

## 1) Principle of development

The proposed area to re-site the station buildings is located within the open countryside. Policy LP2 states that decisions on services, facilities and new development is taken on the basis of a settlement hierarchy. The open countryside represents the bottom of the hierarchy. Development of land outside of residential envelopes and in the open countryside will be restricted to that which:

- i) is demonstrably essential to the effective operation of local agriculture, horticulture, forestry, outdoor recreation and access to natural greenspace, transport or utility services;
- ii) satisfies the 'exception' test set out in Policy LP8; or
- iii) is in accordance with Policy LP11; or
- iv) is minerals or waste development in accordance with the separate Minerals and Waste Development Plan Documents.

Paragraphs ii) and iv) are not relevant to this proposal. Further to reviewing paragraph iii), it is not considered that any parts of the proposal are relevant to Policy LP11.

With regards to paragraph i), it is not considered that the proposal would meet any of these points. The relocated station would not contribute to specific transport or utility services, minus a cycle access that is not directly related to the station. Additionally, whilst the station would host a number of service uses, the proposal remains currently too broad to confirm that it would accord with the principles of paragraph (i). It is not considered that this community facility would meet the principle of development prescribed under Policy LP2.

With regards to the specific residential element of the proposal, this would represent a replacement of a residential use, given that the existing station has been 'lived in' in the past, albeit there is no planning permission or lawful development certificate to confirm this. Paragraph (iii) enables under Part B of Policy LP11 for replacement dwellings in the open countryside and does allow for alternative locations if the original footprint cannot be utilised. This specific element could therefore accord with Policy LP11 in principle, but it is advised that a supporting statement is provided with any future planning application to demonstrate compliance within Policy LP11.

The proposed siting, however, would be very near to a land safeguarded for strategic development. Walking and cycling infrastructure is proposed strategically from Barnack to the north and Wansford station to the south under Policy LP15. This predominantly follows the old rail lines that once existed, which pass by the current station's siting as well as the proposed siting of the station. If the proposed station relocation were to also bring about the development of this strategic development and incorporate walking and cycling facilities, this would enable the proposal to obtain more weight as a result of delivering development proposed under Policy LP15. The plans submitted however are not clear in terms of whether this full footpath could be secured. As such, a precautionary stance must be taken, which is one of unacceptability.

As such, the principle of the proposal is unacceptable under Policies LP2 and LP15 of the Peterborough Local Plan (2019). The following material planning considerations shall be assessed.

## 2) Design and impact to the character and appearance of the site and the surrounding area.

The application site is predominantly of a soft nature. Fields abut either side of the trees and shrubs which follow the rail line, with the west field to host the siting of the proposed re-located station. The topography of the surrounding land is uneven, which allow clear views of the A47 and vice versa. Although the locally-listed station is proposed to be removed, there is another locally-listed structure, which is the bridge that supports the A47 traffic. It should be noted that the former Wansford to Stamford Line will be included within the updated Local List and is therefore considered a non-designated heritage asset.

The Conservation Officer that there is an initial presumption to relocate the former station because this would save the asset and whilst its context is different to its current location, it would retain to some degree its relationship within its historic siting, as well as to the historic buildings nearby,



including the bridge and Heath House. This is considered to be beneficial in historical character terms.

However, it is considered that the proposed siting of the station on the bank as proposed would be appear awkward and odd within the soft rural landscape. It would be readily visible from the A47, especially to traffic travelling eastwards as a result of the varied topography. Additionally, whilst the broad plans are helpful, they would require more detail which would have landscaping impacts. For example, if a classroom is proposed, as suggested by the Applicant, hard surfacing would need to be installed to accommodate vehicular parking and drop off/pick-up facilities. Even with added landscaping, this would alter the rural landscape within the portion of the open countryside and would potentially impact upon the setting of the building itself. As such, whilst it is respected that the Conservation Officer places weight to saving the asset in historic character matter, there are concerns about the impact to the surrounding environment and the building itself.

As described earlier under Section 1), the strategic walking and cycling facilities along the former railway line are proposed under Policy LP15. If both proposals were combined, this further enhances the heritage argument. However, it is not considered that this would outweigh the harm to the open countryside as described earlier.

Therefore, whilst the proposal could accord with Policy LP19 of the Peterborough Local Plan (2019) in terms of the preservation of the heritage asset, the harm of a sizable structure upon raised land, along with necessary ancillary developments to support this (such as parking) which have not been expanded upon, the proposal would harm the landscape character of the area and not accord with Policies LP16 and LP27 of the Peterborough Local Plan (2019).

### 3) Highway safety and parking provision

The Local Highway Authority have raised no objections in principle to the proposed development. However, this in-principle view is based only upon the limited details submitted within this pre-application enquiry only.

There are a number of matters that are unclear and which cannot be commented upon at this time. Specifically, the required access, parking and turning facilities into the site for vehicles and cycles. The reintroduction of use to the station and the different community uses proposed need to be identified and their respective floorspaces calculated. This should enable the required parking facilities to be calculated for both vehicles and cycles.

It is therefore advised that a statement is produced that identifies:

- All land in control of the Applicant;
- A site plan that identifies proposed parking spaces (vehicles and cycles);
- Proposed staffing levels (the number of 'full time equivalents');
- A statement that details: what uses are proposed within the building, including their floorspace equivalents in sqm (this should be annotated on the proposed floor plan).

If a planning application is submitted, as well as the Local Highway Authority assessing the proposal, National Highways would also be instructed to provide comments given the site's proximity to the A47. The City Council's pre-application service only deals with internal consultees. There is no provision to consult National Highways. As such, it is advised that contact is made with them to specifically discuss your pre-application. Please be advised, should they object to any proposals (and it is suspected that they would object to any proposal that generates significant traffic without a suitable junction), the LPA would not be in a position to go against them.

Finally, it must be recognised that depending on the required parking spaces, the relevant hard surfacing required and its construction, this may also adversely impact upon the surrounding landscape in character terms. The development must be mindful of its wider character impacts.

On the basis of highway safety matters, the proposal in principle could accord with Policy LP13 of the Peterborough Local Plan (2019).

### 4) Amenity



There are no neighbours immediately surrounding the site. Given the lack of residential premises immediately surrounding the site within this relatively isolated location, it is not considered that the proposed development would unacceptably impact upon the amenity of residential neighbours through adverse overbearing, overshadowing or loss of privacy impacts.

In light of the above, the proposal is considered to be in accordance with Policy LP17 of the Peterborough Local Plan (2019).

#### 5) Flood risk and water management

The proposed siting of the station falls on land which does not fall within Flood Zones 2 or 3. However, these flood zones only appear to cover the west and central sections of the same field the station would be sited within. Given that the station does not fall within these flood zones, it is not considered that the station and its supporting uses would be at adverse risk from flooding.

*The City Council's Drainage Officer has raised no objection in principle to the proposal. The Officer advises that if a planning application were to be submitted, details would be required to demonstrate how surface water would be drained from all impermeable areas.*

Subject to the submission of these details which show an acceptable drainage scheme, the proposal in principle could accord with Policy LP32 of the Peterborough Local Plan (2019).

#### 6) Trees

The proposed site is immediately adjacent to trees formally protected by way of a Tree Preservation Order (PCC Tree Preservation Order No.5 1986) which covers in this case the area W.1. (woodland designation) (reference: 86/00005/TPO). This designation covers the southern edge of the A47 and follows the route of the old railway line.

The City Council's Tree Officer objects to the proposed development as a result of the insufficient information provided. More information is required to make an informed assessment as to the impact of the proposal to these trees. With any planning submission, an Arboricultural Impact Assessment (AIA) including an Arboricultural Method Statement (AMS) and a suitable and appropriate tree protection scheme by way of a Tree Protection Plan (TPP), if carrying out works within the root protection areas (RPA's), would need to be included. It is unclear at present what impact the relocation would have upon these nearby trees.

The Tree Officer also clarifies that no objections would be raised if it can be confirmed through the required plans and documents that there would be no impact upon the protected trees. However, at this time, given that impact is not clear, a precautionary principle must be applied with required to the protected trees and thus an unacceptable stance is held.

On the basis of the above, the proposal is not considered to be acceptable and therefore not in accordance with Policy LP29 of the Peterborough Local Plan (2019).

#### 7) Ecology

The application proposes that the reconstruction occurs within the boundaries of a County Wildlife Site: Sutton Meadows North. This site is designated for its mature pollard willows and other semi-nature habitats and borders the Sutton Disused Railway, which is designated for supporting areas of CG5 Upright Brome-Chalk False-Brome Grassland.

The Council's Wildlife Officer advises that if the development site has over a 0.2ha footprint, or at least 1000m<sup>2</sup> internal space, then this would trigger the SSSI Impact Risk Zone for the Sutton Heath and Bog SSSI, designated for its calcareous grasslands. As a result, it would be likely that both the Wildlife Trust and Natural England would need to be consulted with regards to your proposal. As these are external consultees, there is no provision to consult them within this pre-application.



Generally, there is too little information within the pre-application with regards to the method of construction and the potential operational impacts of the building to form a judgement as to the impact upon the CWS. However, the proposed siting has high biodiversity value and therefore the proposal may negatively impact several statutorily and non-statutory areas. The level of negative impact will vary greatly depending on the exact methods for which the building will be constructed and the final size of the footprint.

The Wildlife Officer recommends the following:

i) Submission of a Preliminary Ecological Appraisal (PEA)

It is strongly recommended that a Preliminary Ecological Survey is undertaken to establish how the proposed development would impact the site, the priority habitats and the relevant protected species. Particular attention should be paid to the flora present. With the current information provided, it is difficult to predict exact what species and/or habitat would be a concern for this construction.

The Preliminary Ecological Appraisal (and subsequent Ecological Impact Assessment if required) will need to carefully consider the mitigation hierarchy in relation to the proposal's construction and operation. The Wildlife Officer advises that the mitigation hierarchy is a system that looks at the potential negative impacts of a development and considers first if they can be avoided, then mitigated for and lastly if they can be compensated for. Due to the sensitive nature of the location, this process must be followed on all aspects of the proposal.

It is very likely that extensive further survey is going to be required after the PEA is completed and certain surveys are limited to being performed at certain times of year. The Wildlife Officer highly recommends that a meeting is held with a suitably qualified ecologist to discuss the potential requirement of this development.

ii) Biodiversity Net Gain

If it is possible to construct this building while compensating and mitigating for the potential negative impacts that its construction and operation will have on material concerns of the Local Planning Authority, it will represent a permanent net loss of habitat from the County Wildlife Site.

The Wildlife Officer advises that the exact extent of this net loss is difficult to determine without the information that a Preliminary Ecological Survey will provide, however it will need to be compensated for through the provision of land that is not currently being used for ecological conservation. A detailed Ecological Mitigation Strategy will also be required that establishes how the new land will achieve the conservation goals and provides contingency for adverse results. The amount of land needed for this mitigation will likely be greater than the total area lost.

Please note that this may change depending on the enactment of the requirement within the Environment Bill to secure a mandatory 10% biodiversity net gain on every site. As a precaution, it is recommended that a biodiversity net gain assessment is performed as part of the PEA.

Finally, the Wildlife Officer advises that any lighting proposed on site should follow the lighting guidance as produced by the Bat Conservation Trust and Institute for Lighting Professionals (<https://www.bats.org.uk/our-work/buildings-planning-and-development/lighting>).

Overall, it is not possible to determine at this time what the biodiversity impact of the scheme would be given the various variable that could arise within this site that is very valuable in biodiversity terms. Given the unclear impacts, a precautionary principle must be applied with required to the protected trees and thus an unacceptable stance is held.

In light of the above, the proposal is not considered to be acceptable and is not in accordance with Policy LP28 of the Peterborough Local Plan (2019).

## 8) Contamination

The City Council's Environmental Health Officer has raised no objections to the proposed development. It is considered necessary however that, in the event that unknown contamination



arises during the works, the unsuspected contamination planning condition is applied to ensure the unknown contamination is assessed and acceptably mitigated for.

In light of the above, the proposal is considered to be in accordance with Policy LP33 of the Peterborough Local Plan (2019).

#### 9) Developer Contributions

The City Council has an adopted Community Infrastructure Levy (CIL) charging schedule which came into effect on 24th April 2015. The purpose of this levy is to raise funds from developers who are undertaking new building projects, to help pay for the infrastructure that is needed to support it. CIL replaces Section 106 planning obligations for many forms of infrastructure, although these agreements can still be used for site-specific mitigation measures (i.e. off-site highway works) and for open space provision and affordable housing (only applicable if a proposal exceeds policy triggers). More information on CIL and the charging schedule can be found on our website at: <http://www.peterborough.gov.uk/cil>.

Any future planning application you may wish to submit must be accompanied by a Planning Application Additional Information Requirement (CIL Questions) Form, otherwise it will be deemed invalid. The information supplied on this form will help the Council determine whether or not CIL is payable, and if it is, a provisional CIL amount. The form can be accessed via the link above.

#### Conclusion

Based on the above, subject to a planning application being received by the Local Planning Authority with amendments and additional information supplied as requested above, it is my professional opinion that the proposal as its presently stands could not be supported by the Local Planning Authority. Whilst there is support from the Conservation Officer on heritage grounds, there are concerns with regards to the proposal's impacts to the character and appearance of the surrounding area, along with the uncertain impacts to vehicular/parking arrangements and the development's impact to protected trees and ecology. The principle of development is not considered to be acceptable on the basis of the community aspects of the proposal.

Should you wish to apply for planning permission regardless of the above advice, guidance on how to apply for planning permission can be found on our website at [www.peterborough.gov.uk/planningoss](http://www.peterborough.gov.uk/planningoss).

Please note that whilst all reasonable care has been taken, new, unforeseen matters may arise during the consideration of an application. The views expressed in this letter are my personal professional opinion and are given without prejudice to the decision of this authority in respect of this pre-planning application or any future application proposal which may be submitted.

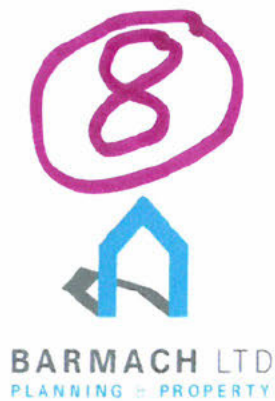
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Yours sincerely



Mr Jack Gandy  
Senior Development Management Officer





17 February 2022

Dear Robbie

### **Sutton Station Relocation**

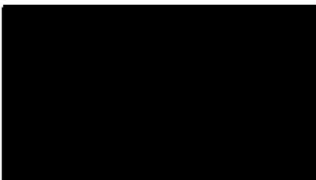
It was great to meet you last week and to better understand your proposals for the relocation of the station. Thank you again for your instruction to support the project.

As you know, I am a Chartered planner and have held a number of local authority head of planning service roles over the years. From 2009 to 2019 I was Executive Director of Growth and Economy at *Peterborough City Council* and responsible for a wide range of services including planning, property, highways, built and natural conservation, waste services, open space management, housing and environmental health, the Council's Local Plan, economic development regeneration. I maintain a good working relationship with former colleagues and with elected members, as well as with a wide range of local stakeholders.

Having read the Council's pre-application advice letter regarding potential relocation of the station I do not consider that there are any 'showstoppers'. There is however significant merit to your proposal, not least in securing the future of this heritage asset. The Council's advice understandably highlights a number of areas where additional supporting information will be necessary such as ecological, landscape and heritage impact reports but this is not unusual. What we need to do next is further shape your proposal and to commission that supporting information.

I have attached my preliminary comments on the Council's pre-application response letter.

Kind regards,



**Simon Machen MRTPI**

**Barmach Ltd**



Company registration number: 11719352  
Registered address: 22 Charlotte Way, Peterborough, PE3 9ES



## Planning Officer's pre-application advice in blue and my response in black

### 1) Principle of development

The proposed area to re-site the station buildings is located within the open countryside. Policy LP2 states that decisions on services, facilities and new development is taken on the basis of a settlement hierarchy. The open countryside represents the bottom of the hierarchy. Development of land outside of residential envelopes and in the open countryside will be restricted to that which:

i) is demonstrably essential to the effective operation of local agriculture, horticulture, forestry, outdoor recreation and access to natural greenspace, transport or utility services;

ii) satisfies the 'exception' test set out in Policy LP8; or

iii) is in accordance with Policy LP11; or

iv) is minerals or waste development in accordance with the separate Minerals and Waste

Development Plan Documents.

Paragraphs ii) and iv) are not relevant to this proposal. Further to reviewing paragraph iii), it is not considered that any parts of the proposal are relevant to Policy LP11.

With regards to paragraph i), it is not considered that the proposal would meet any of these points. The relocated station would not contribute to specific transport or utility services, minus a cycle access that is not directly related to the station. Additionally, whilst the station would host a number of service uses, the proposal remains currently too broad to confirm that it would accord with the principles of paragraph (i). It is not considered that this community facility would meet the principle of development prescribed under Policy LP2.

With regards to the specific residential element of the proposal, this would represent a replacement of a residential use, given that the existing station has been 'lived in' in the past, albeit there is no planning permission or lawful development certificate to confirm this. Paragraph (iii) enables under Part B of Policy LP11 for replacement dwellings in the open countryside and does allow for alternative locations if the original footprint cannot be utilised. This specific element could therefore accord with Policy LP11 in principle, but it is advised that a supporting statement is provided with any future planning application to demonstrate compliance within Policy LP11.

Clearly the existing footprint cannot be utilised. Evidence can be provided of historic residential occupation of the property and such use has not been abandoned. Indeed, utility services remain connected to the property. Given the age of the building it very clearly predates the contemporary planning system so could not be expected to have a planning consent – like many buildings across the country.

The proposed siting, however, would be very near to a land safeguarded for strategic development. Walking and cycling infrastructure is proposed strategically from Barnack to the north and Wansford station to the south under Policy LP15. This predominantly follows the old rail lines that once existed, which pass by the current station's siting as well as the proposed siting of the station. If the proposed station relocation were to also bring about the development of this strategic development and incorporate walking and cycling facilities, this would enable the proposal to obtain more weight as a result of delivering development proposed under Policy LP15. The plans submitted however are not clear in terms of whether this full footpath could be secured. As such, a precautionary stance must be taken, which is one of unacceptability.



*As such, the principle of the proposal is unacceptable under Policies LP2 and LP15 of the Peterborough Local Plan (2019). The following material planning considerations shall be assessed.*

What this very narrow interpretation of planning policy fails to recognise is that the proposal relates to the relocation of an existing building – a heritage asset – a short distance from its existing location to one that remains adjacent to the same redundant railway line some 200 metres to the south. It does not relate to new development per se, and relocation is only required as a consequence of the A47 major infrastructure project. There is no net increase in development in the open countryside. In my professional opinion a very strong planning policy case can be made for relocation to the site proposed. The heritage asset would very clearly remain ‘Sutton’ station which would not be the case should it be relocated elsewhere. It would be appreciated within the context of the associated railway line. It should not be necessary to insist that walking and cycling infrastructure are provided above that which serves the existing location of the building, although this would of course be beneficial. Again, relocation is only necessary as a consequence of the A47 infrastructure project.

## ***2) Design and impact to the character and appearance of the site and the surrounding area.***

*The application site is predominantly of a soft nature. Fields abut either side of the trees and shrubs which follow the rail line, with the west field to host the siting of the proposed re-located station. The topography of the surrounding land is uneven, which allow clear views of the A47 and vice versa. Although the locally-listed station is proposed to remove, there is another locally-listed structure, which is the bridge that supports the A47 traffic. It should be noted that the former Wansford to Stamford Line will be included within the updated Local List and is therefore considered a non-designated heritage asset.*

*The Conservation Officer states that there is an initial presumption to relocate the former station because this would save the asset and whilst its context is different to its current location, it would retain to some degree its relationship within its historic siting, as well as to the historic buildings nearby, including the bridge and Heath House. This is considered to be beneficial in historical character terms.*

**These positive comments are noted.**

*However, it is considered that the proposed siting of the station on the bank as proposed would be appear awkward and odd within the soft rural landscape. It would be readily visible from the A47, especially to traffic travelling eastwards as a result of the varied topography. Additionally, whilst the broad plans are helpful, they would require more detail which would have landscaping impacts. For example, if a classroom is proposed, as suggested by the Applicant, hard surfacing would need to be installed to accommodate vehicular parking and drop off/pick-up facilities. Even with added landscaping, this would alter the rural landscape within the portion of the open countryside and would potentially impact upon the setting of the building itself. As such, whilst it is respected that the Conservation Officer places weight to saving the asset in historic character matter, there are concerns about the impact to the surrounding environment and the building itself.*

The station complex is fundamentally development in a rural landscape – it served a rural community - and there is a very strong argument that this heritage asset would be better appreciated if more readily visible. It also had a very clear functional link to waterborne transportation of goods on the river Nene. What the above assessment fails to take into account is the landscape change that will result as a consequence of the A47 major infrastructure project. That will have a far more profound impact and it is that scheme which necessitates relocation of the station. The intention of the relocation project is to achieve a low-key community and heritage asset rather than an intrusive form of visitor attraction with extensive car parking provision. These are matters than can reasonably be agreed through formal pre-application discussion as the scheme progresses. Ultimately it will retain



the appearance of a station adjacent to the railway line which it served, and a short distance from its existing site. Again, I consider that a very strong planning policy case can be made for relocation.

*As described earlier under Section 1), the strategic walking and cycling facilities along the former railway line are proposed under Policy LP15. If both proposals were combined, this further enhances the heritage argument. However, it is not considered that this would outweigh the harm to the open countryside as described earlier.*

*Therefore, whilst the proposal could accord with Policy LP19 of the Peterborough Local Plan (2019) in terms of the preservation of the heritage asset, the harm of a sizable structure upon raised land, along with necessary ancillary developments to support this (such as parking) which have not been expanded upon, the proposal would harm the landscape character of the area and not accord with Policies LP16 and LP27 of the Peterborough Local Plan (2019).*

**Any planning application would be accompanied by both a landscape impact assessment and a heritage impact assessment and these would be weighed in the planning balance. The relocation of the station has to occur by virtue of a major infrastructure project and the heritage argument for relocation a short distance away is to my mind a compelling one, not least when overall landscape impact is considered.**

### **3) Highway safety and parking provision**

*The Local Highway Authority have raised no objections in principle to the proposed development. However, this in-principle view is based only upon the limited details submitted within this pre-application enquiry only.*

*There are a number of matters that are unclear and which cannot be commented upon at this time. Specifically, the required access, parking and turning facilities into the site for vehicles and cycles. The reintroduction of use to the station and the different community uses proposed need to be identified and their respective floorspaces calculated. This should enable the required parking facilities to be calculated for both vehicles and cycles.*

*It is therefore advised that a statement is produced that identifies:*

- All land in control of the Applicant;*
- A site plan that identifies proposed parking spaces (vehicles and cycles);*
- Proposed staffing levels (the number of 'full time equivalents');*
- A statement that details: what uses are proposed within the building, including their floorspace equivalents in sqm (this should be annotated on the proposed floor plan).*

**These details can reasonably be provided through formal pre-application discussion, but as set out above, the aim is to create a low-key community and heritage asset.**

*If a planning application is submitted, as well as the Local Highway Authority assessing the proposal, National Highways would also be instructed to provide comments given the site's proximity to the A47. The City Council's pre-application service only deals with internal consultees. There is no provision to consult National Highways. As such, it is advised that contact is made with them to specifically discuss your pre-application. Please be advised, should they object to any proposals (and it is suspected that they would object to any proposal that generates significant traffic without a suitable junction), the LPA would not be in a position to go against them.*

**Wide stakeholder engagement would be undertaken as the scheme progresses.**



*Finally, it must be recognised that depending on the required parking spaces, the relevant hard surfacing required and its construction, this may also adversely impact upon the surrounding landscape in character terms. The development must be mindful of its wider character impacts.*

**These comments are noted**

*On the basis of highway safety matters, the proposal in principle could accord with Policy LP13 of the Peterborough Local Plan (2019).*

#### **4) Amenity**

*There are no neighbours immediately surrounding the site. Given the lack of residential premises immediately surrounding the site within this relatively isolated location, it is not considered that the proposed development would unacceptably impact upon the amenity of residential neighbours through adverse overbearing, overshadowing or loss of privacy impacts.*

*In light of the above, the proposal is considered to be in accordance with Policy LP17 of the Peterborough Local Plan (2019).*

**These comments are noted**

#### **5) Flood risk and water management**

*The proposed siting of the station falls on land which does not fall within Flood Zones 2 or 3. However, these flood zones only appear to cover the west and central sections of the same field the station would be sited within. Given that the station does not fall within these flood zones, it is not considered that the station and its supporting uses would be at adverse risk from flooding.*

*The City Council's Drainage Officer has raised no objection in principle to the proposal. The Officer advises that if a planning application were to be submitted, details would be required to demonstrate how surface water would be drained from all impermeable areas. Subject to the submission of these details which show an acceptable drainage scheme, the proposal in principle could accord with Policy LP32 of the Peterborough Local Plan (2019).*

**These comments are noted**

#### **6) Trees**

The proposed site is immediately adjacent to trees formally protected by way of a Tree Preservation Order (PCC Tree Preservation Order No.5 1986) which covers in this case the area W.1. (woodland designation) (reference: 86/00005/TPO). This designation covers the southern edge of the A47 and follows the route of the old railway line.

The City Council's Tree Officer objects to the proposed development as a result of the insufficient information provided. More information is required to make an informed assessment as to the impact of the proposal to these trees. With any planning submission, an Arboricultural Impact Assessment (AIA) including an Arboricultural Method Statement (AMS) and a suitable and appropriate tree protection scheme by way of a Tree Protection Plan (TPP), if carrying out works within the root protection areas (RPA's), would need to be included. It is unclear at present what impact the relocation would have upon these nearby trees.

The Tree Officer also clarifies that no objections would be raised if it can be confirmed through the required plans and documents that there would be no impact upon the protected trees. However, at this time, given that impact is not clear, a precautionary principle must be applied with required to the protected trees and thus an unacceptable stance is held.

On the basis of the above, the proposal is not considered to be acceptable and therefore not in



accordance with Policy LP29 of the Peterborough Local Plan (2019).

**An arboricultural impact assessment and tree report would be commissioned and the buildings sited to avoid damage to trees. This is a technical design matter and is not an impediment to the scheme.**

#### 7) Ecology

*The application proposes that the reconstruction occurs within the boundaries of a County Wildlife Site: Sutton Meadows North. This site is designated for its mature pollard willows and other semi-nature habitats and borders the Sutton Disused Railway, which is designated for supporting areas of CG5 Upright Brome-Chalk False-Brome Grassland. The Council's Wildlife Officer advises that if the development site has over a 0.2ha footprint, or at least 1000m<sup>2</sup> internal space, then this would trigger the SSSI Impact Risk Zone for the Sutton Heath and Bog SSSI, designated for its calcareous grasslands. As a result, it would be likely that both the Wildlife Trust and Natural England would need to be consulted with regards to your proposal. As these are external consultees, there is no provision to consult them within this pre-application.*

**The scheme falls well below the 0.2 hectare and 1000 square metre thresholds.**

*Generally, there is too little information within the pre-application with regards to the method of construction and the potential operational impacts of the building to form a judgement as to the impact upon the CWS. However, the proposed siting has high biodiversity value and therefore the proposal may negatively impact several statutorily and non-statutory areas. The level of negative impact will vary greatly depending on the exact methods for which the building will be constructed and the final size of the footprint.*

*The Wildlife Officer recommends the following:*

##### *i) Submission of a Preliminary Ecological Appraisal (PEA)*

*It is strongly recommended that a Preliminary Ecological Survey is undertaken to establish how the proposed development would impact the site, the priority habitats and the relevant protected species. Particular attention should be paid to the flora present. With the current information provided, it is difficult to predict exact what species and/or habitat would be a concern for this construction.*

*The Preliminary Ecological Appraisal (and subsequent Ecological Impact Assessment if required) will need to carefully consider the mitigation hierarchy in relation to the proposal's construction and operation. The Wildlife Officer advises that the mitigation hierarchy is a system that looks at the potential negative impacts of a development and considers first if they can be avoided, then mitigated for and lastly if they can be compensated for. Due to the sensitive nature of the location, this process must be followed on all aspects of the proposal.*

**A PEA would be commissioned to accompany the planning submission and the scheme carefully designed to ensure no adverse impact on protected species.**

*It is very likely that extensive further survey is going to be required after the PEA is completed and certain surveys are limited to being performed at certain times of year. The Wildlife Officer highly recommends that a meeting is held with a suitably qualified ecologist to discuss the potential requirement of this development.*

**This is a standard requirement for proposals of this nature but it is not an impediment to development.**

##### *ii) Biodiversity Net Gain*

*If it is possible to construct this building while compensating and mitigating for the potential negative impacts that its construction and operation will have on material concerns of the Local Planning Authority, it will represent a permanent net loss of habitat from the County Wildlife Site.*



*The Wildlife Officer advises that the exact extent of this net loss is difficult to determine without the information that a Preliminary Ecological Survey will provide, however it will need to be compensated for through the provision of land that is not currently being used for ecological conservation. A detailed Ecological Mitigation Strategy will also be required that establishes how the new land will achieve the conservation goals and provides contingency for adverse results. The amount of land needed for this mitigation will likely be greater than the total area lost.*

*Please note that this may change depending on the enactment of the requirement within the Environment Bill to secure a mandatory 10% biodiversity net gain on every site. As a precaution, it is recommended that a biodiversity net gain assessment is performed as part of the PEA.*

*Finally, the Wildlife Officer advises that any lighting proposed on site should follow the lighting guidance as produced by the Bat Conservation Trust and Institute for Lighting Professionals*

*(<https://www.bats.org.uk/our-work/buildings-planning-and-development/lighting>).*

*Overall, it is not possible to determine at this time what the biodiversity impact of the scheme would be given the various variable that could arise within this site that is very valuable in biodiversity terms. Given the unclear impacts, a precautionary principle must be applied with required to the protected trees and thus an unacceptable stance is held.*

*In light of the above, the proposal is not considered to be acceptable and is not in accordance with Policy LP28 of the Peterborough Local Plan (2019).*

**This judgment has been reached only on the basis of the information submitted to date which is limited. There is nothing within these comments that cannot be satisfactorily addressed through a PEA, BNG assessment and BEMP which is a standard development approach.**

#### *8) Contamination*

*The City Council's Environmental Health Officer has raised no objections to the proposed development. It is considered necessary however that, in the event that unknown contamination arises during the works, the unsuspected contamination planning condition is applied to ensure the unknown contamination is assessed and acceptably mitigated for.*

*In light of the above, the proposal is considered to be in accordance with Policy LP33 of the Peterborough Local Plan (2019).*

**These comments are noted.**

#### *9) Developer Contributions*

*The City Council has an adopted Community Infrastructure Levy (CIL) charging schedule which came into effect on 24th April 2015. The purpose of this levy is to raise funds from developers who are undertaking new building projects, to help pay for the infrastructure that is needed to support it.*

*CIL replaces Section 106 planning obligations for many forms of infrastructure, although these agreements can still be used for site-specific mitigation measures (i.e. off-site highway works) and for open space provision and affordable housing (only applicable if a proposal exceeds policy triggers). More information on CIL and the charging schedule can be found on our website at:*

*<http://www.peterborough.gov.uk/cil>.*

*Any future planning application you may wish to submit must be accompanied by a Planning Application Additional Information Requirement (CIL Questions) Form, otherwise it will be deemed invalid. The information supplied on this form will help the Council determine whether or not CIL is payable, and if it is, a provisional CIL amount. The form can be accessed via the link above.*

These are standard comments relating to all planning applications.

### **Conclusion**

*Based on the above, subject to a planning application being received by the Local Planning Authority with amendments and additional information supplied as requested above, it is my professional opinion that the proposal as its presently stands could not be supported by the Local Planning Authority. Whilst there is support from the Conservation Officer on heritage grounds, there are concerns with regards to the proposal's impacts to the character and appearance of the surrounding area, along with the uncertain impacts to vehicular/parking arrangements and the development's impact to protected trees and ecology. The principle of development is not considered to be acceptable on the basis of the community aspects of the proposal.*

All of the matters raised are technical matters capable of being addressed through the submission of technical reports. It appears that the officer's main concern relates to the open countryside location and landscape impact. However, it is clear that the proposal is only necessary as a consequence of the A47 major infrastructure scheme and that the impact of the station relocation must be considered within this context, and the recognised need to protect this important heritage asset. I consider that the heritage benefits of the case can very reasonably be argued to outweigh and landscape impact in planning policy terms.



## Re: Sutton Station Meeting

robbie reid [REDACTED]

Tue 08/02/2022 09:47

To: Gohel, Tarvinder [REDACTED]

Dear Tarv,

Will get Simon's report to you asap, but based on what he knows none of the issues highlighted by planners cannot be addressed.

With regards

Robbie

---

**From:** Gohel, Tarvinder [REDACTED]

**Sent:** 07 February 2022 11:17

**To:** robbie reid [REDACTED]

**Cc:** Stirzaker, Craig [REDACTED]

A47 Wansford to Sutton RIS <A47WansfordtoSuttonRIS@highwaysengland.co.uk>; Louro, Jay

**Subject:** RE: Sutton Station Meeting

Hi Robbie,

Many thanks for the update.

Just to let you know, in order to secure National Highways funding, we have had to make a decision based on the information available. I will be responding formally to you in due course.

Regards

Tarv

**Tarv Gohel**

Technical Director / Bridges Team Leader

Arcadis Consulting (UK) LTD

Cornerblock, 2 Cornwall Street, Birmingham | B3 2DX | United Kingdom





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**From:** robbie reid [REDACTED]  
**Sent:** 04 February 2022 15:11  
**To:** Gohel, Tarvinder [REDACTED]  
**Subject:** Sutton Station Meeting

Dear Tarvinder,

We are holding a site meeting on Friday 11th 3pm at the station with Richard Astle from Landyke Trust and Simon Machen our planning consultant, former head of planning at Peterborough.


The purpose of this meeting is to familiarise Simon with the building and the proposed new site, and I am going to ask him to do a report as an assessment of the planning issues. Also, what we need to do before we put in for planning ie what reports and assessments need to be complete, do we do outline before going to full.

Once he has done this assessment, we will forward to yourself, but will try and get this done as soon as possible. Once this is done, I will be starting to move onto potential costs so after Simon's report has been done and you have had time to consider it would be good to know if our relocation will have your option over the NVR proposal, which nobody locally has heard nothing on their plans. Also, if we are going to put in for "outline" which with the speed of process from Peterborough planning department you may be starting to build the road by the time they make a decision.

With regards

Robbie  
PS have a good weekend

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### Info on old rail line

Mick G [redacted]

Wed 09/02/2022 19:30

To: robbie reid [redacted]



#### The Stamford to Wansford Branch Line

Also known as the "Stamford to Sibson Line", "The Sibson Extension" and even the "Bread & Onion Line", the unique nature of this 8 mile branch line arises from its early closure in 1929 ..... long before Dr Beeching came along ! Despite having been closed for nearly 100 years, this old line that was built by the small Stamford & Essendine ...

[redacted]



#### Wansford to Stamford Branch Line Animation

A wonderful animation created by Marcus Thompson giving a real flavour of how a railway journey from Wansford to Stamford might have looked like back in the early 1900s.

[redacted]

The walking video has been posted on facebook so hope it doesn't encourage to many walkers on your land. The second video I found on youtube which may be useful in you claim for the station house and platform.

[redacted]



## Station house

Mick G [REDACTED]

Mon 28/02/2022 09:49

To: robbie reid [REDACTED]

Hi Robbie,

See the attached addition note I have sent to Tarv just ramp up the pressure a little more:

"Dear Tarv,

I find myself in a difficult position where we have a number of very positive DF projects we are working on but in my capacity as Chairman of our Parish Council need to convey the concerns of my parishioners and landowners within the Parish.

My main objective is to ensure a heritage asset within the parish is preferably kept within the parish, or if not, is protected as its current form in another location.

I have been given some additional information over the weekend to which I would add comment to my original email on the subject.

Two parties have come forward wishing to acquire the building, Nene Valley Railway(NVR) and Mr Reid of our Parish who is strongly supported by the Langdyke Trust and other local organisations. According to the planning records neither party have planning permission for the relocation however, Mr Reid is proposing a location on the former rail line adjacent to the existing site.

I gather you have made a preliminary decision in favour of NVR based on information provided by both parties despite both submissions having some shortcomings. NVR have been given the opportunity to address their issues but Mr Reid has not been afforded the same. As this building has been acquired using taxpayer funds the process must be robust and objective in the interest of fairness, value, risk and overall merits. Making a preliminary decision with shortcomings from both applicants certainly goes against a robust and objective process.

As the A47 project has yet to achieve permission from the Secretary of State and progress through the Planning Inspectorate process I do not understand the current urgency you are attaching to this decision. In the interest of objectiveness and robustness I would urge you to give both parties the same opportunity to address their submission shortcomings and withdraw your premature preliminary decision.

On behalf of all the interested parishioners I eagerly await your response to both my emails.

Kind regards

Mick Grange

Chairman - Sutton Parish Council"

Cheers

## National Highways - A47 Sutton Station House Building

Gohel, Tarvinder [REDACTED]

Fri 18/02/2022 09:41

To: robbie reid [REDACTED]

Cc: A47 Wansford to Sutton RIS <A47WansfordtoSuttonRIS@highwaysengland.co.uk>; Louro, Jay [REDACTED] Malone, Gemma [REDACTED]

Dear Robbie,

Many thanks for your continued interest and support in retaining and relocating the Sutton Station House building. As you are aware another party has also come forward with a proposal to relocate the building. As a result, National Highways, with support from Peterborough City Council and Historic England, undertook an objective review of both proposals to review relative merits and risks.

Due to the tight windows to secure funding we have had to go ahead and make a decision on which proposal to move forward with. On the balance of risk, we have decided to progress with the other proposal. We know this will come as a great disappointment to you and the community. However, we feel with the current constraints, the other proposal will provide greater value and less risk. We have provided a summary of our review below for your records.

If you wish to discuss this, please feel free to get in touch.



<i>H&amp;S implications:</i> No major concerns with proposals.
<i>Customer Impacts:</i> Rojali proposal has very strong links to local user groups, Langdyke trust and local parish. The building was likely to be used a community hub but try to retain as many original features as possible of the building. There was a slight concern around being relocated to private land and accessibility.
<i>Proposals for Dismantling / Construction:</i> No major concerns with proposals.
<i>Commercial Implications:</i> Rojali is a private company and relocation site is private land so there were commercial gain concerns.
<i>Land for relocation:</i> No major concerns with proposals.
<i>Planning permissions / Peterborough requirements:</i> Planning officer raised a number of concerns around the proposals. These are currently being reviewed and independent planning consultant has been engaged to address concerns. Serious risk to delivery still remains if planning process is protracted.
<i>Access Considerations:</i> No major concerns with proposals.
<i>Agreements/Insurances/Liability:</i>

[REDACTED]



No major concerns with proposals.
<i>Experience of Similar Works:</i> No major concerns with proposals.
<i>Funding proposals:</i> No major concerns with proposals.
<i>Programme implications:</i> Rojali proposal provided indicative timescales for dismantling but not much detail around construction.
<i>Environmental implications:</i> No major concerns with proposals.
<i>Public benefits and requirements:</i> No major concerns with proposals.

Regards

Tarv

**Tarv Gohel**

Technical Director

Arcadis Consulting (UK) LTD

Cornerblock, 2 Cornwall Street, Birmingham | B3 2DX | United Kingdom



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