

PLANNING REFERENCE 21/05476/FUL

Dear Planning Committee,

EXECUTIVE SUMMARY

This objection is from the Parochial Church Council St Andrew's Church, Cherry Hinton. In it we represent our concerns about the effect of this development upon our 13th century church building and the work that is done within our church, church centre and extensive churchyard. We are also representing the concerns of people in this parish, especially the most vulnerable and those most unable to access the planning system. We are particularly mindful of the residents of Kathleen Elliot way estate, some of the most deprived and vulnerable in Cherry Hinton, who stand to lose the most from this proposal. We object to:

1. The Size and Scale of the project
2. The loss of every kind of amenity: visual impact, acoustic impact, light pollution
3. Its incompatibility with National and Local Air Quality policies and aspirations
4. The fact it claims to be beneficial to the environment when it clearly is not.
5. The many risks it poses to human health and wildlife as contaminated land is disturbed which no mitigation measures can completely alleviate.
6. The effect that large increases in HGV traffic, generated by the B8 business envisioned on this site will have upon pedestrians, cyclists, load roads, schools and the fabric of our Grade 1 listed church and Grade 2 listed churchyard walls.
7. The lack of proper consultation with the local community on this proposal

In essence this new application is largely similar to the previous one, and although we appreciate that Andersons has made some alterations to address the concerns of the 500+ people and organisations who took the time to write in to object to their initial plans, most of our earlier comments still stand and this letter reflects these as well as making comments about the changes proposed. Since the last set of Anderson's plans, we have also had sight of the proposed new Local Plan which anticipates shoehorning as many people as currently live in all of Cherry Hinton into the Marshall airport site on the north side of Coldham's Lane. Although Anderson's hasn't had to consider the impact of their plans against the backdrop of this likely development in such close proximity, surely the planners — and the people of this community — are right to do so.

WE OBJECT TO THE SIZE AND SCALE OF THIS PROPOSAL

This proposal is out of size and scale within the small area of Cherry Hinton because the existing business park and retail buildings comprise smaller, locally focused, relatable activities like domestic storage, Digital services, restaurant or building supplies, car salesroom, a gym and a small hotel which generate relatively small levels of domestic vehicle traffic and NOT 'last mile logistics'.

Local Policy 16 which governs the use of this site refers to a fairly tiny plot of protected industrial land in the area of Parcel A and nothing like the intensity, size and scale of this proposal for Parcel A.

Although Anderson's have reduced the percentage of buildings designated for certain B8 use, the total 'floorspace' of this new plan has actually increased over the last plan. Even more green space will be lost in these new proposals. The buildings will be situated at a density not characterised elsewhere in Cherry Hinton: they will remove an area of open green space which safeguards the sense of community and identity in Cherry Hinton. The 260 car parking spaces proposed shows something of the increase in congestion which will impact Cherry Hinton roads and air quality — even before the HGV and delivery vehicle traffic is factored in.

Many of the decisions over siting of the buildings have been deferred until the reserved matters stage, but whichever way they are configured, it is not possible to site them without having a significant detrimental effect on the amenity of surrounding residences.

Although there are plans for landscaping to 'hide' this development, the plans admit that the buffering and landscaping necessary to develop any kind of effective screening will take 10-15 years to develop (however the previous ES admitted it would take 40 years).

Furthermore the remediation works necessary on this land to prevent the leakage of contaminants involve an 'impermeable membrane' laid over Parcel A. This surely will make the growth of mature trees an impossibility on site, and therefore promises to screen this development from view cannot be serious.

We object to this proposal because it completely fails to consider the cumulative impact of its size and scale next to the now published proposals for the Local Plan which will densely develop the whole of Marshalls airport, throwing an exponentially larger number of cars and cyclists onto Coldham's Lane and the surrounding roads. The plans to turn this area into a pleasant urban centre to the southeast of the city will be scuppered if this large area north of Coldham's Lane is allowed to be developed in such a way as to offer very minimal amenities to current and future residents. We do not feel that the prospect of being able to walk around the West Lake will do enough to convince residents, current and future, that this land has been developed according to the aspirations of the both current and future Local Plans.

WE OBJECT TO THE LOSS OF AMENITY FOR ALL LOCAL RESIDENTS

There will be significant loss of amenity as a result of the development because local residents will be subjected to more noise, air and light pollution, traffic, loss of greenspace and downgrading of a key leisure space: the Tins Cycleway which is much appreciated and used by cyclists and pedestrians from the local community.

The pleasant pollution free open nature of the Tins pathway will be replaced by a more enclosed path, loss of open views, significant loss of greenery, more air pollutants for runners, walkers and cyclists, and an underpass that no doubt will before long smell of urine and be graffitied because rarely do underpasses escape that fate. An underpass will also reduce the sense of safety users of the Tins currently enjoy. Despite proposals to improve the path by citing food concessions alongside it, (which may also attract anti-social behaviour in the evenings) this key cyclist and pedestrian amenity will be much worse than what we currently have and this development will be contrary to policies about safeguarding and promoting health through walking and cycling. The proposals do nothing to address the 'pinch point' for cyclists at the railway bridge. And the experience of cycling on every road nearby, given the huge increase in HGV and 'in a hurry' delivery van traffic this development proposes, will become extremely dangerous.

Although the new proposal offers concessions to the Wolsey Way based residents who have most vigorously opposed the initial plans, the brunt of the new plans is born by the residents and Spinney Schoolchildren along Hayster and Harcombe who will have lorries accessing an enormous distribution warehouse at the end of their gardens and by the residents of Kathleen Elliot Way who will have a vast warehouse the length of their whole street as their outlook. The new residents of the new 'Cherry Tree Apartments' (office building turned into residential units) will also be deeply affected by HGV movements and light pollution as they look squarely out onto this warehouse.

Noise and Light

The new planning statement 'assumes' no noise at night associated with reversing lorries because the lorries will be 'guided by a banksperson' (Planning Statement section 3, pg 11). We question how this can be enforced. It also reverses the earlier commitment to provide acoustic fencing arguing there will be 'screening by the units themselves'. The current plans for the siting of HGV access to units suggests that the 'units themselves' will in no way screen all residents from the 24/7 HGV noise.

The issue of light pollution is deferred by Andersons until the reserved matters stage, which means residents have no say over how this affects them.

No matter how these buildings are configured, the size and scale will create hardships for the many residents who live adjacent to this development — which is why logistics hubs are not usually shoehorned into residential districts.

WE OBJECT TO THE DETRIMENTAL EFFECT THIS PROPOSAL WOULD HAVE ON AIR QUALITY

We pointed out in our last objection that the Air Quality section of the ES was flawed because it appeared to be largely based on cars and not HGVs. Although car emissions are predicted to fall due to higher numbers of electric vehicles, HGV emissions are not predicted to fall. And the extra percentage of HGVs this development will put onto our local roads is the main objection we and many resident have to this proposal.

The current Air Quality report admits as much in section 9.23 They are using the latest emissions predictions 'based on the uptake of electrical cars and light goods vehicles'.

Section 92.7 is also concerning as the report admits that since, 'Defra and Central Government does not recognise local authority monitoring or local modelling studies when determining the likelihood of the Limit Values [EU standards which have been adopted by the UK] being exceeded. As such the Limit Values have not been considered further in the Air Quality Assessment.

The figures which follow do not seem to take into account the extra emissions which will occur when traffic comes to a standstill as it most certainly will on Coldham's Lane when all the residential development is complete. Especially if Andersons is allowed to build a logistics hub on the south side.

The leading case of *Gladman v SSCLG and CPRE (2019 EWA Civ 1543)* refers to a refusal of planning permission due to a failure to ensure Air Quality standards were met in an Air Quality Management Area. Although the proposal is not in such a Management Area, plainly the emissions will significantly increase and have an adverse effect on the air quality in Cherry Hinton, to the detriment of local health, particularly in proximity to the several Primary Schools and Community facilities including churches and sports centre.

We object that St Andrew's Church which sits at the intersection most likely to be affected by standing traffic, was not considered more carefully in the ES consideration of air quality. We have a significant number of children and elderly people accessing our churchyard, church centre and church each day. Most of these come on foot and have to cross that intersection to attend the many groups and activities put on in these spaces. More and more we try to use the outside spaces for outdoor toddler play, outdoor worship and 'Forest Church'.

As we know young people and old people are particularly vulnerable to poor air quality, which the UK's Air Quality Plan is meant to be addressing with some urgency. The fact that it hasn't been addressed with suitable urgency was the subject of the *R(ClientEarth)* litigation, which the council must take into account in making decisions about the detriment to Air Quality arising from this development.

The information in the environmental statement relies heavily on 'assumptions' about ongoing reductions in emissions due to electric vehicles- but this certainly won't be achieved before 2030 since that is the longstop for phasing out cars running on petrol or diesel. Moreover HGVs are not cars so are in a different category. Any reduction in local

domestic car emissions will be overwhelmed by the introduction of large numbers of uncontrolled HGV emissions, which will concentrate and remain at a low breathable level in between the small roads and buildings of Cherry Hinton-(ES 13-43 refers to the 'dense urban fabric' of Cherry Hinton).

Therefore the application appears contrary to stated local and national policy regarding reducing emissions and increasing air quality across all areas of the UK. There is no known way currently to reduce NO2 emissions other than to reduce the actual number of emissions. This proposal will significantly increase those emissions within a small built up area, and since this cannot be overcome by Condition, our planners need to render this proposal unacceptable.

WE OBJECT TO THE CLAIM OF 'ENVIRONMENTAL BENEFIT' WHICH IS UNSUBSTANTIATED AND DECEPTIVE

The development claims environmental benefits but in fact the MAJORITY of the 38 ha site comprising Parcels A, B and C is already health promoting greenspace. Parcels A and C are designated City Wildlife Sites and Parcel B is Protected Open Space already.

We echo the objections so forcefully stated in the Wildlife Trust's letter of 12/1/22 which rejects the basis upon which the Environmental Assessment has been calculated and many of the figures and methods of calculation used in the Biodiversity Net Gain argument.

The fact is that Andersons have systemically degraded a City Wildlife Site (Parcel A) over the best part of a decade and now wish to be rewarded with permission to build all over it, claiming it has little environmental value.

We object to the fact that they will be disturbing contaminated land in order to do so. Although they now claim a safer method of dealing with the contamination, which alleviates the need to cart tons of it through the local neighbourhoods, they will still be digging up and sifting through contaminated soil on site— at the same time as keeping the Tins — the major cycle way into Cambridge City Centre open.

We repeat our point made in our objection to their initial proposals, that trust in their methodology is low. Why was the 'safer' method of building upon Parcel A not considered initially? Why were we able to find all kinds of discrepancies in the Environmental Survey the first time? They may be there this time, but we've not been given enough time to crunch those figures.

We object strongly to the danger of water contamination resulting from the construction of these buildings. The extensive mitigations proposed to prevent this suggest we are absolutely right to be concerned. Cherry Hinton Brook is such a delicate ecosystem, and a key amenity in Cherry Hinton to both human and non human life.

Digging up contaminated land will always increase risk to human health and risk to the environment. We rely on our elected representatives on the Council to protect us from these risks.

PARCEL B

This greenspace is also currently a valuable biodiversity area which will be completely dredged out, stirring up contaminants and pollution in the process, then recontoured and filled with bare aggregates (hopefully not breakup of runways and buildings of the adjacent Cambridge Airport) before some reseeded with insect friendly plants (see Parcel B Masterplan diagram). It will be nothing like the coppices and open greenery currently there. Insects will forage beyond the boundary of Parcel B inevitably so the proposal is to encourage an insect friendly habitat that will be regularly cut through by HGVs and further traffic all around and will result in most of those insects being wiped out on the windscreens and bumpers of traffic. This neutralises any benefit of the proposed change in habitat.

PARCEL C

The Lakes are currently quiet, green and largely undeveloped with mainly informal access from youth looking to swim. The new plan largely does away with the initial idea of an 'urban country park' by reducing its ambition and limiting access to a walk around the lake with two entry points, with no additional parking. The revised plans should be more beneficial to wildlife, however they also downgrade the value of the amenity to the human population looking for (and very much needing once Marshalls is developed) more green leisure spaces.

We continue to object that the balance of this development extracts a high cost from the local population for minimal gain. Even the hope that the proposals might discourage the 'wild swimming' which occasionally blights the lives of residents near the East Lake, have come to naught. This proposal offers nothing to teenagers looking to swim, drink and socialise in large groups. They will continue to illegally access the East Lake. The proposal offers no security measures which might dissuade them from doing so. Instead these proposals simply invite further unsafe behaviour with nothing in place to stop people jumping into water which is very cold, very deep, full of contaminants and very difficult to access by emergency services. In an area which will be very remote, the potential for serious accidents is very high and the likelihood of finding any organisation wanting to take on the liability of managing the site very low.

WE OBJECT TO THE INEVITABLE INCREASE IN TRAFFIC AND ITS EFFECT ON CYCLING

There is no doubt that this development will produce more traffic: the business model of distribution centres depends upon high levels of traffic in and out, with much of this inevitably from HGVs bringing in supplies. Indeed the model of the warehouse site featured on Anderson's website includes many articulated lorries docking into many warehouse bays.

One of the key issues with this application is that almost all of the HGV traffic will want to approach and leave the site from the South-eastern branch of Coldham's Lane, thus producing great pressure on the narrow roads and tight junction at the corner of Coldham's and Cherry Hinton High Street. Currently that is the only way many HGVs can access this site because of the low railway bridge to the northwest on Coldham's Lane.

Andersons propose to lower the road under this bridge to make access from the north possible, and this is a welcome idea. However this will not solve the problem of overall congestion on the roads in this part of Cambridge. Although traffic might move relatively freely at most times of the day now (during a pandemic) planners need to consider that congestion will most definitely increase to a level which will make Anderson's delivery hub clients question their business model, once those 7000 homes have been built on the other side of Coldham's Lane. The implications of approving this application are that HGV traffic will be hard baked onto Coldham's Lane for as long as large lorries deliver goods to delivery hubs. This will preclude possibilities for allowing greener methods of transport to use this road, or for designating it for high speed bus, trolley or minibus services into central Cambridge

Lowering the road under the bridge won't solve the narrowness of the aperture which already makes cycling through it dangerous. We note that there are suggestions they might restrict the traffic to 'one through at a time' to allow for safe cycling around the edges. This plan would almost certainly back up traffic on the nearby roundabout to alarming levels.

In any case, re-routing the HGV's to avoid the narrow streets of Cherry Hinton won't be enforceable long term. The route in from the A14 is shorter via Cherry Hinton, and especially if there's a bottleneck at the railway bridge, this is the route HGVs will inevitably take.

Finally we object to the fact that this proposal will make cycling on the already difficult Coldham's Lane, and on all the other roads which traffic will use to access this site, much more difficult and dangerous. We note that Andersons are offering to use some of the s106 monies to improve cycling paths along Coldham's — however the increase in traffic and the insolvable problem of the narrow bridge aperture will make cyclists very wary of using this road. And increased traffic on surrounding roads will have a similar effect.

Given the Council's much touted plans to improve cycling levels in the locality, this development will clearly have a major detrimental effect on this and other 'green' policies.

The planners need to remember that when cycling is perceived to be too dangerous (as it surely is when sharing narrow roads with HGVs) people would rather sit in traffic jams than risk their, and especially their children's, lives.

WE OBJECT TO THE INEVITABLE DAMAGE TO TREASURED HERITAGE

We do not feel that the Heritage Report produced by the developers took adequate account of the detrimental effects of increased pollution and vibrations from HGV as well as noise pollution that will be occasioned by this development.

The report failed to notice or mention the Grade 2 listed churchyard wall which runs along both the High Street and Coldham's Lane, less than 2 meters from the road. This wall is likely to be affected by HGV vibrations to a much greater extent than presently and its foundations will not have been built to withstand such an onslaught.

The church itself dates back to the early 13th century. The oldest part of the church, the tower is less than 10m from Coldham's Lane. This tower and much of the rest of the church, is faced with local 'clunch' a limestone probably mined locally, perhaps from the very land this proposal intends to concrete over. It's part of our local history.

However it's a type of stone easily dissolved and destroyed by noxious emissions -- as reports on Ely and Peterborough Cathedrals, both built in part from the same stone will attest.

St Andrew's is a grade 1 listed church, one of the finest examples of early English architecture we have in the county, renowned for the delicacy of the clunch carvings in its interior. Although not known for its stained glass, the two stained glass windows it has were done by the famous 20th C artist Leon Evetts.

The stone and glasswork of this church were built to withstand change and development, but not the pollution and vibrations of many HGVs coming past.

We have just finished a very costly restoration project which we thought would protect this very valuable bit of heritage and community space for many decades to come. We strongly object to a development just 280m away from us which is likely to create such unnecessary and impossible costs for us over the years, in cleaning and repairs.

We also object to the inevitable noise pollution which will erode the peaceful nature of our church and churchyard, community amenities which enhance well being for so many.

And we object to the pollution and traffic which will deter elderly and more vulnerable users from accessing the groups which meet at the Church Centre and in the church itself.

We object to the pollution which will affect the 50 people each week who queue in front of the church (along Coldham's Lane) for up to an hour, to access free food.

The downgrading of three community amenities: church, church centre and churchyard which will happen, most probably in very significant and costly ways,(because of the size, scale and nature of this development) must be considered by planners, and not dismissed as 'insignificant' alongside a long list of other very important concerns for local residents as the ES so carelessly does, reportedly in conjunction with the CCC.

WE OBJECT TO THE LACK OF PROPER CONSULTATION WITH THE LOCAL COMMUNITY

One of the hardest documents for residents to stomach is the statement of Community Involvement. Several years ago the community was asked what it would like to happen with the Lakes without being told of the many risks associated with these bodies of water. The proposals Andersons presented to the community involved residential housing on Parcel A and a variety of fantasies about what might be possible on the lakes: swimming, boating park and playground areas, refreshment kiosks etc...

There has been no effective consultation with the local community over the current proposal and it is disingenuous to claim otherwise.

A representative from Andersons has met with Wolsey Way residents once after submitting their first proposal and once before the submission of the current plans. But this was not a public meeting open to all, and was not advertised by Andersons.

The East area Committee meeting in March 2021 to which the document refers was not an occasion upon which the public had time to offer much feedback, nor was it effectively publicised. This was not Andersons consulting, but a standard meeting to which they were invited— and Andersons has been conspicuous by their absence from further area Council and Cambridge East Community forum meetings. Even when they send a representative he does not take questions.

Both applications in all their obscure complexity were sprung on residents with very little time to read, digest and comment; 3 weeks was all we had initially in June 21 (although we successfully argued for an extension) and 6 weeks over Christmas and the onslaught of a new COVID variant this time with no extension granted. Many of the documents have spent a lot of time 'unavailable for viewing' which has made putting together detailed objections almost impossible.

The community has not been properly consulted and therefore, and very importantly, **the trust necessary for a community to allow a company to develop a toxic landscape of industrial waste right in the heart of its residential areas does not exist.** The risks of something going wrong with all the mitigations proposed by the ES are too high and the liabilities undertaken by any Council permitting this development too great. Therefore we object in the strongest possible terms to this proposal and ask that the Council revisits any promises it has previously made to this developer.

St Andrew's Parochial Church Council

Revd Dr Karin Voth Harman

Revd Dr Ruth Barry

Revd Peter Ievins

Revd Deborah Ford

Mr Chris Shore (churchwarden)

Mr Michael Sanders (churchwarden)

Mr Stephen Burden (deputy churchwarden)

Prof David Ford OBE

Mrs Ayleen Ross
Mr Mark Goldsbrough
Mr Richard Shannon
Mr Ian Stevens
Mr Barney Leeke
Mrs Nicola Hamill Stewart
Mr Robin Greenwood