

APPLICATION 26/01721/PRIOR
29 STATION ROAD, SHEPRETH



OBJECTION ON BEHALF OF SHEPRETH PARISH COUNCIL

A. INTRODUCTION

1. Shepreth Parish Council ("**SPC**") objects in the strongest possible terms to application **26/01721/PRIOR** for prior notification as to whether prior approval is required for development under Class ZA of Part 3 of Schedule 2 ("**Class ZA**") of the Town and Country Planning (General Permitted Development) Order 2015 (the "**GPDO**") (the "**Application**") and requests that it be put before the full Planning Committee. The Application relates to the former Grants Instruments site at 29 Station Road, Shepreth, and has been brought by the current owners, GCR Camprop Fifteen Ltd ("**CamProp**"). The Application is inextricably linked to application **26/01471/PRIOR**, to which SPC also submitted a strong objection on 28th May 2026, and to a third application, **26/01957/FUL**, all relating to the same site. In this submission, we refer to applications 26/01721/PRIOR and 26/01471/PRIOR as "**the Applications**": we will be responding separately to application 26/01957/FUL, to which the Parish Council also objects.
2. In this document, SPC sets out its grounds of objection to the Application, and the basis on which it invites the SCDC to refuse prior approval for the demolition and erection of a new building sought by CamProp in the Application. For the purposes of readability, certain of the submissions on the relevant criteria (specifically transport and noise, are supported by separate appendices setting out SPC's case in detail: these should be treated as incorporated into and forming part of this formal objection.
3. These written submissions are the product of a collaborative effort by those parish councillors who do not have a conflict of interest in the proposed development at the Site, with assistance from both lawyers and residents who have an expert interest in the matters arising for consideration on the Applications.

Summary of Objections

4. The documentation and information provided in support of the Application is in many respects woefully deficient, and comes nowhere close to satisfying the requirements for prior approval under Class ZA.2 of the GPDO. For the LPA to grant approval would in the circumstances be unlawful.

5. SPC believes that CamProp's proposal fails to satisfy almost all of the criteria set out Class ZA.2(2), as explained more fully below. However, we have particular concerns about 9 matters in particular, each of which constitutes a separate and stand-alone ground for refusal of the Application, but which – taken cumulatively and with the other matters raised in these submissions – make it clear that any grant of prior approval would involve a significant breach of the GPDO by the LPA.
6. In terms of flooding risk (Class ZA.2(2)(c)), Anglian Water has filed a robust objection to the Application, noting that the proposed development risks the pollution and deterioration of the nearby watercourse – the rare chalk stream known as the River Shep – and would overwhelm the local sewage network, resulting in unacceptable risks to water quality.
7. The LPA's own Contaminated Land department has noted that in relation to contamination risks in relation to the proposed new building (Class ZA.2(2)(b)) that CamProp has failed to submit a proper study of the risk of contamination, but relies on (i) risk assessment conducted 2 years ago in June 2024 for the purposes of the current commercial use (ii) fails to take account of the fact that the proposed use is residential; (iii) does not adopt sufficiently robust screening criteria; and (iv) fails to provide a remediation programme that is sufficiently intensive and detailed for a residential site. Given that this is the view of the LPA's own officers.
8. In relation to noise impacts on residents of the proposed building, the External Noise Intrusion Assessment is wholly deficient for the purposes of satisfying the criterion in Class ZA.2(2)(h). The list of deficiencies is lengthy (we set it out below) but ranges from an insufficient demonstration of compliance with UK acoustic guidance requirements and the relevant British Standards, to a flawed survey process and questionable methodology. Those are not just SPC's conclusions: they are those of the LPA's own Environmental Planning department.
9. In relation to Class ZA.2(2)(g) and (h) – lighting and impacts on neighbouring properties:
 - a. The calculations in the Climate Based Daylight Modelling assessments are incorrect and significantly overstated, and the LPA can have no confidence that all rooms within the development will meet the required standards.
 - b. The Daylight & Sunlight Report incorrectly states that the impact on neighbouring properties on Station Road and Docwras Close meets BRE

recommendations. The proposed development will in fact cause a notable reduction in light in some of those properties.

- c. The recently issued application for planning permission (not prior approval) number 26/01957/FUL calls into question whether the ultimate light levels in Building EX2 will meet the statutory 50% requirement. The application proposes a reduction in glazing, in circumstances where the daylight reports state that certain habitable rooms would receive daylight levels of as low as 53.1%. The current daylight reports do not take the proposed reduction into account, so the LPA cannot be satisfied that the lighting requirements in relation to building EX2 will be satisfied. That is a ground for rejecting Application 26/01471/PRIOR (and we will be writing to the LPA separately about that).
10. As far as Class ZA.2(2)(k) – demolition methodology – is concerned, the Application does not demonstrate a genuine demolition methodology: there is insufficient information on demolition impacts on nearby heritage assets, archaeology, neighbours, Station Road traffic, or railway infrastructure.
11. SPC believes that this development will have material adverse "*transport impacts*" in the terms of Class ZA.2(2)(a). This conclusion is based on an analysis of historic use of the site and a reliance on the LPA's own numbers as represented in the draft local plan (considered in detail in Appendix One).
12. Moreover, as we set out below, there are serious concerns about:
 - a. the design and appearance of the building – and in particular its height, which is not readily apparent from any of the documents submitted in support of the Application – and the landscaping proposals, which are deficient;
 - b. the impact that the proposed development would have on the amenity of neighbouring premises (particularly in relation to light, overlooking and loss of privacy); and
 - c. the impact that the very significant increase in residential use that would result from this development if it were approved would have on Shepreth, which is a small rural community and has been designated in the Local Plan as an "infill village".

Procedural Matters

13. SPC formally resolved to object to the Application by unanimous resolution of those Parish Councillors entitled to vote at an Extraordinary Meeting held on 19 May 2026.
14. SPC further resolved to request that South Cambs District Council (“**SCDC**”) consider the application at its full Planning Committee. That request was made in writing by the Parish Clerk on 19 May 2026.
15. A public meeting was held on 27 April 2026, attended by upwards of 30 concerned residents from Shepreth: all those who spoke were against the proposals contained in this Application and in 26/01471/PRIOR, many on the grounds set out in the Public Comments that have been submitted in response to both. SPC notes that there has been almost universal opposition to CamProp’s proposals on social media.
16. The level of public opposition is evident from the very large number of Public Comments visible on the Planning Portal (which shows at the time of writing 19 objections for this Application and 22 for 26/01471/PRIOR: a total of 41 in relation to both Applications). There have also been, at the time of writing, 3 objections to 26/01957/FUL.

Other Matters Addressed in these Submissions

17. SPC also takes the opportunity in these written submissions to:
 - a. Place into context the Applications referred to above, together with the planning permission application made recently, numbered 26/01957/FUL, and highlight (i) the community’s dismay at the “sleight of hand” and lack of engagement on the part of CamProp in relation to its proposed change of use (which follows its half-hearted attempts over the last few years to implement the original permission that it was given for the Site), and (ii) the potentially deleterious impacts that the Applications, if granted, will have upon *inter alia* transport, drainage, flood risk, noise, local amenities, and community cohesion within what is, by any measure a small “infill” village which is not – and will never be – able to support developments of the intensity envisaged in the Applications.
 - b. Set out our request that SCDC immediately issue an Interim Article 4 Direction, to be followed in due course by a full Article 4 Direction, to prevent the abuse of the GPDO by unscrupulous developers wishing to

avoid having to comply with the planning requirements and restraints that would ordinarily apply to large-scale housing developments, particularly in relation to environmental impacts and sustainability (through which the present Applications drive a coach and horses).

18. SPC has already made the request in relation to Article 4 in our submissions in response to 26/01471/PRIOR, and note that we have not had a response from the LPA. Copies of this submission, highlighting this point, will be sent to the Leader of SCDC and the Head of Planning, as well as to our local District and County Councillors, in order that this request be given the priority that it plainly requires.

Other Applications

19. As SCDC will be aware, consistent with the piecemeal fashion in which it has sought to develop the Site, CamProp has recently submitted a further application with the number 26/01957/FUL for changes, inter alia, to windows and doors. As to that application, SPC will be making a separate submission in response to that application, by the deadline set by the LPA of 19 June 2026.
20. SPC wishes to register its objection to the manner in which the – now three – applications, i.e. the Applications as defined above, have been advanced by CamProp. The submission of successive applications makes it very difficult to assess their impact on the development of the Site (no doubt deliberately) and it imposes a heavy burden on the local community in responding to it, given that SPC is a volunteer group (likewise).

B. STRUCTURE OF THIS SUBMISSION

21. For convenience, SPC has structured this submission as follows:

- a. Section A: Introduction
- c. Section B: Structure
- d. Section C: Background and Key Issues/Problems
- e. Section D: Objections from Third Party Consultees
- f. Section E: Summary of SPC's response on the relevant criteria:
 - (a) *transport and highways impact of the development;*
 - (b) *contamination risks in relation to the building;*
 - (c) *flooding risks in relation to the building;*
 - (d/e) *the design and external appearance of the new building;*
 - (f) *the provision of adequate natural light in all habitable rooms;*

- (g) *impacts of the development on the amenity of the new building and of neighbouring premises including overlooking, privacy and light;*
 - (h) *impacts of noise from commercial premises on the intended occupiers;*
 - (i) *the impact on business and new residents of the development's introduction of, or increase in, residential use in the area in which the development is to take place;*
 - (j) *the impact of the development on heritage and archaeology;*
 - (k) *the method of demolition of the old building;*
 - (l) *the plans for landscaping of the development, including the planting and maintenance*
- g. Section F: Proposed Article 4 Direction
 - h. Appendices on Transport Impact and Noise.

C. BACKGROUND

22. Shepreth is a small village, with only 329 residential units and 789 people. The proposed development envisaged in the Applications would result in the creation of a further 55 residential units and, on a best case scenario, with each unit occupied by only one person, a further 55 residents: that means an increase in the number of residential units of 17% and in residents of 7%.

23. Single occupancy should not be assumed however (as, for instance Cambridgeshire Highways appear to have done in response to the Applications): it is not unreasonable to assume that at least 50% of the units could be occupied by two people, which would mean upwards of 80 new residents moving (or being moved) into the village.

24. That would be a significant increase in any context. However, Shepreth is an "Infill Village" under South Cambridgeshire's Local Plan, adopted in 2018. Such villages are defined in the Local Plan as follows:

"Infill Villages are generally amongst the smallest in South Cambridgeshire. These villages have a poor range of services and facilities and it is often necessary for local residents to travel outside the village for most of their daily needs. These villages generally lack any food shops, have no primary school and may not have a permanent post office or a village hall or meeting place. Development on any scale would be unsustainable in these villages, as it will generate a disproportionate number of additional journeys outside the village."

25. In Shepreth's case, the lack of facilities is almost total. Specifically:

- a. There is no food shop or post office: the nearest small convenience stores are in Foxton (1.5 miles away by road) and Barrington (1.8 miles away by road). There is also a convenience store in Meldreth, which is 3.1 miles

away by road). All three of those stores are post offices. A small Co-Op food store is also located in Melbourn (again 3.1 miles away by road).

- b. There are no larger food stores within walking or cycling distance of Shepreth. The nearest supermarkets are in Royston (6 miles away) or Trumpington (7.1 miles away) and can only be reached by car: they cannot be reached by public transport.
- c. Shepreth does not have a primary or a secondary school.
- d. As is addressed in more detail in Appendix One, whilst there is a train service to/from Cambridge and London Kings Cross (allowing access to Royston, Foxton and Meldreth), the services are limited in off-peak hours. There is presently a once-daily bus service to Cambridge, and there is no expectation that a regular more effective service will be implemented at any point in the near- to mid-future.
- e. As set out in Appendix Two, the drainage and sewage system in Shepreth is already beyond breaking point, and cannot cope with the demands of the current population. This is a potential source of flooding issues which has not been properly assessed for the purposes of the Applications. The revised surface water disposal strategy is, by the Applicant's own admission, non-compliant due to the high groundwater level and will lead to increased flooding.
- f. The sewage system is overloaded, and Anglian Water's objection to 26/01471/PRIOR on the same site states unequivocally that:

"the site is unsustainable due to the associated environmental risk and the increased discharge rates, which could lead to a deterioration in water quality and an unacceptable risk of breaching environmental legislation."
- g. **It is disingenuous for CamProp to state Anglian Water have approved a foul water connection without stating the full truth that this approval related to the formerly intended commercial, rather than residential use.**
- h. In terms of community space, there are two public houses, albeit that one is at the outer edge of the village boundary and is 1.3 miles from the proposed site. There is a Village Hall, but that is not a meaningful sense a "meeting place": it is rented commercially by a local nursery 5 days a week throughout the year, and is hired out for events in the evenings and at weekends. It does not have any social facilities.

- i. There are no medical services in Shepreth. The nearest GP surgery is in Melbourn, 3.1 miles away by road, for instance.
 - j. There are limited sporting facilities for residents. Apart from one multi-use games area installed on the village's Recreation Ground in 2025 (for tennis and netball), there are no gyms or health centres or similar spaces.
 - k. In light of the lack of facilities and the village's limited connectivity to essential services, it should be immediately obvious that the introduction of 55 residential units, and with the potential for 80 (if not more) residents would be unsustainable. SPC would go further and suggest, without hyperbole, that it could be catastrophic in terms of the impact upon the village's non-existent infrastructure and its community.
 - l. What are the people who will be moving into these proposed units (which have no outdoor space) going to do when not working? Where are they going to go? How will they occupy their time? The risks of anti-social behaviour and risks to the safeguarding of local residents are obvious, we suggest. It is not clear to SPC how this development "*should be viewed positively*" as claimed by the Applicant's covering letter. SPC reminds the reader of the definition of an Infill village set out in paragraph [24] above.
26. That is not just the view of SPC. It is also the view of Greater Cambridge Planning, of which SCDC forms part ("**GCP**"). It is instructive to note that the proposed site was submitted to the new Local Plan as site number 56169, with options to refurbish for industrial purposes or for full redevelopment for 30 dwellings (55% of the total number of units now being proposed by CamProp in its Applications).
27. The site was rated "Amber" by GCP, which concluded that "*due to the proximity of the rail line, it is recommended only employment or industrial use be considered*". A determination has thus already been made that the site is unsuitable for residential purposes, not least because it is too noisy (a matter to which we will return).
28. Yet the residents of Shepreth find themselves in a situation where, through a loophole in the law, a development can be foisted on them without any proper consideration as to its sustainability. It is worth noting that, if the Applications had been brought as ordinary planning applications, they would have fallen at the first hurdle of being unsustainable under the Local Plan. SCDC will doubtless appreciate that the community feels aggrieved to a very high degree that the protections that they believed they were afforded

by the Local Plan and the TCPA 1990 can be bypassed in the way proposed (unless SCDC refuses approval – which, for the reasons set out below – we consider that it should).

29. SPC should make it clear that it is not opposed to residential development in and around Shepreth: indeed, in recent years, it has actively facilitated the proposed development of a redundant commercial site in the heart of the village (at the former Kenzies Yard site) and also gave its support to a residential development on Barrington Road that would, had it been taken forward by the developer, have resulted in a number of 1- and 2-bed units being built.
30. However, what the village is opposed to is development on a site that is manifestly unsuitable (that being not just our view, but that of GCP), without regard to sustainability (including environmental sustainability) or the “*unacceptable risk*” of pollution and a breach of environmental legislation that will result from already overburdened infrastructure (particularly sewage and drainage systems, as well as local roads – as discussed below) and our limited, almost non-existent community resources.
31. It is also incumbent on SPC to say something about the manner in which CamProp has behaved in relation to putting forward the Applications. Permission to develop the Grants Site as laboratory and office space was first granted in 2023. Since then, CamProp has implemented that permission in a half-hearted fashion, and in a manner that has repeatedly involved the breaking of promises to the local community about the manner in which works would be carried out and the effective abandonment of the site for many months.
32. That lack of good faith has manifested itself in the way in which the proposed change of use was announced to the village without any forewarning or attempt to discuss it with SPC: in effect, the development has been sprung on us out of the blue. That has necessarily caused no little dismay. There has been no attempt to engage with the community since the Applications were issued.
33. SPC’s concerns have been pithily summarised by a local resident in their submissions on the Applications:

“The manner in which the applicant has progressed the change of use for EX2, followed by the subsequent planning application for EX1, raises serious procedural concerns ... It gives the clear impression of a piecemeal strategy, where elements of the scheme are brought forward separately rather than transparently as a whole. This

lack of openness creates concern that further components, such as EX3/RM1, may be introduced incrementally in a similar manner, reducing scrutiny Such an approach undermines confidence in the application process and risks preventing proper consideration of the cumulative impacts of the development."

34. SPC appreciates, however, that such matters are not directly relevant to the planning decision that SCDC will have to make in response to the Applications, to which SPC now turns.

D. THIRD PARTY CONSULTEE CONCERNS

35. We have referred above to the number of public comments that have been submitted in response to this Application and to Application 26/01471/PRIOR. SPC does not propose to rehearse the matters raised in each of those, but gratefully adopts them and requests that SCDC give each of those submissions proper weight and attention: they raise serious matters of concern and demonstrate clearly that CamProp's proposal fails to meet the criteria for prior approval.
36. SCDC is specifically asked to consider and address each of the individual submissions. Planning officers – and members of the LPA if this matter goes to Committee – should ensure that those views are accorded proper respect and weight. Officers are reminded that both SPC and our local councillors have requested that this matter should go to Committee, with SPC's written request being made on 19 May 2026.
37. In this section, we address third party consultee concerns. SPC notes that four consultees have expressed concerns about the proposed development when considered as a whole: one from SCDC's Contaminated Land department covers both this Application and 26/01471/PRIOR, two from UK Power Networks ("UKPN") and Anglian Water ("AW") cover 26/01471/PRIOR only (at the date of writing) but are directly relevant to the site as a whole. The fourth, from Environmental Planning, covers this Application only (although we submit that the points made in it can be made with equal force in relation to application 26/01471/PRIOR).

Inappropriateness of reliance on GPDO to avoid proper scrutiny

38. One set of objections – those from UKPN – highlights the problem with using the GPDO to permit development without proper scrutiny, and with a view to procuring a result that would simply never be allowed if the application were being determined outside the GPDO. More relevantly, however, UKPN notes that there has been a failure to properly assess the noise impacts of the

sub-station, which justifies a refusal of prior approval. Similarly, for the reasons that we set out below, the objections from AW and Contaminated Land constitute an absolute impediment to the grant of prior approval.

Contaminated Land

39. Development under Class ZA of the GPDO is permitted subject to the condition that before beginning development under Class ZA, the developer must provide “*such information as the developer considers necessary to enable the local planning authority to determine the application*” (see ZA.2, sub-para. (2)(b)).
40. It is implicit therefore that any application in relation to contaminated land has to be sufficient to assess the risk of contamination. Where, as here, the supporting reports are, in layman’s terms, the “wrong” ones, the LPA cannot sensibly determine the risk and must refuse.
41. What is clear from the report from Contaminated Land is that the information provided by CamProp is simply insufficient to permit SCDC to determine the Application. SPC notes with concern Contaminated Land’s conclusion that CamProp has failed to submit a proper study of the risk of contamination, but relies on risks assessments conducted in June 2024 for the purposes of the current commercial use.
42. Moreover, we note – as do Contaminated Land– that CamProp has failed to take account of the fact that the proposed use is residential, and that its previous studies are thus redundant and cannot be relied on. SPC understand that more robust screening criteria need to be applied to the Site, and a more intensive and detailed remediation programme strategy produced: CamProp has failed to do either.
43. Contaminated Land, in its memo of 26th May 2026, has suggested that a condition should be imposed that no development should take place until (i) detailed Phase 1 and Phase 2 Desk Studies have been submitted and approved, and a suitable Remediation Method Statement produced and approved.
44. SPC considers, however, that this insufficient, and to proceed in that fashion would be wrong in law and leave the SCDC liable to a judicial review.
45. Bluntly, SCDC must go further and refuse the Application on the basis that there is likely to be contamination and CamProp – which must, in bringing an application under the GPDO, satisfy all of the relevant criteria before making it, and cannot simply be permitted to remedy matters after it has

obtained prior approval – has failed to carry out a proper study or produce a remediation strategy, or to submit the same to SCDC.

46. To allow the Application to proceed in the absence of such information would be unlawful; the GPDO does not make provision for conditions in such circumstances.

Environmental Planning

47. In its report of 29 May 2026, the GCP Environmental Planning department points out the many woeful inadequacies of the External Noise Intrusion Assessment. These include the following:

- a. Insufficient demonstration of compliance with current UK planning and acoustic guidance requirements;
- b. Missing key information, assessment methodology and sufficient detail;
- c. Incomplete methodology within the ProPG Planning and Noise guidance document and an Acoustic Design Statement (ADS);
- d. Incomplete ProPG Planning and Noise guidance;
- e. Insufficient detail of acoustic design process demonstrating how the adverse impacts of noise will be mitigated and minimised, and how significant adverse noise impact will be avoided in the finished development;
- f. No assessment undertaken in accordance with BS4142 of assess noise impacts from nearby commercial noise sources, including the substation operating nearby;
- g. No record of engagement with UKPN (and it is noted that failure to engage could result in unnecessary complaints being received as a result of technically inappropriate development).
- h. Questionable noise survey location on a flat roof. Some windows may need to be kept closed at night and alternative ventilation provided to prevent sleep disturbance.

48. The report concludes that the External Noise Intrusion Assessment does not enable a robust or defensible decision to be made on the acceptability of the development and is thus unfit for its sole purpose.

49. SPC believes that this conclusion constitutes a separate and stand-alone ground for refusal of the Application, and that to grant prior permission would, in the circumstances, be unlawful (see paragraphs [44] to [46] above).

50. SPC notes that the matters raised in the Environmental Planning report overlaps with – but also goes further than – SPC’s own detailed analysis of

the inadequacies of CamProp's Noise Assessment, as set out in Appendix 2 to this submission.

Anglian Water

51. On 1 June 2026, AW filed an objection to Application 26/01471/PRIOR. As that application relates to what is functionally the same site, it is self-evident that AW's objections carry great weight and are equally relevant to this Application. However, on 9 June 2026, AW filed an objection to the Application, stating unambiguously that:

"any connection into our foul network from the proposed development will contribute to pollution and deterioration of the watercourse via the WRC as it cannot accommodate additional flows"

52. AW's objection also states:

"Anglian Water has determined that the site is unsustainable due to the associated environmental risk and the increased discharge rates, which could lead to a deterioration in water quality and an unacceptable risk of breaching environmental legislation at Foxton (Cambs) WRC. Considering these concerns, we recommend that planning permission be refused on the grounds of insufficient infrastructure capacity and to prevent environmental harm."

53. The CAR Flood Risk Assessment and Drainage Strategy Report, somewhat incredibly states that:

"Anglian Water confirmed they have no objection to an indirect foul water connection to the public foul water sewer in Station Road. A sewer connection into the Anglian Water public sewer was granted in June 2024."

54. This is not merely disingenuous: it is actively misleading. The sewer connection was granted on the basis of commercial use, which clearly is no longer the case.

55. AW further states that the waste water recycling centre at Foxton:

"currently lacks the capacity to accommodate the additional flows that would be generated by the proposed development"

56. AW currently has no plans to invest in increased capacity prior to 2030.

57. It follows that SCDC is being told unambiguously by AW that there is no capacity to accommodate the proposed development without creating an unacceptable risk of real environmental harm and a serious breach of environmental legislation. This alone should cause the LPA to refuse ALL applications relating to this site.
58. Again, we believe that this is a sufficient stand-alone ground for the refusal of prior consent to this Application (and indeed Application 26/01957/FUL).
59. AW also objected to Application 26/01471/PRIOR on the grounds of surface water disposal. SPC notes that the current application now relies on a system of infiltration for disposal. The revised surface water disposal strategy is, by the Applicant's own admission, non-compliant according to Flood Authority guidelines due to the high groundwater level and will lead to increased flooding, which, as stated in the section "Fluvial and Surface Water Flooding" below, remains a real problem in Shepreth, despite CAR assertions to the contrary.

UK Power Networks

60. UKPN, in its submission of 16 May 2026 in relation to Application 26/01471/PRIOR noted that its engineering guidelines states that the distance between dwellings of two or more stories with living or bedroom windows overlooking a substation (which is what is proposed in the Applications) should be a minimum of 7 metres from the substation, or 10 metres where the substation does not have a GRP surround. This is to reduce the risk of vibration from transformers impacting the dwelling and to minimise noise emanating from the substation.
61. In the present case, the misleading nature in which the Site plans have been presented by CamProp disguise the fact that the rear of building EX1 falls within the 7 metre/10 metre zone. One would not know that from the way the sub-station has been blanked out of the drawings.
62. UKPN state that the dwellings should be designed so that high occupancy rooms do not look out over the substation and the gap between the proposed dwellings and the substation should be more than 10 metres. The proposals from CamProp – who do not address this issue adequately, if at all – manifestly fail to meet either of these criteria, at least in relation to the planned residential units facing away from Station Road. It cannot be right, SPC submits, for prior approval to be given to a scheme which would have the effect of breaching UKPN's own engineering guidelines.

63. In any event, and critically, UKPN raise significant objection in relation to the potential noise impacts of the substation on future occupiers of the proposed development. This has not been properly assessed and, in the circumstances, justifies refusal of prior permission on noise grounds (see further the Appendix below relating to Noise).
64. Again, in circumstances where UKPN advert to the absence of a proper noise assessment, to grant prior approval would be unlawful.
65. If prior approval were to be given, SCDC should make it a condition that no development can commence until CamProp has entered into a party wall agreement with UK Power Networks, and has taken all remedial measures required of them by UK Power Networks (a request that we have also made in our submission in relation to 26/01471/PRIOR).

E. SPC'S RESPONSE TO THE RELEVANT CRITERIA

66. SPC notes that paragraph ZA.2(2) of the GDPO provides that where any development under Class ZA is proposed, development is permitted subject to the condition that before beginning the development, the developer must apply to the local planning authority for prior approval of the authority as to:
- (a) *transport and highways impact of the development;*
 - (b) *contamination risks in relation to the building;*
 - (c) *flooding risks in relation to the building;*
 - (d/e) *the design and external appearance of the new building;*
 - (f) *the provision of adequate natural light in all habitable rooms;*
 - (g) *impacts of the development on the amenity of the new building and of neighbouring premises including overlooking, privacy and light;*
 - (h) *impacts of noise from commercial premises on the intended occupiers;*
 - (i) *the impact on business and new residents of the development's introduction of, or increase in, residential use in the area in which the development is to take place;*
 - (j) *the impact of the development on heritage and archaeology;*
 - (k) *the method of demolition of the old building;*
 - (l) *the plans for landscaping of the development, including the planting and maintenance.*

Criterion (a) – Transport

67. What follows is just a summary of SPC's position, which is set out in full in an Appendix below (Appendix One), which the LPA is invited to read with close attention.

68. The Transport Technical Note (“TTN”) submitted by CamProp (in support of both Applications) is a flawed document. Not only does it contain inconsistencies (as Highways has acknowledged) but it proceeds on the basis of a number of highly theoretical and contrived assumption that exaggerate potential industrial traffic movements at the site, whilst downplaying residential movements and ignoring the reality “on the ground”. Put another way, the methodology is fundamentally flawed and the results are disingenuous and misleading.
69. Whilst the TTN claims the change of use will bring a reduction of 113 traffic movements per day, SPC’s analysis (based on historic use data and data from the Local Plan) suggests that the proposal will in fact bring an additional 936 movements per week, or 134 per day. This will result in a minimum 16% increase in overall traffic movements in Shepreth. That is a material adverse impact. The proposal thus has a material adverse transport impact in the terms of paragraph MA2.2 of the GDPO and this increase will occur in the immediate proximity of the already problematic level crossing at Shepreth Station.
70. Further, the increase in traffic numbers will have a separate adverse transport impact in so far as it will lead to an increase in on-road parking within the village (the 10 parking spaces provided for on the Site are plainly insufficient for upwards of 80 residents) and have potentially serious impacts on the East West Rail (“EWR”) Scheme (because the sub-station next to the Site and Station Road are designated as falling within the scope of the Development Consent Order (“DCO”) that EWR is presently seeking, and it is anticipated that there will be a considerable intensification of traffic in the immediate vicinity of the Site. None of this has been taken into account in the TTN (or indeed by Highways, whose positive response is as flawed as the report to which it purports to respond).
71. As mentioned above, SPC sets out its position in detail in Appendix One below, and on the basis of the material in that Appendix:
- a. Requests SCDC to attribute limited weight to the TTN, which is a flawed document advanced on a flawed basis.
 - b. Invites SCDC to give similarly limited weight to the Highways consultation response, which is flawed because it fails to take into account or weigh in the balance the information set out above;

- c. Requests that SCDC refuse prior approval for the Applications, on the basis that the transport impacts of the proposal are likely to be significantly adverse.

Criterion (b) – Contamination Risks

72. As far as contamination risks are concerned these have been addressed in paragraphs [39] to [46] above.

Criterion (c) – Flooding

73. In this section, we address two specific issues: (i) fluvial and surface water flooding and (ii) sewage overflows.

Fluvial and Surface Water Flooding

74. The CAR Flood Risk and Drainage Report states that fluvial flooding is very low risk. However, whilst the River Shep has rarely flooded, the River Rhee frequently floods surrounding fields during wet winters.

75. Surface flooding is also said to be low risk. This is incorrect as ex-employees confirm that the onsite car park is prone to flooding. Immediately adjacent areas such as Bexwell Farm, Docwras Close and Station Road have experienced significant surface floods of the roadway and farm yard during heavy downpours.

76. The reality (borne out by the experience of villagers as opposed to outside consultants) is that surface flooding is a significant problem in the village, with widespread road floods in the immediate vicinity during wet winters. The original plan suggested connecting the surface water discharge to the foul water drain, an unacceptable practice.

77. Application 26/01471/PRIOR proposed to discharge surface water into an “existing waterway ”. This is in fact a blocked off old ditch bordering Docwras Close, that was filled in during building works in the 1960s and in the construction of Collins Close. In wet weather, the gardens and properties in Docwras Close remain at high risk of flooding.

78. CamProp’s surface water disposal strategy has been amended following AW’s objection to 26/01471/PRIOR, to include a water infiltration approach. The revised strategy remains unacceptable, however, as the Applicant’s own report admits on Page 19 of its amended strategy that the groundwater level at the site is too high for a compliant infiltration of surface water. The

proposed infiltration strategy is also insufficiently clear for the LPA to be satisfied that it would be compliant.

79. Furthermore, given the shallow groundwater conditions and lack of a defined fallback discharge mechanism, the proposal does not robustly demonstrate that surface water can be managed without increasing flood risk. Accordingly, the revised strategy, itself based on a “relatively coarse methodology” (which is not sufficient for the purposes of a prior approval application under Class ZA.2) does not adequately address Anglian Water’s objection.
80. The Parish Council has noted above the frequent surface flooding at the site and believes that a surface water disposal method that cannot be installed in compliance with Cambridgeshire County Council’s standards because of too much water confirms the unsuitability of the development.
81. The Parish Council also notes that Cambridgeshire County Council is the Lead Local Flood Authority and therefore its standards need to be adhered to. The Parish Council also notes that the alternative drainage strategies are neither clearly defined nor robustly demonstrated. The Application should thus be refused on the grounds of an inadequate strategy and an increased flood risk.
82. Accordingly, the Flood Risk and Drainage Assessment fails to demonstrate that the site can be developed safely without increasing flood risk or causing environmental harm. The assessment is not sufficiently updated or proportionate to the change in vulnerability, given that residential development is classified as more vulnerable to flooding than commercial use under the NPPF.
83. SPC also draws attention to the following matters, all of which point against the grant of prior approval:
 - a. The report inconsistently acknowledges surface water flood risk but dismisses it without adequate evidence, undermining the credibility of its conclusions.
 - b. In addition, the Ground Investigation Report confirms the presence of groundwater at very shallow depths, raising significant concerns regarding drainage capacity, site stability, and construction feasibility.
 - c. The reliance on limited and preliminary data, with further testing still required, creates significant uncertainty as to whether the proposed

drainage strategy will function effectively or remain resilient to future climate change impacts.

84. In the circumstances, the submission does not properly assess the flood and drainage impacts of the proposed residential development, instead relying on superseded employment-based approvals. It does not provide sufficient certainty that flood risk can be effectively managed, or that the development would not increase flood risk both on and off site.
85. The LPA cannot on that basis be satisfied that the criterion in Class ZA2(2)(c) is satisfied, and prior approval should be refused on that basis. To do otherwise would be unlawful.

Sewer Overflows

86. It is common knowledge to those residents whose sewers back up on a regular basis that the local wastewater network is under significant capacity pressure.
87. The CAR report states on Page 13 that there are no historic reports of sewer overflows. This is simply not the case, as several properties in Docwras Close have experienced problems flushing toilets and one resident has experienced toilets overflowing on two occasions, all reported to Anglia Water, who sent out teams to intervene and will necessarily have records of such visits. **SCDC is asked to contact AW for confirmation, as the AW response to Application 6/01471/PRIOR is clearly based on incorrect data** (it seems that AW have not consulted their own records). In any event, AW has now put in an objection which makes it clear that the sewerage infrastructure could not cope with the proposed development (see paragraph 51 above).
88. Ground water levels in the village are very high in winter. Several properties in Station Road have old well heads, which are prone to overflow when the levels are high. In relation to groundwater levels, see above (including at paragraph 83(b)).
89. AW recently carried out a detailed survey of the sewer network in the village, which confirmed that the system does not have sufficient capacity to accommodate the proposal. The sewer in the High Street is well known to overflow during wet winters, the discharge runs down into road drains which ultimately drain into the River Shep, a rare high quality chalk stream.
90. AW are aware of this problem, having carried out flow monitoring and camera surveys. If overflow of the sewer in Station Road were to occur as in

the High Street, this would be washed directly into the River Shep with potentially serious consequences for both the Shep and the River Cam downstream.

91. In January 2025, AW was quoted in the Cambridge Independent as saying it could not connect more homes to the Foxton water recycling centre (which serves Shepreth) without polluting rivers. Underlining this insufficient capacity, AW between 2021 and 2024 documented 502 spills at the Foxton plant lasting 2,480 hours, or 103 days. It is a rising trend with figures showing that in 2024 alone there were 179 spills lasting 1,080 hours, or 45 days.
92. Additional waste water from the proposed development will inevitably cause increased discharge of untreated sewage into the Shep, Rhee and Cam. Sheep's Green on the Cam in Cambridge was granted official "Designated Bathing Water" status by the Environment Agency in May 2024. While this ensures mandatory water quality monitoring from 15 May to 30 September, water quality tests in both 2024 and 2025 indicated a "Poor" rating.
93. The recent government consultation on the Development Corporation for Cambridge states that *"the existing treatment plant is operating near capacity and is a constraint on growth. In 2025, AW raised concerns about planning applications in the Cambridge area as a result"*.
94. On 1 June 2026, AW filed an objection to Application 26/01471/PRIOR. At the time of writing, it is unclear whether AW have filed a comment relating to this Application. It is however self-evident that AW's objections carry great weight and are equally relevant to this Application.
95. The CAR Flood Risk Assessment and Drainage Strategy Report blithely states:

"Anglian Water confirmed they have no objection to an indirect foul water connection to the public foul water sewer in Station Road. A sewer connection into the Anglian Water public sewer was granted in June 2024."
96. As we have stated above, this is actively misleading. It bears repetition that:
 - a. The connection was granted on the basis of commercial use, which clearly is no longer the case.
 - b. As regards this development, AW states in its objection that *"the site is unsustainable due to the associated environmental risk and the increased discharge rates, which could lead to a deterioration in water quality and an unacceptable risk of breaching environmental legislation"*.

- c. AW further states that the waste water recycling centre at Foxton:
“currently lacks the capacity to accommodate the additional flows that would be generated by the proposed development”

97. **The River Shep is a rare chalk stream, one of the UK's most ecologically important freshwater habitats. Chalk streams are recognised as a priority habitat under the UK Biodiversity Action Plan and receive special consideration in environmental planning and conservation. The River Cam likewise benefits from environmental protections that apply through planning law, water-quality regulations, and habitat conservation. Parts of the Cam catchment area are recognised as chalk-stream habitat of high ecological value.**

98. It is hard to avoid the conclusion that the unusual nature of these applications is designed to circumvent this environmental protection.

99. The LPA is being told unambiguously by AW that there is no capacity to accommodate the proposed development without creating an unacceptable risk of real environmental harm and a serious breach of environmental legislation.

100. This alone should cause the LPA to refuse all applications relating to this site. If these related applications are allowed to proceed in the knowledge of the above, SPC will wish to study the reasons for such a decision carefully and will reserve all options necessary to protect the village, up to and including judicial review.

Conclusion on Flooding Issues

101. In conclusion, the Parish Council objects to the proposal and believes the proposed change of use should be refused on the grounds of a material adverse impact on flooding risk, especially from sewer overflows, the lack of capacity in local infrastructure and the unambiguously stated risk of environmental harm and a breach of environmental legislation.

Criteria (d) and (e) – Design and External Appearance

102. Shepreth is a predominantly rural village mentioned in the Domesday Book and with evidence of settlement as far back as the Stone Age. The conservation area at the historic centre, where many of the village's 37 listed

buildings are located, borders Docwras Close, which itself immediately abuts the development.

103. The immediate vicinity of the development is characterised by two storey residential buildings in Station Road and Docwras Close. The current EX1 building, the station and its associated industrial and commercial sidings are all two-storey buildings and form a pleasant and coherent buffer between the historic centre of the village and the open countryside beyond.
104. The submitted drawings do not clearly identify the proposed ridge height, eaves height, or overall building height, nor do they provide a definitive comparison with the existing building. Nevertheless, the proposed section reproduced below indicates an overall height of approximately 8.5 m compared with an existing building height of approximately 4.4 m, implying an increase of around 4 m (roughly doubling the height).
105. In the elevation below, the existing roof ridge (orange dashed line) appears to sit around the level of the first-floor structure of the new building. The proposed building thus has:
- a full second floor above that; and
 - a roof structure above the second floor.
106. In the absence of specific comparative dimensions, SPC fails to understand how the LPA can sensibly determine the magnitude of the increase or fully assess the design, appearance, amenity, heritage and landscaping impacts as required by Class ZA.2(2)(d) and (e). In the circumstances, SPC submits that the LPA cannot proceed to grant prior approval to the proposed development, and that it would be unlawful for it to do so.



107. It would appear from the above comparison of old and new that the proposed building is double the height of the current building EX1. The proposed replacement building is thus materially taller and more visually prominent

than the existing building and fails to respond appropriately to the established scale, grain and rural character of this part of Shepreth.

108. This excessive prominence results in a poor relationship with the surrounding buildings and will prejudice both the character of Station Road and the approach to the conservation area and the historic centre of Shepreth. It thus contravenes Class ZA.2(2)(d) and (e), and HQ/1 and constitutes grounds for refusal of the Application (separately from the point raised above about the inadequacy of the information provided by CamProp in relation to key elements of its proposal).

Criterion (f) – Lighting

109. In this section we address primarily criterion (f) in Class ZA2.2 (*“the provision of adequate natural light in all habitable rooms of each new dwellinghouse in or comprising the new building”*). However, issues as to lighting are also relevant to criterion (g) as well (*“the impact of the development on the amenity of the new building and of neighbouring premises, including overlooking, privacy and light.”*)
110. In this regard, we also address Planning Application 26/01957/FUL, which has a material impact upon the lighting issues on which CamProp has to satisfy the LPA under Class ZA2.2(f).

Amenity within the Proposed Development

111. To assess the daylight levels to the proposed habitable rooms, Climate Based Daylight Modelling (“CBDM”) assessments have been undertaken. The Report states that all rooms will meet the required standards.
112. However, whilst the results do indeed show that the results are above the relevant criteria, it appears clear that the calculations are incorrect and significantly overstated from what will actually be experienced.
113. The CBDM assessments are dependent on a number of variables. Those set out at paragraph 6.1 of the Report do match those set out within the Appendix. (Page 44 of the PDF). For example, the glazing bar correction factor is stated to be 0.75 at Paragraph 6.1 but 0.8 within the Appendix. (Within the Appendix the Glazing Bar Correction factor is denoted by ‘Tb’). If 0.8 has been used in the calculations rather than 0.75 as stated in the Report the results are over stated.
114. The 3D images at Appendix 1 show the assessment model used for the calculations (see the relevant 3D images below). The windows shown are large, fully glazed apertures but in reality, the glazed areas of the window structural openings are much smaller. The submitted elevation drawings

detail that part of the opening will be infilled with a Aluminium powder coated ventilation louvre and the bottom section of the window will have a solid spandrel panel. When reviewing the 3D images and elevation drawings by eye, the actual glazing area proposed is considered to be some 50% smaller than those used in the calculations. The result of this error is that the daylight calculations will be significantly overstated.

115. It is clear that the results and conclusions set out at Section 6 of the Report are substantially incorrect and should not therefore be relied upon. Any failure to have regard to them and to the fact that, as a result, CamProp has not satisfied the criterion in Class ZA2.2(f), resulting in the grant of prior approval will be unlawful.

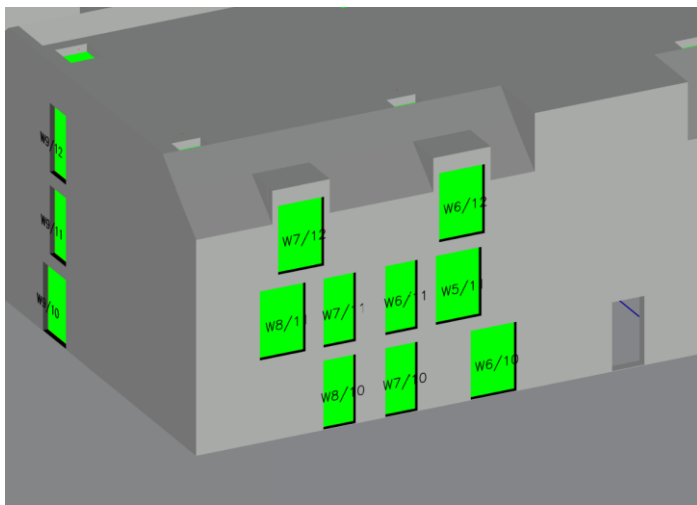


Figure 1: Extract image of the 3D Modelling used for the daylight calculations (Front Elevation)



Figure 2: Extract image of the elevation

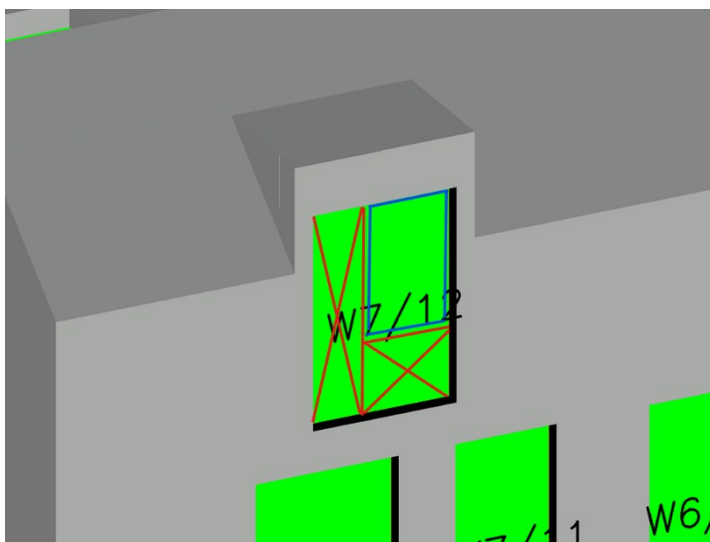


Figure 3: Sketch of actual window design overlaid on assessment model (Actual area of Glazing shown by Blue lines)

Impact on Existing Neighbours

116. The Daylight & Sunlight Report dated May 2026 by Urban Light Surveyors ("the Report") assesses the daylight and sunlight effects to the neighbouring properties on Station Road and Docwras Close.
117. Under the daylight distribution sub-heading of 'NSL', at paragraph 5.4, the Report states that all rooms assessed will meet the BRE guideline recommendations. This is not the case.
118. Within the tabular results at Appendix 1, (Page 29 of the PDF) room R2/40 which is a ground floor room within 2 Docwra's Close experiences a reduction of 22.01%. This is beyond the BRE guidelines' recommendations. The table also makes it clear that the BRE guidelines criteria is not met with the word 'No' in the relevant column.
119. When considering the significance of the likely effect, the actual reduction in No-Sky Line to this room is 47.5 sq.ft. (4.4 sqm). This is not considered a small area of light loss to one room and therefore considered a notable reduction.
120. The concluding statements suggesting that the effects are fully acceptable are therefore incorrect.
121. When the applicant is challenged on this effect, the response will no doubt reference the need to apply flexibility to the BRE guidelines etc, as generally set out within the Report. However, one important factor here is that the site is in a rural village location, not an urban area. Good daylight and sunlight levels should therefore be expected, and if this is not a location where the

BRE guidelines criteria should simply be applied, it would be interesting to know where the author of the Report thinks is appropriate.

122. In conclusion, the impacts to the neighbouring properties are not within the BRE guidelines criteria, and a notable reduction in daylight will be experienced, especially to 2 Docwra's Close. The site, being a rural village is considered a location where the BRE guidelines should be applied without need for 'flexibility'.
123. As such the Proposed Development does not meet Class ZA.2(g) of the Class ZA legislation. Prior approval should be refused on that basis alone, and a failure to do so would (at the risk of repetition) be unlawful.

The Impact of Planning Application 26/01957/FUL

124. SPC notes that a third planning application has been submitted to change the external façade of building EX2. (referred to as 'the New Planning Application'). This changes matters and makes the case for refusal of prior approval all the more compelling.
125. The New Planning Application was submitted on 26 May 2026 almost one month after a permitted development application 26/01471/PRIOR (submitted on 17 April 2026) which relates to the "Change of Use from Commercial, Business and Service (Use Class E) to 32 No. Residential Flats (Use Class C3)".
126. The permitted development application was accompanied by a daylight report suggesting that all rooms would enjoy good levels of daylight and thus accord with comply with paragraph MA.2. (f) of The Town and Country Planning (General Permitted Development) (England) Order 2015.
127. However, as set out by a number of objectors to the permitted development application, the conclusion that all habitable rooms would enjoy good levels of daylight is considered incorrect given there are kitchens without windows.
128. The New Planning Application appears to reduce the amount of glazing proposed to the habitable rooms. This will reduce the daylight levels to the habitable rooms and it is quite likely that some rooms will no longer meet the daylight standards.
129. For example, as part of the permitted development application, the daylight reports set out that the living rooms labelled R20/20, R2/20, R18/20 would

receive median daylight levels of at least 150 Lux to between 53.1% and 59.4% of the room's area. Given the criterion is that 50% of a room's area, a reduction in glazing could result in these rooms no longer meeting the standards.

130. Given the above, a daylight and sunlight report should be submitted with the current Applications (i.e. **26/01471/PRIOR** and **26/01721/PRIOR**) so that the LPA can be satisfied that adequate daylight levels will continue to be enjoyed in Building EX2 with these proposed changes. At the moment, it cannot be so satisfied, and prior approval must be refused.

Criterion (g) – Amenity of the New Building and of Neighbouring Premises

131. **Lighting.** SPC believes that the height and mass of the proposed building will have a significant adverse amenity effect, as it effectively doubles the size of the existing building, will overlook neighbouring buildings and severely impact privacy.
132. As noted above, the impacts to the neighbouring properties are not within the BRE guidelines criteria, and a notable reduction in daylight will be experienced, especially to 2 Docwra's Close. The site, being a rural village is considered a location where the BRE guidelines should be applied without need for 'flexibility', and as such the Proposed Development is not considered to meet Condition ZA.2 (g) of the Class ZA legislation
133. **Parking.** The development as a whole offers 18 parking spaces for 55-80 car dependent residents. It would clearly overload the parking areas and create significant additional traffic disturbance in the immediate vicinity of the level crossing, with a consequent negative effect on neighbouring properties.
134. **Lack of Amenity Generally.** The absence of amenity is indirectly confirmed by the developer in a communication to SPC dated 16th April 2026, which states:

"Alongside the residential proposals, we are also working with our design team to explore whether complementary amenities could be incorporated into the wider development. These may include facilities such as a small general grocery store, a coffee shop, or a community-accessible space, subject to feasibility, design considerations and planning policy. Our intention is to consider whether elements of the scheme can deliver an amenity benefit for the wider village, as well as for future residents."
135. It is perhaps unsurprising to note that the Application contains no such benefits for current or future residents.

Criterion (h) – Noise

136. SPC believes that the current proposals taken as a whole do not satisfy the requirements in ZA.2(2)(h) in relation to noise, and that SCDC should refuse prior approval on that ground alone. Our detailed response is set out in Appendix Two below.
137. We also draw attention to the fact that the deficiencies in CamProp's report to which we refer below are shared (and indeed amplified) by GCP Environmental Planning (see above). In other words, the LPA's own officers believe that prior approval should be denied: in that context, if the LPA were to give prior approval, it would plainly be unlawful.
138. In summary, the noise assessment produced by Scotch Partners is a demonstrably flawed document because:
 - a. the noise survey location was not representative of the proposed dwellings;
 - b. the noise survey was carried out during a period that was unrepresentative of typical operating conditions;
 - c. the assessment fails to pay sufficient regard to key noise impacts generated by immediately adjacent sources, such as (as noted above) the electricity sub-station, the nearby industrial yard, and noise from the immediately adjoined railway line. Moreover, the glazing/façade assumptions are untested and generic.
139. SPC draws attention to the following matters in particular:
 - a. The placement of the microphones used to generate the noise assessment was inappropriate, which renders the conclusions of the report void.
 - b. The assessment does not model railway noise properly, fails to assess tonal noise from the substation or from the log supplier on the other side of the level crossing, and does not take into account the operation of the level crossing itself (the noise of which is intrusive).
 - c. The absence of any proper analysis of potential noise impacts from the substation on future occupiers is a matter of particular concern here, being a matter to which UKPN has specifically adverted and to which CamProp and its advisers ought properly to have been alert. Such impacts include car parking noise, overspill parking, refuse collection, plant noise and the general intensification of use of the site. As set out

above in relation to Contaminated Land, the absence of such a report means that SCDC cannot safely proceed to grant prior approval.

140. Beyond these methodological concerns, the assessment also fails to adequately reflect the actual acoustic environment experienced locally, or to take account of the cumulative interaction between noise mitigation measures (such as closed windows) and other environmental constraints, including overheating and ventilation requirements. There is also a failure to take account of the impact of the significant vibration from the substation and the railway line.
141. Accordingly, the noise assessment does not provide a robust or reliable basis for evaluating future residential amenity. The outcome is therefore clear: prior approval should be refused. A revised assessment should be undertaken using representative baseline conditions and should fully account for the frequency, intensity, and character of both rail and infrastructure-related noise sources affecting the Site.
142. SPC repeats the point made above that when this Site was put forward for proposed residential development under the “call for sites”, it was deemed unsuitable precisely because of its proximity to the railway line and the resultant noise. SPC notes that a recent planning application in Foxton was refused in part because of its proximity to the (same) railway line, the decision noting that residents would experience a high level of noise disturbance from the railway line, causing undue harm to the living conditions of future occupiers (in conflict with paragraph 135 of the NPPF). Exactly the same issue arises with this Site.
143. Separately, SPC notes that:
 - a. No overheating mitigation strategy is provided, and the open-window noise exceeds the limits set out in Approved Document O of the Building Regulations.
 - b. No account has been taken of the draft DCO which EWR is proposing to make in respect of the UKPN electricity substation. The Site sits adjacent to strategic transport and electricity infrastructure and the East West Rail land order indicates likely future intensification rather than stable baseline conditions. The submitted external noise intrusion assessment thus necessarily underestimates future operational conditions.

144. In light of those matters, whilst the report concludes that *"It can therefore be assured that the indoor noise levels can achieve the recommended guidance values ..."* (4.3.3), that is simply not the case.
- a. The survey location and timing is unrepresentative;
 - b. The glazing assumptions are untested;
 - c. Tonal noise is ignored;
 - d. Industrial noise is ignored;
 - e. The assessment does not evaluate noise at the facades of the proposed dwellings.
145. In any event, and critically, UKPN has, in relation to application 26/01471/PRIOR raises significant objection to the development as a whole in relation to the potential noise impacts of the substation on future occupiers of the proposed development. This has not been properly assessed and, in the circumstances, justifies refusal of prior permission on noise grounds (see further below). Whilst those objections were made in relation to application 26/01471/PRIOR (which relates to building EX2), they apply with equal force to this application (which relates to building EX1), given the proximity of EX1 to the electricity substation.
146. As referenced above, the LPA's own planning officers have concluded that *"due to the proximity of the rail line, it is recommended only employment or industrial use be considered"*. A determination has thus already been made that the site is unsuitable for residential purposes.
147. In the circumstances, prior approval should be refused: the noise assessment is manifestly inadequate, and when the site as a whole is looked at objectively, it is plain that the noise criterion in ZA.2 can never be satisfied, particularly given that the Site immediately abuts a noisy sub-station and one of the busiest railway lines in the region.

Criterion (h) -Impact on business and new residents of the development's introduction of, or increase in, residential use in the area in which the development is to take place

148. Over and above the noise issues that will affect residents, SPC has argued above that this development would have a significant adverse impact on their wellbeing.

149. The questions that go unanswered in this proposal (which highlight the adverse impact that the proposed development will have are) include the following: What are the people who will be moving into these proposed units (which have no outdoor space) going to do when not working? Where are they going to go? How will they occupy their time? The risks of anti-social behaviour and risks to the safeguarding of local residents are obvious, we suggest.
150. Bluntly, it is not clear to SPC how this development “*should be viewed positively*” as claimed by the Applicant’s covering letter. SPC reminds the reader of the definition of an Infill village in paragraph [24] above.

Criterion (j) - Impact on Heritage and Archaeology

151. As stated above, Shepreth is a small village with a quiet rural character. This will be adversely impacted by the scale, height and mass of the proposed development as well as a 17% increase in the number of dwellings. The substantial increase in traffic movements, confirmed by SCDC’s own officers, will further exacerbate this negative effect.

Criterion (k) - Method of Demolition

152. The Application does not appear to contain a genuine demolition methodology capable of allowing assessment under Class ZA.2(2)(k). In particular, there is insufficient information on demolition impacts on nearby heritage assets, archaeology, neighbours, Station Road traffic, or railway infrastructure. The submissions appears to be an asbestos survey rather than a demolition methodology statement, which is plainly insufficient.
153. For ZA.2(2)(k), an authority might reasonably expect information on
- a. demolition sequence;
 - b. demolition plant and equipment;
 - c. HGV routes, having regard for the weight-limited bridge in the village;
 - d. dust suppression;
 - e. vibration control;
 - f. protection of neighbours;
 - g. traffic management;
 - h. protection of trees and ecological features;
 - i. working hours;
 - j. railway and level crossing interface and mitigation measures.

154. None of these matters are addressed adequately in CamProp's Application. It follows that the LPA lacks sufficient information to enable it to satisfy itself under Class ZA.2(2)(k) in relation to "method of demolition of the old building" and must therefore refuse the Application. To grant prior approval would, in the circumstances, be unlawful.

Criterion (l) - Landscaping

155. This criterion is – along with the others – not satisfied in this case. The landscaping strategy relies heavily upon newly planted hedgerows and young trees which will take many years to establish, resulting in a significant period during which the development is insufficiently assimilated into its village setting.
156. Most of the new planting consists of:
- new native hedgerows;
 - hornbeam hedging;
 - relatively small new trees.
157. As the proposed building is materially taller than the existing structure and neighbouring structures, it is clear that the proposed landscaping would not adequately mitigate the visual impact of the increased height and massing for many years after completion because the planting would require substantial time to mature. The Application should thus be refused under Class ZA.2(2)(l).

SECTION F - ARTICLE 4 DIRECTION

158. As appears from the summary above and the detailed analyses in the appendices below, the scheme envisaged is deeply flawed and prior approval should be refused.
159. However, there is another route by which SCDC can put a stop to CamProp's proposals and require CamProp, if it wishes to develop the site for residential use, to apply through the conventional permission route, thereby satisfying the requirements of the Local Plan and other relevant frameworks and criteria.
160. This would be for SCDC to make an Article 4 Direction disapplying Class ZA of the GDPO from Shepreth and other infill villages in South Cambridgeshire. This can be done where there is evidence – which there is here in abundance – that the exercise of permitted development rights would harm both local amenity and the proper planning of the area.

161. In the instant case, there is a compelling case for concluding that there are exceptional circumstances: the proposed development will have a deleterious, indeed disastrous impact on transport, infrastructure and the environment if it is allowed to proceed, and if this proposal is allowed to go ahead, there would be nothing to stop the many sites within South Cambridgeshire infill villages for which planning permission has been given for commercial uses being converted into residential use in the manner proposed by CamProp.
162. That would effectively rip up the carefully calibrated approach to development set out in the Local Plan and be inimical to the interests of South Cambridgeshire residents as a whole. That being the case, South Cambridgeshire must act, SPC suggests.
163. SPC understands that it is possible for local planning authorities to issue Immediate Directions (where permitted development rights are withdrawn with immediate effect, albeit that they have to be confirmed by the local planning authority within six months following local consultation. We also understand that Immediate Directions can be made in respect of changes of use. The relevant provisions are Parts 1-4 and Schedule 31 of Schedule 2 to the GPDO, with which SCDC will be more than familiar.
164. Frankly, there is no excuse for SCDC not to make an Immediate Direction now, and a failure to do so would be inexplicable and, frankly, a derogation of duty.

SHEPRETH PARISH COUNCIL

11 JUNE 2026

APPENDIX ONE - TRANSPORT

Introduction

1. The Parish Council believes that this development will have material adverse "*transport impacts*" in the terms of paragraph ZA2.2 of the GDPO and that the Planning Authority should refuse the application. This conclusion is based on an analysis of historic use of the site and a reliance on the Planning Authority's own numbers as represented in the draft local plan. The Parish Council further believes, should the application proceed, that this material adverse impact on traffic in the immediate proximity of a level crossing will trigger a statutory referral for consultation with both Network Rail and the Secretary of State for Transport.

2. The Parish Council is disappointed with the response of Highways, which appears to accept the conclusions in the Applicant's Transport Technical Note (TTN) uncritically and without having any regard to the context of a rural village. The TRICS modelling on which the modelling is based is an industry standard where no baseline exists. The Parish Council would like to remind the Planning Authority that a comprehensive baseline does exist in its own draft Local Plan, and moreover shows that the TTN woefully understates the likely residential traffic movements at the site. Its claim that residents will not be car reliant is flatly refuted by both the Plan and the rail user numbers, as demonstrated below. There will be almost total car reliance and a substantial increase in traffic movements.

3. It is plain that CamProp's proposal, far from resulting in a reduction in vehicle movements and an "*intensive down-scaling*" of the vehicular use of the extant access, will lead to a significant increase in traffic into and out of the site. The case is incontrovertible, as appears from the analysis below.

4. The Parish Council believes that, in the following analysis, it has demonstrated a material adverse change in traffic movements resulting from the proposed change of use, using the Planning Authorities' own data. We submit that the Planning Authority must believe and act on its own figures. The increase in traffic movement, whether it be 11% or 16%, constitutes a material increase and the Applications should be refused. ~~That increase is sufficiently material to require a referral to the Secretary of State for Transport and Network Rail under paragraph W (5) of Part 3 of the GPDO.~~

5. The Parish Council would suggest that the only reason that prior approval could be granted and the matter not referred is if the planning officers disbelieve their own figures, a decision that would not only come under intense scrutiny but one which would also undermine the entire economic strategy of Greater Cambridge for the next twenty years.

Flaws in the TTN

6. The TTN claims the change of use will bring a reduction of 113 traffic movements per day. This is disingenuous and based on a highly theoretical and contrived set of assumptions that exaggerate potential industrial traffic movements at the site, downplay residential movements and do not work in a real-life context.

7. The Parish Council has developed an analysis based on historic use of the site, the Grant Instruments' annual report, information from long-standing residents and employees and data from the Local Plan. This suggests that, far from bringing a reduction in traffic movements, this proposal will bring **an additional 936 movements per week, or 134 per day. This will result in a 16% increase in overall traffic movements in Shepreth in the immediate proximity of the already problematic level crossing, with the consequent added level of risk of serious disruption and accident.**

8. The TTN further claims that *"it is expected that future residents (of the proposed development) would not be reliant on car travel."*

9. Whilst not directly relevant to the application, the South Cambridgeshire Local Plan definition of an Infill village perfectly describes the situation in Shepreth which undermines the assertion that villagers are not car reliant. This states (with the emphasis added):

*"Infill Villages are generally amongst the smallest in South Cambridgeshire. These villages have a poor range of services and facilities and it is often necessary for local residents to travel outside the village for most of their daily needs. These villages generally lack any food shops, have no primary school and may not have a permanent post office or a village hall or meeting place. **Development on any scale would be unsustainable in these villages, as it will generate a disproportionate number of additional journeys outside the village.**"*

10. Moreover, Shepreth has permanently lost its half-hourly off-peak train service and, whilst the station is indeed a valuable amenity, residents also need to go about their business outside peak periods, in the evenings and at weekends, when the train service is at best sporadic. According to the Office of Rail and Road (ORR) data portal, 23.5% of trains arriving at Shepreth were delayed by more than three minutes last month and 3.3% were cancelled, often in the evening.

11. Figures from the ORR for 2024-25 suggest there were 109,514 entries and exits at Shepreth station, equating to 54,757 return journeys or 1,053 per week. The population of Shepreth from the 2021 Census was 789, meaning that each resident of Shepreth made only 1.3 return train journeys per week for work, school, social or other purposes. Given the absence of reliable public transport (there is one bus a day to Cambridge and back), **it can be safely assumed that the vast majority of journeys to and from the village are made by car** and that will remain the case for the residents of this proposed development, were that to go ahead.

12. The simple fact is that residents of Shepreth are already totally reliant on car travel and there is no reason to think that this will be different for future residents. An unsustainably disproportionate number of additional car journeys to and from the village will indeed be generated.

13. We also note that the October 2021 Greater Cambridge Local Plan Transport Evidence Report Special Option 6, which focusses on public transport corridors, refers to services such as the guided busway and the Cambourne to Cambridge bus, but is silent on the ability of a local rail service to reduce car dependency in a village in a meaningful way.

14. The TTN anticipates occupation of the proposed development by “*the local workforce and student population*”. This is somewhat mystifying as there is no recognisable demand for single-person households in the area. The village has no local student population and no local tertiary education facilities; few, if any, employment opportunities for young professionals and, other than the one nearby pub, no social or shopping facilities. Furthermore, there is no communal and social space in the proposed development. Students are highly unlikely to want to live so far away from peers on or near campus. Being so far away from peers would result in social isolation and increased risk to mental health, in support of which there is no local provision. The train timetable is particularly unsuitable for young people working shifts as entry level professional workers or assistant level support staff. It is a six mile walk or cycle to Tesco and a 20-minute cycle ride to the GP in Melbourn. This reinforces the reliance on a car for most aspects of everyday life.

15. The TTN further suggests that the buildings with industrial use have the potential” to generate 296 car movements per day between 07.00 and 19.00, or **1,480 movements per week**. A methodology comparing a residential site with a fully employed industrial site is flawed, highly theoretical and unrealistic, not least because the site has been vacant for a long time and there is no evidence that it could be reoccupied at the claimed intensity or that such intensity is achievable without major changes requiring planning permission.

16. SPC also relies on the fact that Highways has identified that the TTN and associated documents contain inconsistencies, and suggests that they cannot sensibly be relied on by SCDC. Put simply, if the material that has been presented is incorrect, prior approval must be refused.

Inevitable Increase in Traffic and Resultant Adverse Impacts

17. An analysis of historic use of the site underlines the inaccurate nature of the report’s assumptions. The Grant Instruments Annual Report for 2019 states there were 75 employees worldwide, of whom 33 in production, 25 in sales and 17 in administration. The company has subsidiaries in the US, India and The Netherlands, with 37% of turnover in the UK, 37% in non-UK Europe and 25% elsewhere. In the

absence of a geographical breakdown, it is not unreasonable to assume that production was based in Shepreth and that sales and admin locations mirrored the economic activity. This implies a Shepreth workforce of 48. The Parish Council has assumed 50 for purposes of calculation and this has been confirmed as reasonable by a former employee resident in the village. Of these however, nine were locals who walked or cycled to work and five took the train.

18. Thus around 36 employees made 360 movements per week, with deliveries adding a further 40 per week for a total of **400 movements per week**. Even allowing for a margin of error, the Transport Technical Note theoretical industrial usage is grossly (almost 4x) overstated and cannot be relied on as a baseline.

19. The TTN admits *“there are no suitable student accommodation sites which are comparable”* and has consequently based its assumptions on affordable or local authority flats. This is inappropriate, as the development will be a private rental dominated by studio units, rather than affordable housing, and targeted at young professionals. Residents will thus in reality have materially different car ownership and travel patterns from those in affordable housing and the theoretical number of 183 daily movements between 07.00 and 19.00, or **915 movements per 5-day week** is materially understated. The Parish Council notes however it still represents a **129% increase in movements** to 515 over the historic use rather than the decline of 113 claimed by the TTN.

20. The TTN also seems to ignore the fact that residents would be on site for seven days per week. On a seven-day basis, there are **1,281 movements per week**. An absence of shopping facilities in the village suggests at least one delivery per unit per week (probably an understatement) that would bring another 55 movements for a total of **1,336 movements per week, an increase of 936 movements or 234%** over the historic use, **or 134 extra movements per day**. This also excludes visitors, taxis and ride-sharing vehicles, maintenance, refuse and other service vehicles.

21. Further independent evidence of this understatement lies in the October 2021 Greater Cambridge Local Plan Transport Evidence Report, which suggests that there are 3.7 car movements per day per dwelling in Shepreth. On that basis, the proposal would generate **1,425 movements per week, a 256% increase over historic use, or 146 per day**. That represents an 11% increase over the TTN’s claimed number of movements.

22. This is far from the claimed 13% decrease. **In fact, this proposal thus has a material adverse transport impact in the terms of paragraph MA2.2 of the GDPO as it results in a 16% increase in weekly traffic movements in Shepreth¹.**

Parking

¹ Taking the baseline as 8,521, being 3.7* 7*the 329 dwellings in Shepreth.

23. The Parish Council would also point out that the proposal has inadequate parking provision, with 10 spaces for 55 car-dependent residents. The forthcoming Greenway project will mean all main roads in the village centre will be double yellow-lined by October. This, along with the recent reversion to paid station parking, will mean that the village hall car park will be taken up by commuter parking, leaving a significant parking overspill in residential streets and cul-de-sacs further from the site thereby further increasing levels of traffic and the risk of disruption. There is also no consideration of other interaction with the Melbourn Greenway, which passes by the Site.

The Level Crossing

24. The intensification of traffic movements will take place in the immediate proximity of the most dangerous junction in the village, namely the level crossing at Shepreth Station. The sole site access is immediately adjacent to the level crossing.

25. It is common knowledge that the changes to the crossing gates have caused traffic chaos in the village, with 15 minute delays not uncommon. Network Rail modelling for the proposed Meldreth Road crossing upgrade showed average barrier downtime increasing from about **62 seconds to 169 seconds** per closure during peak periods. It is reasonable to assume similar results at the Station Crossing. This substantial amount of extra traffic so close to the crossing will exacerbate the already high risk of a vehicle becoming stranded on the crossing, with potential consequences that do not bear thinking about.

26. There will inevitably be problems as residents attempt to exit the development into oncoming traffic unwilling to stop while the barrier is open, leading to increased frustration for drivers. It would certainly add to the long queues already experienced, increasing pollution along the Station Road which, as well as homes, has a nursery for under 5s.

27. The Parish Council notes that none of these matters are addressed in the TTN or by Highways.

Potential Adverse Impact on EWR Scheme

30. The Parish Council is also aware that the adjacent UKPN electricity substation will become subject to the DCO order limits by East West Rail: please find the link to the consultation here:
<https://storymaps.arcgis.com/stories/5e440e6e10844c80bcb21deaec6a6a72>

31. Whilst the detailed use of this site is yet to be confirmed (the draft DCO is still at the pre-examination phase), EWR is almost certainly safeguarding not just railway land, but for potential use including:

- utility diversion corridors,
- construction access,
- traction power infrastructure,
- temporary compounds,
- or highway modifications.

32. The inclusion of the electricity substation is especially notable because EWR's electrification strategy requires new traction power connections and substations adjacent to the railway. EWR documentation specifically says draft Order Limits can include "traction power compounds" and associated utility works. All such construction and service traffic will need to enter and exit by the single entrance to the site by the level crossing, adding further to traffic movements.

Conclusion

33. In light of the matters set out above, the Parish Council:

- 33.1 Requests SCDC to attribute limited weight to the TTN, which is a flawed document advanced on a flawed basis.
- 33.2 Invites SCDC to give similarly limited weight to the Highways consultation response, which is flawed because it fails to take into account or weigh in the balance the information set out above;
- 33.3 Requests that SCDC refuse prior approval for the Applications, on the basis that the transport impacts of the proposal are likely to be significantly adverse.

APPENDIX TWO – NOISE IMPACTS

1. The Parish Council believes that the External Noise Intrusion Assessment produced by Scotch Partners is fundamentally flawed in a number of respects:
 - a. The noise survey location – i.e. the point at which noise was assessed – was not representative of the proposed dwellings within the properties in building EX2. There are similar concerns about the reliability of the report, arising from the timing of the monitoring period, which was unrepresentative of typical operating conditions.
 - b. The assessment focuses solely on “commercial noise” and fails to pay due regard to key noises affecting residents, such as the sub-station and the nearby industrial yard (both of which are in any event commercial) and noise from the immediately adjacent railway line.
 - c. The glazing/façade assumptions are untested and generic.
2. Of particular concern is the noise emanating from the electricity sub-station, which UK Power Networks has referred to in its response to Application 26/01471/PRIOR. As they put it, *“it is a recognised fact that transformers emit a low level hum which can cause annoyance to nearby properties. This noise is mainly airborne in origin and is more noticeable during the summer months when people tend to spend more time in their gardens and sleep with open windows.”* A similar concern arises in relation to vibration from the substation (again adverted to by UK Power Networks) and the railway line.
3. Separately, as mentioned in Appendix One, the report does not take account of the likely intensification of commercial noise arising from the East-West Rail project.
4. For each of these reasons, prior approval should be refused on noise grounds alone.
5. SPC notes that a number of residents have put forward detailed comments on the issue of noise, which SCDC is urged to take into account. SPC endorses everything that has been said by our residents in relation to noise, and expressly adopts them – they should be treated as forming part of our response.

Flaws in the Noise Report

6. As a starting point, it is noted that the survey location used was not an appropriate one. The microphone was placed *"on the flat roof of the main building... near the residences to the south."* (3.2.1) This is not representative of noise in the proposed flats, because:
 - 6.1 It is elevated: roof-level measurements underestimate ground-level noise from road traffic and overestimate distance attenuation from the railway tracks.
 - 6.2 It is on the wrong side of the building. The reports admits that the dominant noise sources are *"road traffic on Station Road ... train pass-bys, tonal 'buzzing' from the substation ... [noise from an] industrial log supplier"*. However, the microphone was placed away from Station Road and away from the railway line with the result that the survey does not capture potential noise impacts in the proposed noise residents.
 - 6.3 It is not at window height. *BS 7445 requires measurements at 1.5 m above ground at the façade. A roof-top free-field position is non-compliant.*
7. The validity and robustness of the baseline noise survey are significantly undermined by the timing of the monitoring period, which is demonstrably unrepresentative of typical operating conditions.
8. The survey was undertaken immediately following the August Bank Holiday and during the late summer holiday period, when traffic flows are materially reduced compared to standard weekday patterns. This is a recognised period of atypical travel behaviour, and as such, the recorded background road noise levels are likely to be artificially suppressed.
9. In addition, the monitoring period coincided with the onset of an early September heatwave, during which rail services-including Thameslink-were subject to disruption, delays, and cancellations. Given the site's close proximity to the railway, any reduction or irregularity in rail movements would have materially influenced the recorded noise environment.
10. Critically, the combined effect of reduced road traffic and disrupted rail services means that the baseline conditions captured do not represent a normal, typical, or worst-case scenario. This introduces a clear risk that the assessment has materially underestimated prevailing noise levels.

11. It follows that the LPA cannot rely on the data generated to determine noise impacts on residents of the proposed dwellings, because it does not represent the likely noise environment.

Assessment Ignores Major Noise Sources

12. The report repeatedly frames the assessment as relating to: "commercial noise" (1.1, 1.2, 6.2) but ignores the fact that the dominant noise sources extend beyond the purely commercial and include
- a. Railway pass-bys (high-energy, high-LAFmax events)
 - b. Electrical substation hum (commercial, tonal, low-frequency)
 - c. Industrial log yard (commercial, impact noise, reversing alarms, machinery)
 - d. Road traffic on Station Road

As a result, the assessment:

- e. Does not model railway noise at facades, but simply assumes the measured LAFmax values apply equally to all dwellings;
 - f. Does not assess tonal noise from the substation, despite acknowledging the existence of that noise at paragraph 3.1.3.
 - g. Does not assess industrial noise from the log supplier on the other side of the level crossing, despite noting that *"Noise owing to activities associated with the nearby industrial log supplier may have also influenced the measurement..."* (3.4.5).
 - h. Does not assess noise from the proposed development itself (including plant noise, refuse collection, car movements. Such operational noise is simply disregarded.
13. Beyond these methodological concerns, the assessment also fails to adequately reflect the actual acoustic environment experienced locally, particularly in relation to the electricity sub-station, railway operations and associated infrastructure.
14. As far as the noise from the sub-station is concerned, SPC notes the concerns of UKPN, both in relation to tonal noise and vibration, and draws attention to the lack of a proper assessment of either within the noise report or the indication within it of any, or any appropriate, mitigation measures.
15. In this regard, it may be instructive for SCDC to have regard to a recent case (dating from 2022) involving Mortimer's Gate in Saffron Walden. In that case, the LPA, Uttlesford District Council, approved housing next to a substation

without a robust tonal analysis in place. The result was that residents suffered persistent tonal hum, and the mitigations put in place by the developer were of minimal effect (reducing noise by only 5dB). On a complaint to the Ombudsman, it was found that the LPA had not adequately protected future occupiers, and the Council was obliged to consider mitigation measures costing £250,000. The Ombudsman's decision may be found here: <https://uttlesford.moderngov.co.uk/documents/s32718/Appendix%20A%20-%20Ombudsman%20Decision.pdf>.

16. Approving this application on the basis of an inadequate and incomplete substation tonal noise assessment would run the same risk for SCDC. The Council would be knowingly exposing itself to foreseeable Ombudsman criticism and significant potential future liability.
17. SPC accepts that this is not a relevant criterion under MA.2. However, what the case demonstrates is the critical importance, for protecting the wellbeing and amenity of any future residents of the proposed development, of obtaining a proper tonal submission prior to the grant of approval or permission (this matter cannot be dealt with by way of condition) and the developer properly demonstrating that acceptable internal noise levels can be achieved.
18. As to railway noise, the railway line is heavily used, with services commencing early in the morning (approximately 04:45). Although timetabled services may appear relatively infrequent outside peak periods, the line accommodates fast-moving through-trains which pass the site at speed, generating significant noise events that are not sufficiently captured in a generalised assessment.
19. SPC notes that a recent planning application in Foxton was refused in part because of its proximity to the (same) railway line, with the decision notice stating: *"The proposal due to its layout would result in an unacceptable standard of living accommodation which would not meet the required standards for new properties. The proposal would experience a high level of noise disturbance from the nearby railway and highway, of which there is insufficient information to demonstrate suitable mitigation. The proposal would therefore cause undue harm to the amenity and living conditions of future occupiers and would conflict with Paragraph 135 of the National Planning Policy Framework (2024), Policy HQ/1 of the South Cambridgeshire Local Plan (2018) and the South Cambridgeshire District Design Guide (2010)."*
20. There are also distinct peak noise events which have not been properly reflected, including

- a. The first train of the morning (circa 04:45), which represents a sudden and intrusive noise event during a period when background levels are otherwise minimal;
 - b. A later evening "heavy" train movement (typically around 22:30-22:45), which generates significantly elevated noise due to train weight and load;
 - c. Increased noise levels associated with heavily loaded freight or service trains, which create greater vibration and sound levels when passing over the tracks.
21. In addition, the operation of the level crossing barriers represents a notable and frequent noise source. The barriers are activated multiple times per hour (approx. 3 per hour - more in peak times) between the hours of 04.30 -01.00, generating audible warning signals and mechanical noise which would be particularly intrusive for any residents within development parcel EX1, given its location directly above and adjacent to this infrastructure.
22. These intermittent but high-intensity noise events are critical in determining residential amenity, particularly with regard to sleep disturbance and overall quality of life. Their omission or underrepresentation materially weakens the conclusions of the assessment.
23. Furthermore, the proposal fails to consider the cumulative interaction between noise mitigation measures (such as closed windows) and other environmental constraints, including overheating and ventilation requirements-highlighting an inherent conflict that has not been resolved.
24. Accordingly, the noise assessment does not provide a robust or reliable basis for evaluating future residential amenity. A revised assessment should be undertaken using representative baseline conditions and should fully account for the frequency, intensity, and character of both rail and infrastructure-related noise sources affecting the site.

Façade and glazing assumptions are unrealistic and unsupported

25. SPC notes that there is an inconsistency in the report, in that it is stated that "*a likely suitable glazing configuration [is] 4-12-4 double glazing* (4.2.3) but the proposal is to "*replace the existing window seals (but retaining the windows*" (6.3).
26. This is highly problematic, because the existing windows have not been tested: there has been no acoustic test and no specification provided.

27. Moreover, the façade performance, which purports to use BS 12354-3 modelling, but:
- a. No façade build-up is provided;
 - b. No window-to-wall ratio is given;
 - c. No room volumes are given;
 - d. No reverberation assumptions are stated.
28. Further, it is noted that the report assumes a 3dB framing loss: however this is unverified and arbitrary.
29. Finally, we note that whilst the report states that it is *“based on a dwelling believed to represent a worst case scenario”* (4.2.1), there are no drawings, no elevations and no room layouts provided or considered within the report to enable the veracity of that statement to be tested.

Conclusions on the report

30. Whilst the report concludes that *“It can therefore be assured that the indoor noise levels can achieve the recommended guidance values ...”* (4.3.3), but that is simply not the case.
- a. The survey location and timing is unrepresentative;
 - b. The glazing assumptions are untested;
 - c. Tonal noise is ignored;
 - d. Industrial noise is ignored;
 - e. The assessment does not evaluate noise at the facades of the proposed dwellings.

Other Matters

31. Separately, we note that no overheating mitigation strategy is provided, and the open-window noise exceeds the limits set out in Approved Document O of the Building Regulations. As to that:
- a. The proposal relies on the assumption that windows will remain closed in order to achieve acceptable internal noise levels. This approach is not realistic, as it conflicts with fundamental requirements for ventilation, thermal comfort, and healthy living environments.
 - b. The assessment identifies repeated exceedances of night-time noise thresholds, indicating a high likelihood of sleep disturbance for future occupants. However, it fails to adequately consider the cumulative and long-term effects of noise on health and wellbeing.

- c. Additionally, the assessment fails to resolve the inherent conflict between noise mitigation (closed windows) and overheating requirements, highlighting the unsuitability of the site for residential use.
32. Finally, there is vibration. The submission fails to adequately assess the impact of ground-borne vibration arising from railway operations, which is a significant omission given the site's immediate proximity to an active and heavily used rail corridor.
33. Passing trains-particularly fast-moving services and heavily loaded freight or service trains-are likely to generate perceptible vibration within adjacent buildings. This vibration is transmitted through the ground and into the structure, resulting in internal disturbance even where airborne noise criteria may nominally be met. This is a well-established effect recognised within BS 6472-1:2008 ("Guide to evaluation of human exposure to vibration in buildings"), which requires consideration of vibration in terms of occupant comfort, disturbance, and potential impact on residential amenity.
34. Local evidence further demonstrates that this is not a theoretical concern. Vibration from passing trains is already experienced within nearby residential properties in Docwras Close, confirming that ground-borne vibration is actively transmitted to the surrounding built environment. Given that the proposed development is in similarly close proximity-if not closer in some cases-there is a clear and evidenced risk that future occupants would be subject to the same or greater effects.
35. These impacts are typically most pronounced during quieter periods, including early morning and late evening, when background levels are low. The first train of the day (circa 04:45), along with heavier late evening movements (around 22:30-22:45) through to the last trains in the evening/early morning (last train to arrive at Shepreth is around 01.00, are therefore likely to give rise to particularly noticeable and intrusive vibration events, with potential to cause sleep disturbance and reduced residential amenity.
36. Furthermore, heavily loaded trains are known to generate increased vibration levels, which can be amplified depending on track condition, speed, and ground composition. These factors have not been robustly assessed. The absence of any detailed vibration monitoring, modelling, or assessment against BS 6472 (operational vibration) and BS 5228-2:2009 (construction vibration) means the submission fails to demonstrate that acceptable indoor vibration levels can be achieved.

37. In the absence of a robust, standards-based assessment-and in light of existing evidence of vibration impacts within nearby properties-the application fails to demonstrate that residents would not be exposed to unacceptable levels of vibration. This represents a material deficiency in the environmental assessment and further calls into question the suitability of the site for residential development.

East West Rail

38. Furthermore, in the course of formulating this response, it has come to the Parish Council's notice that the UKPN electricity substation immediately adjacent to 29 Station Road has become subject to draft land order limits by East West Rail. Whilst the detailed use of this site is as yet unpublished, EWR is almost certainly safeguarding not just railway land, but for potential use including:

- a. utility diversion corridors,
- b. construction access,
- c. traction power infrastructure,
- d. temporary compounds,
- e. or highway modifications.

39. The inclusion of the electricity substation is especially notable because EWR's electrification strategy requires new traction power connections and substations adjacent to the railway. EWR documentation specifically says draft Order Limits can include "traction power compounds" and associated utility works. In a Class MA prior approval application for 55 flats at 29 Station Road, the existence of the UKPN substation and the East West Rail land safeguarding/order becomes directly relevant to the statutory "noise impacts" assessment.

40. Under Class MA, the Greater Cambridge Shared Planning Authority should consider:

- a. the impact of noise from commercial premises on the intended occupiers; and
- b. whether future residents would experience unacceptable living conditions from surrounding operational uses.

41. For a scheme of 55 flats, noise becomes more significant because:

- a. there would be a large number of sensitive residential receptors;

- b. residents are likely to expect windows/openings facing the station corridor;
- c. cumulative infrastructure noise matters more at higher density;
- d. rail, transformer, servicing and ventilation noise can interact.

42. The East West Rail draft land order may bring:

- a. future railway intensification,
- b. safeguarded operational land,
- c. future electrical upgrades,
- d. construction access routes,
- e. increased train frequency,
- f. night-time maintenance,
- g. or long-term infrastructure activity near the site.

43. The site sits adjacent to strategic transport and electricity infrastructure and the East West Rail land order indicates likely future intensification rather than stable baseline conditions. The submitted external noise intrusion assessment thus necessarily underestimates future operational conditions.

44. Residents seeking mitigation will have to rely on sealed windows and a poor residential amenity and are likely to experience low-frequency transformer hum, rail braking noise, announcements, maintenance activity and vibration.

45. Under NPPF 2, The “agent of change principle” encapsulates the position that a developer (ie the agent) introducing a new land use is responsible for managing the impact of that change.

46. This proposal risks “agent of change” conflict with nationally significant infrastructure with current conditions likely to prove a severe understatement of the future level of noise. The Parish Council considers there to be a foreseeable future intensification of infrastructure activity around the site which supports a refusal of prior approval.

[END OF SUBMISSIONS]