

SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

REPORT TO: Planning Committee

7 March 2018

AUTHOR/S: Head of Development Management

Application Number: S/4099/17/OL

Parish(es): Hinxton, Whittlesford and Pampisford

Proposal: Outline application with all matters reserved for development of an AgriTech park comprising 112,000m² gross employment floor space, supporting infrastructure, amenities and landscape works including publicly accessible informal space, enhancements to parkland vehicle and cycle parking, bus and cycle interchange on land west of A1301/north of A505, infrastructure works including vehicular access, highway improvement works, pedestrian and cycle bridge and primary electricity sub station and associated works.

Site address: Land to the east of the A1301, south of the A505 near Hinxton and west of the A1301, north of the A505 near Whittlesford

Applicant(s): Smithson Hill Limited

Recommendation: Delegated Refusal

Key material considerations: Principle of development
Prematurity
Employment
Principle of proposed transport infrastructure within the Green Belt
Landscape, character and visual harm
Heritage
Transport and access
Flooding and surface water drainage

Committee Site Visit: 6 March 2018

Departure Application: Yes

Presenting Officer: Katie Christodoulides, Senior Planning Officer

Application brought to Committee because: It is of public interest and is a departure from the policies of the current Local Development Framework and emerging Local Plan.

Date by which decision due: 13 March 2018

Executive Summary

1. The proposed site lies outside of the village development framework and within the open countryside. The site is not allocated for development in the current Local Development Framework or emerging Local Plan, and would be contrary to these plans and planning policy. Officers are of the view that the proposal would be premature and undermine the plan-making process by predetermining decisions about the scale, location and phasing of new development which are central to the emerging Local Plan, undermining the sustainability and delivery of the development strategy of the emerging Local Plan.
2. The National Planning Policy Framework (NPPF) makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development. This requires an assessment of positive and negative impacts of the development and its contribution to the three dimensions of sustainable development: economic, social and environmental. Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.
3. The proposed development, it is claimed in the application, would result in economic benefits at a national level by the provision of research and development into new technologies to reduce the need for imports, increasing food and agricultural produce, and increasing the strength of UK growth in agriculture and the food sector which would create inward investment in the UK. At a regional and local level, the application suggests that the proposal would result in 4,884 full time equivalent jobs and the promotion of development of high skilled careers in the Cambridge sub region, with the potential to expand this sector of science, research and development, through delivery of a focused site.
4. The proposed social benefits of the development, it is claimed in the application, are the support for agriculture and the food chain to tackle global challenges of hunger, malnutrition, use of resources sustainably, promoting disease resistance, responding to climate change and delivering healthy food to support well being.
5. The proposed environmental benefits of the development, it is claimed in the application, would be meeting the UK's long term role in achieving the global challenge of growing demand for food in a sustainable manner, meeting sustainability in terms of the site through sustainable design and adaption to climate change, restoration of the historic parkland through tree and landscaping enhancements, significant archaeological investigation of the site, ecological enhancements to improve diversity, long term stewardship of agricultural land to improve soil quality and the reduction of site surface water runoff and flooding.
6. Notwithstanding the benefits claimed in the application, the proposed site for the AgriTech park would result in negative impacts in terms of substantial and significant landscape and visual harm, adversely affecting the curtilage and wider setting of the Grade II listed building Hinxton Grange and the loss of high grade agricultural land. The application has also failed to provide a satisfactory transport assessment and flood risk assessment.
7. The proposed site for a bus and cycle interchange and pedestrian bridge connecting the site with Whittlesford Bridge Railway Station would cause substantial harm to the openness and purposes of the Cambridge Green Belt, and the rural and agricultural character of this area. The proposed main site for the AgriTech park adjoins the Green Belt. Insufficient information has been provided to demonstrate the need for a

Green Belt location for the proposed bus and cycle interchange, that alternative sites outside the Green Belt have been considered, and the significant public benefits and requirement for this location. The proposed bus and cycle interchange and transport measures would encroach into the open countryside and reduce the openness of the Green Belt.

8. When taken in the round, the site is not allocated for development in the current Local Development Framework or emerging Local Plan, and would be contrary to these plans and planning policy. Having considered the economic, social and environmental benefits of the development, officers conclude that the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits of the scheme when assessed against the National Planning Policy Framework. Consequently, the scheme does not amount to sustainable development and is contrary to the development, should be refused.

Planning History

9. Land east of the A1301 Hinxton (Main site)
10. S/2363/89/F- Horse Trials Course- Approved
S/0625/17/E2- Scoping Opinion
11. Land south of the A505 near Hinxton, land west of the A1301 and to the north of the A505 near Whittlesford (Bus/Cycle Interchange)
12. No planning history

Environmental Impact Assessment

13. The scale of development and its potential environmental impacts have been assessed falling within the remit of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The application is accompanied by an Environmental Statement (ES).
14. Additional information comprising of an Environmental Statement Addendum including updated Section 8 and revised Appendix G of the Flood Risk Assessment and Drainage Strategy replacing Section 8 and Appendix G of the Technical Appendix E2 of the Environment Statement November 2017, and revised Transport Assessment February 2018 including proposed transport related conditions and detailed Section 106 Heads of Terms (Appendix 11) replacing Technical Appendix J of the Environment Statement November 2017 have been submitted on the 13th February 2018.

Additional Information submitted

15. Land use parameter plan 2357001B-LA-PP101 has been superseded with land use parameter plan 235701B-LA-PP101 rev A.

Planning Policies

National Guidance

16. National Planning Policy Framework (NPPF) 2012
National Planning Practice Guidance (NPPG)
17. Planning (Listed Buildings and Conservation Areas) Act 1990

Town and Country Planning Act 1990 (As Amended)
Planning and Compulsory Purchase Act 2002

18. **Development Plan Policies**

19. **South Cambridgeshire Local Development Framework Core Strategy DPD 2007**

ST/1 Green Belt
ST/8 Employment Provision

20. **South Cambridgeshire Local Development Framework (LDF) Development Plan Document July 2007**

DP/1 Sustainable Development
DP/2 Design of New Development
DP/3 Development Criteria
DP/4 Infrastructure and New Developments
DP/6 Construction Methods
DP/7 Development Frameworks
GB/1 Development in the Green Belt
GB/2 Mitigating the Impact of Development in the Green Belt
ET/1 Limitations on the Occupancy of New Premises in South Cambridgeshire
ET/2 Promotion of Clusters
ET/3 Development of Established Employment Areas in the Countryside
SF/6 Public Art and New Development
SF/8 Lord's Bridge Radio Telescope
SF/10 Outdoor Playspace, Informal Open Space, and New Developments
SF/11 Open Space Standards
NE/1 Energy Efficiency
NE/2 Renewable Energy
NE/3 Renewable Energy Technologies in New Development
NE/4 Landscape Character Areas
NE/6 Biodiversity
NE/8 Groundwater
NE/9 Water and Drainage Infrastructure
NE/10 Foul Drainage - Alternative Drainage Systems
NE/11 Flood Risk
NE/12 Water Conservation
NE/13 Hazardous Installations
NE/14 Lighting Proposals
NE/15 Noise Pollution
NE/16 Emissions
NE/17 Protecting High Quality Agricultural Land
CH/1 Historic Landscapes
CH/2 Archaeological Sites
TR/1 Planning for More Sustainable Travel
TR/2 Car and Cycle Parking Standards
TR/3 Mitigating Travel Impact
TR/4 Non-motorised Modes

21. **South Cambridgeshire LDF Supplementary Planning Documents (SPD)**

Biodiversity SPD - 2 July 2009
Cambridgeshire Flood and Water SPD - November 2016
District Design Guide SPD - 2 March 2010
Health Impact Assessment SPD – March 2011
Landscape in New Developments SPD - 2 March 2010
Open Space in New Developments – adopted 15 January 2009

Public Art SPD - 15 January 2009
RECAP Waste Management Guide SPD – 22 February 2012
Trees and Development Sites SPD - 15 January 2009

22. **Status of Emerging South Cambridgeshire Local Plan**

Planning applications should be determined in accordance with policies in the adopted Development Plan unless material considerations indicate otherwise. However, in accordance with paragraph 216 of the NPPF, weight can also be given to emerging plans. For South Cambridgeshire the emerging revised Local Plan as submitted for examination (28 March 2014) is at an advanced stage, there having recently been consultation on proposed Modifications, and attracts weight in the planning balance, having regard to those policies to which there are no or limited objections. For the most part, however, the adopted development plan policies will attract greater weight than the equivalent policies of the emerging plan in the event that there is any conflict between two equivalent policies.

For the application considered in this report, the following policies in the emerging plan are relevant:

23. **South Cambridgeshire Local Plan – Submission Draft 2014**

S/1 Vision
S/2 Objectives of the Local Plan
S/3 Presumption in Favour of Sustainable Development
S/4: Cambridge Green Belt
S/5 Provision of New Jobs and Homes
S/6 The Development Strategy to 2031
S/7 Development Frameworks
CC/1 Mitigation and Adaptation to Climate Change
CC/2 Renewable and Low Carbon Energy Generation
CC/3 Renewable and Low Carbon Energy in New Developments
CC/4 Sustainable Design and Construction
CC/5 Sustainable Show Homes
CC/6 Construction Methods
CC/7 Water Quality
CC/8 Sustainable Drainage Systems
CC/9 Managing Flood Risk
HQ/1 Design Principles
HQ/2 Public Art and New Development
NH/2 Protecting and enhancing Landscape Character
NH/3 Protecting Agricultural Land
NH/4 Biodiversity
NH/5 Sites of Biodiversity or Geological Importance
NH/6 Green Infrastructure
NH/8 Mitigating the Impact of Development in and adjoining the Green Belt
NH/10 Recreation in the Green Belt
NH/14 Heritage Assets
NH/15 Heritage Assets and Adapting to Climate Change
E/10 Shared Social Spaces in Employment Areas
E/13 New Employment Development on the Edges of Villages
E/15 Established Employment Areas
E/16 Expansion of Existing Businesses in the Countryside
SC/1 Allocation for Open Space
SC/2 Health Impact Assessment
SC/7 Outdoor Play Space, Informal Open Space and New Developments
SC/8 Open Space Standards

SC/10 Lighting Proposals
SC/11 Noise Pollution
SC/12 Contaminated Land
SC/13 Air Quality
SC/14 Hazardous Installations
SC/15 Odour and other fugitive emissions to air
TI/2 Planning for Sustainable Travel
TI/3 Parking Provision
TI/7 Lord's Bridge Radio Telescope
TI/8 Infrastructure and New Developments
TI/9 Education facilities
TI/10 Broadband

24. Modifications have been published to some of the above draft policies of the submitted South Cambridgeshire Local Plan 2014 as part of the Examination in Public. The Local Planning Authority has recently carried out consultation on the Main Modifications to the South Cambridgeshire Local Plan which closed on 16th February 2018.

25. **Supporting Evidence**

Industrial Strategy White Paper November 2017
East of England Science and Innovation Audit 2017
Technology and Innovation Futures 2017
UK Strategy for Agricultural Technologies 2013
The Clean Growth Strategy 2017
Our Plan for Growth: Science and Innovation December 2014
Cambridge high tech cluster growth, opportunities to the south of Cambridge 2014
Strategic Economic Plan (Greater Cambridge Greater Peterborough Local Enterprise Partnership) 2014
LSCC Sector Profiles: Agrifood 2015
Transport Strategy for Cambridge and South Cambridge 2014
Local Transport Plan (LTP3) 2011-2031

26. **Consultation**

Internal

27. **Air Quality Officer**

Does not object to the proposed development on the basis of impacts to or from air quality. A condition in regard to electric vehicle charging is recommended to maintain minimal impact on air quality from all developments.

28. **Contaminated Land Officer**

A Phase 1 desk study has been carried out as has a Phase 2 investigation, the findings of which are agreed with. Further to the Phase 2 investigation a further targeted investigation has been proposed once the layout of the site has been determined. Recommends a condition requiring investigation and recording of contamination, a Remediation Method Statement, and a Verification Report if any contamination is identified.

29. **Ecology Officer**

Methodology/surveys

The Phase 1 habitat Survey dated 2014 and Bat Activity Survey dated 2014 are out of date. Further updated surveys are required. Habitat descriptions of the field margins do not include width of margins or the general physical appearance/structure. There is no mention of either the trial agricultural plots or elements of the wider landholdings such as the extended field margins to the east of Hinxtton Grange adjacent to the area known as Round Plantation.

Construction effects

The production of a CEMP to remove residual risk from direct effects of construction on protected species is welcomed. The document should provide guidance to all phases of construction, a monitoring programme of habitats impacted by future phases of development must be incorporated.

Post construction effects

No indication of specific quantities of semi-nature habitat to be created as part of the development has been given. No quantitative methodology provided of how the effects of habitat loss will be compensated for. The EIA does not provide a coherent strategy to mitigate the effects of lighting on biodiversity in general. There is no indication of how habitat connectivity is to be established, where the main biodiversity corridors will be and how they will be integrated into the development site.

Compensation habitat

Further detail is required in terms of the types of compensation habitat to be integrated into the development. An Ecological Design Strategy should be provided detailing where ecological compensation, biodiversity enhancement and planting schedules, seed mixes and ecological feature placement.

In response to these comments from the Ecology Officer, the applicant/agent replied by letter date 13/2/18 and has clarified a number of specific points from comments raised by consultees. The points clarified in relation to ecology relate to Bat Survey's being conducted in 2015 and 2016 so less than two years from when the application was submitted, the Phase 1 Habitat Survey would have recorded in detail if the field margins are not of value, it is not clear what species of wintering birds, concern is raised, it is acknowledged that there would be a requirement for a (CEMP) and ecological surveys to be updated. Habitat loss vs compensation and enhancement would be detailed on the Reserved Matters application and if deemed necessary a quantitative assessment of the ecological compensation and biodiversity enhancement could form part of the Ecological Design Strategy.

The Ecology Officer has commented on the above and states that Documents submitted to the LPA so far provide site wide surveys for Phase 1, bat activity transects, reptile, breeding birds, and wintering birds (excluding waders) only for 2014. If any of these surveys have indeed been updated in the interim they will need to be submitted. Clarification is required regarding the 2014 Reptile Surveys and the methodology used and specific information regarding the sub optimal conditions in which the surveys appear. The survey referred to by agent in their letter dated 13/2/18 regarding the updated Phase 1 survey for the wider application conducted by Applied Ecology Ltd in April 2017 should be submitted in support of the application and any results therein fed into the ES as appropriate. The golden plover is the wintering bird, the application site is likely to represent only part of their wider range at the time of the survey. The Environmental Statement should be providing at least an outline or 'in principle' approach to provision of how habitat connectivity will be maintained or enhanced, where biodiversity corridors will be placed, what their primary functions will be, how aspects such as dark corridors will be incorporated into the site, or how the loss of farmland bird habitat will be compensated.

30. **Environmental Health Officer**

The proposed development on the basis of the Technical Appendix 1: Noise and Vibration of the Environmental Statement contains a noise assessment which indicates that no significant adverse residual effects on noise sensitive receptors have been identified. There is no information submitted detailing the plant and equipment that will be installed and which will function during the operation of the development. Due to the nearest sensitive receptors (residential premises) being in very close proximity, the noise impacts cannot be accurately predicted at this stage. The report states this type of equipment will be assessed later at the detailed design stage, which is necessary.

31. **Health Impact Assessment Officer**

The Health Impact Assessment as submitted has been assessed as grade A. This meets the required standard of the HIA SPD Policy in terms of performed well, no important tasks left incomplete.

32. **Landscape Officer**

Objects to the proposal as it will result in significant harm and adverse impact on landscape and visual amenity of the area.

Landscape Strategy comments

The size of the site, the numbers and scale of the buildings proposed and sloping land would make it difficult to successfully integrate the proposed development into the landscape. The proposed development would be located hard up against the parkland to the south and west of Hinxtion Grange, and to within 20 metres north and south of the tree lined avenue to Hinxtion Grange. The proposals do not leave sufficient space for a setting for the avenue and parkland, and will remove the long distance open views of the open countryside to the west from Hinxtion Grange towards Duxford. According to the scoping report, it is proposed to reprofile substantial areas of the development site. However within the ES there has been no assessment of how these changes in levels would effect the open rolling chalkland landscape character.

The proposal to avoid off-site disposal of a large surplus of topsoil by creating 3.5m high screening mounds along the south and west boundaries of the site would be a waste of a valuable resource having regard to the high agricultural grading of the land. These screening mounds, together with the proposed NMU bridge abutments at the A505/A1301 junction would appear incongruous in the landscape and contrary to the local landscape character. Moreover any planting on the screening mounds would take significant time to become established and become effective at screening any visually harmful development within the site.

The proposed development comes close to the southern boundary of the site. Buildings would be set high on the 45 metre contour to the south east, to within 60 metres of the boundary with proposed development set above the proposed bunds. The proposed development is set lower on the 35 metre contours to the south west but here development will extend to less than 400 metres from the built edge of Hinxtion. This would result in the retained agricultural land to the south of the development site being out of scale with the local landscape, and with the development itself adversely affecting the approaches to and setting of Hinxtion.

The proposed development for the cycle and bus transport hub at the A505/A1301

roundabout would introduce a substantial new bridge over the entire width of the junction which would be over 200 metres long. This would bring development into the river floodplain and very close to the highly sensitive chalk-stream habitats to the north west. The proposal would encroach into the greenbelt and the open landscape immediately to the north east.

Landscape Visual Impact Assessment Comments -Methodology

The methodology presented for the Landscape and Visual Impact Assessment (LVIA) is acceptable and in accordance with the standards set out by the Landscape Institute in their Guidelines for Landscape and Visual Impact Assessment 3rd Edition 2013. However there are a number of areas where there are concerns as to how the methodology has been applied in the actual assessment..

The Zone of Theoretical Visibility (ZVI) (figure 9.11) as presented cannot be relied upon, nor is it informative as 1) The assumption made with regard to the finished level of development platform has not been provided, and 2) it is not clear which part of ZVI is affected by which part of the development.

There are a number of areas where the applied levels of sensitivity of receptors and the magnitude of effects have resulted in the potential harm to the landscape and visual receptors being underplayed, and the potential successes of the proposed mitigation in reducing landscape and visual harm overstated.

The development site (Landscape Character Area L1) has been extracted from the its surrounding setting (LCA 3 Chalklands) and presents it as a separate entity. This obscures the role and contribution L1 makes to L3 and subsequently enables the significance effects on L1 and L3 to be assessed at completely different levels, although parts of L3 are directly adjacent to L1.

The landscape and visual impacts of the proposed bridge at the A505/A1301 junction and adjacent bus and cycle interchange, cumulative landscape and visual effects and the setting of Hinxton have not been adequately assessed.

Judgement on the overall significance of the effects

The aim of the LVIA is to arrive at a final judgement of the likely significance of the predicted landscape and visual effects as a result of development. The likely significance is reached by consideration of the type and scale of the proposed development and its predicted landscape and visual effects, combined with the sensitivity of the receptors and the magnitude of change. Some judgements have been downplayed in relation to landscape and to visual receptors by assessing landscape effects against large geographical areas or by combining effects on separate visual receptors with high and low levels of sensitivity. As a result, the judgements of the overall significance of landscape and visual effects are underestimated.

Some Areas of Landscape Character, for example area 4B Granta Valley have been established as part of the landscape baseline, but no assessment of the effects of development on the Granta Valley area has been carried out.

There have been no verified views supplied, and the photomontages of the viewpoints do not provide any indication of possible building heights or building mass across the site. Significant parts of the proposed development for example the bus/cycle interchange site and the pedestrian/cycle bridge have not been included in the photomontages. There has been no information submitted to demonstrate the possible effects of night-time lighting across the site, or to demonstrate the effects that

the stated primary and secondary mitigation measures will have in reducing identified landscape and visual harm, either on completion or at 15 years after completion.

The significance of Landscape and Visual Effects

The significance of landscape and visual effects have been reached on the basis of limited evidence, even if a full landscape and visual assessment were carried out, the proposed development would still produce significant and adverse landscape and visual effects, and that these would remain even after the full implementation and establishment of primary and secondary mitigation.

There will be a complete change in the landscape character of the site. The huge scale of the development footprint and the landform rising by over 20m across the site will mean that development is likely to affect both landscape character and visual receptors across a wide area. The views selected from Pampisford and Hinxton to the development will include extensive areas of development that will remain visible after mitigation measures are implemented. The designed views from Hinxton Grange and the setting of the listed buildings will be removed, and proposed mitigation will not address this loss. Landscape and visual effects will remain significant and adverse.

Cumulative Effects

As the applicants note at 9.41 perception of the landscape can play an important part in the assessment of the landscape. The addition of large scale development in this location will begin to give the perception of a single development corridor, as separation between developments is eroded, rather than a river valley which still retains a largely rural character. The proposed development will form a visual and perceptual link between the Genome Campus to the south and the Sawston Business park to the north. There will be (very almost) indivisibility between the Genome Campus and the proposed development.

Hinxton village is already very close to the Genome Campus, less than 100m to the south, and the proposed development will introduce another, far larger facility, 400m to the north, squeezing the village between the two, and compromising the setting of the village. Together these developments would cover an area many times that of the adjacent local villages.

Conclusions

The proposed development will result in substantial and significant landscape and visual harm to the site, to the local landscape character areas and to visual receptors. Due to the scale and location of the proposed development, it will be difficult to find a design solution that will reduce landscape and visual harm to acceptable levels.

The applicants have not adequately assessed the landscape and visual harm, by underplaying sensitivity to change, for example by assessing harm against wide geographical areas and by combining receptors of low and high sensitivity, and by overstating the role of primary and secondary mitigation.

The proposed development will result in significant adverse landscape and visual effects, and so the recommendation is for an objection on landscape grounds.

In response to these comments from the Landscape Officer, the applicant/agent replied by letter dated 13/2/18 and has clarified a number of specific points from comments raised in regard to verified views, cumulative effects, distances between development, the parkland and avenue, the area of development covered by building footprint and assessment of Green Belt land. The Landscape Officer comments that, whilst verified views have not been specifically requested, it has been common practice on a scheme of this size for many years and is now supported by technical

guidance note 02/17 (31st March 2017) published by the Landscape Institute. The Landscape Officer does not say that there was no assessment of cumulative effects assessment, but considered that it was not adequately considered and set out. Notwithstanding what Illustrative figure 51 in the Design and Access Statement indicates, the Landscape and Open Space Parameter Plan shows build form abutting the parkland with the proposed buffer planting within the parkland. The Parameter Plan also shows the total width between development either side of the avenue as approximately 55m. The Illustrative Masterplan (figure 35 in the Design and Access Statement) would also suggest that development will be within 20m of the avenue and hard against the parkland landscape. The Landscape Officer has a full appreciation of the proposals, and of the scale and type of development likely with the stated 25% built footprint plus associated infrastructure, and remains of the views set out in the response. Whilst it is not acknowledged that Green Belt is not a 'landscape' designation, clearly any effect on openness is likely to affect the perception of the landscape and visual amenity of the locality. It is considered that some assessment of this issue would not have been inappropriate in Chapter 9 of the Environmental Statement and could have informed the planning assessment.

33. Listed Building Officer

Objects to the proposal as the development will cause less than substantial harm to the significance of Hinxtton Grange (Grade II Listed Building); its associated stable and coach house to the north east (Grade II Listed Building) and designed landscape (non-designated heritage asset). The site is located within the setting of these heritage assets and is considered to make an important contribution to their significance and the ability to appreciate their significance. The setting of these heritage assets has not been subject to significant later changes.

The proposal would affect important views and visually compete with, and distract from, the heritage assets. The proposed additional landscaping is not considered to remove, mitigate or reduce the harm this development would cause to the setting and significance of the heritage assets. The proposal would conflict with the statutory duty under the Planning (Listed Buildings and Conservation Areas) Act (1990) to give special regard to the desirability of preserving the setting of the listed buildings and as such the test set out in Paragraph 134 of the National Planning Policy Framework would apply. The proposal is also contrary to Policy CH/4 of the Local Development Framework, which states that planning permission will not be granted for development which would adversely affect the curtilage or the wider setting of a listed building. The proposal is also contrary to Policy CH/1, which provides that planning permission will not be granted for development that would adversely affect an historic landscape. Paragraph 135 of the National Planning Policy Framework requires the effect of an application on the significance of a non-designated asset to be taken into account in determining an application, and balanced judgement formed.

34. Sustainable Drainage Engineer

The proposal is acceptable subject to conditions in regard to submission of surface water and foul drainage.

35. Sustainability Officer

Recommends conditions in regard to requiring a carbon reduction statement, water conservation strategy and construction to approved BREEAM very good and post construction certificate.

36. Trees Officer

The proposed tree planting throughout the site should reflect the 30:20:10 rule of biodiversity. Consideration should be given to the use of traditional pollards, coppards and coppice within the scheme to ensure greater habitat diversity. Different palettes of trees should be used in different 'neighbourhoods' of the site to provide a varied landscape.

Existing hedgerow notes

The hedgerows throughout the site would be considered 'important hedgerows' under The Hedgerow Regulations 1997. It is not explicitly clear if these hedgerows are going to be retained but they appear to be retained within landscape between buildings. As the site has an emphasis on sustainability and enhancing its landscape heritage these hedgerows should be retained.

Proposed hedgerow notes

Choice of planting species should reflect local hedgerow species.

37. Urban Design Officer

Preliminary observations on the illustrative masterplan and supporting information are that the proposed location of the development would be contrary to the established settlement pattern of small scale development, located along the river valley. The development would be inconsistent with the characteristics of the local landscape and built environment. Raises concern regarding the building heights of up to 13.5 metres within the core of the development and 9 metres high on the rest of the development. Plant and lift shafts could add as much as 5 metres to these heights. The height and scale of the proposals could have adverse impacts on views of the site from the north, south and west and that the information submitted with the application is insufficient to appropriately assess the impact of the development. The interconnections between the green corridors and greenways are too restricted with too much of the site area indicated as built development. The cohesion and quality of the development would be severely compromised with parked cars having an adverse impact on the setting of buildings and public realm. The full impacts of the proposals cannot be properly assessed with the information provided.

In response to these comments from the Urban Design Officer, the applicant/agent replied by letter date 13/2/18 and has clarified a number of specific points from comments raised by consultees. The two points in relation to the Urban Design comments are that the settlement and development pattern has been a key factor in determining site capacity and the location of built development as detailed in the Design and Access Statement, and that additional landscaping is proposed to the north and west of the development parcel to the north of the avenue, contrary to what was stated that no mitigation is proposed to screen the development north of the avenue. The Urban Design Officer's response is that the existing development pattern may have influenced the location of the built development, the proposals are still considered to be contrary to the established development pattern. The Design & Access Statement, page 13 paragraph 2.22 states that 'A nucleated settlement pattern is evident, regularly dispersed at lower elevations and clustered within the shallow river valleys adjacent to the River Cam. Settlements and indeed all built developments are largely absent at higher more exposed elevations.' The proposals are not located close to the river and the site is in an exposed position which rises up the side of the valley.

38. Waste Officer

No concerns raised regarding the proposed waste collection.

External

39. Archaeology Officer

The Archaeological evaluation indicates that significant evidence for the pattern of prehistoric and Roman land use and settlement survives in the area. These important archaeological remains would be severely damaged or destroyed by the proposed development. Broadly in agreement with the assessment of significance contained in the Environmental Statement and agree that excavation in advance of construction would be appropriate to mitigate the construction impacts. This should be a targeted programme of investigation and not strip, map and record as suggested. Would recommend that the programme of work is secured by way of condition.

40. British Horse Society

No objection to the Planning Application. We have contacted the applicant to ask why access under the A505 bridge at the exit of the road from the station has not been considered as a safe, alternative route for NMU's to the site since this would negate the need for the enormous bridge. All that would be required is a safe crossing of the A1301 to access the site. NMU's would already be on the existing path towards Saffron Walden. We consider there is an alternative access route.

41. Cambridgeshire Fire & Rescue

Recommends a planning condition in regard to provision for fire hydrants.

42. Cambridge Past Present and Future

Recommends refusal as the proposal is not plan led, this should not be determined in isolation as it creates poor quality piecemeal development. It should be considered alongside all developments in this area to ensure an integrated approach and considers impacts on transport and infrastructure. Development should not be north of the entrance drive as it is not appropriate, harmful to the setting and character of the historic park land and listed building and a precursor to further expansion opportunity. There are concerns about the proposed alterations to the infrastructure in the immediate area which has not been coordinated with any proposals along the A505 as part of the Mayor and Combined Authorities proposals in conjunction with the A1307 GCP works. General concerns regarding the harm to the setting and character of the listed building, its historic parkland and that the site was designed to be located within the isolation of the fields and how it will be understood, experienced and interpreted will be significantly altered. Questions future proofing and the potential for alternative uses for the site if the scheme is unviable or becomes more successful and requires expansion. The existing aquifer could potentially become abused, are there any issues regarding water extraction?

43. Campaign to Protect Rural England

Objects to the application on the grounds of development in the countryside and the site being outside the development framework and it should be raised by the review of the Local Plan. The proposed site of the bus and cycle interchange would encroach on the value of the green belt in maintaining countryside around settlements within the green belt. The proposal would result in the loss of arable land and rural landscape,

and the proposed mitigation measures would not compensate for the loss of the valuable habitat. The proposal would generate car journeys overwhelming capacity on local roads, adding to light pollution, urbanization and the potential for flood risk. Consideration required on the business case for the proposal.

44. **Designing out Crime Officer**

The proposal is in an area of low vulnerability.

45. **Development Management Engineer, Cambridge County Council**

Recommends refusal as insufficient information has been submitted with the application to assess the proposal would not lead to a detrimental impact on highway safety. A stage 1/2 Road Safety Audit will need to be completed on all submitted drawings. Requests that the applicant engage with the Cambridge County Council Structures Team in regard to the bridge and its acceptability in principle.

46. **Economic Growth and Development, Essex County Council**

A development of this size would be expected to generate the need for 160 Early Years and Childcare places. Any permission for this development should be granted subject to a Section 106 Agreement that ensures the contribution would be fairly and reasonably related to scale and the kind of development.

47. **Environment Agency**

No objection in principle and recommends conditions in regard to submission of a remediation strategy, if contamination is found no further development is carried out, surface water disposal scheme, piling or foundation design, landscape management plan, plan for protection and mitigation to protected species, a construction method statement and foul water and trade effluent drainage details.

48. **Highways England**

Raises concern regarding drawing number 1736/01/214 (rev D) and the improvements to both M11 off-slip roads and their approach to the roundabout, the effect of the steep embankment between the slip road and M11 should be considered. The improvement shown to the start of the southbank onslip as it leaves the roundabout, will this facilitate 2 lanes and is compliant with the design manual for roads and bridges? Please clarify why no improvement has been made to the northbound on slip. The Transport Assessment does not contain any assessment of the merging between the onslips and the main M11 carriageway. This is required to confirm the mitigation measures.

49. **Historic England**

No objection on heritage grounds. With regard applications that affect the setting of historic environment assets, Historic England has a statutory responsibility to comment on applications affecting Grade I and II* listed buildings and scheduled monuments. The comments made did not consider the setting of Grade II listed buildings on the site.

50. **Imperial War Museum, Duxford**

No objection as the development is outside the safe guarding zone, it is within the 45

metre height zone of interest however the proposed building heights would be within this limit. The proposed pedestrian, equestrian and cycle footbridge is within and at the edge of the safe-guarding zone. Makes the comment that consideration should be made in relation to the further design development of the footbridge given its proximity to safe guarding zone and any development around Duxford can have an impact on day to day running and airshow flying operations. Work is underway to manage the risk of slow unmanaged encroachment on IWM Duxford.

51. Lead Local Flood Authority

Objects to the granting of permission as the applicant has not demonstrated that the total storage volume required to attenuate surface water run-off from the critical 1% Annual Exceedance probability (AEP) critical storm event, including an appropriate allowance for climate change, can be provided on site, groundwater depths have not been considered, there should be a minimum of 1.2 metre clearance between the base of any infiltration feature and peak seasonal groundwater level. Details of the proposed road drainage have not been provided beyond section 8.2. The applicant should demonstrate the proposed impermeable areas, discharge rate, volumes, treatment processes and outfall point / infiltration point. Exceedance flow does not appear to have been considered. Proposals should include details of impact of system exceedance or system failure including flow paths indicating their impact on site access and egress.

52. Natural England

The proposed development in this location does not appear to trigger National England's Impact Risk Zones for potential impact to designated sites. Supportive of Environment Agency's recommendations for planning conditions to require additional information to ensure protection of ground and surface waters. This should demonstrate that the development would not have any effect on nearby water-dependent designated sites through pollution and contamination of controlled waters. Recommends the applicant prepare a site wide biodiversity mitigation, enhancement and management strategy, including mitigation measures to address impacts to Local Wildlife sites, wider biodiversity and demonstrate how the development will deliver enhancements through high quality habitats. The proposal should be compliant with the requirements of emerging Policy NH/3 in regard to protecting agricultural land. Consideration of soil resource management required.

53. National Grid

Places a holding objection as it will cross a high pressure gas pipeline.

54. Plant Protection Team, Cadent Your Gas

Due to the presence of Cadent and/or National Grid apparatus in proximity to the specified area, the contractor should contact Plant Protection before any works are carried out to ensure the apparatus is not affected by any of the proposed works.

55. Strategic Development Engineer, Essex County Council

In terms of the draft Uttlesford Local Plan, the North Uttlesford Garden Community and the Chesterford Retail Park are future allocations that have been excluded from the transport modelling. A sensitivity testing of the transport modelling should be undertaken so that the future impact on the network can be understood in terms of strategic network and the local network. The proximity of the site to Uttlesford and

Great Chesterford and Saffron Walden mean that a large number of employees are likely to be attached to the site from these areas, therefore sustainable transport options should be considered from Great Chesterford, in particular cycle links. The development could also have impacts on residents of Uttlesford who use the A505 as a route out of the northern part of Uttlesford in particular to the M11 north as this development situated just off this route is likely to have a significant impact on this route for traffic accessing the site from most points north/east or west. This should be taken into account and mitigation proposed. Until this work is undertaken, the Essex Highway Authority cannot fully assess the impact of the development on the highway.

56. **Transport Assessment Team, Cambridge County Council (see application file for full response)**

Recommends a holding objection for the following reasons:

To date there is insufficient information provided to consider and respond on the acceptability of the Transport Assessment. Fundamental aspects of the Transport Assessment including trip generation and distribution have not been agreed and therefore Cambridge County Council (CCC) are not in a position to form a view on the impacts of the development on the strategic highway network.

57. The following were consulted and no comments have been received:

Sport England East
County Rights of Way Team
County Minerals and Waste
County Accessibility Officer
The Wildlife Trust
Victorian Society
The Twentieth Century Society
Society for the Protection of Ancient Buildings
Georgian Group
Garden History Society
Gas Distribution
Envoy Online- Gas Pipeline Advice
Civil Aviation Authority
British Gliding Association
Local Enterprise Partnership
Lordsbridge
Anglian Water
Cambridge Water
Police Architectural Liaison Officer
Marshalls of Cambridge
Cambridge Ramblers Group
Health and Safety Executive

Representations

58. **Duxford Parish Council**

A significant effort has been made to assess the current traffic levels and the impact that the development will have on them. Significant shortcomings are apparent and the data on the Hunts Road roundabout is operating well beyond its capacity and the modelled data suggests the model is broken and cannot produce meaningful results. The proposed changes to the A505/A1301 roundabout will make it more difficult for

pedestrians and cyclists from the north to access the existing cycle/pedestrian route along the east of the A1301 from the roundabout to Hinxton, as the junctions on the roundabout will be wider and have greater traffic flow on them. The main part of the development is outside the Green Belt, but the bus-rail interchange is in the Green Belt. The main site is on Grade 2 Agricultural Land and is above a Zone 2 and next to a Zone 1 aquifer.

The proposals give no indication of interest or support from any commercial or publically funded organisations. NIAB originally indicated some support for the project back in 2015, when asked recently they said that their work is concentrating on the redevelopment of their existing Cambridge site and a new joint Centre for Crop Science site with the Cambridge University. Duxford Parish Council object to the application on the basis that it represents an unsuitable development for the existing agricultural land and its adverse impact on the local traffic, both of which are adverse to the current Local Development Framework.

59. **Great Abington Parish Council**

No comments received (out of time).

60. **Great Chesterford Parish Council**

In agreement with the comments of Hinxton Parish Council and wish to submit our comments as expressing identical concerns to those of Hinxton.

61. **Hinxton Parish Council**

Objects to the proposal on the grounds of the development not being included in the draft Local Plan. The plan in its final stage has identified sufficient land to support employment in other locations in the District; the site is not one of the designated established employment areas. The proposed development is contrary to Hinxton's designation as an infill village. The proposal is contrary to the draft Local Plan Policy S/1, S/2 and the National Planning Policy Framework. The proposed business plan and stated purpose of the development have no credibility. There is no evidence of participatory interest by any leading R& D oriented AgriTech organisations. There is no scientific or commercial reason why the proposed park should be sited in Hinxton. The location of key AgriTech activities suggests that there are no particular benefits to locating a new AgriTech business park at Hinxton. There is no scientific or commercial reason why the proposed park should be sited on open farmland. The proposal would be contrary to Policy DP/1, DP/7 and NE/17 of the LDF. There is not evidence of interest by any firms that might wish to use the adjacent fields for crop trials and the proposed siting on high quality agricultural land cannot be justified. The proposal does not minimise the need to travel and reduce car dependency, being contrary to Policy DP/1 and DP/3. The proposed traffic modelling is grossly inaccurate and understates the actual congestion experienced. The proposed roundabout improvements will not enhance overall traffic flow or reduce congestion. The proposed modal shifts in transport are highly unlikely. The proposed new cycle paths and pedestrian, cycle and equestrian bridge over the A505/A1301 roundabout would be useful for recreational use but not provide any significant mitigation for the typically far longer distance commuting needs of the site. The proposed development would have adverse environmental impacts in terms of aquifer damage, increased flood risk, pollution, biodiversity and landscape. In conclusion the proposed Agri-Tech technology park is misdescribed, misconceived and misplaced. Its impact on the traffic and the environment of the locality is grossly underestimated and any proposed mitigation measures are inadequate and under-financed. It is strongly opposed by Hinxton

Parish.

62. Ickleton Parish Council

Objects to the proposal on the grounds of not being in the existing Local Plan or emerging plan. The proposal should come forward as part of the Local Plan process given the significant infrastructure issues, transport and housing. The proposed case for the proposal is unconvincing, there is an absence of a substantive commitment from a reputable co-participant and is a speculative venture. There is a lack of participatory interest from a leading R&D agritech organisation. The application places emphasis on the site's ability to offer land for field trials, there is a disconnect between the amount of land and the amount of employment that the site is intended to offer. The redistribution of soil on the site makes the land unsuitable for trials as it would not be representative of local agricultural land. Little evidence of the case for clustering, little evidence of the need for a development of this size. Concerns regarding where the employees will live, the synergies with the Wellcome Trust seem improbable given their focus on human and animal physiology and medicine. A site located near Norwich would make more sense than Hinxtton, with centres of AgriTech excellence already in existence in the area. The traffic data supplied understates the congestion in the area, the traffic modelling omits other considerations that should be included, with nearby developments. The proposed assumption that 50% of the workforce will travel in private cars is unrealistic. There is limited capacity on trains for bikes. Whittlesford Parkway is not served by many trains with facilities being poor. Insufficient information is provided on the assessment of the impact of the shuttle bus service. The proposed improvements at the roundabout and other mitigation measures are small scale in nature. The increased congestion to this development would be harmful to the quality of life of residents. Proposed car parking is inadequate. No consideration of rat running through Duxford and Ickleton. The proposed development would have a detrimental and irrevocable impact upon the landscape and local area, the built part would be alien to the open countryside. The proposed landscape bund would not be high quality and have an adverse impact on the open landscape. Brownfield sites rather than greenfield should come forward for development. The Wellcome Trust has an established presence in the area and would have a better argument for location on a greenfield site near to its existing facilities than the proposal. Concerns regarding the open agricultural landscape of three communities Hinxtton, Pampisford and the Abington's. Open views of the Grange's avenue of trees and the listed building would be obstructed, having an adverse impact. No justification for the loss of good quality agricultural land, there would also be adverse impacts on biodiversity, light pollution, ground water protection and flood risk.

63. Little Abington Parish Council

Does not support the application. The application appears to be speculative, with few plans for the type of research and activities on site and a number of matters left for detailed applications. Raises concerns in regard to the application being considered in isolation from other development proposals, particularly developments in or near Sawston including a trade park, housing and new sports facility and the development in Uttlesford. The proposed level of 50% of employees driving to work is unrealistic given the distance people will be living from the site. The experience of local residents in regard to traffic, contradicts the findings of the travel surveys and modelling. The A505 and A1301 are at capacity. The investment and strategic plan for solving the problems of the inadequate road network of South Cambridgeshire, Suffolk and Essex must be considered. The train service is at capacity, car parks are full and commuters park in the street. Comments it would be strategically better to locate the site close to

other agricultural research sites in and around East Anglia. The use of the site if unviable may be subject to change and left to decay. Concerns regarding pollution increase, the aquifer and increased flood risk, noise and light pollution. Concerns regarding public access to the site as examples with Granta Park demonstrates that does not work.

64. Pampisford Parish Council

Objects to the proposal on the grounds of the proposal not included in the draft Local Plan traffic, the site being a greenfield site not identified for employment, traffic already at capacity on local roads and the proposed increase on the A1301 and A505, the railway line being congested. The proposed mitigation measures will not be sufficient to reduce access by cars, with the proposed landscaped bund having a visual impact on a predominantly flat landscape. The proposal will have an adverse effect on the local aquifer, with the development resulting in run off and flooding between the site and River Cam. The proposed buildings would be visible and stand out in a largely rural area. The proposal would be visible from Pampisford village, including the Conservation Area and Listed Buildings. There are suitable other sites nearby and to the north of Cambridge nearer to new housing. The proposal would result in the loss of arable land for growing food crops, result in the loss of agricultural land. Concerns regarding funding for research from EU sources and Brexit.

65. Sawston Parish Council

Supports the application subject to local highways, transport and footpath infrastructure improvements to be made to improve access to the site.

66. Uttlesford District Council (Neighbouring Authority)

Requests that the proposal considers the proposed North Uttlesford Garden Community in any transport modelling given the close proximity. This application has the potential to conflict with removing spare capacity on the highway network ahead of consideration of Uttlesford District Council's development strategy.

67. Whittlesford Parish Council

Objects to the proposal on the grounds of the development resulting in an unacceptable increase in car traffic particularly during rush hours, on the A1301 and congested A505 and by rat running through villages. There is insufficient detail on how the site would be operated and managed if planning permission was granted. The traffic issue on the A505 could be resolved by providing a full traffic interchange at Junction 9 on the M11. This would allow the A505 to be downgraded to a local road from Junction 10 on the M11 eastwards and through traffic from the above junction to the A11 at the Four Went Ways could be discouraged.

68. General representations opposed to the proposals raise the following issues:

- Not allocated in Local Plan
- No designated end user
- No need for an Agri-hub/AgriTech scientific institutions in the area
- No justification for a development of this scale
- Application is premature in planning terms
- Does not provide sustainable development in terms of proximity to housing, public transport and services and has significant constraints from an

environmental, social and highways perspective.

- Large number of science and business parks in the area
- No need for national interest given existing science and business parks
- Existing unlet space on nearby sites
- Little relationship with existing bio-tech and research parks
- No other sites and buildings are suitable
- Impact on Conservation Areas and Listed Buildings of Hinxton and Ickleton
- Loss of agricultural land
- Loss of open and rural character
- Out of keeping with the semi-rural character of the area
- Size of buildings disproportionate to buildings in the area
- Proposed earth piles unacceptable to country environment and landscape
- Development is out of scale with the area
- Does not meet local need
- Urbanisation of area with proposed Genome campus extensions, Uttlesford Garden Village proposals and service station on A505
- Visual impact of three storey buildings
- Detract from Cambridge City
- A505 traffic concerns
- A1301 traffic concerns
- A11 & M11 traffic concerns
- Highway improvements proposed would not be sufficient
- Limited bus services in the area, proposals not clear what additional provision will be made to the existing services.
- The proposal is 2.5 kilometres from the railway station not 1.6 kilometres
- The proposed access is dangerously located
- Likely significantly more staff than proposed
- Increase in accidents using the A505/A1301 roundabout
- Increase in traffic in nearby villages
- Increase in parking in nearby villages
- Increase in road, rail and cycle users with insufficient infrastructure
- Person 'Trip Rates' not based on sound, comparable parks or locations
- Vehicle trip rates have been understated
- 2017 Baseline figures and Capacity Analysis in Highways Report is incorrect
- Car parking ratio is not deliverable
- Impact and use of the proposed shuttle buses
- Increase in flooding in the area and River Cam
- Noise and pollution
- Light pollution
- Impact on air quality
- Health and wellbeing impact will be significant
- Lack of potable water in the area
- Reduction in water reaching the aquifer
- Sewerage management is a concern
- Bus/Cycle interchange on Green Belt and agricultural land
- Concerns that the pedestrian/cycle route will not get used
- Footbridge is the wrong side for Hinxton residents to use
- Contamination
- Loss of wildlife habitats
- More appropriate locations such as Norwich
- Impact on Duxford Aerodrome
- Diverting of the Citi 7 bus would deter residents using the service

- Whittlesford Parkway station car park completely full with parking on nearby roads
- Better situated near new town of Northstowe
- Concern regarding the proposal fitting with planned expansion for the Genome Campus in Hinxtton

69. **General representations in support of the proposals raise the following issues:**

- Important nature of work proposed
- Need for scheme
- Job creation
- Vitally needed resource
- Support from local initiatives and groups
- Bring employment to the area
- Well placed for transport access
- Provides social and environmental benefits
- Reduced food miles, waste and packaging waste
- Educational resource
- Make healthy food more accessible
- Provide sustainable food distribution
- Provide opportunities for small food businesses/start ups
- Opportunities for local food producers
- Local community asset
- Provides trial areas and development for UK wide companies
- Important for UK to have own high tech facility
- Speeds delivery and positive outcomes for farming
- Creation of wealth of industry, clustering of research
- Supports growth and innovation
- Improvements to pedestrian and cycle access
- Allow direct access to fields for demonstration and trials
- Proximity to other business parks allows for collaboration
- Ideal location embedded to rural/agricultural area
- Sited in one area acts as hub for businesses to support each other

70. **Agri-Tech East**

Supports the proposal. Seeks to clarify that when previously asked about proposed future involvement in this proposal and site, AgriTech East did not state that there was no intention of using the proposal. As a small virtue network organization, there would be limited use from the facilities proposed. This does not reflect our lack of support for the initiative.

71. **Wellcome Trust**

The Wellcome Genome Campus provides a global hub of genomic knowledge and research, the work at the campus drives, catalyses and leads the advance of life-changing science for the benefit of the world. The aim is to clear the path between fundamental research and genomics based health solutions. The work undertaken at the campus in the fields of genomics and bio-data is recognised as being of national and international importance.

The intention is to build upon the existing campus to create a world class science ecosystem through the accommodation of further space for research, as well as space for

start-up, grow-on and mature companies to co-locate at the campus. As part of this we intend to attract genomics and bio-data related industry to work in partnership with the Campus to build on the research and take forward the development of treatments and therapies, all within a world class campus environment that can attract and retain global scientific talent. Life sciences are central to the delivery of the Industrial Strategy, launched by the Prime Minister in November, which underpins the Government's plans for a positive future for our economy as we leave the European Union. The Industrial Strategy specifically recognises the UK's powerful position in the field to genomics and aspires to sustain its global leading position.

The proposed development requires the Wellcome Trust to consider how public access and overall connectivity to the campus can be enhanced locally, regionally and internationally. Research into the possibilities around the use of autonomous vehicles and other smart technology to enhance this connectivity, but physical infrastructure requirements will be equally as important.

It is imperative that the Agri-Tech proposals do not fetter the ability of the campus to optimise the opportunities emanating from genomics and biodata, particularly with regards to local infrastructure capacity.

72. **Cllr Orgee**

Objects to the planning application for the following reasons. The application should be considered at strategic level rather than through a planning application. Additional employment facilitating land should not be identified beyond the draft Local Plan, until the impact of other prospective development in nearby established employment areas are known. The application is premature and it should be considered in the context of the new review of the Local Plan. Local roads even with mitigation measures would be unable to cope with the additional volume of traffic. The applicant's traffic analysis appears to understate the actual congestion experienced on a daily basis. Travelling to work with non folding cycles by train are not permitted, so travel by train and cycle does not seem to be an option for employees arriving in the morning peak. Questions the numbers proposed to travel to work by non-car means. Concerns regarding the proposed bus, cycle and rail interchange and its appropriate location, and inappropriate due to the Green Belt location. The proposed shuttle bus mitigation measure would be reduced with the congestion. The mitigation measures proposed are inadequate to cope with the increase in traffic that the proposal would generate. Shares the concerns of Hinxtton Parish Council in regard to impacts of the proposal on the important aquifers, in relation to flood risk and biodiversity loss. Babraham Campus, TWI and Granta Park and the Wellcome Trust Genome Campus have all Taken place where there are recognised employment sites, where work carried out Was nationally and internationally recognised and where there were mature belts, the sites were not dominant features in the landscape. The proposed buildings are of a Significant height and would be situated in open landscape with long distance views. The proposed earth bungs would be an alien feature in an otherwise open and undulating rural landscape of the Chalklands Landscape Character area. The proposal will give rise to concerns regarding noise, light, dust and air pollution. Some people are concerned that if the agritech aspirations of this park were not realised then it could become simply transform into another general high tech / research and development park without the need to change the Use Class. In such a circumstance, the particular reasons put forward by the applicant for having a specific agritech park on this site would not necessarily have been relevant for a general high tech park.

In conclusion, objects to the planning application for the reasons above. This is the

wrong site for such a proposal, the traffic impacts would be severe and unacceptable and there would be potential or actual adverse environmental impacts and the mitigation measures proposed would be insufficient to address the impacts.

Planning Comments

Site and Surroundings

73. The site consists of two parcels of agricultural land. The main site where the proposed AgriTech park would be sited measures approximately 102 ha in area and is located to the north east of Hinxtton village, within Hinxtton Parish. To the south west of the site, approximately 1.2 kilometres lies the Wellcome Genome Campus. This campus is home to some of the world's foremost institutes and organisations in genomics and computational biology. The campus provides bioinformatics to the world, delivering training in genomics and biodata to scientists and clinicians. The work undertaken at the campus is recognised as being of national and international importance. The Wellcome Genome Campus have long term future plans to grow their campus to create a world class science eco-system.
74. Part of the development site was previously known as Hanley Grange Ecotown and was promoted through the East of England Regional Spatial Strategy (RSS) for development of a new settlement comprising approximately 7,000 dwellings, an employment zone, town centre and local centres to support the existing high tech and bio tech cluster.
75. The smaller second site where the proposed bus and cycle interchange is proposed measures approximately 7 ha in area and lies to the east of Whittlesford Parkway station and north of the A505. This site lies to the north west of the main site and within Whittlesford and Pampisford Parishes.

Main Constraints

76. The main site lies outside of the Hinxtton development framework and within the open countryside which is Grade 2 ('very good') agricultural land. A high pressure gas main and NTS pipe run through the north western section of the site. The northern area of the site is of high archaeological sensitivity with the site lying within groundwater source protection zones 1,2 and 3. The site lies in Flood Zone 1 (low risk). The site has been used for crop trials, with a tree lined avenue running east to west leading to Hinxtton Grange and associated parkland which provides a strong landscape feature.
77. Adjacent to the site on the eastern boundary lies Grade II listed buildings forming Hinxtton Grange and its Grade II listed stable block and coach house. Adjacent to the north of the site within 2.5 km lies Pampisford Hall forming a historic park and garden, with Sawston Hall a registered park and garden to the north west. Brent Ditch a scheduled ancient monument forms part of Pampisford Hall. A permissive path for the parish of Hinxtton lies along a small unnamed road Tichbault Road to the south of the site.
78. The smaller site lies outside of the development framework and within the open countryside and Green Belt. Part of the site lies in Flood Zones 2 and 3, with the River Cam running through this site which forms a County Wildlife site. Adjacent to the site to the west lies the Chapel of the Hospital of St John the Baptist which is a Grade II* listed building and scheduled ancient monument. The Red Lion Hotel which is sited further west, adjacent to the railway station is a Grade II listed building.

The Proposal

79. The proposal includes a phased 15 year development of an AgriTech technology park comprising of 112,000 m² (gross internal) of employment floor space. With supporting infrastructure, amenities, landscape works including publicly accessible informal open space, enhancements to parkland, vehicle and cycle parking. A foul and water pumping station, primary electricity sub station, telecommunications infrastructure and other associated works are proposed.
80. A bus and cycle interchange is proposed with infrastructure works including new vehicular accesses, highway improvement works, pedestrian and cycle links with a bridge crossings over the A1301/ A505 and River Cam.
81. AgriTech is broadly defined as the 'enabling sector which supports agriculture and the food chain', with the development of technologies to improved performance. The AgriTech sector is relatively new and growing locally and globally.
82. The application is submitted in outline with all matters of appearance, landscaping, scale, access and layout reserved for future determination. The applicant has set out the proposed land use, landscape and open space, movement and access, density and heights within the following parameter plans:
- 235701B-LA-PP101 rev A– Land Use Parameter Plan
 - 235701B-LA-PP102– Movement and access Parameter Plan
 - 235701B-LA-PP103– Landscape and open space Parameter Plan
 - 235701B-LA-PP104– Density Parameter Plan
 - 235701B-LA-PP105 – Height Parameter Plan
83. An illustrative masterplan is submitted for illustrative purposes only within the Design and Access Statement and in this regard only identifies one way in which the scheme may eventually come forward. Officers have therefore only considered this plan insofar as it is indicative and is not a determinative layout. All of the above plans can be viewed in **Appendix 1**.

Pre-Application Engagement and Departure of Application from Local Plan

84. The applicant has undertaken pre-application discussions with South Cambridgeshire District Council. Early engagement with the applicant confirmed that the proposal is contrary to the adopted Development Plan and emerging Local Plan, with the proposed site not allocated for development in these plans. As such, officers have not agreed the principle of the development. For clarity, the proposed development would be contrary to and represent a departure from the following policies of the current Local Development Framework and emerging Local Plan:
- Policy DP/7 of the South Cambridgeshire Development Control Policies DPD, 2007
 - Policies ST/1 and ST/8 of the South Cambridgeshire Local Development Core Strategy DPD, 2007
 - Policy S/7 of the South Cambridgeshire Local Plan Proposed Submission July 2013

85. Officers have in addition advised the applicant that the proposal would be contrary to policy and that submission of this application is premature in light of the current stage of the Local Plan process, as granting planning permission for the proposal would prejudice the sustainability of the emerging Local Plan.

Planning Consideration

86. The key material planning considerations are as follows:

Principle of Development
Prematurity
Employment
Principle of proposed transport infrastructure within the Green Belt
Green Belt and landscape impacts
Heritage
Transport and Access Impacts
Ecology
Archaeology
Flooding and Surface Water Drainage
Loss of Agricultural Land
Environmental Issues
Air Quality
External Lighting
Noise and Vibration
Land Contamination
Odour Generation
Waste and Refuse
Health Impact Assessment
Trees
Residential Amenity
Sustainable Design and Construction
Public Art
Utilities
Benefits

Principle of Development

87. Policy DP/7 of the Development Control Policies, Development Plan Document, part of the Local Development Framework (LDF), identifies development frameworks around settlements. This policy states that outside village frameworks, only development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside will be permitted. For the emerging Local Plan, Policy S/7 Development Frameworks states that outside development frameworks, only development for agriculture, horticulture, forestry, outdoor recreation and other uses which need to be located in the countryside will be permitted. These policies are necessary to ensure that the countryside is protected from gradual encroachment on the edges of villages and to help guard against incremental growth in unsustainable locations. It also ensures that in the countryside development is generally restricted to uses that need to be located there.
88. The application states that the proposal is required to be within a countryside location because of the need for suitable land for field trials and demonstration plots and its direct linkage with the agricultural industry. However, it is not clear how many of the future occupiers would require direct access to field trials given the flexibility regarding how future occupiers are defined (see below regarding the proposed condition wording).

89. Evidence has not been provided as to why, for example, crop trials or equipment testing cannot be carried out on separate sites, with built infrastructure on those sites restricted to that which needs a countryside location.
90. While Policy S/7 states that outside development frameworks “other uses” which are supported by other policies in the plan will be permitted, it is not considered that the proposal is supported by other policies in the plan, as set out below.
91. The proposed development would therefore be contrary to Policies DP/7 of the Local Development Framework and S/7 of the emerging Local Plan, by being sited outside the village framework and within the open countryside.
92. So far as the emerging spatial strategy is concerned, the Local Plan examination process is approaching its conclusion. The Inspector has proceeded to main modification consultation with minor wording additions to Policy S/7.
93. Paragraph 19 of the NPPF states that planning should support sustainable economic growth. Policy ET/2 Promotion of Clusters of the LDF Development Control Policies DPD, states development proposals in suitable locations will be permitted which support the development of clusters. Employment land allocations suited for cluster development are Northstowe, and the urban extensions to Cambridge. Policy ST/8 of the Core Strategy Development Plan Document seeks to ensure that sufficient employment land is available to enable further development of high technology clusters. Additional land will be brought forward for employment development at strategic employment locations as detailed above.
94. In a similar manner, Policy E/9 Promotion of Clusters of the emerging Local Plan states that development proposals in suitable locations will be permitted which support the development of employment clusters. Whilst Policy E/9 is supportive of development which supports the development of clusters, including locally driven clusters as they emerge, it is clear that this relates to suitable locations, which will be defined by other policies in the plan. As detailed elsewhere in this report, the application proposal is not in accordance with a range of policies in both the adopted and the emerging plan.
95. Policy ET/3 Development in Established Employment Areas in the Countryside of the LDF and Policies E/15 Established Employment Areas and E/16 Expansion of Existing Businesses in the Countryside of the emerging Local Plan define existing established employment areas which are sited in the countryside and are identified on the Proposals Map. Appropriate development and redevelopment of Established Employment Areas will be permitted to allow them to be adapted for the needs of existing and future users. The policy states that new employment development outside village frameworks will not be permitted, for the reasons of encroachment on the edges of villages and incremental growth in unsustainable locations.
96. Policy ST/8 of the Core Strategy DPD ensures that sufficient employment land is available to enable further development of high technology clusters. Policy ST/8 projected employment land supply to be 192.53 hectares, with a large number of existing land commitments for research and development at Granta Park, Babraham Hall, Cambridge Research Park, Hinxton Hall and Cambridge Science Park. The emerging Local Plan reinforces this with emerging Policy S/5 establishing a target of 22,000 new jobs in the district by 2031 with South Cambridgeshire having a good supply of existing employment sites, existing commitments with planning permission and opportunities for further provision at sites. The evidence provided therefore shows no shortage of employment land within Greater Cambridge to meet the needs during the plan period.

97. The proposed site has not been allocated for development in the current Local Development Framework or emerging Local Plan, therefore would be contrary to Policies DP/7 and ET/3 of the LDF Development Control Policies, DPD, Policy ST/8 of the Core Strategy DPD, and Policies S/5, S/7, E/15 and E/16 of the emerging Local Plan.

AgriTech Sector

98. The application states in the Planning Statement paragraph 4.11, 'while it is acknowledged that the draft South Cambridgeshire Local Plan includes policies to provide for what the council considers the objective need with regard to future employment development over the plan period, neither the Local Plan nor its evidence base takes any account of the specific needs of the emerging AgriTech sector.' The application therefore claims that the Local Plan is out of date in this respect including the provision of jobs and homes.
99. The Cambridge and South Cambridgeshire Local Plan Employment Land Review 2012 which informed the Local Plan review considered growth across all sectors. The review identified the land and floor space required for employment development over the Plan period for both districts. It also analysed the qualitative needs for new employment development over the plan period, using a range of sources of information. It considers the sites available to meet needs, and gaps that need to be addressed. It was informed by a review of the commercial property market. The review met the requirements of National Planning Practice Guidance regarding employment needs and land supply¹. The AgriTech sector has gained in prominence as a grouping of industries (see below), but the sectors of agriculture and technology were addressed in the Local Plan evidence. There are a substantial number of existing businesses in the Cambridge area that could be said to work in the AgriTech sector.
100. The Local Plan responded to the evidence of need with a flexible employment supply, beyond the needs identified, in order to provide a flexible plan that can respond to changing circumstances including the growth of sectors as they emerge. That flexibility is defined by policies in the Local Plan. The Local Plan is not considered out of date or silent with regard to the issue of employment land supply, given the significant amount of employment land available to meet the assessed needs in the district over the Emerging Local Plan period 2011-2031.

Justification for the particular site

101. The application states the international and national drivers for AgriTech being a key growth sector supported by Government. It states that the East of England is an area with existing strengths and opportunities for growth in AgriTech innovation. These facts are not disputed: Government has recognised Agri-Tech as a key growth sector alongside a further 10 sectors in the Industrial Strategy, and is supporting its growth via a number of funding programmes. Government is also putting funding into research and development, including into AgriTech, and the East of England is recognised nationally as an area of excellence for AgriTech; the sector is recognised in the LEP Strategic Economic Plan; and in the East of England Plan Science and Innovation Audit (SIA). It is noted that AgriTech is emerging quickly and it has strong synergistic links to both Life Sciences and ICT. While there are, therefore, reasons to support the growth of the AgriTech sector in the East of England, this does not demonstrate that a development

¹ See: Cambridge and South Cambridgeshire Local Plan - Consideration of the National Planning Policy Guidance with respect of Employment and Retail (RD/Strat/380)

of this nature is needed in this location.

102. AgriTech is a sector which crosses a range of disciplines relating to the farming industry². The interdisciplinary nature of the AgriTech sector has implications for considering the economic need for and impacts of the development:

- Evidence indicates that AgriTech-related companies are spread across East Anglia (see planning statement section 2). There is no evidence to suggest why an AgriTech development of this scale would need to be located in the Cambridge area.
- The AgriTech sector includes, among other subsectors, software, data analysis, remote sensing, robotics, manufacturing technologies, and biotech. These are all subsectors which are locating successfully in the Cambridge area across a range of sites. Firms in the sector may gain benefits from clustering with other similar firms, for example IT firms, which tend to focus on the northern part of the district. It is not demonstrated that:
 - there is a need for one specific site of the scale proposed to accommodate the needs of firms related to AgriTech (see below regarding clustering); or that the sector would fail to grow if firms were to locate on existing sites or new development opportunities available in the area. This is a very large proposal within which widely varying mixes of types and sizes of business may or may not locate, as acknowledged in the application³. This uncertainty is added to by the fact that the number and scale of firms expressing an interest in locating on the site (planning statement paragraph 3.25) is extremely small in comparison with the scale of the proposal. The Planning Statement also states (paragraph 3.26) that there has been interest from other national and international corporations, but this is not detailed. The lack of substantive interest from businesses in locating on the site, for example from a large ‘anchor’ tenant, means that:
- The economic need for a stand-alone AgriTech employment site of this scale has not been demonstrated.
- There is no evidence that AgriTech firms could not find suitable locations on other nearby sites either existing or planned.
- The deliverability of this speculative proposal has not been demonstrated, in particular one starting from nothing, with no institution to cluster around (see below regarding clusters).
- The viability of the scheme of this scale has not been demonstrated.

² GCGP LEP et al, 2017. East of England Science and Innovation Audit, para 1.32

³ “For the purpose of the economic assessment an indicative allocation of job types and the split of site occupiers between different company types has been developed. In practice the actual split will be dependent on which companies choose to locate at the site”. Economic Impact Assessment Appendix 5 - Projected Occupiers and Employment Splits

Factors affecting site selection

103. Evidence of need for development of this scale in this specific location is not provided. The applicants include an assessment of alternatives to their site in the planning statement (section 5). There are a number of principles put forward to govern site selection including, among others, a location close to a number of key economic centres, within a certain distance of transport nodes including a range of UK airports, and a site size of 50ha or more.
104. They consider that the application site is the only one that meets or partially meets all their criteria. These criteria are discussed below.

Site location

105. The detailed site selection criteria include that the location should be within the London-Stansted-Cambridge Corridor and Cambridge-to-Norwich Corridor on the basis that these are areas where there is existing support for the growth of the AgriTech sector, providing enhanced opportunities for investment and grant funding for businesses. On the basis of opportunities for funding, support for AgriTech is expressed in the economic strategies of Greater Cambridge Greater Peterborough Local Enterprise Partnership (LEP), New Anglia LEP, Lincolnshire LEP and South East LEP areas which also have existing strengths in AgriTech. Incorporating these wider geographies in the site search could have led to different site selection results.
106. Proximity to Cambridge is used as an initial criterion “to benefit from the knowledge base and brand associated with Cambridge”. While the Cambridge brand is attractive to businesses in many sectors, Cambridge has the highest concentrations of life sciences, technology and digital sectors, while other locations in the East of England have strengths in AgriTech research and employment. For example, Norwich Research Park has 52 hectares of development land.
107. There is not compelling evidence why such a site needs to be located to the south of Cambridge.

Site size - clustering and open innovation

108. The application justifies the requirement for a site of 50ha or more by identifying the benefits of clustering that can be obtained from a campus development. Other than comparisons with other campus developments, the need for this scale is not demonstrated. It is considered incorrect to assume that clustering benefits can only be obtained from locating a sector or specialism on a single site. Whilst the desire to apply the open innovation model (referred to in the planning statement at paragraph 2.85 & 2.86) has increased in the Cambridge area in recent years, cooperation across sites has always been a strong feature of the Cambridge economy. There is no evidence this will be harmed by having firms in multiple locations.
109. The Cambridge cluster does not rely on all firms being in one location. Firms across a range of high tech research and development sectors are located in many locations across the Cambridge area, from central or edge of Cambridge sites, rural business parks, to village locations. The development strategy of the current Local Development Framework and emerging Local Plan supports clusters located across multiple locations. Alongside the Transport Strategy for Cambridge and South Cambridgeshire, the emerging Local Plan focuses on improving links between Cambridge and surrounding areas, improving connections between existing and planned employment

areas which will facilitate the benefits of clustering.

110. There are a wide range of existing development opportunities in the Greater Cambridge Area for businesses in the AgriTech sector to move to or expand within. There are numerous business parks and science parks in South Cambridgeshire that have met the needs of B1(b) research and development businesses in the past, and will continue to do so in the future. For example, Granta Park, Babraham Research Park, Cambridge Research Park, and Hinxtton Genome Campus are all established and all have planning permissions for further growth. The new settlements of Waterbeach and Northstowe will also play an important role in providing future employment land opportunities.
111. Notwithstanding the criteria used to assess sites, the application's approach to the site search of alternative sites focused on sites in existing development plans or employment land reviews. It is not surprising that few stand alone sites of this scale were identified.
112. In summary, whilst the plan includes a policy which supports the continued development of clusters, this is predicated on a site being suitable, which is defined by other policies in the plan. The site is not allocated in the current Local Development Framework or emerging Local Plan, and does not comply with a range of policies as detailed within this report. There is no need for this development to meet the employment land needs identified in the emerging Local Plan. The application identifies a series of material considerations, including the developing needs of the AgriTech sector, and benefits that could be delivered by the site in terms of new jobs, and growth in Gross Value Added (GVA) (see below at Economic Benefits). However, it is not considered that the need for this site has been demonstrated, and that the AgriTech sector could not grow successfully without this site.

Prematurity

113. The Council's emerging Local Plan has been prepared, consulted upon and examined by an Inspector appointed by the Secretary of State. The plan is currently at an advanced stage, in which public consultation on main modifications has recently been carried out and closed on 16th February 2018. In regard to economy, the main modifications put forward are for the allocation of additional employment land at Cambridge Biomedical Campus (which was previously consulted on in 2015 as a provisional modification) with policy amendments. The Inspectors final conclusions are expected early summer 2018.
114. In producing the emerging Local Plan, the Council has built on the sustainable development strategy included in the adopted development plans, which is now being delivered on the ground, to support the nationally important economy. The strategy, in both the current LDF identifies the need for jobs and homes and identifies how those needs will be met. It applies a development strategy which applies a development sequence which maximises use of land within and on the edge of Cambridge compatible with protecting the Green Belt setting of the historic city; it then provides for new settlements linked to Cambridge by sustainable transport corridors, and limits development in the rural area to the larger and more sustainable villages. Policy S/5 Provision of New Jobs and Homes of the Proposed Local Plan identifies 22,000 additional jobs to support the Cambridge Cluster and provide a diverse range of local jobs in the district over the plan period 2011- 2031.
115. There are sufficient existing employment sites and opportunities for significant further provision including at Northstowe, Cambridge University's North West Cambridge

development, Granta Park, Babraham Research Park, Cambridge Research Park and Hinxton Genome Wellcome Trust.

116. The proposed application site has not been allocated for any development in either the current LDF or emerging Local Plan, and would be contrary to policy, and represents a significant departure. Given the scale of this windfall proposal, granting permission would give rise to a risk that the strategy in the emerging Local Plan might need to be revisited.
117. Paragraph 21b-014-20140306 of National Planning Policy Guidance (NPPG) discusses the circumstances surrounding prematurity: “Annex 1 of the National Planning Policy Framework explains how weight may be given to policies in emerging plans. However in the context of the Framework and in particular the presumption in favour of sustainable development- arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:
- (a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or Neighbourhood Planning; and
 - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
118. The Local Plan Inspectors have concluded their hearings and advised on the Main Modifications they consider may be needed for the Plan to be found sound, and consultation is taking place on those Modifications. Whilst the Inspectors’ conclusions will be made in their final report in due course, the Local Plan examination process is approaching its conclusion, and the Council considers that the stage which the Local Plan has reached is such that prematurity may, in principle, arise as a material consideration, in accordance with the NPPG.
119. Smithson Hill (formerly Hinxton Land Ltd) made representations to the emerging Local Plan at the Proposed Submission stage, and in statements to the examination, that the employment provision in the plan would not meet the foreseeable need for economic development, that pressure for growth is significant to the south of Cambridge, and that through Policy E/9 developments can be delivered in addition to allocation in the plan. The specific site was not promoted in their representation.
120. The Main Modifications to the emerging Local Plan do not include significant changes to the development strategy or employment policies, with the exception of the addition of an additional allocation south of Cambridge Biomedical Campus proposed by the Councils in response to updated evidence regarding the Green Belt.
121. In terms of criterion (a) detailed above, the scale of development proposed within this application is substantial and comprises up to 112,000 m² of gross internal employment space over approximately 108.6ha of agricultural land. The emerging Local Plan has a clear strategy to support economic growth by maintaining South Cambridgeshire’s position as a world leader in research and technology based industries, research and education by continuing to support proposals that build on the successful employment clusters; whilst ensuring sufficient employment land to support the economy and

growth, whilst protecting the quality of the built and natural environment.

122. The emerging Local Plan is at an advanced stage. The Inspector did not identify for consultation any significant main modifications to the Local Plan regarding employment provision or request more allocations for employment sites, with the exception of the land put forward by the Council south of the Cambridge Biomedical Campus. There has been put forward employment omission sites arguing the need for more allocations and the Inspector has not asked for any modifications in response to these.
123. Given the advanced stage of the Local Plan and the scale of the proposal that is contrary to the policies of the emerging plan and goes to the heart of the development strategy in the emerging plan, it is considered that to grant permission for this proposal would undermine the plan-making process by predetermining decisions about the scale, location and phasing of new development that are all central to the emerging Local Plan. On this basis, both criteria of the NPPG are met and officers consider the application gives rise to a clear and compelling prematurity objection in light of draft Policies S/5 and S/6 of the submitted South Cambridgeshire Local Plan, 2014 and Paragraph 12 of the National Planning Policy Framework and Paragraph: 014 Reference ID: 21b-014-20140306 of the National Practice Guidance.

Prejudice to future Plan Review

124. The A505 corridor is home to a number of major employment sites, including Granta Park, Babraham Research Campus, and the Wellcome Trust Genome Campus, which form an important part of the Cambridge life sciences cluster and are central to the continued success and future growth of the London Stansted Cambridge Corridor in the UK's economy.
125. Existing development in the area is already known to place significant pressure on road infrastructure. Between Duxford Aerodrome (west of the M11) and the A11, the A505 experiences frequent congestion that also has congestion impacts on other routes. These include the M11, where congestion at the roundabout with the A505 at junction 10 can lead to southbound traffic leaving the motorway queueing on the hard shoulder at peak periods. The A1301 experiences significant levels of congestion at its junction with the A505. The Wellcome Genome Campus is accessed directly from the A1301, just to the north of its junction with the A11. There are already additional growth pressures that will need to be considered. The draft Uttlesford Local Plan proposes a North Uttlesford Garden Community of 5,000 homes near Great Chesterford. Additional growth is planned at Haverhill (up to 4,260 homes from 2009 to 2031). Other existing Research Parks in the south east of the district are in the process of considering their future needs.
126. Funding has been approved by the Combined Authority for a strategic economic growth and transport study to include outline business case development for a scheme on the A505. The outcome of this study is needed to understand the capacity to accommodate growth, the opportunities to improve infrastructure, and when and how those improvements could be delivered.
127. The South Cambridgeshire Local Plan Main Modifications includes a proposal to formalise into policy the commitment the Council has already made to commence a joint Local Plan review in 2019. The above issues will be relevant to that plan review.
128. A speculative development of the scale proposed in this application has the potential to impact on options available in this corridor, and take up any capacity for future growth. This is not a prematurity issue in the sense identified by Planning Practice Guidance and related to a plan review which is underway. However, it is a material consideration,

as to whether the circumstances in this area mean that it would prejudice strategic issues that need to be considered through the Local Plan review. It is considered that granting planning permission would have a significant impact on the ability to consider strategic issues in this area through the plan review. This could cause harm to the continued success of the South Cambridgeshire economy and the ability to meet future growth needs.

Employment

129. Employment provision in the Local Plan

Paragraph 19 of the NPPF states that planning should support sustainable economic growth. Paragraph 21 of the NPPF states that local planning authorities should in drawing up Local Plans, plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries. Policy ST/8 Employment Provision of the Core Strategy Development Plan Document seeks to ensure that sufficient employment land is available to enable further development of high technology clusters. Additional land will be brought forward for employment development at strategic employment locations such as Northstowe and the urban extensions to Cambridge.

130. Policy S/5 Provision of New Jobs and Homes of the emerging Local Plan identifies the need for 22,000 additional jobs to support the Cambridge Cluster and provide a diverse range of local jobs in the district over the plan period 2011 to 2031. Paragraph 2.36 of the emerging Local Plan states that the Employment Land Review 2012 identifies that growth on this scale would generate a net demand of around 143,000 m² of additional floor space or 43 hectares of land in the B use classes for the plan period 2011 to 2031. The Local Plan identifies (at paragraph 8.10) that supply available significantly exceeds those figures.

131. The South Cambridgeshire Annual Monitoring Report 2017 identifies that there is employment land with planning permission for around 80.4 hectares⁴ (108.4 hectares gross) in the district. In floor space terms, this will enable 238.298m² net space. There are a range of employment allocations. The current LDF includes 25.05 hectares of employment allocations that do not yet have planning permission⁵. The emerging Local Plan includes further opportunities for employment development at Cambridge Northern Fringe East, Cambridge Science Park, Waterbeach New Town, Bourn Airfield New Village, Cambourne West, Fulbourn Road Cambridge, and a main modification subject to consultation identifies an additional employment allocation south of the Cambridge Biomedical Campus. There is therefore a sufficient and flexible supply of employment land to meet the needs identified in the plan period, to plan positively for clusters, and including sufficient surplus that would also ensure that if the economy performs better than expected, the plan will not constrain economic potential. There is not therefore a general need for a development of the scale proposed.

132. It is considered that there is a risk of the proposed development impacting on the delivery of the development strategy in the emerging Local Plan. This is discussed above under prematurity. This proposal for 112,000m² of office, research and

⁴ South Cambridgeshire Annual Monitoring Report 2017 - Figure 4.47: Net amount and type of employment land (ha) available with planning permission at 31 March 2017

⁵ South Cambridgeshire Annual Monitoring Report 2017 - Figure 4.48: Gross and net amount and type of employment land (ha) available on allocated land without planning permission at 31 March 2017

development, light industry, laboratories and storage floor space on approximately 76 hectares of land for built development would almost double the current supply of land with planning permission in the district. Permitting a new development of the scale envisaged has the potential to impact negatively on the delivery of planned developments, including employment provision at new settlements such as Northstowe. The scale of the proposal also has the potential to impact on housing provision and needs.

Principle of proposed transport infrastructure within the Green Belt

133. The two application sites are located outside of the development framework in both the current Local Development Framework and the emerging Local Plan 2014 and would comprise development in the countryside. The proposed location of the sites would therefore be contrary to Policy DP/7 of the Development Control Policies DPD 2007, and Policy S/7 of the draft South Cambridgeshire Local Plan.
134. Whilst the main part of the site is outside but adjoining the Cambridge Green Belt, the outer boundary of which follows the A505 in this location, the proposed site for the bus and cycle interchange, shared user route to the north of the A505 and northernmost end of the foot, cycle and equestrian bridge north of the A505 with associated earth bunding and planting would fall within the Cambridge Green Belt wherein there is a presumption against inappropriate development for purposes other than those categories specified in paragraphs 89 and 90 of the National Planning Policy Framework (NPPF) 2012.
135. Paragraph 90 of the NPPF states that local transport infrastructure is a form of development which is not inappropriate in Green Belt locations, provided it preserves the openness of the Green Belt, does not conflict with the purposes of including land in the Green Belt and can demonstrate a requirement for a Green Belt location. The application claims that the works are to be defined as local transport infrastructure which needs to be sited in the Green Belt given all the undeveloped land around Whittlesford Parkway station is within the Green Belt, and the enhancements for access to the railway station need to be sited in the Green Belt to connect to the railway station. In addition to this, the application claims that all the development on the southern edge of the Green Belt, not including the shared user route along the western edge of the A1301 towards Sawston will preserve the Green Belt's openness.
136. The NPPF states that certain forms of development are not inappropriate in the Green Belt where (a) the local transport infrastructure can demonstrate a requirement for a Green Belt location, (b) they preserve the openness of the Green Belt and they do not conflict with the purposes of the Green Belt. Inappropriate development is by definition harmful to the Green Belt, except when very special circumstances can be demonstrated which justify the grant of planning permission and that harm by reason of inappropriateness, together with any other harm, is clearly outweighed by other factors. The planning statement submitted with the application provides a response to these matters which are considered below:-
 - (a) The requirement for local transport infrastructure in a Green Belt location
137. Within the submitted planning statement, it is claimed that all the undeveloped land around Whittlesford Parkway station is located within the Green Belt, as is the proposed bus and cycle interchange, the shared pedestrian, cycle and equestrian route and the northernmost end of the foot, cycle and equestrian bridge. The planning statement makes reference to a distinct requirement for significant enhancements for access to the station of the type proposed in order to connect to the station. The public benefits of this being the enhanced pedestrian and cycle links to Whittlesford Parkway Station from

the north and south, provision of a safe crossing of the A505 and A1301 in the form of a foot, cycle and equestrian bridge and enhanced bus access to serve Whittlesford Parkway Station with adequately sized turning facilities as full sized buses cannot turn currently in Station Road East, adjacent to the railway station. The improved pedestrian crossings and bridge will improve connectivity between Hinxton, the proposed AgriTech park and settlement to the north at Sawston.

138. The information provided within the application is very limited on the specific requirement and need for this proposed transport infrastructure to meet existing demand and address any future demands. The information put forward therefore does not demonstrate a significant requirement and need for the proposal, and for it to be sited in the Green Belt.

(b) Alternative Sites

139. In light of the proposed site for the cycle and bus interchange, shared user route and foot, cycle and equestrian bridge being located within the Green Belt, no details of sequential assessment of potential alternative sites has been submitted and detailed in the application. Therefore evidence has not been provided with the application that demonstrates that there are no alternative sites currently suitable or available to meet the need for bus access to serve Whittlesford Parkway Station. Officers are therefore not satisfied that an assessment of suitable alternative sites available that are not sited in the Green Belt has been fully explored. As such the policy requirement in the NPPF to 'demonstrate a requirement for a Green Belt location' has not been met.

(c) Preservation of the openness of the Green Belt

140. Paragraph 79 of the NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. The proposed site for the transport infrastructure located within the Green Belt comprises of open farmland and is rural in character. The proposed development would comprise of structures to serve the bus and cycle shelters up to a maximum height of 3.5 metres and the proposed foot, cycle and equestrian bridge at 7.5 metres to platform level and 4 metres in width. This would add built form into the open arable landscape and would change the approach to Whittlesford Parkway Station along the A505 from the east which is rural and open in character, with built form encroaching into the countryside. Therefore, the location and scale of the development would significantly reduce and fail to preserve the openness of the Green Belt, contributing to encroachment on the countryside, being contrary to paragraph 79 of the NPPF.
141. Proposed earth bunding and native species woodland planting would be incorporated around the proposed foot, cycle and equestrian bridge to minimise any visual impact. It is however considered that these landscaping proposals are not considered to mitigate the impact of the development on the Green Belt and the proposal would compromise the openness of the Green Belt despite that.

(d) Conflict with the five purposes of including land in the Green Belt

In terms of national policy, Green Belts serve five purposes (paragraph 80 of the NPPF):

- i. To check the unrestricted sprawl of large built-up areas;
- ii. To prevent neighbouring towns merging into one another;
- iii. To assist in safeguarding the countryside from encroachment;

- iv. To preserve the setting and special character of historic towns; and
- v. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

142. The proposed location and scale of the transport infrastructure would clearly conflict with Green Belt purpose (iii) by encroaching into the open countryside and reducing the openness of the Green Belt.
143. The development's contribution to countryside encroachment and reduction in openness would also be contrary to the following local Green Belt Purposes Policy ST/1 of the Core Strategy DPD, 2007:
- i. To preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;
 - ii. To maintain and enhance the quality of its setting;
 - iii. To prevent communities in the environs of Cambridge from merging into one another and with the city.
144. These local Green Belt purposes are considered to be wholly consistent with paragraph 80 of the NPPF and therefore should be afforded significant weight in decision-making terms. The development would create significant harm and conflict with Green Belt purposes (ii) by:
- Resulting in the encroachment of built form into the countryside
 - Negatively changing the open and agricultural landscape character of this area

Very Special Circumstances Balancing Exercise

145. The development proposal is considered for the reasons set out above to be inappropriate development in the Green Belt. In working through the abovementioned paragraphs of the NPPF, there is a need to determine whether there are very special circumstances which justify planning permission being granted for this development. In doing so Paragraph 88 of the NPPF does state that substantial weight should be given to any harm to the Green Belt, and that 'very special circumstances' will not exist unless the potential harm to the Green Belt, by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.
146. In undertaking this assessment, officers have been mindful of the approach set out within the NPPF and attached substantial weight to the harm caused to the Green Belt. In the case of the proposal there will be significant harm to openness. Moreover it has been identified that the development would conflict with one of the five purposes of including land within the Green Belt of the NPPF. Therefore whilst substantial weight needs to be given to the harm caused by the development together with its inappropriateness, this needs to be balanced against other considerations and in particular the benefits of the scheme in accordance with the approach in Paragraph 88 of the NPPF.
147. The applicant has put forward in the Planning Statement that the Very Special Circumstances (VSC) of the scheme would include the national importance of the proposal with respect to the wider development that they serve and this would significantly outweigh any harm. The very special circumstances include the public benefits from the enhanced pedestrian and cycle links to Whittlesford Parkway Station from the north and south, provision of a safe crossing of the A505 and A1301 in the

form of a foot, cycle and equestrian bridge and enhanced bus access to serve Whittlesford Parkway Station.

Conclusions

148. In summary, the proposal represents inappropriate development which is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances, as prescribed in paragraph 87 of the NPPF. Officers consider that the proposals for the bus and cycle interchange, shared user route and foot, cycle and equestrian bridge would not constitute a local transport infrastructure that can demonstrate a need to be sited in the Green Belt. In accordance with Paragraph 88 of the NPPF, given that the proposal would be classed as inappropriate development in the Green Belt and harm has been identified to openness, the NPPF requires an assessment to be made as to whether any considerations exist that would clearly outweigh the harm caused to the Green Belt. The Local Planning Authority should ensure that substantial weight is given to any harm to the Green Belt. 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of its inappropriateness, and any other harm, is clearly outweighed by other considerations (paragraph 88 of the NPPF). The proposal as discussed above is therefore considered to fall short of the very significant public benefits as detailed within the principle of development and employment sections of this report, that would be expected in such an application to clearly outweigh the substantial harm to the Green Belt and other harm identified in this report.

Landscape

149. Paragraphs 17 and 109 of the NPPF state that the planning system should take account of the different roles and characters of different areas, recognising the intrinsic character and beauty of the countryside and protecting and enhancing the natural environment.
150. Local policies in the current LDF and proposed Local Plan follow these national policy objectives by requiring development to:
- preserve or enhance the character of the local area, the local landscape character and important environmental assets (DP/1, DP/2, DP/3 and NE/4 of the South Cambridgeshire Development Control Policies DPD 2007 and NH/2 of the submitted South Cambridgeshire Local Plan 2014)
151. These local policies are considered to be consistent with the NPPF and therefore carry significant weight in decision-making terms. With these in mind, this next section will go on to assess the landscape and visual impacts of the development on the local character.

a) Site Analysis (Agritech Park)

152. The significant scale of the proposed site at 101.7 hectares for the Agritech Park is very apparent when reaching the site boundaries. For instance, the total length of the western boundary, adjacent to the A1301, incorporating the pedestrian, cycle and equestrian footpath is 2000 metres which takes a considerable time to traverse by foot. The site's scale is apparent to the observer due to the openness of the land and vantage points created by the land's topography. Land levels rise from the west, the River Cam valley in Hinxton and road A1301 towards the eastern edge of the site with an elevation gain of approximately 20 metres. There are no public right of ways within the site. As a result of this topography, the site is visible from multiple public locations with the eastern and northern parts of the site being visible from the west along the

A1301 and the adjacent pedestrian walk and cycleway. Contained within these public views are the central tree lined avenue and woodland around Hinxtion Grange. The land elevation gain forms the chalkland hills and does not visually appear as steep due to the large area of the site and layers of vegetation which combine to foreshorten the views. The overall impression of the site is one of a predominantly rural landscape, with limited views of the domestic and commercial buildings which lie adjacent to the site. When approaching the site from the A1301 from the south the site is obscured by trees and hedgerows. When viewed from the A505 Causeway going east towards Pampisford and south west towards the roundabout with the A1301 and A1303, there are long distance open, flat views of the site in which the tree lined avenue is a dominant feature; the site is entirely rural in character with some buildings evident in the visual landscape.

Landscape Visual Impact Assessment

b) Methodology

153. The methodology applied in the Landscape and Visual Impact Assessment (LVIA) generally complies with the industry standard set out by the Landscape Institute in their Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, 2013. The aim of an LVIA is come to a final judgement of the likely significance of the predicted landscape and visual effects as a result of a development. The likely significance is reached by consideration of the type and scale of the proposed development and its predicted landscape and visual effects, combined with the sensitivity of receptors and magnitude of change.
154. Officers are of the view that there are areas of the assessment where the applied levels of sensitivity of receptors and the magnitude of effects have resulted in potential harm to the landscape and visual receptors being underplayed, and the successes of the landscape mitigation in reducing landscape and visual harm being overstated. The Councils' Landscape Officer has set out below where insufficient information has been submitted as part of the LVIA. Notwithstanding this, the proposed development has been assessed and is considered to result in significant and adverse impact to landscape and visual amenity. This impact, even with proposed landscape mitigation would not be sufficient to overcome the significant harm caused.
- (ii) Insufficient information
155. The applicants have intended to assess predicted landscape and visual effects in terms of the development under construction, on completion, after 15 years from completion, night-time effects and differences due to seasonal variations. It is evident that some judgements have been downplayed in relation to landscape and to visual receptors, for example by assessing landscape effects against large geographical areas or by combining effects on separate visual receptors with high and low levels of sensitivity. As a result, it is considered that the judgements of the overall significance of landscape and visual effects are underestimated.
156. Some areas of landscape character, for example area 4B Granta Valley have been established as part of the landscape baseline, but no assessment of the effects of the proposed development on the Granta Valley area has been carried out, providing an insufficient assessment.
157. There have been no verified views supplied, and the photomontages of the viewpoints do not provide an indication of possible building heights or building mass across the site. Significant parts of the proposed development, for example the bus/cycle interchange site and the pedestrian/cycle bridge have not been included in the

photomontages. There has been no information submitted to demonstrate the possible effects of night-time lighting across the site, or to demonstrate the effects that the stated primary and secondary mitigation measures will have in reducing identified landscape and visual harm, either on completion or at 15 years after completion.

(iii) Judgement on the overall significance of the effects

158. The proposed development area of buildings, landscaping, car parking and other hard infrastructure would cover an area of approximately 49 hectares. The proposed scale of the built form would comprise of 9 metre high two storey and 13.5 metre three storey buildings. The proposed density of the built form would comprise of smaller buildings of up to 60 metres in length and 22 metres in width located on the edges of the development with larger three storey buildings sited to the south and west of the parkland. The proposed height, scale and size of the buildings together with the land levels in which the lowest point of the site with a level of 26.38 metres adjacent to the A1301 and south of the tree lined avenue and highest point at 46.30 metres to the east would result in the proposed development being excessively prominent. The proposal would be visible, with the eastern and northern parts of the site being prominent above the lower levels and landscape of the west.
159. The proposed location of the development would be evident in views from the north of the site, by built form being sited within 20 metres to the north and south of the tree lined avenue. The proposal would be sited hard up against the parkland to the south and west of Hinxton Grange, failing to enhance the parkland and leaving sufficient space for the avenue and park setting. As a result the views from Hinxton Grange towards the west, over existing agricultural and open land will be lost. The proposal would be sited close to the southern boundary, extending less than 400 metres from the built edge of Hinxton. The proposed arrangement of the retained agricultural land to the south would be out of scale with the local landscape, and adversely impacting and affecting the approaches to and setting of Hinxton village.
160. The proposed 3.5 metre bund comprising of native species woodland planting including whips, transplants and advanced nursery stock which is proposed to be sited along the south and west boundaries of the site would appear as an incongruous feature in the landscape and would take a significant time to become effective in providing any screening or mitigation for the proposal.
161. The proposed development by virtue of its location, scale, height, size, bulk and mass will result in significant and substantial adverse harm upon the site, local landscape and visual amenity of the area. As a result of the size, scale and location of the proposed development, and land levels, mitigation and the integration of the proposal through landscaping would not be sufficient to overcome and reduce the harm to the landscape and visual harm.

(iv) Conclusions of Landscape and Visual Harm

162. In terms of the visual and landscape effects, the proposal for the Agritech technology park by virtue of its location, scale, height, size, bulk and mass together with the increase in land levels to the east of the site would result in the introduction of substantial incongruous built form into the rural countryside. The proposal would be excessively prominent, resulting in the loss of open, rural countryside and harm to the visual amenity of the area. The proposal given its significant visual impact and encroachment on the countryside and rural area would fail to be mitigated against, reducing this significant visual harm.

Conclusion

163. In terms of visual and landscape effects, the proposed development for the Agritech park would cause significant adverse visual effects to short, medium and distance views. It would result in the introduction of substantial incongruous built form into rural countryside. The proposal would be excessively prominent, resulting in the loss of open, rural countryside and harm to the visual amenity of the area. The proposal given its significant visual impact and encroachment on the countryside and rural area, would fail to be mitigated against, reducing this significant visual harm.
164. The application is therefore contrary to paragraphs 7 and 17, of the National Planning Policy Framework 2012; Policies DP/1 (1p), DP/2 (1a), DP/3 (2m), and NE/4 of the South Cambridgeshire Development Control Policies DPD 2007; Policy and Policy HQ/1 and NH/2 of the draft South Cambridgeshire Local Plan 2014.

Heritage

165. The site is adjacent to Hinxton Grange; a Grade II listed building (List Entry Number: 1318208) and its associated stable and coach house to the north east, also a Grade II listed building (List Entry Number: 1128074). The house dates to c. 1835 and was designed by Wedd William Nash. The house is set within its own designed landscape. This was historically accessed along a tree-lined avenue from the west, which cut through agricultural land. This situation still exists today. The principal dwelling is located at the eastern extent of the property, with woodland plantation to the east. Its designed landscape is located to the west, north, south and east of the house, and historic mapping demonstrates this situation has changed very little over the last century. The depictions of trees and shrubbery on historic mapping, has consistently shown a gap on the western edge, south of the drive. This allows for a long ranging designed view looking west from the house across the parkland towards Duxford, over the wider open countryside. Some of the important designed views of the house within its parkland are along the approach drive. Views from the wider surrounding landscape include the trees of the approach avenue to the house, and associated woodland of Round Plantation to the east. The designed landscape around the house is a non-designated heritage asset recorded on the Cambridge Historic Environment Record (Record Number: 12121), and contributes to the setting and significance of the listed buildings.
166. The National Planning Policy Framework (NPPF) makes it clear that the setting of a heritage asset is the surroundings, in which it is experienced, a situation which is very relevant here. Historic England's 'Good Practice Advice in Planning 3' (GPPA 3) outlines that '*many heritage assets have settings that have been designed to enhance their presence and visual interest or to create experiences of drama or surprise*'. GPA 3, goes on to state that designed landscapes may themselves have a wider setting, '*that includes lines-of-sight to more distant heritage assets or natural features beyond the park boundary*'. This is evidently the case of Hinxton Grange, where the surrounding designed landscape, with parkland and tree lined avenue leading up to the house, are surrounded by the contrasting open farmland of its agricultural estate.
167. It is clear that the development site is within the setting of the heritage assets and that this setting makes an important contribution to the significance of the heritage assets and the ability to appreciate their significance. That contribution relates to the proximity of the open land to the asset and their historical relationship; the open fields allow the status of the house and its designed landscape to be easily discerned, understood and appreciated as being set within, but clearly distinct from, its agricultural estate. The setting of the heritage assets has not been subject to significant later changes. The

proposal, as outlined in the illustrative plan, would intrusively affect important views and would visually compete with and distract from the heritage assets. The proposed additional landscaping is not considered to mitigate, remove or reduce the harm this development would cause to the setting and significance of the heritage assets.

168. The proposed development would cause harm to the setting and significance of Hinxton Grange (designated heritage asset), its associated stable and coach house to the north east (designated heritage asset) and to its associated designed landscape (non-designated heritage asset), and the ability for their significance to be appreciated.
169. The proposal would conflict with the statutory duty under the Planning (Listed Buildings and Conservation Areas) Act (1990) to give special regard to the desirability of preserving the setting of the listed buildings. Paragraph 132 of the NPPF requires that when considering the impact of a proposed development on the significance of a designated heritage asset, 'great weight' should be given to the asset's conservation. In Framework terms, the harm to the designated heritage assets would be less than substantial therefore the test set out in Paragraph 134 of the National Planning Policy Framework would apply.
170. The proposal is also contrary to SCDC DCP policy CH/4, which provides that planning permission will not be granted for development which would adversely affect the curtilage or the wider setting of a listed building. The proposal is also contrary to SCDC DCP Policy CH/1, which provides that planning permission will not be granted for development that would adversely affect an historic landscape. Paragraph 135 of NPPF requires the effect of an application on the significance of a non-designated asset to be taken into account in determining an application, and a balanced judgement formed.
171. The application is therefore contrary to paragraphs 7 and 17, of the National Planning Policy Framework 2012.
172. To the west of the proposed bus and cycle interchange site, lies the Chapel of the Hospital of St John the Baptist which is a Grade II* listed building and scheduled ancient monument. The Red Lion Hotel which is sited further west, adjacent to the station is a Grade II listed building. The proposed bus and cycle interchange, given its location and siting away from these heritage assets are not considered to result in any harm to these assets.

Transport and Access Impacts

173. The application is supported by a Traffic and Transport Assessment (TA), which forms part of the submitted Environmental Statement under Chapter 12 and Appendix J. Due to the uses and scale of the development the proposal is considered to give rise to significant amounts of movement. Paragraph 32 of the NPPF requires decisions on such proposals to take account of whether:
 - opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
 - safe and suitable access to the site can be achieved for all people; and
 - improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.

174. Paragraph 34 goes on to require developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. The proposal is therefore assessed in this policy context and with regard to the sustainable transport principles set out in Policies DP/1, DP/4, TR/1, TR/2, TR/3 and TR/4 of the South Cambridgeshire Local Development Framework 2007 and Policies TI/2, TI/3 and TI/8 of the submitted South Cambridgeshire Local Plan 2014.

a) Vehicular traffic impacts

175. Significant local concern has been raised with regard to the development's impact on traffic generation and congestion in the immediate and surrounding locality. The road network in this locality is already congested, as acknowledged in the submitted Transport Assessment (TA). The TA has been closely scrutinized by officers and following consultation with the Local Highway Authority, a number of deficiencies have been found in the assessment. This has led officers to conclude that there is insufficient evidence included in the TA which are fundamental to the trip generation and distribution evidence base of trips from the proposed development and therefore officers have not been provided with sufficient information to be satisfied that any adverse impact on the public highway can be mitigated.

b) Accessibility by non-car modes

176. Significant local concern has been raised with regard to the development's impact on traffic generation and congestion in the immediate and surrounding locality. The submitted Transport Assessment (TA) details the limitations on the current pedestrian facilities within the immediate vicinity and on route to the site, and on the current network cycling. However at this stage, insufficient information has been submitted in the application to detail proposed non car modes and the level of proposed mitigation and enhancement to be delivered.

c) Access and highway safety

177. Significant local concern has been raised with regard to the development's impact on highway safety in the immediate and surrounding locality. The road network in this locality is already congested, as acknowledged in the submitted Transport Assessment (TA). The TA has been closely scrutinized by officers and following consultation with the local highway authority, a stage 1/2 Road Safety Audit on all the submitted drawings has not been completed and therefore there is insufficient information submitted with the application to demonstrate that the development would be acceptable to highway safety. For this reason, the proposal is contrary to paragraphs 7, 17 and 32 of the NPPF 2012 and Policies DP/1, DP/3 (1b) and DP/4 of the South Cambridgeshire Development Control Policies DPD 2007.

d) Car and cycle parking

178. The proposed car parking provision is for 2,000 spaces on site at a rate of 0.5 spaces per employee. The proposed development will comprise of employment uses primarily B1 (Business) with ancillary uses, accommodating up to 4,000 employees. This level of parking provision would be below the maximum parking standards set out in Policy TR/2 of the LDF which sets a provision of 1 space per 30m² of gross floor area over 2,500m² for B1 Business use. In accordance with Policy TI/3 of the emerging Local Plan, car and cycle parking provision should be provided through a design-led approach.

179. A total of 4000 bicycle spaces are proposed. This would be above the indicative cycle parking standards which require 1 secure cycle space per 30m² of gross floor area.
180. The proposed level of car and cycle parking has been scrutinized by officers and it has led officers to conclude that there is insufficient evidence included in the TA which provides justification for the proposed level of parking, to give officers the reassurance that car and cycle parking proposed is sufficient to meet expected need. Therefore officers are not in a position to form a view on the suitability of the proposed development in relation to car and cycle parking.

e) Conclusion

181. The road network in this locality is already congested, as acknowledged in the submitted Transport Assessment (TA). There is insufficient information in the TA to demonstrate the full extent of the development's impact on the local highway network, including insufficient evidence to substantiate the trip rate information provided and therefore what extent of highway mitigation is required. Additionally, there is insufficient information to demonstrate that sufficient transport mitigation measures and encouragement of sustainable travel options will be achieved. Consequently, the proposal has not demonstrated it would have a satisfactory impact on the local highway network, that the cumulative impacts of the development are severe and that it would amount to sustainable development. The application is therefore contrary to paragraphs 7, 17 and 32 of the NPPF 2012 and Policies DP/1 and DP/4 of the South Cambridgeshire Development Control Policies DPD 2007.

Ecology

182. Paragraph 9 of the NPPF is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution. Adopted Policy NE/6 of the South Cambridgeshire LDF 2007 and draft policies NH/4 and NH/6 of the Proposed Local Plan are consistent with this aim. Therefore significant weight can be attached to these policies in decision-making terms.
183. The submitted ecological details are provided in Chapter 10 of the Environmental Statement in which the proposed development will result in the loss of 76 hectares of arable farmland and 5.4 hectares of arable field margins. The proposal will incorporate earth bunding along the western and southern edges of the main site, new tree planting, native blocks of woodland, new grassland area, a natural pool and swimming lake.
184. The Ecology Officer has raised no objections to the proposal but requested further clarification and details on the proposed ecological mitigation measures. At detailed design stage, a Construction Environmental Management Plan (CEMP) and Ecological Design Strategy (EDS) shall be submitted with all phases of development detailing Ecological and biodiversity enhancement.

Archaeology

185. The site is located within a landscape of high archaeological potential. Chapter 6 of the Environmental Statement details this. The site has been subject to an archaeological evaluation which indicates that significant evidence for the pattern of prehistoric and Roman land use and settlement survives in the area. These important archaeological remains would be severely damaged or destroyed by the proposed development. The Archaeology Officer is broadly in agreement with the assessment of significance

contained in the Environmental Statement and agrees that excavation in advance of construction would be appropriate to mitigate the construction impacts. This should be a targeted programme of investigation and not 'strip, map and record' as suggested. A planning condition is recommended to ensure that a programme of work is secured by way of condition requiring a written scheme of investigation, completion of a Post-Excavation Assessment, completion of the programme of analysis and submission of a publication report and production of an archive report and site archive.

Flooding and Surface Water Drainage

186. The objections raised by the Lead Local Flood Authority are acknowledged in relation to surface water drainage and flooding. The application has failed to demonstrate that the development would not increase flood risk overall due to insufficient information being provided within the Flood Risk Assessment (FRA) as follows:
187. (a) There is no demonstration that the total storage volume required to attenuate surface water run-off from the critical 1% Annual Exceedance probability (AEP) critical storm event, including an appropriate allowance for climate change, can be provided on site.
188. (b) It is proposed to discharge surface water via infiltration and on-site infiltration testing has been undertaken to support this. Groundwater depths have not been considered and there should be a minimum of 1.2 m clearance between the base of any infiltration feature and peak seasonal groundwater level.
189. (c) Details of the proposed road drainage have not been provided beyond section 8.2 and it should demonstrate the proposed impermeable areas, discharge rate and volumes, treatment processes and outfall point / infiltration point.
190. (d) Exceedance flow does not appear to have been considered. The proposals should include details of impact of system exceedance or system failure including flow paths indicating their impact on site access and egress.
191. Consequently, the development is contrary to paragraphs 7, 17 and 103 of the NPPF 2012, Policy NE/11 of the South Cambridgeshire Development Control Policies DPD 2007 and Policy CC/9 of the draft South Cambridgeshire Local Plan 2014.

Loss of Agricultural Land

192. Paragraph 112 of the NPPF requires plans to take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, the NPPF requires local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. The best and most versatile agricultural land is defined in the NPPF glossary as land in grades 1, 2 and 3a of the Agricultural Land Classification. This aim is consistent with Policy NE/17 of the South Cambridgeshire LDF 2007 and Policy NH/3 of the draft South Cambridgeshire Local Plan 2014, which state that development will not be permitted if it would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land unless:
 193. (a) Land is allocated for development in the Local Development Framework;
 194. (b) Sustainability considerations and the need for development are sufficient to override the need to protect the agricultural value of the land.
195. Therefore significant weight can be attached to these policies in decision-making terms.

196. The development will result in the loss of circa 33 hectares of grade 2 'very good' and 3a 'good to moderate' and 38 hectares of grade 3b 'moderate quality' and 4 'poor quality' agricultural land. Approximately 10.9 hectares of land to the south of the main site will continue in agricultural use with topsoil from the development being redistributed over these fields to improve their agricultural land quality. The proposal given its purpose as a Agritech technology park with a focus on productivity and sustainability is expected to increase global physical and economic output of agriculture through promoting increased agricultural production technologies and new methods of delivering more sustainable food chains. The argument put forward by the applicant is that any reduction in agricultural production on the site would be compensated for by even a very minor increase in agricultural production elsewhere due to the work conducted at the site.
197. The proposal is considered to represent a significant loss of 'the best and most versatile agricultural land' as defined in the NPPF. The application does not demonstrate that sustainability considerations and the need for development in this location are sufficient to override the need to protect the agricultural value of the land. Consequently, the development would cause significant and irreversible loss of agricultural land and farmland biodiversity contrary to: paragraphs 7, 17 and 112 of the NPPF; Policy NE/17 of the South Cambridgeshire LDF 2007; and Policy NH/3 of the draft South Cambridgeshire Local Plan 2014.

Environmental Issues

Air Quality

198. Paragraph 17 of the NPPF requires planning to contribute to reducing pollution and achieving a good standard of amenity for all existing and future occupants of land and buildings. Policies DP/3 and NE/16 of the South Cambridgeshire LDF 2007 follow this aim and require development proposals to seek to minimise emissions and avoid any unacceptable adverse impacts on residential amenity and the environment.
199. The submitted air quality information is contained within Chapter 4 and Appendix B of the Environmental Statement. The Council's Air Quality Officer has reviewed this information and broadly agrees with the findings of the air quality assessment and does not find any unacceptable adverse impacts in relation to air quality, subject to the recommended condition to secure:
- electric vehicle charging

Subject to this condition the proposal would accord with Policies DP/3 and NE/16 of the South Cambridgeshire LDF 2007.

External Lighting

200. Policies DP/3 and NE/14 of the South Cambridgeshire LDF 2007 require proposed lighting to be kept to a minimum and avoid any unacceptable adverse impacts on nearby properties or the surrounding countryside. Lighting is detailed in chapter 9 of the Environmental Statement. Lighting would be fully considered at the detailed design stage. At this stage a detailed lighting impact assessment should be provided and should cover light spillage, hours of illumination, light levels, column heights, the levels of impact on nearby dwellings including horizontal and vertical isolux contours and methods of mitigating any adverse effects.
201. It has been predicted that during the construction phase there may be some impacts from site lighting on residential receptors. This will need mitigation and can be included in a Construction and Environmental Management Plan (CEMP) to be submitted prior to commencement.

Noise and Vibration

202. Policies DP/3 and NE/15 of the South Cambridgeshire LDF 2007 states that planning permission will not be granted which has an unacceptable adverse impact on the indoor and outdoor acoustic environment of existing or planned development; has an unacceptable adverse impact on countryside areas of tranquillity or would be subject to unacceptable noise levels from existing noise sources. Noise and Vibration are detailed in Chapter 11 of the Environmental Statement. The Environmental Health Officer raises objections in regard to noise and the impact on nearby residential properties. At detailed design stage, full details on noise from the development and during the construction phases and its control will be required to be submitted.

Land Contamination

203. The site is currently used for agriculture and crop trials. The proposed end use would introduce receptors onto this land. A Phase 1 desk study and Phase 2 investigation have been carried out, in which a further Phase 2 investigation has been proposed once the layout of the site has been determined. The Contaminated Land Officer raises no objections to the proposal subject to a condition requiring further detailed scheme for investigation and recording of contamination, a Remediation Method Statement, Verification Report and further contamination identified have been submitted and agreed in writing by the Authority.

Odour Generation

204. Objections are raised in relation to odour generation resulting from the development when in operation due to the use and adjacent nearby properties by the Environmental Health Officer. At detailed design stage, full details on odour generation and its control will be required to be submitted.

Waste and Refuse

205. The submitted waste information is contained within Chapter 13 and Appendix K of the Environment Statement. This estimated waste arising from the construction of the proposed development on a worse case estimate would be a total of 26,310 tonnes. 808 tonnes of waste per year are predicted to be generated by the proposed park for AgriTech.
206. A temporary waste recycling facility in place throughout the construction phase of the development to maximise the re-use, recycling and recovery of inert waste from construction and demolition operation and construction environmental management plan (CEMP) would be secured by planning condition.

Health Impact Assessment

207. Policy DP/1 of the South Cambridgeshire LDF 2007 and Policy SC/2 of the draft South Cambridgeshire Local Plan 2014 require major developments to be accompanied by a Health Impact Assessment (HIA). The South Cambridgeshire Health Impact Assessment SPD states that HIAs should:
208. 1.Appraise the potential positive and negative health and well-being impacts of the proposed development on planned new communities and the adjacent existing communities in the development area.
- 2.Highlight any potential differential distribution effects of health impacts

209. among groups within the population by asking 'who is affected?' for the impacts identified.
210. 3.Suggest actions / mitigations that aim to minimise any potential negative health impacts and maximise potential positive health impacts, referencing where possible the most affected vulnerable group(s).
211. The submitted HIA identifies that the proposed development would likely to have positive health and well being impact on existing residents, existing workers in the area and new employees working on the proposed development. Negative health and wellbeing impacts on existing residents and workers in the area during the construction phase have been identified relating to construction traffic, noise, disruption and a small reduction in road safety. Mitigation measures have been proposed within the Health Impact Assessment to reduce these health inequalities.
212. Consequently, the submitted HIA is considered to demonstrate that the principles of sustainable development have been applied in accordance with Policy DP/1 of the South Cambridgeshire LDF 2007; the South Cambridgeshire Health Impact Assessment SPD 2011; and paragraphs 7 and 17 of the NPPF.

Trees

213. The submitted Arboricultural Impact Assessment shows that there are a total of 144 trees, tree groups and hedgerows which were recorded on this site. Of this, nine trees, seven groups of trees and six sections of hedge approximately 168 metres in length would require removal. The removals are proposed as a direct consequence of the proposal and for new access roads, footways and cycle ways.
214. The proposed trees to be removed from the site don't fall within A, B or C categories in BS5837. Some of the hedgerows to be removed provide vegetative screening to the A1301. There is sufficient information in the application to demonstrate that the outline proposals would have negligible impact on existing trees. The submission of a detailed arboricultural method statement and soft landscaping scheme would normally be sought at detailed design stage.

Residential Amenity

215. The nearest residential properties lie to the east and north east of the site at Hinxton Grange, Churchfield House, Hinxton Grange Cottage, Hinxton Court and 3 & 4 Hinxton Grange Cottage. These residential properties would lie 200 metres from the built development. Given this distance, the proposal is considered to provide a sufficient level of privacy and not result in significant harm through loss of light and overbearing impact. The outline proposals do not present any unacceptable adverse impacts on the living conditions or amenities of these existing nearby residential properties subject to the agreement of a satisfactory Construction Environmental Management Plan.

Sustainable Design and Construction

216. The application is accompanied by a Sustainability Statement as required by Policy DP/1 of the adopted Local Development Framework 2007. The statement demonstrates conformity with relevant sustainability and environmental requirements. The proposed development will meet the requirements to achieve the Building Research Establishment Environmental Assessment Method (BREEAM) Very Good rating for each building on site. The proposal would be developed over a phased period of fifteen years, therefore the strategy has been considered by adopted Local Plan polices and

emerging policies.

217. The application is also accompanied by an Energy and Carbon Reduction Statement and Water Conservation Statement. The proposal would achieve a 20% carbon reduction through energy efficiency measures and renewables which would make it compliant with local energy and carbon policies. The proposal would achieve 61% water conservation saving by using non potable water sources, compared to other sources.

Public Art

218. Public art can be secured via planning condition or S106 agreement to ensure the development accords with local and national policy.

Utilities

219. Planning permission for new developments will only be supported where there are suitable arrangements for the improvement or provision of infrastructure necessary to make the development acceptable in planning terms, as per Policy DP/4 of the South Cambridgeshire Development Control Policies DPD 2007 and Policies TI/8 and TI/9 of the draft South Cambridgeshire Local Plan 2014.

220. The submitted Utility Strategy sets out existing electrical, gas, water and telecommunications utilities networks within and immediately surrounding the application site, along with potential outline modifications needed. These are assessed in turn below.

(a) Electrical infrastructure

221. The Utilities Strategy has confirmed that there are no assets within the site boundary. UK Power Networks (UKPN) are the incumbent distribution network operator for this service area. High voltage cables are buried and run in the A1301, A11 and vehicular tracks to the north and south of the site. UKPN have confirmed that due to the load required for the proposal, a new 33-11kV primary substation will be required on site, as well as a reinforcement works to the Fulbourn primary substation. The indicative route for offsite cabling has been confirmed as feasible. A new primary electricity substation has been proposed to the east of the site.

(b) Gas infrastructure

222. National Grid Gas (NGG) records indicate that there is a high pressure (HP) transmission pipe running to the immediate north of the site and through a section of the northwest corner. The National Grid Gas Transmission Asset Management Team have raised an objection to the proposal as the proposed new footway, cycle and equestrian route would run over this high pressure gas main pipeline. The applicant will need to rectify this non material planning matter.

223. National Grid records show a 180mm medium pressure (MP) polyethylene main running in the near verge of the A1301. National Grid has confirmed that there is sufficient capacity available in the existing MP main located in the A1301 to support the proposal without the requirement for reinforcement works.

(c) Water infrastructure

224. Cambridge Water are the incumbent distribution network operator for this service area. No water mains are shown running within the main site boundary but running in the

nearside verge of the A1301 and footpath. Cambridge Water have confirmed that there is sufficient capacity available in the trunk main that is located at the McDonalds roundabout where the A505 crosses the A1301. The pressure has been identified as modest so a small booster station will be needed on-site to ensure that higher parts of the development receive an acceptable level of service.

(d) Telecommunications infrastructure

225. BT provides telecommunication services in the area of the development. No apparatus is located on the site. BT have confirmed that each unit within the development could be provided with a business ADSL connection. Virgin Media have confirmed that a 1GB bandwidth fibre connection can be provided to serve the site from BT's existing infrastructure in the A1301.
226. In conclusion, the applicant has demonstrated that the application site is capable of being served by sufficient gas, electrical, water and telecommunications infrastructure to meet the needs of the development in accordance with Policy DP/4 of the South Cambridgeshire LDF 2007.

BENEFITS

The Proposed Economic Benefits

227. The proposed economic benefits as claimed in the application are the creation of around 200 jobs per year during construction, creation of a net of 4,887 FTE jobs at the regional level including up to 4,000 full time equivalent jobs on site once fully operational, on site and wider job creation is estimated to increase regional GVA by around £277 million per annum by 2030 and a 7% increase in employment in the agricultural technology sector at UK level.
228. As noted above, AgriTech is an interdisciplinary sector. Given this, the sector is difficult to identify within employment statistics⁶, which leads to conflicting views of employment levels. For example, the East of England Science and Innovation Audit states that South Cambridgeshire has the highest levels of AgriTech employment in the East of England (9,800)⁷, while the applicant states that "South Cambridgeshire currently under-performs in relation to AgriTech employment" in comparison with the East of England (2,300 people employed in AgriTech in the district)⁸. This significant conflict highlights the difficulty of defining what types of business might locate to the site, and what the proposal's impact might be on the local economy.
229. The interdisciplinary nature of AgriTech as a sector combined with the lack of certainty about the nature and number of site occupants (discussed above) means that the estimate of 4,000 jobs is speculative, and that corresponding assumptions about the type and size of proposed businesses, which inform conclusions about wider economic impacts, are also uncertain. The proposed condition to limit to 'companies associated with the AgriTech sector'⁹ does not provide any certainty about what types of businesses may locate to the site, given the difficulty of defining AgriTech.
230. It is recognised that the exact economic impact of any proposal is uncertain, and that

⁶ [BIS RESEARCH PAPER NUMBER 284 Agri-Tech Industrial Strategy: Evaluation Scoping Study and Baseline JULY 2016](#)

⁷ GCGP LEP et al, 2017. East of England Science and Innovation Audit, Table 4.1

⁸ Terence O'Rourke, 2017. Planning Statement, para 4.37

⁹ Terence O'Rourke, 2017. Planning Statement, para 3.33

therefore an economic impact assessment must include assumptions to address this. It is also recognised that this proposal would have economic benefits. However, given the conflicting evidence about the current level of AgriTech employment locally, regionally and nationally, and uncertainty about the nature of the completed development, the specific quantitative economic benefits and impacts on the local and wider area estimated within the application are subject to a high degree of uncertainty and should not be given significant weight as material considerations.

231. The proposed economic benefits of the proposal when assessed against the impacts of the scheme which are detailed within this report are not considered significant to outweigh the harm caused from the proposal, and overcome the proposal being contrary to the current Local Development Framework and emerging Local Plan.

The Proposed Social Benefits

232. The proposed social benefits claimed within the application are the provision of green infrastructure comprising 48 hectares of public open and accessible space, a multi-user foot, cycle and equestrian route on and off site, investment in infrastructure including highway improvements and utility changes to the electricity network. The proposal would allow for enhanced public access across the A505 and A1301 to Whittlesford Parkway Station from Hinxton, Sawston and Pampisford by non car modes. The application suggests that the proposal would promote sustainable transport methods through public transport, walking and cycling, fulfil investment in and space for companies developing technologies to benefit farmers and food chain companies, and long term leases on land for crop trials and agriculture.

233. The proposed social benefits when assessed against the impacts of the scheme which are detailed within this report are not considered significant to outweigh the harm caused from the proposal, and overcome the proposal being contrary to the current Local Development Framework and emerging Local Plan.

The Proposed Environmental Benefits

234. The proposed environmental benefits of the scheme claimed within the application are the UK's long term role in achieving the global challenge of growing demand for food in a sustainable manner, meeting sustainability in terms of the site, plot and individual buildings through sustainable design and adaption to climate change. This is proposed to be achieved through buildings achieving a BREEAM Very Good rating, use of renewable technologies, 40% electric vehicle charging bays, achieving BREEAM Excellent for water conservation and BREEAM Excellent standard for waste. The proposal would result in the restoration of the historic parkland through tree and landscaping enhancements, significant archaeological investigation of the site, ecological enhancements to improve diversity, long term stewardship of agricultural land to improve soil quality and the reduction of site surface water runoff and flooding. The proposed environmental benefits of the scheme through the proposed achievement of meeting global demand for food in a sustainable manner is considered to be very broad and less quantifiable than the tangible benefits of providing parkland enhancements and achieving BREEAM status buildings.

235. The proposed environmental benefits when assessed against the impacts of the scheme which are detailed within this report are not considered significant to outweigh the harm caused from the proposal, and overcome the proposal being contrary to the current Local Development Framework and emerging Local Plan.

Conclusions to Benefits

236. The proposal would be contrary to, and fail to accord with, Policies DP/7 and ET/3 of the LDF, Policy S7/8 of the Core Strategy DPD and Policies S/5, S/7, E/15 and E/16 of the emerging Local Plan. In addition, the proposal would be premature in terms of the emerging Local Plan, and would result in other harm as identified and discussed within this report in regard to visual amenity, landscape, the location of the bus and cycle and transport measures within the Green Belt, transport and heritage impact. As a result, the proposal would, in addition be contrary to specific development policies within the LDF and the emerging Local Plan. The application claims that the benefits of the scheme would constitute significant material considerations to outweigh any perceived conflict with the current Local Development Framework. It is accepted that these matters could be seen as positive benefits of the scheme. However, when weighing up the proposed economic, social and environmental benefits claimed in the application for the scheme, against the material planning considerations raised in this report, these claimed benefits do not outweigh the harm that would result from the proposed development and the proposal would not represent sustainable development, which would be contrary to the National Planning Policy Framework.

CONCLUSION

237. Applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. The proposed site lies outside of the village development framework and within the open countryside. The site is not allocated for development in the current Local Development Framework or emerging Local Plan. The proposal would therefore be contrary to Policies DP/7 of the Local Development Framework and S/7 of the emerging Local Plan.
238. The application claims that the economic, social and environmental benefits of the proposal would contribute to significant material considerations to outweigh any conflict with the development plan.
239. The proposed economic benefits of the development, it is claimed in the application, would result at a national level to research and development into new technologies to reduce the need for imports, increasing food and agricultural produce, and increasing the strength of UK growth in agriculture and the food sector which would create inward investment in the UK. At a regional and local level, the proposal would result in 4,884 full time equivalent jobs and the promotion of development of high skilled careers in the Cambridge sub region, resulting in a new cluster of science, research and development.
240. The proposed social benefits of the development, it is claimed in the application, would be to support agriculture and the food chain to tackle global challenges of hunger, malnutrition, use of resources sustainably, promoting disease resistance, responding to climate change and delivering healthy food to support well being.
241. The proposed environmental benefits of the development, it is claimed in the application, would be meeting the UK's long term role in achieving the global challenge of growing demand for food in a sustainable manner, meeting sustainability in terms of the site through sustainable design and adaption to climate change, restoration of the historic parkland through tree and landscaping enhancements, significant archaeological investigation of the site, ecological enhancements to improve diversity, long term stewardship of agricultural land to improve soil quality and the reduction of site surface water runoff and flooding.
242. The proposal has been assessed in terms of assessing and weighing these claimed benefits, and it is clear that there are international and national drivers for AgriTech which is a key growth sector supported by Government. The East of England is an area

with existing strengths and opportunities for growth in AgriTech innovation and this is recognised in the LEP Strategic Economic Plan; and in the East of England Plan Science and Innovation Audit (SIA).

243. Notwithstanding the above and in addition to the fact that the proposal is contrary to the current Local Development Framework and emerging Local Plan, the proposal would also lead to significant adverse impacts. In addition to being in conflict with the emerging Local Plan, the proposal would be premature within the meaning of the NPPF. It is considered that no evidence has been provided to demonstrate that having farms in multiple locations would harm the AgriTech sector, that such a large site is needed to maintain growth and why crop trials or equipment testing cannot be carried out on separate sites, with built infrastructure on those sites restricted to that which needs a countryside location. In summary, it is not considered that the need for the site has been demonstrated and that the AgriTech sector could not grow successfully without this site.
244. In addition to the above, the proposal would result in other harm and be contrary to Local Development Framework policies with the proposed site for the bus and cycle interchange causing substantial harm to the openness and purposes of the Green Belt, and the rural and agricultural character of this area. Insufficient information has been provided to demonstrate the need for this Green Belt location. It would encroach into the open countryside and reduce the openness of the Green Belt. The proposal would result in substantial and significant landscape and visual harm, adversely affecting the curtilage and wider setting of the Grade II listed building Hinxtun Grange, resulting in the loss of high grade agricultural land. The application has also failed to demonstrate a satisfactory transport assessment and flood risk assessment.
245. The NPPF makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development. This requires an assessment of positive and negative impacts of the development and its contribution to the three dimensions of sustainable development: economic, social and environmental.
246. When taken in the round (and having considered the economic, social and environmental dimensions of the development) officers conclude that the adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits of the scheme when assessed against the policies in the Framework taken as a whole. The timing of the application also undermines the plan-making process by predetermining decisions about the scale and location of new development that are central to the emerging Local Plans. Consequently, the scheme does not amount to sustainable development and should be refused.

Recommendation

247. Officers seek delegated powers, recommending that the Committee **refuses** the application for the following reasons:

1. Principle

The proposed development would be located outside of the village development framework and within the open countryside. The proposed site has not been allocated or put forward for development in the current Local Development Framework or emerging Local Plan. The development is therefore contrary to Policies DP/7 and ET/3 of the South Cambridgeshire Development Control Policies DPD 2007, Policy S7/8 of the Core Strategy DPD and Policies S/5, S/7, E/15 and E/16 of the draft South Cambridgeshire

Local Plan 2014.

2. Prematurity

The Council's emerging Local Plan is at an advanced stage of preparation. The proposed site is not allocated for any development in the current Local Development Framework or emerging Local Plan. The scale of the proposal is such that, if permission were granted now, it would undermine the plan-making process and sustainability of the Local Plan by predetermining decisions about the scale, location and phasing of new development that are central to the emerging Local Plan given its advanced stage. It is therefore considered the proposal is premature in light of draft policies S/5 and S/6 of the submitted South Cambridgeshire Local Plan, 2014 and Paragraph 12 of the National Planning Policy Framework and Paragraph: 014 Reference ID: 21b-014-20140306 of the National Planning Practice Guidance.

3. Green Belt Harm

The proposed site for the bus/cycle interchange and the northernmost end of the foot, cycle and equestrian bridge are located within the Cambridge Green Belt wherein there is a presumption against development for purposes other than those categories specified in paragraphs 89 and 90 of the National Planning Policy Framework (NPPF) 2012.

The proposal is considered to fall outside of these specified categories and is inappropriate development by definition. The location of the development would cause substantial and irreversible harm to the openness of the Green Belt and would conflict with the following national Green Belt purpose (paragraph 80 of the NPPF) to assist in safeguarding the countryside from encroachment. Additionally, the proposal would conflict with the following local Green Belt Purposes (Policy ST/1 of the Core Strategy DPD, 2007):

a) To maintain and enhance the quality of its setting;

The very special circumstances put forward by the Applicant are not considered to clearly outweigh the harm to the Green Belt, and other harm (listed in the additional reasons for refusal below). Consequently, the proposal is contrary to: paragraphs 7, 17, 80, 87, 88, 89 and 90 of the National Planning Policy Framework 2012; Policy ST/1 of the South Cambridgeshire Core Strategy DPD 2007 and Policies GB/1 and GB/2 of the South Cambridgeshire Development Control Policies DPD 2007 and Policy NH/8 of the draft South Cambridgeshire Local Plan 2014.

4. Landscape Character and Visual Harm

Insufficient information has been submitted as part of the assessment for the Landscape and Visual Impact Assessment (LVIA). Notwithstanding the insufficient information submitted, the proposal for the Agritech technology park by virtue of its location, scale, height, size, bulk and mass together with the increase in land levels to the east would result in the introduction of substantial incongruous built form into the rural countryside. The proposal would be excessively prominent, resulting in the loss of open, rural countryside and harm to the visual amenity of the area. The mitigation proposed would fail to overcome this harm. The proposed location of the bus/cycle interchange development and the northernmost end of the foot, cycle and equestrian

bridge would harm the open, rural agricultural character of this site. The development would add built form and an incongruous bridge structure into the open arable, rural landscape, encroaching into the countryside. For these reasons, the development would fail to preserve or enhance the local character of the area and would have an unacceptable adverse impact on the countryside and landscape character. The development is therefore contrary to paragraphs 7 and 17 of the National Planning Policy Framework 2012; Policies DP/1 (1p), DP/2 (1a), DP/3 (2m) and NE/4 of the South Cambridgeshire Development Control Policies DPD 2007 and Policy HQ/1 of the draft South Cambridgeshire Local Plan 2014.

5. Transport

Motorists would access the proposed development via the A1301 and a single access junction. The road network in this locality is already congested, as acknowledged in the submitted Transport Assessment (TA). There is insufficient information in the Transport Assessment to demonstrate the full extent of the development's impact on the local highway network. This information is fundamental to trip generation and distribution evidence base, and therefore there is uncertainty on the impacts of the development on the strategic highway network. Consequently, the application has not demonstrated it would have a satisfactory impact on the local highway network and that it would amount to sustainable development. The application is therefore contrary to: paragraphs 7, 17 and 32 of the National Planning Policy Framework 2012 and policies DP/1 and DP/4 of the South Cambridgeshire Development Control Policies DPD 2007.

6. Highway Safety/Access

Motorists would access the proposed development via the A1301 and a single access junction. The road network in this locality is already congested, as acknowledged in the submitted Transport Assessment (TA). A stage 1/2 Road Safety Audit has not been carried out on all the submitted drawings to allow the therefore be contrary to: paragraphs 7, 17 and 32 of the National Planning Policy Framework 2012 and Policies DP/1, DP/3 (1b), DP/4 and TR/2 of the South Cambridgeshire Development Control Policies DPD 2007.

7. Car and Cycle Parking/Non Car Modes

Insufficient information has been submitted with the application to demonstrate that the proposed low levels of car and cycle parking and non car travel for the development would be sufficient to meet demand and would not result in inappropriate parking and demand on local and surrounding streets, resulting in an unacceptable impact on highway safety. The application would therefore be contrary to: paragraphs 7, 17 and 32 of the National Planning Policy Framework 2012 and Policies DP/1, DP/3 (1b), DP/4 and TR/2 of the South Cambridgeshire Development Control Policies DPD 2007.

8. Heritage

The proposed site lies adjacent to, and within the setting of the Grade II listed Hinxton Grange, its Grade II listed stables and coach house, and designed landscape. The house dates from c.1835 and is set within its own formal garden and parkland, with open views from Hinxton Grange across the designed landscape, to the open countryside to the west. The proposal by

virtue of its size, scale, siting, location and proximity would result in harm to the setting and significance of the designated and non-designated heritage assets (which would be less than substantial). Any harm to the significance of a listed building requires a clear and convincing justification in accordance with s.66(1) of the Planning and Listed Buildings Act (1990). The application would therefore be contrary to paragraphs 7, 17 of the NPPF 2012, Policy CH/4 of the South Cambridgeshire Local Development Framework, Development Control Policies DPD, 2007 and the Listed Buildings Supplementary Planning Document 2009, which states that development proposals should ensure that all new development would preserve or enhance the character and appearance of the listed building, s.66(1) of the Listed Buildings Act 1990. The application would also be contrary to Policy CH/1 of the South Cambridgeshire Local Development Framework. In Framework terms, the harm to the designated heritage assets would be less than substantial therefore the test set out in Paragraph 134 of the National Planning Policy Framework would apply. Paragraph 135 of NPPF requires the effect of an application on the significance of a non-designated asset to be taken into account in determining an application, and a balanced judgement formed.

9. Floods and Water

The submitted Flood Risk Assessment (FRA) has not demonstrated that the development would not increase flood risk overall due to insufficient or lacking information contained within the FRA as follows:

- a) There is no demonstration that the total storage volume required to attenuate surface water run-off from the critical 1% Annual Exceedance probability (AEP) critical storm event, including an appropriate allowance for climate change, can be provided on site.
- b) It is proposed to discharge surface water via infiltration and on-site infiltration testing has been undertaken to support this. Groundwater depths have not been considered and there should be a minimum of 1.2 metres clearance between the base of any infiltration feature and peak seasonal groundwater level.
- c) Details of the proposed road drainage have not been provided and it should demonstrate the proposed impermeable areas, discharge rate and volumes, treatment processes and outfall point / infiltration point.
- d) Exceedance flow does not appear to have been considered. The proposals should include details of the impact of system exceedance or system failure including flow paths indicating their impact on site access and egress.

Consequently, the development is contrary to paragraphs 7, 17 and 103 of the NPPF 2012, Policy NE/11 of the South Cambridgeshire Development Control Policies DPD 2007 and Policy CC/9 of the draft South Cambridgeshire Local Plan 2014.

10. Loss of Agricultural Land

The proposed development comprises 33 hectares of grade 2 'very good' and 3a 'good to moderate', and 38 hectares of grade 3b 'moderate quality' and grade 4 'poor quality' agricultural land. This would represent a significant loss of 'the best and most versatile agricultural land' as defined in the National Planning Policy Framework (NPPF). The application does not demonstrate that sustainability considerations and the need for development in this location are sufficient to override the need to protect the agricultural value of the land. Consequently, the development would cause significant and irreversible loss of agricultural land and farmland biodiversity contrary to: paragraphs 7, 17 and 112 of the NPPF 2012; Policy NE/17 of the South Cambridgeshire Development Control Policies DPD 2007; and Policy NH/3 of the draft South Cambridgeshire Local Plan 2014.

Background Papers:

The following list contains links to the documents on the Council's website and / or an indication as to where hard copies can be inspected.

- South Cambridgeshire Local Development Framework Core Strategy (adopted January 2007)
- South Cambridgeshire Local Development Framework Development Control Policies (adopted July 2007)
- National Planning Policy Framework
- National Practice Guidance
- South Cambridgeshire Local Plan Submission 2014
- Cambridge Local Plan and South Cambridgeshire Local Plan Main Modifications Consultation Report January 2018
- APPENDIX 1 – Application site boundary and outline parameter plans

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