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Soham Town Council

Ms Leonora Grcheva

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17th December 2018

Your ref: Email including attachment dated 20th November 2018 - vehicle link High St Soham Town Centre updates and proposed further actions in regards delivery Soham Eastern Gateway.

Dear Ms Grcheva

Thank you for your email dated 20th November 2018 with attachment indicating current and proposed further actions by Soundings and the Developers This Land Ltd in progressing delivery of Soham Eastern Gateway housing development at SOHM1. Matters were considered by Soham Town Council at its meeting on the 10th December 2018 and again on 21st January 2019.

Soham Town Council is not indifferent unsympathetic or unsupportive to successful delivery of the Eastern Gateway Scheme nor indeed any large scale housing development that can demonstrate merit in build quality, in exemplary living standards & design but also in viability and sustainability not just within the Scheme itself but in extending that sufficiency, balance, synergy and harmony to the existing population and established community.

Soham Town Council has observed over a number of its own successive four year administration terms as no doubt the previous Developers Cambridge County Council (CCC) had found that the provision of adequate direct vehicular access to the town centre of Soham is only one of a number of critical factors still to be resolved in order to progress and ultimately successfully deliver the Eastern Gateway housing development.

Having attended previous public consultation events up to and including the most recent in Summer 2018 due to corporate restructuring and changes of executive management team to This Land Ltd Cllr members as individuals and residents continue to express deep reservations on a number of both material and non-material planning matters. Irrespective of these ongoing issues and

continuing concerns, that will be formally commented on by this council at a planning application submission stage, Cllr members remain unified in being unable to comment positively or in advocating support to any planning application/Scheme where the introduction of circa 500 new dwellings at SOHM1 does not provide, as part of local infrastructure provisions and improvements commitments agreed with the Planning Authority, provision of direct vehicular access link(s) with the town centre/High St.

Soham Town Councils' membership has remained throughout this protracted timeframe consistently adamant that where no appropriate access to the town centre/High St is or can be provided a 'bedroom community' at SOHM1 would be created wedged between, isolated from and solely serviced by a new roundabout/junction at the A142. In that unacceptable situation Soham Town Council considers that such a housing development would bring no perceivable advantage or benefits to the town nor be conducive to promoting and/or building cohesion and sustainable community with Soham.

Under those conditions Soham Town Council would register an absolute objection to any proposed development at SOHM1.

The communication received currently proposes town centre/High St access being achieved from an upstream entry point off/from Brewhouse Lane within the vicinity of the Staploe Medical Centre grounds (legal agreements & specifics TBD) to the existing single point junction at Brewhouse Lane and Paddock St which would then presumably act as central traffic 'hub' or island operating, servicing and dispersing traffic entering/exiting theoretically one of four (4)¹ destination (options) routes to/from Soham town High St (see Table Below, attached schematic + photos). The correspondence also further indicates that preliminary approaches to CCC Highways as the Statutory Consultee for traffic matters in the planning application process would in principle consider and, subject to confirmatory traffic survey and assessments, be amenable to such arrangement.

Brewhouse Lane is a very busy road as it is the only vehicular access to the Staploe Health Centre which serves not only residents of Soham but those from Fordham, Wicken, Barway and Isleham. It also serves a substantial estate of houses whose residents would be adversely affected by making this road the only vehicular access to the town from the new development. Although part of Brewhouse Lane could be widened, the junction with Paddock Street is a pinch point and cannot be widened sufficiently to allow all the extra traffic which would result from the current proposed access point.

Soham Town Council as a Body is under a statutory obligation to represent its residents and has as consequence received a number of representations over the years that this scheme has been discussed in absolute objection and complaint to the entire proposed Scheme at SOHM1². At its meeting in December 2018 it once again noted members of the public voicing a number of complaints regarding the proposals including land drainage and stability suitability but specifically to the current suggested access routes³.

¹ A fifth non town route [to junction A142] via East Fen Common (currently not under consideration) poses other road traffic safety issues including the lack of street lighting on this C road) and high accident point (source transport and street map available from @ mycambridgeshire.gov.uk)

² In 2018 official records, Soham Town Council-mins 21/18,36/18, 95/18, 114/18, 179/18

³ 185/18

Soham Town Cllrs as residents have significant local and historic knowledge and from which the Town Council as a Body Corporate may cumulatively draw upon in its own deliberations, rational decision making and any subsequent official comment and approvals.

The junction at Brehouse Lane and Paddock St, being the single hub in current proposal, currently serves the local traffic's volume and flow to and from residential roads of Paddock St Eastern Avenue and Brehouse Lane allowing unidirectional travel, street parking and passing space provision for homeowners and other road users alike. Currently capacity needs are met poorly already with little off road/driveway parking, no road parking restrictions or resident parking permit privileges. Daily obstruction and nuisance is caused by the influx of vehicles during the working week and at peak day and evening hours by users to the nearby amenities of the Staploe Medical Centre and Weatherall's Primary School. Consequently double road and pavement parking are normal occurrences in these residential areas which without adequate road lining/marketing and/or lack of active community policing already pose serious road nuisance safety and obstruction issues for the residents and to those critical service Providers in the event of an emergency. These parking, safety, nuisance and emergency accessibility concerns would only be exacerbated on Brehouse Lane, Eastern Avenue and Brehouse Lane by traffic generated from the Eastern Gateway complex and from those additional users requiring not only access but seeking parking provision to use the school and medical facilities, respectively.

The cumulative traffic effects that an initial access created from Brehouse Lane from/to SOHM1 would generate extreme negative social and welfare impacts for existing residents but that these difficulties and disadvantages would continue and extend through to the 4 proposed connecting roads stemming from this point. Due to a combination of antique construction, single lane, extremely limited or no parking provision and single direction traffic flows, the four connecting routes are to some greater or less extent unsuitable for extra traffic load and demand (see Table below)

Possible Route to High St via:	Indicative road Directions from proposed Brehouse Lane/Paddock St intersection	Pinch point number attached schematic (photograph numbers in parenthesis)	Observations/concerns
Paddock St	R Paddock St merging into Churchgate St to High St	2 ()	<ul style="list-style-type: none"> • Difficult junction to negotiate esp. during school pick up and set down times •
Market St	R Paddock S L Market St to High St	3 ()	<ul style="list-style-type: none"> • Very poor junction visibility accessing onto High St • No double yellow lines cars park close to junction. •
White Hart Lane	R Paddock Rd L White Hart Lane to High St	4 ()	<ul style="list-style-type: none"> • Road only allows two way traffic part way from proposed hub • characterised by of a narrow non-pavemented single track thoroughfare • Acute junction (poor visibility)

			onto High St
Brook Dam Lane	L Paddock Rd merging with Brook Dam Lane to High St	5 ()	<ul style="list-style-type: none"> • Bus stop close to exit onto High St • •

In general those residential streets joining below Brewhouse Paddock St intersection/junction like many streets in Soham have originated as single lane tracks primarily for vehicles and transport of a bygone era which is not unsurprising given the aetiology and chronology of growth of Soham from its historical past rural, village and parish (parochial) heritage to current town status.

As such at the December 2018 meeting the membership registered alarm at the current High St connectivity solution suggested in the correspondence and as consequence Soham Town Council resolved unanimously to register its opposition to such an access point.

Soham Town Council did acknowledge in the correspondence that a Consultant would be engaged to provide report to identify 'any necessary improvements works to the road and/or junction in the Brewhouse Lane area'. Notwithstanding its own objections regarding the current proposed access routes members were sceptical that Consultant-generated reports, commissioned by the Developers, particularly where traffic and its management is concerned, and from its own experience of past planning submissions, rarely if ever reveal anything more than limited detrimental impact(s) on local and indeed strategic (amenity and) infrastructure capacities requiring no more than low (no) level or minimal modifications. Conversely and where significant remodelling of, or major addition to, the amenity or infrastructure is needed or indeed essential, a combination of prohibitive costs deterring the Developer together with lack of insistence and impotency to ensure enforcement of required changes results in lack lustre compromise of mediocre stop-gap modifications to patch and augment, and not the extensive step-change upgrades needed to, current amenity and infrastructure provisions.

Soham Town Council acknowledges Consultant-derived reports only apply statistical approaches to calculating both current and projected amenity and infrastructure need, capacities and demands posed at the development site. Consultants only comment on matters and specification which they have been paid to undertake and are under no obligation or brief from the Developers to widen the scope and approach to their analyses to consider amenity and infrastructure deficits caused as a whole or in full and to the existing community.

It remains the contention of Soham Town Council that in not undertaking proper diligence and exhaustive modelling these capacity assessment reports fundamentally and persistently fail to consider the cumulative impact of demands made additive and incrementally by these development to and in combination with all subsequent large scale housing developments in the area.

Soham Town Council has already had cause to formally raise serious complaint to the Planning Authority ECDC over current sewage and foul water drainage amenity provision deficits arising from a large scale housing development currently nearing completion and by the Developers lawful attempts to connect to existing services which has culminated in reaching and breaching capacity limits. Importantly in dialogue and meetings between relevant Parties to resolve matters and to generatively learn from the experience so as to avoid repeat, was commitment to pursue proper

accountability from those relevant stakeholders and Statutory Consultees who remain responsible for planning decisions that result in detrimental and unacceptable impact(s). The membership was pleased and encouraged by this and to receive report from the participants that frank discussions had proactively included the strategic amenity improvements needed to assure sustainable sewage and foul water drainage provision at SOHM01.

Traffic and road use, like any other infrastructure and amenity provision, is not a disconnected discrete, disjointed, linear or singular in function but rather additive in the sum of interconnections and influenced by many competing factors and dynamics. The additional traffic volume, flow, parking and congestion from these large scale developments, without doubt and by real demonstration place enormous strains on existing road capacities and tolerances not just locally but further afield and strategically on main and arterial roads in and out of Soham towards Ely, Newmarket (A142) and beyond (A11, A14).

Soham's economic viability and recognition as a market town has primarily been founded on its agricultural and farming past with high(er) level skilled and paid job opportunities historically centred near more urban towns and cities in the County. With mechanisation and automated farming practices there are fewer numbers and variety of jobs available in this more traditional sector and naturally residents are pursuing work opportunities farther afield. Without encouraging newer types of light business and tech-based Industries which would centre business and employment opportunities into Soham this daily migratory trend and travel patterns will not only continue but further reinforced by introduction of further large scale housing developments particularly where land previously designated for light industrial and start-up SME use has been redefined and marked for further housing provision⁴.

Whilst employment issues are in themselves not material planning matters in the planning process their impact on road transport and traffic management are and Soham Town Council members nor its residents have not failed to recognise the resulting daily commuter traffic from Soham onto the A142 and onward travel to the A11 & A14 in the morning generating long queues, congestion and delays only to be repeated in the opposite direction and back into Soham by the evening commute. The lack of acknowledgement and comprehension of complexity to strategic traffic movements, to its volume, its daily ebb and flow and to effective management both in, and to neighbouring, District and County's transport system(s) has been one of a number of issues of concern highlighted recently by the Planning Inspector as lacking in the examination stage(s) of ECDC's current Local Plan.

Soham Town Council has been requested to financially intercede financially to meliorate specific instances of poor road management and detrimental traffic impacts arising from introduction of recent large scale development sites recently:

- Kingfisher Drive CLT /The Shade (inc primary school-conurbations impacting on this area exacerbated by initial Developers going into administration- requires pedestrian crossing – costs circa **£30K**
- Barcham Rd Arboretum (/18) which although strategic access to this facility was considered no attention to the local infrastructure needs arising to resident and pedestrian safety on this road –requires road markings and signage (MHI application currently being progressed outcome tbd)- costs circa **£15K**

⁴ SOHM1 is example of a large housing development without business opportunity

The membership readily acknowledge the facts that Developers do make CIL contributions to the District Council for infrastructure and amenity improvements, that a minor proportion is received directly by the town council and that currently there is an annual competitive minor highways improvement (MHI) tender and points based awarded programme for works between CCC and town or parish councils. However when the financial benefit gained is for an expense arising to mitigate failures, errors and shortcomings that should have been identified in the planning approval and during execution (construction) stages to these large scale housing developments the CIL provision or MHI opportunities are not bonuses or 'benefits' but mechanisms by which residents may be compensated for those previous enjoyments, privileges or entitlements that have been endangered, diminished, eroded or indeed lost from the introduction of the large scale housing development(s).

Due to these experiences Soham Town Council remains highly concerned that local infrastructure needs for road and traffic management matters to the Eastern Gateway Development, which by absolute housing number proposed is the largest currently planned on a site in excess of 50 acres, will prove no better in quality, design, consideration and/or modification than previous large scale planning applications other than to satisfy those minimum requirements in the planning process which expedites the Developer ability to submit and successfully gain planning approval.

Soham Town Council therefore remains adamant that local road infrastructure improvements including traffic management recommendations to the Eastern Gateway proposal must not be limited to information that solely supports the Developers ambition of obtaining a successful planning application outcome.

Under such a more stringent examination Soham Town Council considers that the current suggestion to use of Brewhouse Lane and Paddock St's current junction being staggered simply could not safely act as the 'single hub' to the proposed access to the town for traffic generated by an additional 500+ houses without posing severe and ongoing safety issues to existing residents and would at the very least require:

- significant junction revision and/or improvements including consideration of a mini roundabout, road widening and/or provision of 3 or 4 way traffic light control and/or operation of a one way (circular) system from this to adjoining routes and/or provision of alternative additional routes emanating from the development to link into other residential roads other than current suggestion

The membership conceded that modifications of this junction area and to such a degree may be in light of the physical dimension constraints, existing surrounding dwellings, road type and layout be logistically difficult/impossible to achieve whilst an alternative suggestion providing multiple additional alternative route access points emanating from site SOHM1 to ease traffic load might be logistically impossible as well as commercially unattractive to the Developers, This Land Ltd a company limited by share capital solely owned by CCC that has vested as asset this and other public-owned lands.

Soham Town Council considers that irrespective of the complications posed it remains imperative that any approach to traffic its flow, volume, parking and congestion management and to any local infrastructure modifications introduced in mitigation must be sufficiently robust in solving not only the day-to-day problems created by the introduction of + new 500 homes but to those problems created for all existing residents in Soham.

Soham Town Council would consider that any Responsible Home Developer particularly when it acts *in loco* of the parent owner Local Authority (CCC) would wish to ensure that as part of its planning submission it provides comprehensive supporting documentation that not only validates the quality but in its merit commends any planning submission proposal not only to those consultees formally requested to make comment or decision but for them to be held accountable to the Soham resident.

Soham Town Council would on that basis legitimately seek written (re)assurance and on which it may subsequently rely that any Consultant-derived assessments and recommendations to traffic and transport management including road modifications is not merely 'acceptable' to CCC Highways but that as the Responsible Authority and Statutory Consultee for road and transport matters in the planning application process and by legal association to the owners CCC, it may be held financially accountable for any resulting failures requiring restitutive intervention(s) and action(s).

Given full weight and due consideration to the myriad of issues as too those complexities at its meeting on Monday 10th December 2018 under min 185/18a Soham Town Council unanimously approved to:

- **register its opposition in the strongest possible terms to any proposal that provided access to the town centre/High St via Brewhouse Lane area irrespective of what subsequently transpires in negotiations with owner/occupiers of the Staploe Medical centre**
- **provide its formal objection pre-emptively to ensure its proper registration to any consultation held and/or any planning application(s) subsequently submitted that includes a proposed entry and access route(s) via Brewhouse Lane area/vicinity for the development of SOHM1, Eastern Gateway.**
- **provide courtesy copy for information and reference to its District & County Cllrs, those relevant Stakeholders & other interested Parties.**

Council members however wished it to be noted that they continue to commend and appreciate the genuine effort and commitment made by both Soundings and This Land Ltd to engage with not only Soham Town Council but with Soham residents who will be both indirectly and directly, and in some instances detrimentally so, affected by the delivery of this Development and in that continued dialogue to garner and incorporate germane, relevant feedback and suggestions⁵.

Soham Town Council remains confident that there remains sufficient scope and opportunity for the delivery of the Eastern Gateway at SOHM1 to act in role model to, and provide higher and better bench mark standards by which, all prospective Developers who might aspire when undertaking these large scale housing developments not only in Soham but in the wider District. In this aspiration Soham Town Council considers it remains a critical friend to both Soundings and This Land Ltd in the Eastern Gateway, SOHM1 proposed development.

Soham Town Council looks forward with anticipation to not only the next round(s) of consultations to which Cllrs will attend in capacity as residents to make comment but in due course when a formal planning application submission inclusive of comprehensive supporting plans to the Planning Authority, ECDC, is made and at which time matters will be listed formally for the Town Council's

⁵ In 2018 official records, Soham Town Council-mins 21/18,37/18, 68/18, 79/18, 94/18, 132/18

Planning Committee to make official comment under the guiding principles and considerations set out herein and thereafter by ratification, with or without amendment of the full town council⁶.

At its January 2019 meeting under min /18 Soham Town Council approved the content herein as response to its expectation of exemplary standards from This Land Ltd and from other Statutory Consultees together with indication of the wide range of matters it will consider when lending support to progressing delivery of Eastern Gateway Development at SOHM1.

For public interest and information a copy of the attachment dated 20th November 2018 and Soham Town Council's response will be placed on the town councils website www.soham-tc.gov.uk. In the meantime should Soham Town Council be of more assistance please do not hesitate to contact this Office

Yours sincerely

Enc: email plus attachment dated 20th November 2018

photos identifying indicative issues and concerns (Table)

Cc: District Cllrs Sennitt, Schumann, Ross, Bovington; County Cllrs Goldsack & Hunt; Mayor Palmer Cambridgeshire & Peterborough Combined Authority.

⁶ Soham Town Council-mins 55/18, 62/18, 143/18, 149/18 PL 57/18 & PL 78/18 and planning minutes of 28th November 2018 Soham Town Council planning committee confirmed they would not meet with or make comment on applications or pre-applications provided by the Developer informally and/or made under a request for confidentiality. The Standing committee confirmed that all matters must be formally listed on either a full or planning committee agenda and to which the public may attend to observe proceedings.