rather limited.
- The absence of any leisure options within comfortable walking distance will encourage increased transport by private car, particularly towards the town centre.

- Moreover, Local Plan policy *SP10: Healthy Communities* states that the council will *Require appropriate levels of new community, cultural, leisure and built sport & recreation facilities to be provided in new development*
- There is a real need for additional community space within easier access to the east of the town, following the cumulative effects of the Hoy development, the proposed development, and the existing residences.

Questions:

- Can provisions be made within the development for a multi-purpose community venue? Perhaps in return for a slightly lower housing density, noting that the proposal is for 325 houses vs the Local Plan allocation of 300 houses. This would considerably improve the benefits provided by the proposed development.
- Alternatively, can the S106 agreement seek funding for the development of a multi-purpose community venue elsewhere in the east of the town - perhaps situated on part of the NHDC owned Newmarket Road recreation ground?

5. Highways Access suitability

- The cumulative effect of points 1-4 is that transport by private car arising from the development is likely to be higher than has been assumed within Transport Assessment.
- This brings into question the proposed access arrangements and their suitability i.e. a single priority junction from Newmarket Road.
- Additionally, there is longstanding public concern about speeding on Newmarket Road – this features consistently in residents' priorities for policing within the town.² This section is particularly prone to speeding, being closer to the A505.
- The officer report for original application for this site (17/00110/1) stated that *"Given that a single vehicle access to Newmarket Rd was a major planning concern for the proposals of the Hoy Site (RY2), requiring the plans to be reconsidered, the planning authority should not give permission until these new plans are fully assessed."*
- The officer report for Hoy Site, which was for a site of substantially similar size (330 homes) stated that: *"At the time the application was submitted in October 2014, it was envisaged by the applicant that the access to the site would be taken from Newmarket Road. However, following discussions and advice from the highway authority, it was established that the proposed junction design and location on Newmarket Road would not be acceptable for the predicted volume of traffic or in highway safety terms."*
- The Hoy development access was ultimately resolved by the construction of a new dedicated access via a roundabout from the A505.
- I am concerned that this development presents substantively the same issues and yet the proposed access does not deal adequately with them.

Questions:

- In what substantive ways does the proposed access differ from the unsuitable access originally proposed for the Hoy development?

² <https://www.inyourarea.co.uk/news/tackling-anti-social-behaviour-and-speeding-among-new-royston-policing-priorities/>

- What mitigations are being put in place to address the concerns arising from the proposed development?
- Will there be any additional traffic calming to reduce traffic speeds?
- Will the updated Highways Assessment consider the problematic assumptions identified within the Transport Assessment in evaluating the proposed access?

6. Valley Rise / Bury Plantation pedestrian access

- 4.4.8 of the Transport Assessment indicates that *pedestrian connections to Bury Plantation will be provided to the west*.
- The Access and Movement Parameter Plan indicates two accesses, one to the north-west at Aintree Road and the other to the south-west at Saffron Street.³
- 4.15 of *Planning Statement Updated 13.05.24*, however, states that this access is proposed only “subject to deliverability”.
- These access points would provide more convenient pedestrian and cycle access both to Studland Rise First School and to the town centre, by negating the need to twice cross, and walk several hundred metres alongside, the busy Newmarket Road. In doing so they could mitigate to some extent the impacts on the transport network highlighted above. They would also enhance the feeling of the new development being joined to the town, rather than remote from it. Sensitive treatment would need to be given to the existing habitats on the Bury Plantation.
- These access points are, in my view, essential to the proposals, however the caveat “subject to deliverability” suggests this access is not yet secured.

Questions:

- Can the provision of these pedestrian and cycle access points be secured?

7. Open space provision

- The open space provision is approximately 3ha, significantly below the recommended levels for a development of this size.
 - The Fields in Trust Standard, which the Council has adopted, suggests that a development of this size should provide at least 4.4ha.
 - This site is also within the Therfield Heath SSSI and so a higher standard is sought – suggesting 6.24 is required.
- The Planning Statement suggests that this is mitigated by the LEAP, the length of the perimeter path, and access to other green space including signalised access to Newmarket Road recreation ground opposite.
- The proposals for signalised access to the recreation ground is necessary and the additional proposals for footpaths joining to Newman Avenue are also welcome.
- However it should also be remembered that this recreation serves a large existing estate, and will also serve the Hoy development which adjoins it to

³ https://documentportal.north-herts.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=E6F43F44C5F24A27B3913651FE993567

the East. This is evident in S106 funding from the Hoy development for improvements to the equipment.

- The Council's Therfield Heath Mitigation Strategy (5.5.4) already highlights "*a lack coherent north-south links in the rights of way network to the east of Royston as well as a general underprovision of alternate natural and semi-natural open space.*"⁴ 5.5.10 suggests a further crossing point to join with the Icknield Way should be explored, whilst 5.5.11 suggests long-term use of paths to the south and east of the site should be secured. 5.5.12 suggests that the permissive paths around the Burloes development should be connected to the rights of way to the south. The action plan on page 60 calls for these connectivity improvements to be pursued. However I could see no mention these within the proposed development (albeit there is a contribution to Therfield Heath conservation within the original S106 agreement).
- Moreover, Royston has a recognised shortage of allotment space within the town. The allotments standard under Fields in Trust is 0.3 hectares per 1,000 people. Royston currently has 0.11 hectares of allotment provision per 1,000 people.⁵ Existing plots are half the recommended size and there are approximately 130 people on the waiting list, with up to twenty places becoming available in a typical year. Providing more housing without any increase in allotment provision within the town will impact this ratio still further and add to the waiting list which is already several years long.
- I am concerned that the proposals are overly reliant on the existing open space infrastructure and do not provide sufficient additional benefit to the town to mitigate for the use of the existing shared space
- I am also concerned about the precedent of the Council compromising on new open space provision, given the larger sites still to be developed within the Local Plan

Questions

- What options have been considered to increase open space provision within the proposed development?
- If the site is to compromise on new open space provision, can significant contributions be secured towards recreational facilities in this part of the town in order to mitigate for existing residents be required to share space with residents of the proposed development? Perhaps these could be as per point 4 above.
- Alternatively, could allotment space be provided within the development for the benefit of new and existing residents?
- Does the application proposal take full account of the findings within the Council's Therfield Heath Mitigation Strategy, or could more be done with this site to secure the recommendations made within it?
- If it approves this application as is, how will the Council ensure that new open space provision is not compromised on future development sites within the Local Plan?

⁴ <https://www.north-herts.gov.uk/sites/default/files/2023-02/Therfield%20Heath%20SSSI%20Mitigation%20Strategy%20-%20November%202022.pdf>

⁵ <https://docs.google.com/document/d/1MjZ4UII2ixSWaKWziE9a4dtvHBqWRBUI/edit>

8. Affordable housing provision

- The Planning statement indicates that the affordable housing provision will be 22% within the development.
- The Local Plan policy states that the minimum provision for affordable housing should be 40%.
- The Officer report for the original application suggests that the lower proportion was acceptable on the basis that a higher percentage was not deemed viable, and that there is a high proportion of social rent.
- Nevertheless I am concerned about deviation from the adopted local plan – both in terms of this development and in terms of the precedent it sets for other large sets within the Local Plan. It is vital that these development site meet local housing need and if affordable housing is compromised then this will be more difficult to achieve

Questions

- What is the justification for accepting affordable housing provision which is significantly below the Local Plan policies?
- If it approves this application, how will the Council ensure that affordable housing provision is not compromised on future development sites within the Local Plan?

9. Sustainability SPD compliance

- The Planning Statement references Local Plan policies SD1 and SD2 but makes no mention of the Council's Sustainability SPD, which sought to strengthen local policies in these areas
- The Energy and Sustainability Statement, dated April 2024, similarly refers to SD1 and SD2 but does not mention the Sustainability SPD. Point 2.7 (page 6) also refers to the "Rochdale Core Strategy", which does not inspire confidence in the report.

Questions:

- Is the proposed development in accordance with the Sustainability SPD?

10. Overhead power line

- 4.22 of the Planning Statement states that *The site currently has a 132kV power line crossing overhead. It is anticipated this will be buried in accordance with national guidance.*
- 3.14 of Officers report from the previous application indicates that UKPN advised *that this does not automatically mean the line will be buried but that it may remain in situ with the necessary 'Way Leave'*⁶
- This is a concern as the retention of the overhead line would presumably be rather unsightly and diminish the visual appearance of the development

Questions

- What is the status of the overhead powerline within the current application?

⁶ https://documentportal.north-herts.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=135F1AA45A0C11EAB9AD00155D5936D9

11. Healthcare provision

- Royston's health services are significantly overstretched, as has been widely reported
- The NHS England report on the original application demonstrated that there was significant negative capacity across health premises within the town.⁷ This situation has worsened in the intervening period since more houses have been built and there has been no increase in health premise space
- I can see no reference to additional health facilities within the planning documents
- I understand that health contributions are typically secured through S106

Questions

- What contributions are being sought towards healthcare provision resulting from this development?

Conclusion

I accept the principle of development at this site, and the need for additional housing within the district, however this acceptance is subject to a number of concerns being addressed either through the planning or S106 process. The most significant of these in my view are:

- Review and update of the Transport Assessment, taking account of the concerns raised regarding the assumptions which have been listed – with appropriate measures to mitigate the increase in traffic volumes which this implies.
- Securing of pedestrian access points across Bury Plantation towards Valley Rise
- Reconsideration of the Open Space provision vs Local Plan policies and the Therfield Heath Mitigation Strategy
- Consideration of the need for additional community / cultural / leisure / recreational space in the east of the town, accounting for the cumulative scale of development and increased reliance on existing shared space
- Reconsideration of the Affordable Housing provision vs Local Plan policies

⁷ https://documentportal.north-herts.gov.uk/PublicAccess_LIVE/Document/ViewDocument?id=6EC79DA5415C11E7B78400155D94410F