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Dear Members of the Planning Committee

Re Planning Applications Owlstone Croft Ref 22/02066/CONDR and 22/02066/CONDF - Submission of details required by condition 14 (Traffic Management Plan) and condition 8 (Air Quality and Dust Management Plan) of planning permission 22/02066/FUL

1. We are instructed by the South Newnham Neighbourhood Forum and are writing in relation to the above applications. Our clients have previously made submissions and submitted reports in relation to the application to discharge Condition 14. This letter also includes submissions in relation to the application to discharge Condition 8.
2. On 23 July the above applications will be considered by the Planning Committee. The Planning Officer has recommended approval of both applications. We are writing to express our concerns about the recommendations. Although there is some overlap, we address each application separately.

Condition 14 – Traffic Management Plan

3. This is the second application to discharge this condition. It is important for the Committee to appreciate that the details being provided (about the number of vehicles etc) were not available at the time of the initial application or the appeal to the Inspector. The latest management plan is version 12 and some of the revisions have been significant (for example the level of HGV impact currently estimated is much greater than previously anticipated - an increase from 22 to 30 movements a day).
4. Our clients have instructed Bruce Bamber of Railton TPC Ltd to consider the report submitted on behalf of the applicant. He has commented on previous iterations of the applications to discharge this condition and his revised report is attached. The parts in red set out changes since his previous report. The latest report identifies the following concerns:

a) Vulnerable Highway Users and Safe Management:

- i. The proposals still fail to demonstrate how the safety of all users of the local narrow roads will be ensured. At a meeting on June 18th the applicant's contractor stated that bankspersons would facilitate the safe movement of HGVs along Grantchester Street to the Barton Road junction. This provision has not been included in the latest CTMP and safety on Grantchester Street with sheltered housing, shops and large numbers of pedestrians and cyclists remains a serious risk.
- ii. The evidence of initial attempts to steer the large vehicles through these narrow streets casts doubt upon the feasibility to achieve what is proposed even with bankspersons.

b) Safe Access to Owlstone Croft:

- i. The swept path information for Short Lane (Appendix C of the CTMP) shows a vehicle travelling extremely close to the inside of the bend. Contrary to the officer's report at 10.22, the plans fail to show the swept paths of 11.9m HGVs, the largest HGV expected to access the site. There remains doubt as to whether repeated and long-term use of Short Lane for HGV access could be achieved without damage being caused to roadside structures and trees;
- ii. There is similar concern about the access at the Lodge and whether there is sufficient tolerance in the clearances to reduce the risks of collisions to an acceptable level. This is apparent from the "unorthodox" step of removing of the gates.
- iii. It has not been demonstrated that large vehicles are able to access the site within the available width of Short Lane. It would therefore require removal of boulders, shrubs and trees that is explicitly not permitted. This would significantly alter the street environment in this sensitive area and together with the removal of bollards reduce highway safety for vulnerable road users by removing refuge opportunities.
- iv. There appear to be significant problems with vehicle parking, loading and unloading within the site. Insufficient evidence is provided to demonstrate that these problems will not lead to adverse highway safety impacts for other users of the lane.
- v. It has not been demonstrated that site accommodation and welfare units can be transported to and from the site.

c) Diversion Routes:

- i. Cabling work for the development will close Grantchester Street from 23 July to 2nd September 2025. CTMP V12 states that construction traffic will follow the diversion routes, but these are narrow residential streets with a series of right-angled bends and poor visibility at the junctions. They are totally unsuitable for HGVs.

- ii. This is not the route agreed by the Inspector at Appeal. No swept path analyses have been provided or any evidence that construction vehicles can negotiate these busy streets safely or indeed at all.

d) Lack of Planning Permission for Sports Ground use:

- i. The sports ground is presumed to have permission for F2 (c) use: “Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms).” Any current use of the car park will be considered to be ancillary to the site’s use as a sports ground. This would not cover the use of the sports field as a construction vehicle holding centre and there should have been an application for permission to change the use. The use of the sports ground for these purposes would therefore appear to be unlawful.
- ii. Figure 6 of the CTMP shows a fenced off material laydown/storage area. This would be a further unlawful change of use.

The Planning Officer should be asked to clarify the position on the use of the Sports Ground and whether this would amount to unlawful development.

- iii. Furthermore, the applicant has not undertaken and submitted a robust assessment of the impact of its proposed use of the sports ground and what is proposed at the sports ground shows the potential for users of the sports field to come into conflict with the construction traffic:
 - It has not been demonstrated that when two HGVs are at the sports ground, it will be possible for other vehicles to enter or leave the car parking area.
 - The HGVs will have to reverse in an area directly outside a pavilion or changing block presenting a significant risk to pedestrians using the facilities.
 - There are corresponding concerns about the ability of larger vehicles to access the site without damaging the entrance.
 - No evidence has been provided to show that an HGV can enter the sports ground access at sufficient speed to avoid presenting a risk to oncoming vehicles on Barton Road.
 - The Officer’s Report states that the ground is already being used by coaches and other heavy vehicles. The applicant is likely to have limited (if any) control over the existing movements and is unlikely to be able to eliminate the risk of existing large vehicles conflicting with construction traffic.

e) Impact of Construction Traffic on Air Quality

In addition to the road safety concerns raised by Mr Bamber about the CTMP, there are also concerns about the impact on health caused by emissions from the construction vehicles as identified by the Air Quality expert Claire Holman which are set out at paragraph 7e) below. This also takes into account Mr Bamber’s observations about the increase in the numbers of vehicles compared to what was initially contemplated.

Summary and Conclusion.

The applicant has failed to demonstrate that construction vehicles are able to negotiate the access to the site safely given the constraints and without unacceptable risks to the local residents. Similar concerns arise about the use of the sports ground. The comments by the Highways Officer dated 10 July are extremely brief and his formal consultation response applies “solely to the extent of the adopted public highway”. The Owlstone access track and Short Lane are not adopted highway. The absence of any comments on these other aspects by the Highways Officer and failure to comment on the diversion proposals means that the Planning Committee is unable to be confident that they have been properly considered.

Condition 8 – Air Quality and Dust Management Plan

5. This application was deferred from June and the addendum to the latest AQ Management plan was only provided on 10 July 2025.
6. Our clients have commissioned an AQ technical note from Claire Holman, honorary IAQM President, which raises a number of concerns:
 - a) No contingency has been provided in the AQDMP to manage the possibility that the demolition is delayed. The AQMP must make it clear that if the works cannot be completed in the summer holidays, there would be no further demolition work until the following school holiday, and that suitable dust mitigation measures are maintained over the intervening period.
 - b) No contingency plan has been provided if there are constraints on the supply or spraying of water (“the most important mitigation measure during demolition”)
 - c) The AQDMP provides no information on whether the demolition material will be processed on site. The inclusion of such equipment could increase dust emissions.
 - d) The adequacy of the monitors that will be used to monitor the levels of dust particles has been questioned.
 - e) There has been no assessment of the impact on local air quality in light of the time that the large vehicles will spend in the local narrow streets, the consequent impact on local traffic, and the low speeds (with emissions also during idling)¹. The current access arrangement is anticipated to exacerbate congestion and elevate emissions along the narrow local roads. Amongst the steps that could be taken to reduce the impact of emissions from construction traffic, Claire Holman has identified the following:
 - i. all vehicles could comply with Euro VI and Euro 6 emission standards or be EVs.
 - ii. a non-idling zone could be established for the duration of the construction works to reduce the unquantifiable emissions from idling construction vehicles on Grantchester Street.

¹ This observation should also take into account Mr Bamber’s observations about the increase in numbers of vehicles compared to what was initially contemplated.

- f) There are areas where sensible further measures could be taken (putting into question whether the steps being taken to mitigate the effects amount to best practice). For example:
- i. To reduce the impact of emissions from construction traffic, all vehicles could comply with Euro VI and Euro 6 emission standards or be EVs.
 - ii. The non-road mobile machinery (NRMM) could meet the emission standards set out by the Greater London Authority.
 - iii. To reduce the unquantifiable emissions from idling construction vehicles on Grantchester Street, a non-idling zone could be established for the duration of the construction works.
 - iv. The use of higher quality monitors (see above).

Summary and Conclusion

The AQMP is deficient in a number of important respects (especially the failure to consider vehicle emissions) and the contingency plans if the demolition cannot be completed over the summer if there are constraints on the water supply) and the applicant has failed to demonstrate that best practice is being used.

In view of the serious concerns that have been raised regarding both Condition 8 and Condition 14 by well-qualified and experienced experts, neither of these conditions should be discharged until their deficiencies have been addressed.

Yours faithfully



RICHARD BUXTON SOLICITORS

Enc. Reports of Bruce Bamber and Claire Holman